

# Cabinet

## Special Meeting - Wednesday 7 July 2021 at 5.00 p.m.

Meeting venue: Council Chamber, Council House, Lichfield Street, Walsall.

via Microsoft Teams: Public access: <https://youtu.be/Rw9PcvKkttg>

### Portfolios

Councillor M.A. Bird,  
Leader of the Council



Councillor G. Perry,  
Deputy Leader and  
Resilient Communities



Councillor A. Andrew  
Deputy Leader and  
Regeneration



Councillor C. Towe,  
Education and skills



Councillor R. Martin,  
Adult social care



Councillor S. Craddock,  
Health and wellbeing



Councillor T. Wilson,  
Children's



Councillor M. Statham  
Internal Services



Councillor O. Butler,  
Clean and green



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## The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012

### Specified pecuniary interests

The pecuniary interests which are specified for the purposes of Chapter 7 of Part 1 of the Localism Act 2011 are the interests specified in the second column of the following:

Subject	Prescribed description
Employment, office, trade, profession or vocation	Any employment, office, trade, profession or vocation carried on for profit or gain.
Sponsorship	<p>Any payment or provision of any other financial benefit (other than from the relevant authority) made or provided within the relevant period in respect of any expenses incurred by a member in carrying out duties as a member, or towards the election expenses of a member.</p> <p>This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Regulations (Consolidation) Act 1992.</p>
Contracts	<p>Any contract which is made between the relevant person (or a body in which the relevant person has a beneficial interest) and the relevant authority:</p> <p>(a) under which goods or services are to be provided or works are to be executed; and</p> <p>(b) which has not been fully discharged.</p>
Land	Any beneficial interest in land which is within the area of the relevant authority.
Licences	Any licence (alone or jointly with others) to occupy land in the area of the relevant authority for a month or longer.
Corporate tenancies	<p>Any tenancy where (to a member's knowledge):</p> <p>(a) the landlord is the relevant authority;</p> <p>(b) the tenant is a body in which the relevant person has a beneficial interest.</p>
Securities	<p>Any beneficial interest in securities of a body where:</p> <p>(a) that body (to a member's knowledge) has a place of business or land in the area of the relevant authority; and</p> <p>(b) either:</p> <p>(i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or</p> <p>(ii) if the share capital of that body is more than one class, the total nominal value of the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.</p>

## **Part I – Public session**

1. Apologies

2. Declarations of interest

3. **Local Government (Access to Information) Act, 1985 (as amended):**

There are no items for consideration in the private session of the agenda

### **Deputy Leader and Regeneration: Councillor Andrew**

#### **Key decision**

4. Black Country Plan: Draft Plan for Consultation
- Report attached

#### **Non-key decision**

5. Acceleration of the UK Afghan Locally Employed Staff (LES) Relocation scheme
- Report to follow

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## Cabinet – 7 July 2021

### Black Country Plan: Draft Plan for Consultation

**Portfolio:** Councillor A Andrew – Deputy Leader and Regeneration Portfolio

**Related portfolios** n/a

**Service** Economy, Environment & Communities

**Wards:** All

**Key Decision:** Yes

**Forward Plan:** Yes

#### 1. Aim

- 1.1 The Black Country Plan (BCP), which is currently in preparation, will form part of the development plan when adopted. The Council is required by law to determine planning applications in accordance with the development plan unless material considerations indicate otherwise. Development plans are therefore very important as the basis for economic development and regeneration, protecting land uses and supporting the physical enhancement of the Borough. They have to be carefully prepared, subjected to public scrutiny, and examined by independent Planning Inspectors, before they can be adopted.
- 1.2 The BCP will, once adopted, replace the existing Black Country Core Strategy (BCCS) and ‘carry forward’ most of the site allocations in the Walsall Site Allocation Document (SAD). The BCCS and SAD currently run to 2026. The BCP will aim to provide sufficient land for homes and jobs, as well as safeguarding and enhancing the natural and built historic environment, for the period to 2039.
- 1.3 The first stage of public consultation on the BCP was about the Issues and Options Report in 2017. The outcome of that consultation has informed the production of the Draft Plan. As well as providing more detail about the number of additional homes and amount of employment land that we are aiming to provide for, the Draft Plan identifies specific sites that are proposed to be allocated for development.
- 1.4 The BCP is being prepared jointly between the four Black Country authorities. Similar reports are therefore being taken to the respective cabinets of Dudley, Sandwell and City of Wolverhampton.

## **2. Summary**

- 2.1 This report seeks authorisation to consult on the Draft Plan version of the Black Country Plan. The Draft Plan is provided in full in Appendix A whilst a non-technical summary leaflet is provided as Appendix B. The report outlines the main methods to be used in the consultation.
- 2.2 Approximately 76,000 additional homes and around 565 hectares of additional employment land (for industry and warehousing) need to be provided to meet the needs of the Black Country over the period 2020-39. We also need to plan for:
- How we will address climate change
  - How we will create healthy and safe places
  - How we will protect and enhance the historic and natural environment
  - The design standards that new development should meet
  - How we will provide housing to meet the needs of different residents, including affordable housing
  - How we will maintain vibrant and attractive town centres
- 2.3 Much of the land for these homes and jobs already has planning permission and/or is allocated in our existing development plans. The BCP will continue to focus on bringing forward for development previously developed land in the urban area. Officers are also exploring the capacity of our urban areas to accommodate additional homes through, for example making use of land and buildings that are no longer required for other purposes such as retail and offices, and by increasing densities. We are also continuing discussions with neighbouring authorities outside the Black Country under the Duty to Cooperate to encourage them to allocate land in their local plans to meet some of the need arising from the Black Country and Birmingham.
- 2.4 However, all these sources together would not provide sufficient land to meet our requirements. The Draft Plan therefore proposes to remove land from the Green Belt to provide in total around 7,700 homes and 47 hectares of employment land to be delivered by 2039. 7,100 homes (5,400 of which would be built by 2039) and 47 hectares of employment land (11ha of which is previously developed land) are in Walsall. A total of approximately 320 hectares of land is involved in Walsall, which equates to approximately 8% of the current area of Green Belt in the Borough.

## **3. Recommendations**

- 3.1 That Cabinet approves the draft Black Country Plan as set out in Appendix A for consultation.
- 3.2 That Cabinet approves the approach to consultation as set out in Appendix D of this report.
- 3.3 That Cabinet delegates authority to the Director of Regeneration and Economy to make any necessary amendments to the Draft Plan and other consultation documents prior to the commencement of the consultation process.

**4. Report detail – know**

- 4.1 The BCP will form a key part of the statutory development plan once adopted. The development plan is a document, or collection of documents, that identifies future needs for homes, employment and other land use requirements, and contains policies to safeguard open space, areas of value for nature conservation or built heritage. It forms the basis in law of decisions on planning applications, and is used to guide decisions on investment and regeneration.
- 4.2 The development plan for Walsall currently comprises ‘saved’ policies of the Walsall Unitary Development Plan (UDP), the Black Country Core Strategy (BCCS), the Walsall Site Allocation Document (SAD) and Walsall Town Centre Area Action Plan (AAP). The BCCS, adopted in 2011, sets a strategy and targets for homes, employment land, retail and offices for the period to 2026. Specific sites to meet these targets are allocated in the SAD and AAP, which were adopted in 2019. Parts of the UDP, which was adopted in 2005, have been replaced by the BCCS, but many policies in the UDP, especially those that do not relate to specific sites, remain in place.
- 4.3 The BCP will set out land use requirements to roll forward to 2039. National planning policy states that development plans should identify requirements for 15 years from the date of adoption. It is intended that the BCP will be adopted in 2024. The BCP will replace the BCCS but, unlike the BCCS, the BCP will also allocate specific sites for different land uses. It will therefore ‘carry forward’ the allocations in the SAD but will also allocate additional sites to meet need over the longer time period.
- 4.4 Preparation of the BCP began in 2016 and consultation on the ‘Issues and Options’ to be considered in the plan took place in 2017. Since then, a great deal of work has taken place to examine potential sites to be allocated in the plan (over 200 of these have been examined in Walsall alone), as well as studies of housing need (both the overall number of homes required but also the breakdown between tenure and dwelling size that is likely to be required), the employment land need and supply (including the suitability of existing employment premises for long term retention), and studies of town centres, waste and minerals. These studies, and responses received to the issues and options consultation, have informed the draft plan.
- 4.5 Cabinet in October 2020 approved a revised timetable (the Local Development Scheme – LDS) for the future stages of the plan. These now comprise:

Cabinet consideration of Draft Plan	July 2021
Draft Plan Public Consultation	August-September 2021
Cabinet consideration of Publication version of BCP	July 2022
Publication Public Consultation	August-September 2022
Submission of Plan	March 2023
Examination	April 2023 - March 2024
Adoption	April 2024

- 4.6 The BCCS envisaged that development needs to 2026 could be met entirely within the existing urban area. This was based on the principle that there was a declining need for industrial land as work moved to offices, which has a higher employment density (the amount of floorspace per job). The redundant industrial land could then be redeveloped for housing.
- 4.7 However, industry has proven to be more resilient than expected, particularly in Dudley and Sandwell. There are a number of reasons for this. Firstly, much of the industry in the Black Country is specialist manufacturing, with a skilled and loyal workforce. Companies have been reluctant to relocate to newer and better quality premises both because of the cost but also because of concern that they will lose their workforce. They have chosen instead to invest in their existing premises. Second, many older industrial areas are in fragmented ownerships, often with absentee or unknown owners, and there is no practical means of consolidating land parcels to allow a comprehensive redevelopment.
- 4.8 Even prior to Covid-19, demand for offices in the Black Country was low. Growth in retail employment has also failed to occur. Warehouses and other premises to serve internet-based shopping tends to have a low employment density. However, the growing population of the area also means that the total number of jobs needs to increase in order to provide adequate economic activity. More land is therefore required for employment. The draft BCP estimates that around 520 hectares of additional employment land is required.
- 4.9 Housing need is now determined by the standard method set by the Government. This indicates that an additional 76,076 homes need to be provided across the Black Country over the period 2020-2039. This compares with the requirement of 63,000 net new homes which the BCCS requires for the period 2006-2026. Housing completions since 2006 have been largely in line with the trajectory set by the BCCS. As a result however, this means that we are effectively running out of land for housing.
- 4.10 The capacity of the urban area has been assessed as part of the preparation of the BCP. This shows that only 205 hectares of employment land and land for 39,255 homes is available in the area. There is therefore a shortfall of over 300 hectares of employment land and land for 36,821 homes.
- 4.11 Work under the Duty to Cooperate is ongoing with neighbouring authorities in Staffordshire, Shropshire and Solihull to accommodate some of this shortfall in their areas. Discussions to date suggest around 150 hectares of employment land and 9,500 homes could be exported to them. The remainder however will need to be met in the Black Country, by developing land that is currently in the Green Belt.
- 4.12 In Walsall it is proposed that land for 5,418 homes and 47 hectares of employment land will be allocated for development by 2039 on areas that are currently in the Green Belt. This equates to approximately 8% of the current area of Green Belt. The larger sites include:

Home Farm, Sandhills	Aldridge North and Walsal Wood	800 homes
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Yieldsfield Farm, Bloxwich	Bloxwich East	600 homes
Queslett Road East/ Aldridge Road	Streetly	960 homes
Sutton Road/ Longwood Lane	Pheasey Park Farm	202 homes
Yorks Bridge	Pelsall	580 homes
Coronation Road/ Mob Lane	Aldridge North and Walsall Wood	763 homes
Calderfields, Aldridge Road	St Matthews	442 homes
Bentley Lane (Beatwaste)	Short Heath	11ha employment
Johnsons Farm/ Meadow Farm, Watling Street	Brownhills	14ha employment

- 4.13 Most of these sites will include land to be used as open space and to enhance biodiversity.
- 4.14 As well as allocating sites, the BCP will also replace the existing policies in the BCCS and elsewhere that apply to various existing and proposed land uses. The BCP policies will take account of changes to legislation and national planning policies since the BCCS was adopted, requirements arising from the evidence prepared for the plan and new challenges such as the need to address climate change and enhance provision for nature conservation.
- 4.15 The Council is required to assess the environmental and sustainability effects of any development plans it produces. Preparation of the Draft Plan has been informed by Sustainability Appraisal (incorporating the requirements of Strategic Environmental Assessment). The Draft Sustainability Appraisal Report, including non-technical summary, is available to view at Appendix C. The sustainability appraisal considers the anticipated sustainability effects of the Draft Plan, potential mitigation measures, and appraises the reasonable alternative options considered during the plan preparation process.
- 4.16 Public consultation on the Draft Plan is anticipated to take place between 9th August and 4th October. The arrangements have of necessity changed as a result of Covid-19 but are proposed to include methods as set out in Appendix D.

#### ***Council Corporate Plan priorities***

- 4.17 The Council's Corporate Plan 2021-2022 sets out the Council's purpose along with the priorities, with the aim of reducing inequalities and maximise potential. Having a plan that looks to deliver development in the borough in the right locations directly links to the Council's priority of "economic growth for all people, communities and businesses". It also links to the Council priority of ensuring "communities are prospering and resilient with all housing needs met in safe and healthy places that build a strong sense of belonging and cohesion" by ensuring we have a programme of plans that continue to identify land to meet our housing needs. Having a plan also supports the Council priority of ensuring our residents have "increased independence, improved health and can positively contribute to their communities". Planning documents provide the



mechanism for ensuring communities have access to opportunities, services and facilities which can support healthy living and independence. The consultation process behind plan making also provides real opportunities for communities to engage in the future of the borough.

### ***Risk management***

- 4.18 Failure to have a development plan that is based on sound evidence could result in the borough having insufficient land to meet the need for housing, employment and other land uses that are necessary to support the economic and environmental well-being of the area. It could also result in development being placed in the wrong locations, leading to an inefficient use of resources, traffic congestion and other harm. Having a development plan in place is also essential in order to defend the Council's position in planning appeals. Without an up to date development plan, the Council and other Black Country Authorities risk intervention from central government and may compromise our ability to make decisions locally.

### ***Financial information***

- 4.19 The work to prepare the BCP is being financed and funded jointly by the Black Country Local Authorities and through an external grant from MHCLG (previously DCLG) of £560,000. The Council's contribution to the work on the BCP is being met through existing mainstream revenue budgets which provides the staffing and strategic resource towards the plans preparation and a one-off revenue reserve of £250,000 which is provided for the preparation of the evidence base through external experts and each stage of the plans preparation including stages of consultation and the Examination in Public.

### ***Legal Implications***

- 4.20 The process for the preparation of development plans is set out in the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012

### ***Procurement Implications/ Social Value***

- 4.21 None arising directly from this report. Preparation of the BCP has involved the commissioning by the Black Country authorities of a number of pieces of evidence from external consultations. Procurement is carried out by Sandwell Council on behalf of the four Black Country authorities

### ***Health and wellbeing implications***

- 4.22 Preparation of the BCP includes the carrying out of an integrated Sustainability Appraisal, Equality Impact Assessment and Health Impact Assessment. One of the objectives of plan making is to ensure that the siting of new developments contributes to the health and well-being of residents of the borough, for example by being located where they can be accessed by walking and cycling.

### ***Staffing implications***

- 4.23 None arising directly from this report. Work on the BCP is carried out by the Planning Policy Team in the Economy, Environment & Communities Directorate with officers from the other authorities.

### ***Reducing Inequalities***

4.24 Preparation of the BCP includes the carrying out of an integrated Sustainability Appraisal, Equality Impact Assessment (EqIA) and Health Impact Assessment. One of the objectives of the BCP will be to ensure that jobs, homes and services are provided for all residents of the borough including children and young people, and groups such as gypsies and travellers. All Local Plans need to be produced in accordance with the Statement of Community Involvement (SCI) which sets out the Councils commitment to engagement with all communities, including minority ethnic communities, faith based communities, disabled groups and individuals, young people, people on low incomes and the business community. This approach is designed to ensure that those communities that traditionally have not had their say on planning decisions are able to influence the planning process.

## 5. Decide

5.1 Consultation about the Draft Plan will allow the public and other stakeholders to influence the final version of the document. This will inform future decisions by Cabinet about the version to be submitted for examination by the Secretary of State and ultimately adopted by the Council.

## 6. Respond

Should Cabinet resolve to approve the Draft Plan, it will be finalised with supporting documents to be used in the public consultation.

## 7. Review

The outcome of the public consultation will provide the opportunity to review the content of the next version of the plan, the Publication Plan, which is intended to be prepared in 2022 for approval by Cabinet and public consultation before being submitted for examination.

## Background papers

The BCP is supported by a range of evidence documents that are published on the BCP web site at [Black Country Plan \(dudley.gov.uk\)](http://dudley.gov.uk)

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Simon Neilson  
Executive Director

Date 25/6/2021



Councillor Andrew  
Portfolio Holder

Date

APPENDIX A1 Draft Black Country Plan Written Statement

APPENDIX A2 Draft Black Country Plan Policies Map

APPENDIX B Non Technical Summary for Walsall

APPENDIX C Draft Plan Sustainability Appraisal Report

APPENDIX D Public Consultation Engagement Techniques

# Black Country | Plan

Planning for the future of the Black Country



## Draft Black Country Plan

July 2021



Walsall Council

CITY OF  
WOLVERHAMPTON  
COUNCIL

DRAFT

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# 1 Introduction

## Purpose of the document

- 1.1 The Draft Black Country Plan (referred to as the BCP throughout this document) contains planning policies and land allocations to support the growth and regeneration of the Black Country over the years to 2039. It has been prepared and approved for consultation by the four Black Country Authorities (Dudley, Sandwell, Walsall, and City of Wolverhampton), referred to in this document as the BCA.
- 1.2 The draft BCP contains a Vision for the Black Country in 2039. This is underpinned by strategic objectives and priorities designed to deliver the Vision and associated outcomes. The proposed policy framework will guide and shape development across the Black Country and will set clear parameters for growth and transformation.
- 1.3 Once adopted, the BCP will provide a strategy for bringing land forward with a clear presumption in favour of sustainable development. It will provide certainty and transparency to residents, businesses and developers about how the sub-region is expected to grow to 2039.

## Why does the Black Country need a Strategic Plan?

- 1.4 The government requires all local authorities to develop a long-term plan that sets out how and where land can be developed over the next 15 years, to meet the growing needs of local people and businesses. The BCP, which sets out strategic policies<sup>1</sup> for the BCA, will provide a policy framework to:
  - a) facilitate the delivery of the right development types to meet identified and emerging needs in the most sustainable places;
  - b) prevent uncoordinated development;
  - c) provide certainty over the types of development that is likely to be approved;
  - d) to meet housing needs between now and 2039;
  - e) attract new businesses and jobs and offer existing businesses the space to grow by meeting employment land needs;

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<sup>1</sup> See NPPF paragraph 21 for definition

- f) increase employment opportunities to support the delivery of the Black Country and West Midlands Combined Authority Strategic Economic Plans (SEP), the Local Industrial Strategy and Covid-19 recovery plans;
- g) address the issue of climate change;
- h) promote and enhance health and well-being in accordance with the four local authorities' health and well-being strategies;
- i) protect and enhance designated areas;
- j) ensuring infrastructure, such as roads, public transport, new schools, new healthcare facilities, upgraded utilities and broadband, waste and sewage disposal, is provided at the right time to serve the new homes and employment provision it supports;

### **What will the Local Plan replace?**

- 1.5 When adopted the Black Country Plan will replace the Black Country Core Strategy (2011) and significant elements of 'Tier 2' plans in the form of Area Action Plans and Site Allocations Documents, as set out in Appendix 15.

### **The Context of the Local Plan**

- 1.6 This consultation draft plan has been prepared in the context of national and local guidance and strategies. A range of evidence has been commissioned / undertaken by the BCA to justify the draft spatial strategy and draft policies within this plan, which will be available to view on the BCP website alongside the consultation documents.

### **National Planning Policy Framework (NPPF)**

- 1.7 The revised NPPF sets out the Government's planning policies for England and how these should be applied. It provides the framework within which locally-prepared plans for housing and other development can be produced.
- 1.8 Planning law requires that applications for planning permissions are determined in accordance with the development plan, unless material considerations indicate otherwise. The NPPF must be taken into account when preparing the development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and other statutory requirements.

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## Duty to co-operate

- 1.9 The Localism Act (2011) introduced a requirement on all local authorities to co-operate with neighbouring local authorities and other bodies with a regulatory or strategic interest in Local Plan issues. The duty requires ongoing, constructive, and effective engagement on areas of plan-making, which may have strategic cross-boundary implications.
- 1.10 The Duty to Co-operate Statement included in the Draft Black Country Plan Statement of Consultation documents how the BCA have fulfilled the duty through the plan preparation process, and how the bodies referred to in the Act have helped to shape the draft BCP. It is intended to draft and agree Statements of Common Ground with relevant authorities and bodies on key duty to co-operate issues at the BCP's publication stage.

## Black Country Local Enterprise Partnership

- 1.11 The Black Country Local Enterprise Partnership (LEP) has the overall aim of transforming the sub-regional economy by creating the conditions for enterprise to flourish, resulting in greater economic prosperity across the Black Country.
- 1.12 The Black Country Strategic Economic Plan (SEP) sets out the vision, objectives, strategy, and actions to improve the quality of life for everyone who lives and works in the Black Country, an area with unique assets, challenges, and opportunities. In May 2019 the West Midlands Combined Authority, in partnerships with the region's three Local Enterprise Partnerships (Black Country, Coventry and Warwickshire and Greater Birmingham and Solihull), published the West Midlands Local Industrial Strategy<sup>2</sup>, building on local Strategic Economic Plans.

## West Midlands Combined Authority

- 1.13 The West Midlands Combined Authority (WMCA) seeks to deliver a vision of a more prosperous West Midlands. The Strategic Economic Plan (SEP) sets out the vision, objectives, strategy and actions needed to improve the quality of life for everyone who lives and works in the West Midlands

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<sup>2</sup> [Industrial Strategy \(wmca.org.uk\)](http://Industrial Strategy (wmca.org.uk))

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- 1.14 To deliver success for the West Midlands, the West Midlands Local Industrial Strategy was agreed with government and published in May 2019. It sets out a number of priorities intended to help increase the productivity of the West Midlands.
- 1.15 The adopted Black Country Core Strategy and the forthcoming BCP provide a basis for public and private investment decisions, particularly the Housing Deal agreed with Government in March 2018 and other devolved housing and land funds. The BCA and the WMCA are working together to ensure that investment and delivery in the Black Country continues beyond the existing Core Strategy and into the plan period of the new Black Country Plan.

### Previous consultations on the Black Country Plan

- 1.16 The preparation of the draft BCP commenced in 2016 and included an Issues and Options Consultation in 2017. This used both traditional and online mechanisms to support consultation and drew responses from residents, the development industry and statutory bodies.
- 1.17 There was concern from residents around the possibility of building on the Green Belt, although developers questioned the brownfield-first approach and whether it was capable of delivering sufficient capacity based upon past trends.
- 1.18 The consultation demonstrated that there was support for housing to be built in sustainable locations and a desire to protect the environment of the Black Country.
- 1.19 A summary of the issues and options responses and how they have been addressed in the Draft Plan are detailed within this document, under the relevant policy themes.

### Existing Black Country Core Strategy

- 1.20 The Black Country encompasses the areas administered by Dudley Metropolitan Borough Council (MBC), Sandwell MBC, Walsall Council, and the City of Wolverhampton Council. The four authorities worked together to produce the existing Black Country Core Strategy, which was adopted in 2011. The existing Core Strategy provides the framework for various Site Allocation Documents and Area Action Plans, which themselves set out local policies and site allocations for individual authority areas.
- 1.21 The existing Core Strategy covers the period between 2006 and 2026. From the outset there was a clear intention to review it five years after adoption, to ensure the



spatial objectives and strategy were being effectively delivered and to keep the plan up to date. This is in line with national planning guidance. Rolling the plan forward will also enable the longer-term needs of the Black Country to be addressed. The most contentious issues the Black Country is facing is that both its population and economy are set to continue to grow and as a result there is a need to identify additional housing and employment sites, which are currently beyond the capacity of the existing Strategy.

- 1.22 The need for a review has been given even greater urgency by new challenges that have emerged since 2011. The national economic situation has also changed. The existing Core Strategy was prepared as the country was emerging from the global recession of 2008, and the Black Country was recovering from a period of economic and population decline. This was reflected in the Core Strategy in a clear emphasis on the recycling of land previously in industrial use to provide for housing and newer employment activities such as offices. In reality, the manufacturing and industrial markets of the Black Country have remained stable and have expanded in some cases, meaning that the expected surplus of vacant brownfield land has not occurred in practice.
- 1.23 Looking to the future, the opening of HS2 and the extension to the Midland Metro are likely to have a significant impact on the Black Country within the timeframe of this Plan. There have also been several changes to national policy, especially a revised national planning policy framework and guidance.
- 1.24 More recently, the COVID19 pandemic in 2020 – 2021 caused a significant shift in the way Black Country residents work, shop and access services. There are likely to be some longer-term changes in the way communities operate that may have implications for land uses, and the BCP will seek to address those issues through the use of robust yet suitably flexible and sensitive policies.

### Black Country Spatial Portrait

- 1.25 **Sub-regional Context:** the Black Country forms a distinctive sub-region on the western side of the West Midlands conurbation, close to the City of Birmingham. It shares an eastern boundary with Birmingham and to the north, west and south it is bounded by districts within Staffordshire, Shropshire and Worcestershire and is in relative proximity to centres such as Cannock and Bromsgrove. It has a unique

- economic history, settlement form and topography and is very much shaped by its industrial past.
- 1.26 The four local authorities have a shared set of social, economic, and environmental challenges and have found it effective to tackle strategic issues on a cross-boundary basis. The authorities have worked closely together for 14 years to establish a clear and collective set of ambitions and directions of travel, expressed in an agreed economic and spatial strategy. This joint working has strengthened and deepened over time – moving from establishing a 30-year Vision in 2003, to adopting a joint Core Strategy in 2011, through to securing funding through the Black Country LEP and the West Midlands Combined Authority in 2017 to deliver priority projects.
- 1.27 **Demographic Trends:** the population of the Black Country currently stands at just over one million people and is anticipated to grow further. The Black Country population is extremely diverse, and therefore has the capacity to harness the talents of different groups of people to make for a more robust and resilient economy. The BCP will provide a basis for opportunity for its residents, ensuring the development of skills and learning are linked to communities and growth.
- 1.28 **Economy and Skills:** the Black Country has a long industrial history, especially in manufacturing. Until the 1980s the Black Country, together with neighbouring Birmingham, was the powerhouse of Britain's manufacturing economy.
- 1.29 A legacy of the decline in heavy industry, and the jobs associated with it, has been the difficult ground conditions left behind. Recently however, the economy has grown, and residents' wages have increased. At the same time the employment rate has grown at a faster pace than in England generally (3.5% growth compared to 0.9%) and Gross Value Added in the Black Country was £21.7bn in 2020, an eight-year high (Black Country Consortium, 2020).
- 1.30 The challenge is to keep that momentum, particularly in the light of the Covid-19 pandemic, ensuring growth is sustainable and that the Black Country Plan is part of that process through providing the right sites for economic growth.
- 1.31 The West Midlands was one of the hardest hit parts of the UK during the collapse in the economy in the first wave of the Covid-19 pandemic, official figures have shown. The BCP therefore needs to provide the basis for delivery, making sure that

development is sustainable and that the Plan is part of that process through providing the right sites for economic growth.

- 1.32 **Skills:** a long-standing skills challenge exists in the Black Country, with too many people having no qualifications and not enough holding higher qualifications. This leads to sustained weaker employment and lower earnings. However, latest data shows that our average earnings are growing faster than national average and so gap is reducing. Black Country residents working full-time earn £27,839 as of April 2020 (+£1,505 from April 2019), which is a 5.7% increase compared to 3.5% nationally. Data has also shown that the percentage of Black Country residents with NVQ4+ qualifications is increasing. The percentage of those with no formal qualifications fell by over 30% between 2007 and 2019. More recently, the number of people with no qualifications decreased from 121,800 in 2019 to 91,600 in 2020. Whilst employment and earnings in the Black Country have remained below the national and regional average, the gap has closed recently. In line with national trends, the number of apprentices has decreased. Several further and higher education opportunities are available, including the expansion of Wolverhampton University, the Elite Centre for Manufacturing Skills - National Foundry Training centre in Tipton, a specialist Music Institute at Cable Plaza and the Very Light Rail National Innovation Centre training college and test facility in Dudley. These and other outlets are providing a diversifying and expanding portfolio of training and upskilling opportunities.
- 1.33 **Housing:** the Black Country is continuing to see new homes built – an increase of 2,500 this year to a total of 493,000 for the growing population, which is expected to reach 1.2 million in 2039.
- 1.34 **Health and Wellbeing:** the Black Country has lower rates of physical activity and higher rates of obesity than the rest of England. In addition, the Black Country has issues with alcohol abuse, depression and social isolation.
- 1.35 It also has lower life expectancy and higher rates of multiple deprivation, of children living in poverty and of unemployment than the average for England. Life expectancy is lower than both the West Midlands as a whole and England and higher mortality rates are suffered by the population.
- 1.36 These and other issues, which negatively affect the physical and mental health and wellbeing of residents of the Black Country, are all influenced by the built and natural environment.

- 1.37 **Transport:** there are 25 towns and four major strategic centres in the Black Country (Brierley Hill, Walsall, West Bromwich, and Wolverhampton). The denseness of the urban area and the number of centres create particularly complex movement patterns and have led to a complicated transport network. Buses are the most important method of public transport travel in the Black Country, but they face challenges especially from declining speeds due to congestion.
- 1.38 The Black Country is connected to the main line rail network at Wolverhampton and Sandwell and Dudley Stations. Improvements in the public transport network (especially the Wednesbury to Brierley Hill Midland Metro Extension) will better connect the Black Country into the national and local rail network and improve mobility across the Black Country.
- 1.39 For work, travel by car remains very important in the Black Country, reflecting in part the complexity of the urban area and declining bus speeds.
- 1.40 **Centres:** centres play a crucial role in the priorities identified in para 1.2 by sustainably providing services to meet the needs of communities from shopping and leisure to housing and education. The Black Country's four Strategic Centres provide the focus for shopping, particularly non-food, commercial, leisure and employment; complemented by its town centres (including Walsall's district centres) and network of local centres, serving the Black Country's communities. Changing shopping patterns are presenting many challenges, such as vacancy levels, which mean many centres are struggling.
- 1.41 By ensuring future growth in the Black Country, particularly housing, can be served by the existing network of centres, this can help ensure their future vitality and viability.
- 1.42 **Black Country Broadband:** the Black Country is part of the West Midlands 5G testbed. This is the UK's first large-scale multi-city test bed (with a hub in Wolverhampton) centred on using 5G technology in the health, construction and automotive sectors to assist in the drive for economic growth and to benefit the population through new digital technologies and digitally transformed public services. The Black Country performs very well, when compared to the rest of the Midlands – in large due to successful Black Country Superfast Broadband investment where over 60,000 premises were enabled to access superfast broadband.

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## Challenges and Issues

1.43 The following summarises the key strategic challenges and opportunities that have arisen since the Core Strategy was adopted in 2011. These issues are the main reasons why a review is needed, and form the main opportunities and challenges which the Plan Strategy, objectives and suite of policies and proposals seek to address:

- a) ***Providing good quality housing that meets the needs of a growing population*** - the Plan needs to identify sufficient land for housing to meet the needs of people who are likely to live in the area over the period of the plan.
- b) ***Supporting a resurgent economy, which provides access to employment and opportunities for investment*** - the Plan should provide for a range of employment sites capable of meeting a wide variety of investment needs.
- c) ***Reviewing the role and extent of the Green Belt*** - evidence suggests that there will be significant housing and employment needs and a deficit in the brownfield land supply within the Black Country, which has resulted in the need for an assessment of the Green Belt to help identify potential areas for growth.
- d) ***Supporting strong and competitive centres*** - to address the health and enhance the vitality and viability of our centres and ensure we have realistic ambitions for growth. The Plan should provide a flexible policy framework to allow centres to serve the future growth identified in the Black Country (particularly Housing and Employment), diversify and provide strict tests to defend against proposals that could undermine centres, such as out-of-centre developments.
- e) ***Climate change and protecting and enhancing the environment*** - the Plan needs to address the challenge of mitigating and adapting to the impacts of climate change in ensuring sustainability principles are embedded across all areas. It will also need to create a strategy for the enhancement and protection of the Black Country's environment and make provision for new environmental infrastructure required to support sustainable growth across the Black Country.
- f) ***Keeping the Black Country connected*** - a balanced approach to transport investment is required that recognises the need to invest in all modes of transport but identifies a priority in increasing the proportion of people using public transport, walking and cycling.

- g) **Providing infrastructure to support growth** - physical and social infrastructure is required to enable and support the growth required over the plan period. New housing and economic development will put pressure on existing services and utilities but may also create opportunities to provide infrastructure solutions.
- h) **Health and Wellbeing** - The role of the environment in shaping the social, economic and environmental circumstances that determine health and wellbeing is increasingly recognised and understood (see Figure 3, chapter 5). The BCP seeks to help address this.

## Draft Black Country Plan

1.44 The Plan is structured as follows:

- Section 1 sets out how the Plan has been prepared and establishes the local context, highlighting the strategic challenges the Black Country faces.
- Section 2 provides the spatial vision, strategic objectives and priorities of the Plan that provide the basis for the policy and spatial approach.
- Section 3 sets out the overall spatial strategy for the Black Country, containing overarching policies intended to deliver the vision and objectives of the Plan.
- Sections 4-12 set out the detailed policies, organised by themes and reflecting the role of the Vision in delivering sustainable growth for the Black Country.
- Section 13 is divided into four chapters related to each of the four Black Country authorities (Dudley, Sandwell, Walsall and Wolverhampton) and identifies the site allocations for each authority.
- Section 14 outlines how the Councils will monitor and manage the Plan in terms of the delivery of the spatial visions, strategic objectives and implementation of the strategy.

1.45 The Appendices provide detail on proposed changes to existing plans as a result of the Draft Plan, further information in relation to the Black Country's centres and the Black Country Nature Recovery Network and a glossary of terms.

## 2 The Black Country 2039: Spatial Vision, Strategic Objectives and Strategic Priorities

### What is driving the Vision for the Black Country?

- 2.1 The Vision reflects what the Black Country will be like in the future if the needs and aspirations of those who live, work in or visit the area are to be met, whilst also ensuring that it retains the characteristics that make it attractive and distinctive. It also needs to be flexible, to allow authorities to respond to future challenges in a way that is right for the Black Country, its residents and its businesses.
- 2.2 The Vision has been written in the context of the national, regional and local policy frameworks.

### Vision for the Black Country

- 2.3 The Black Country Plan is the spatial planning document for the wider ambitions and goals of the BCA and their partners. By implementing the policies in the Black Country Plan, the Councils will guide investment and development to 2039 by:

***“Creating a prosperous, stronger and sustainable Black Country”***

- 2.4 The Vision will be delivered via progress towards the achievement of eight objectives. The relationship between these objectives is illustrated in Figure 1 below.

**Figure 1 Relationship between Vision and Objectives**

	Climate Change	
Housing that meets all our needs	<b>Create a prosperous, stronger, and sustainable Black Country</b>	Promoting sustainable transport and active travel
Improving the Health and Wellbeing of residents and promoting social inclusion		Enhancing our natural and built environment
Enabling a strong, stable, and inclusive economy		Meeting our resource and infrastructure needs
	Enhancing the vitality of our centres	

- 2.5 To assist in the delivery of the vision and objectives, the following strategic priorities have been identified, which then form the basis of individual policies contained in the BCP. These priorities directly address the key strategic challenges and opportunities that have arisen since the Core Strategy was adopted in 2011, as outlined in paragraph 1.40.

**Table 1 – Black Country Plan - Objectives and Strategic Priorities**

<b>Objective</b>	<b>Strategic Priority</b>	<b>Policy</b>
<b>Climate Change</b>	Strategic Priority 1: To mitigate and adapt to climate change to protect the people, environment and economy of the Black Country and meet wider national and international obligations	CSP1; CSP4; HOU1; ENV2; ENV4; ENV8; ENV9; CC1 – CC6; HW1; HW3
	Strategic Priority 2: To adapt to and minimise the impact of Climate Change by reducing carbon emissions, maximising the use of low carbon energy solutions, seeking to reduce the impact of flooding, and enhancing the Black Country's Green and Blue Infrastructure	CSP1; GB1; TRAN3; TRAN5; TRAN6; TRAN8; ENV3; ENV4; ENV8; CC1 – CC6; HW1; HW3
<b>Housing that meets all our needs</b>	Strategic Priority 3: to provide a range and choice of accommodation, house types and tenures to meet the needs of current and future residents	HOU2; HOU3; HOU4; HOU6
	Strategic Priority 4: to improve and diversify the Black Country housing offer	HOU2; HOU6
<b>Improving the Health and Wellbeing of residents and</b>	Strategic Policy 5: To provide a built and natural environment that supports the making of healthier choices through provision for physical activity and recreation, active travel, encouraging social interaction.	CSP1; CSP5; HW1 – HW3; CEN5; TRAN5; TRAN8; ENV8; ENV9; CC4;



Objective	Strategic Priority	Policy
<b>promoting social inclusion</b>	Strategic Policy 6: To provide a built and natural environment that protects health and wellbeing through minimising pollution (air, noise and other forms), providing healthy homes, reducing the negative health effects of climate change and providing streets safe for active, low emission travel for all.	CC4; W3; W4; MIN4
<b>Enabling a strong, stable and inclusive economy</b>	Strategic Priority 7: To provide a balanced portfolio of employment sites and to protect and enhance existing sustainable employment areas to support the development of key employment sectors and enable existing businesses to expand	CSP1; DEL1; DEL2; EMP1 – EMP5; TRAN1; TRAN2; TRAN4;
	Strategic Priority 8: to enable communities to share the benefits of economic growth through securing access to new job opportunities and enhanced skills and training programmes.	DEL3; HOU5; EMP5
<b>Enhancing the vitality of our centres</b>	Strategic Priority 9: To enhance the vitality, diversification and performance of town centres, to serve the current and future needs of communities as places to live, shop, work and visit.	CSP2; CSP5; CEN1 – CEN6;
<b>Promoting sustainable transport &amp; active travel</b>	Strategic Priority 10: To prioritise sustainable and active travel and seek to improve transport infrastructure to ensure efficient and sustainable accessibility within an integrated network	TRAN1 – TRAN8; HW1; HW3
	Strategic Priority 11: To protect and enhance the natural environment, biodiversity, wildlife corridors geological resources, countryside, and	ENV1 – ENV9; HW1; HW3

Objective	Strategic Priority	Policy
<b>Enhancing our natural &amp; built environment</b>	landscapes, whilst ensuring that residents have good access to interlinked green infrastructure	
	Strategic Priority 12: To protect, sustain and enhance the quality of the built and historic environment whilst ensuring the delivery of distinctive and attractive places	CSP4; GB2; ENV5; ENV6; ENV9
<b>Meeting our resource and infrastructure needs</b>	Strategic Priority 13: To manage waste as a resource and minimise the amount produced and sent to landfill	W1 – W5
	Strategic Priority 14: To safeguard and make the most sustainable use of the Black Country's mineral resources without significantly compromising environmental quality	MIN1 – MIN4
	Strategic Priority 15: To ensure the Black Country has the infrastructure in place to support its existing and future growth and prosperity	DEL1, HW2

### Ensuring delivery of the vision, objectives, and strategic priorities

- 2.6 Primarily, the Vision, objectives and strategic priorities set out above will be delivered via the application of the policies of this Plan. Table 1 above sets out which policies will be most important in delivering each strategic priority. The monitoring section at the end of each chapter identifies targets for key indicators that will need to be achieved if these policies are to be successful.

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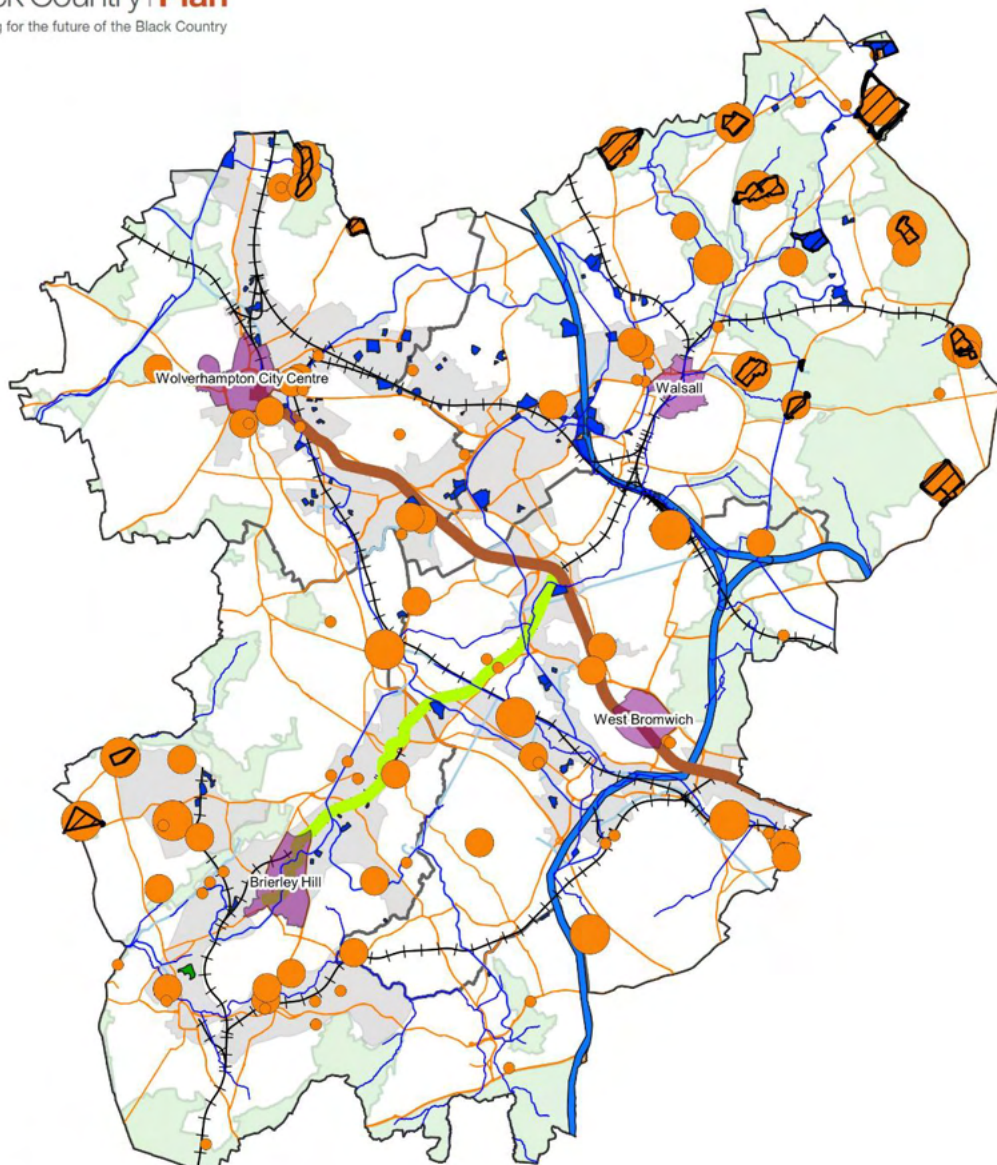
## 3 Spatial Strategy

### Introduction

















- 3.1 The Plan can help achieve sustainable development by ensuring that the Black Country benefits from the right development in the right place at the right time. This development will meet the needs of people living and working in the Black Country, while protecting and enhancing the environment and the unique character of the area.
- 3.2 The Spatial Strategy as set out in Policies CSP1, CSP2, CSP3 and CSP4, and illustrated on the Key Diagram (Figure 2) provides the overarching basis for the Plan's proposals for growth and infrastructure improvements. This diagram is supplemented by thematic key diagrams for housing, economy, transport, environment, waste and minerals.
- 3.3 These policies address all the Plan Objectives and Strategic Priorities, but particularly Priorities 3, 4, 5, 7, 10 and 11.

Figure 2 - Key Spatial Diagram

**Black Country | Plan**  
 Planning for the future of the Black Country



**Spatial Strategy**

Key:	
	Housing Allocations (HOU1)
	Employment Development Sites (EMP1)
	Existing West Midlands Metro (TRAN4)
	Wednesbury -Brierley Hill Metro Extension (TRAN4)
	Rail Network (TRAN4)
	Motorways
	Key Route Network (TRAN1)
	Canal (ENV7)
	Tier One Strategic Centres (CEN2)
	Local Authority Boundaries
	Core Regeneration Areas (CSP2)
	Strategic Allocations
	Local Green Space (DSA .4)
	River Network
	Black Country Green Belt (GB1)
	Neighbourhood Growth Areas (CSP3)

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## Development Strategy

- 3.4 Policy CSP1 provides the overarching spatial strategy for the Black Country, setting out the scale and distribution of new development for the Plan period to 2039.

### Policy CSP1 – Development Strategy

- 1) **To deliver sustainable economic and housing growth and to meet strategic planning targets based on the needs of local communities and businesses, the BCA, working with local communities, partners and key stakeholders, will:**
  - a) **Deliver at least 47,837 net new homes and create sustainable mixed communities that are supported by adequate infrastructure.**
  - b) **Deliver the development of at least 355ha of employment land.**
  - c) **Ensure that sufficient physical, social, and environmental infrastructure is delivered to meet identified needs.**
- 2) **The spatial strategy seeks to deliver this growth and sustainable patterns of development by:**
  - a) **Delivering the majority of development in the existing urban area.**
  - b) **Supporting and enhancing the sustainability of existing communities through the focussing of growth and regeneration into the Growth Network made up of the Strategic Centres and Core Regeneration Areas;**
  - c) **Protecting and enhancing the quality of existing towns and Neighbourhood Areas and re-balancing the housing stock by delivering homes supported by jobs and local services;**
  - d) **Delivering a limited number of Neighbourhood Growth Areas in highly sustainable locations on the edge of the Urban Area;**
  - e) **Protecting the openness, integrity and function of the Black Country's designated and retained Green Belt by resisting inappropriate development;**
  - f) **Protecting the Black Country's character and environmental assets including heritage assets, natural habitats and open spaces;**
  - g) **Minimising and mitigating the likely effects of climate change**

## Justification

- 3.5 The economy and population of the Black Country are growing. The BCA need to plan for economic recovery and growth, enhanced business productivity and 47,837 new homes within the plan period. To accommodate this future growth, locations that are both sustainable and deliverable have been identified for development, at levels and in locations that do not breach the environmental capacity of the area.
- 3.6 The Development Strategy is based on a number of considerations, including:
- a) National planning policy.
  - b) The Plan's Vision, objectives and aims.
  - c) Environmental constraints,
  - d) The availability and viability of land for development.
- 3.7 The Development Strategy has been developed through a comprehensive assessment of a range of alternative options. It is one of 11 Spatial Options considered through this process and corresponds to Spatial Option J – Balanced growth, as set out in the Spatial Options Paper. The Sustainability Appraisal shows that this Option will enable the BCA to meet most of the growth needs within the Black Country in a broad development and delivery focussed manner that takes full account of environmental, climate change, accessibility and social requirements. By promoting the right type and amount of development in the most sustainable locations, the Strategy therefore plays a crucial role in delivering an inclusive Black Country that supports communities to achieve their goals.
- 3.8 The distribution of growth as proposed in the Development Strategy is summarised in Table 2 below.

**Table 2 - Black Country Development Strategy 2020 - 2039**

Location	Housing (net new homes) *	Employment Land development (ha)
<b>The Growth Network</b>		
Strategic Centres	9,561	0
Core Regeneration Areas	11,208	192

Location	Housing (net new homes) *	Employment Land development (ha)
<b>Total</b>	<b>20,769</b>	<b>192</b>
<b>Towns and Neighbourhoods Areas</b>		
Neighbourhood Growth Areas	6,792	36
Towns and Neighbourhoods Areas	12,625	53
<b>Total</b>	<b>19,417</b>	<b>89</b>
Small windfall housing and employment sites (outside Strategic Centres)	7,651	74
<b>Total Black Country</b>	<b>47,837</b>	<b>355</b>
To be exported through Duty to Co-operate	28,239	210
<b>Grand Total</b>	<b>76,076</b>	<b>565</b>

\*Following appropriate discounts

- 3.9 The Growth Network – made up of the Strategic Centres and Core Regeneration Areas (Policy CSP2) - is the primary focus for co-ordinated and sustained regeneration and infrastructure investment to support the delivery of regionally significant growth and promote wider benefits to local communities. The Growth Network is the focus for the delivery of these objectives and contains most of the areas where regeneration and land-use change will be concentrated over the plan period. Although this plan does not make development allocations within the Strategic Centres, it sets out deliverable development targets for each centre, based on up-to-date evidence, which will be met through other local plan documents to be prepared alongside or immediately following adoption of this plan.
- 3.10 The four strategic centres of Brierley Hill, Walsall, West Bromwich and Wolverhampton, and the eight Core Regeneration Areas are already served by an extensive transport system and therefore provide the most suitable locations for

- economic and housing growth, although improvements are required to enhance connectivity, accessibility and environmental quality.
- 3.11 While most change and intervention will be focussed on the Growth Network, some large-scale developments will be brought forward outside the network within the Towns and Neighbourhoods Areas (Policy CSP3), to enable vibrant and diverse communities to thrive and prosper. The Towns and Neighbourhoods Areas make up most of the existing urban area and are where most residents live. The overall land use-pattern within the Towns and Neighbourhoods Areas is not expected to alter greatly by 2039, but there will be some incremental change through a mix of permitted and allocated sites, windfall developments and town centre regeneration activity. On the edges of the Towns and Neighbourhoods Areas the Plan identifies a number of employment and housing-led Neighbourhood Growth Areas.
- 3.12 Strong links will be created between the Growth Network and the Towns and Neighbourhoods Areas, through high-quality design, green infrastructure and transport investment, to help spread regeneration benefits, improve community cohesion and create an effective network of centres.
- 3.13 The BCA are aiming to utilise land efficiently through the use of previously developed land, vacant properties and surplus industrial land, and maximising housing densities where appropriate, but there is a shortage of deliverable sites to meet housing and economic growth needs. The BCA attach great importance to the ongoing protection of the Black Country Green Belt; however, the green belt boundary is drawn tightly around the urban edges. In order to help meet objectively assessed needs for housing and employment land development, exceptional circumstances to alter green belt boundaries need to be demonstrated.
- 3.14 Paragraph 137 of the NPPF (2019) states that before exceptional circumstances can be demonstrated, local authorities should be able to show that they have considered and explored all other reasonable alternatives to the use of green belt for development. The BCA have identified and made effective and extensive use of brownfield and urban sites and have also undertaken density uplifts in relation to both existing and new allocations. Sites have been assessed in terms of their accessibility by all modes of transport. There is a significant need to provide for the continued managed growth of the Black Country, to enable it to provide capacity for economic prosperity while recognising and protecting the most sensitive



- environmental resources and ensuring that proposed development does not adversely affect certain areas unduly.
- 3.15 Land should therefore be fully assessed not just against its suitability for green belt status but also with regard to the sustainability of the development it might accommodate relative to various issues important to the BCP or the wider area. In this context, the BCA feel they have demonstrated that exceptional circumstances exist to justify the redrawing of green belt boundaries around the urban edge to release land for development.
- 3.16 The BCA have undertaken an extensive Green Belt and landscape sensitivity assessment to identify land that, if developed, would cause the least harm to the purposes of the Green Belt and to landscape character, is suitable and available for development and that could create long-term and defensible Green Belt boundaries. The Site Assessment Report sets out the details of the methodology used to assess the suitability of sites for development, and the results of that assessment process.
- 3.17 The overall effect of the strategy is that most housing growth and employment land development will be located in the existing built-up area; this will include 40,117 new homes and 307ha of employment land. An additional 7,720 homes and 48ha of employment land are allocated on sites that have been removed from the Green Belt. Most of these homes and employment land sites are provided in the Neighbourhood Growth Areas and the remainder on smaller sites at the edge of the Towns and Neighbourhoods Areas in the form of rounding-off or through the redevelopment of previously developed land.
- 3.18 This will allow the BCA to maximise deliverable housing land supply as required by the NPPF, and to ensure land is available in a variety of locations and at a range of scales to meet needs over the whole plan period. The housing trajectory (Appendix 17) demonstrates that the plan will be able to deliver an even supply of housing development land over the Plan period to meet a consistent housing target of 2,517 homes per annum (Policy HOU1).
- 3.19 The spatial strategy also seeks to protect green spaces within the Black Country, the extensive green belt on the edges of the urban area and the 'wedges' of open land providing both valuable open breaks between settlements and access to the wider countryside, including for wildlife.

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## Duty to Co-operate

- 3.20 This Plan will provide for the great majority of housing and employment land needs arising in the Black Country to be met within the Black Country. However, the capacity of the Black Country is finite; it is not possible to provide for all the Black Country's housing and employment land needs within its administrative boundaries, given the circumstances around land deliverability, justifiable constraints and the need to protect the unique character of the area.
- 3.21 This plan sets a housing target for the Black Country of 47,837 new homes over the period 2020-39, compared to a local housing need for 76,076 homes, creating a shortfall of 28,239 homes.
- 3.22 For employment land, the EDNA establishes a need for 565ha of land for employment development, an anticipated supply of 355ha and a shortfall of 210ha.
- 3.23 National planning policy requires this unmet housing and employment land need to be provided for across the Housing Market Area, Functional Economic Market Area (FEMA) and other areas with which the Black Country has a physical or functional relationship.
- 3.24 As a result, the BCA have worked openly and constructively with neighbouring authorities to help provide as much certainty as possible about how and where the Black Country's full housing and employment land needs will be delivered. The current position is set out in the Draft Plan Statement of Consultation and will be elaborated on in more detail in Statements of Common Ground at Publication stage.
- 3.25 The BCA recognise that this approach may only address a proportion of the housing and employment shortfall, as it is inappropriate and beyond the powers of the BCA to establish the limits of sustainable development in neighbouring authorities.
- 3.26 Notwithstanding, the BCA are committed to continued and constructive engagement, through the Duty to Co-operate, with their neighbours to secure the most appropriate and sustainable locations for housing and employment growth to meet Black Country needs. In terms of housing, the engagement will extend beyond the adoption of this plan and will build on the partnership approach developed across the Greater Birmingham and Black Country Housing Market Area to address the combined housing shortfalls of the Birmingham and Black Country authorities in particular.

- 3.27 Reflecting the efforts of those neighbouring authorities who are supporting the delivery of the Black Country's wider housing and employment land need, where it is shown to be desirable, appropriate, sustainable and deliverable the BCA will support their neighbours in bringing forward land for housing and employment that sits adjacent to the existing administrative boundaries, and will work in partnership to ensure infrastructure needs are met in full across administrative boundaries.

## Evidence

- Dudley, Sandwell, Walsall and Wolverhampton SHLAAs (2021)
- Black Country Urban Capacity Review Update (2021)
- Black Country Employment Areas Review (2021)
- Black Country Viability and Delivery Study (2021)
- Black Country Green Belt Study (2019)
- Black Country Landscape Sensitivity Assessment (2019)
- Black Country Economic Development Needs Assessment (2017 and 2021)
- Strategic Transport Evidence
- Strategic Environmental Evidence.
- Draft Black Country Plan Statement of Consultation

## Delivery

- Annual update of SHLAAs
- Dudley, Sandwell, Walsall and Wolverhampton Authority Monitoring Report
- Review of Local Plans covering the four Strategic Centres
- Housing renewal will be delivered through local authority intervention
- Securing funding to facilitate delivery
- Working with key partners and delivery agencies.

## Issues and Options Consultation Responses

- 3.28 A large number of responses were made to the Spatial Strategy elements of the Issues and Options consultation. In summary, the majority of representations from

residents and community groups supported the focus on brownfield sites and objected to the principle of removing land from the Green Belt for housing and employment development.

3.29 By contrast, the representations from developers and landowners suggested that the BCCS 'brownfield only' strategy will not provide sufficient land to meet future development needs. Instead, the strategy should facilitate removal of land from the green belt for development and move away from the focus on Regeneration Corridors.

3.30 Most respondents agreed that Policy CSP1 of the BCCS should be retained but it needed to be reviewed in the light of new evidence and reflect the location of the new sites allocated through the BCP

### Strategic Centres and Core Regeneration Areas

3.31 Policy CSP2 sets out the strategic approach for the growth network.

#### Policy CSP2 – The Strategic Centres and Core Growth Regeneration Areas

- 1) **The Growth Network, consisting of the Strategic Centres and Core Regeneration Areas, is the primary focus for regeneration and infrastructure investment to support the delivery of regionally significant growth and promote wider benefits to Black Country communities.**
- 2) **The Strategic Centres and Core Regeneration Areas are the primary focus for new development, regeneration, and infrastructure investment.**
- 3) **The Strategic Centres of Brierley Hill, Walsall, West Bromwich and Wolverhampton will provide:**
  - a. **Re-energised core commercial areas providing a rich mix of uses and facilities, set in a high quality built and natural environment;**
  - b. **The principal locations for major commercial, cultural, leisure, entertainment and community facilities, providing the widest possible range of such facilities appropriate for their catchments;**
  - c. **9,561 new homes of mixed type and tenure - the majority built at high densities as part of mixed-use developments;**

## Policy CSP2 – The Strategic Centres and Core Growth Regeneration Areas

- d. **Excellent public transport links, making the centres highly accessible to their catchment areas;**
- e. **Green infrastructure**
- 4) **The Core Regeneration Areas linking the Strategic Centres will provide:**
  - a. **The principal concentrations of strategic employment areas. These are high-quality employment areas that will be safeguarded and enhanced for manufacturing and logistics activity to support the long-term success of the Black Country’s economy (see Policy EMP2);**
  - b. **The main clusters of local employment land that are vital in providing for local jobs (see Policy EMP3);**
  - c. **The principal locations for new industrial and logistics development - providing 192ha of developable employment land to meet growth needs;**
  - d. **11,208 new homes in sustainable locations well-supported by community services and local shops, set within and linked by comprehensive networks of attractive green infrastructure with cycling and pedestrian routes;**
  - e. **The focus for investment in existing, new, and improved transportation infrastructure with a focus on public transport routes and hubs which will maximise use of the public transport network by residents, workers and visitors;**
  - f. **Strong links with the surrounding communities and the network of centres and spread the regeneration benefits by knitting together old and new to create a richer, varied, and integrated sense of place.**
  - g. **Green infrastructure**

### Justification

- 3.32 The re-energising and repurposing of the Strategic Centres of Brierley Hill, Walsall, West Bromwich and Wolverhampton is of fundamental importance to the regeneration of the Black Country, as they are the engines of the Black Country economy and comprise the hubs of the transport networks. They are in the most

- sustainable locations and are best-placed to provide all sections of the community with easy access to comparison shopping, leisure, entertainment and cultural facilities and office-based employment.
- 3.33 Much of the housing growth taking place up to 2039 will be concentrated into the Strategic Centres (and locations within the Core Regeneration Areas close to the Strategic Centres), providing an opportunity to enhance their sustainability and viability. Promoting the distinctive strengths and unique opportunities provided by each Strategic Centre will also help to encourage investment. The existing suite of Area Action Plans for Brierley Hill, West Bromwich, Walsall and Wolverhampton will be subject to an early review, to reflect the development targets and strategic objectives and policies within this Plan.
- 3.34 The Core Regeneration Areas broadly reflect the distribution of large parcels of employment land across the Black Country and accommodate the clear majority of manufacturing and logistics businesses and jobs. The backbone of this network is a system of sustainable transport routes (including rail, metro, bus and for walking and cycling) and the extensive canal system. The key characteristics of the Core Regeneration Areas are:
- a) recognised as priority locations for existing or programmed multi-agency public sector intervention;
  - b) existing or programmed multi-modal transport infrastructure as identified in Strategic Priority 10;
  - c) clusters of housing / employment development opportunities providing at least 500 homes or 50ha of employment land and / or major concentrations Strategic or Local Employment Areas of at least 100ha.
- 3.35 The Core Regeneration Areas represent an update of the network of Regeneration Corridors identified in the 2011 Core Strategy. These Regeneration Corridors served the Black Country well, providing a clear focus for concerted intervention and growth. The BCP took the opportunity to review the Regeneration Corridors in the light of more up-to-date information on the deliverability of previously allocated development opportunities, changing infrastructure priorities and to reflect where planned investment and growth has already taken place.
- 3.36 The strategy for the Core Regeneration Areas reflects two key issues arising from the evidence base – firstly, the need to provide for economic growth through the protection and enhancement of sustainable employment land and premises; and

secondly, delivering housing growth through the release of poor quality and underused land to support the ongoing regeneration of the Black Country.

3.37 Achieving the right balance of jobs and housing by 2039 is a key aim of the Spatial Strategy. The Black Country Economic Development Needs Assessment (EDNA) and Black Country Employment Area Review (BEAR) provide key evidence on demand and supply of employment land to 2039 and this work has directly informed the employment land and housing allocations in this Plan.

## Evidence

- Dudley, Sandwell, Walsall and Wolverhampton SHLAAs (2021)
- Black Country Urban Capacity Review Update (2021)
- Black Country Employment Areas Review (2021)
- Black Country Viability and Delivery Study (2021)
- Black Country Economic Development Needs Assessment (2017 and 2021)
- Strategic Transport Evidence
- Strategic Environmental Evidence

## Delivery

- Annual update of SHLAAs
- Dudley, Sandwell, Walsall and Wolverhampton Authority Monitoring Reports
- Review of Local Plans covering the four Strategic Centres
- Housing renewal will be delivered through local authority intervention
- Securing funding to facilitate delivery

## Working with key partners and delivery agencies Issues and Options Consultation Responses

3.38 Policy CSP2 is the equivalent of Policy CSP1 in the BCCS. Most respondents agreed that Policy CSP1 of the BCCS should be retained but it needed to be reviewed in the light of new evidence and reflect the location of the new sites allocated through the Plan.

## Towns and Neighbourhood Areas and the Green Belt

- 3.39 Policy CSP3 sets the strategic approach for the Towns and Neighbourhoods Areas and the Green Belt.

### **Policy CSP3 – Towns and Neighbourhood Areas and the green belt**

- 1) The areas outside the Strategic Centres and Regeneration Corridors will provide:**
  - a) A mix of good quality residential areas where people choose to live;**
  - b) 27,068 new homes through:**
    - i. A network of new Neighbourhood Growth Areas providing 6,792 homes, in highly sustainable locations on the edge of the Urban Area;**
    - ii. A limited supply of large-scale brownfield sites providing new homes within the urban area through the repurposing of redundant employment sites and other surplus land;**
    - iii. A supply of small-scale residential development opportunities;**
    - iv. Housing renewal areas;**
  - c) Clusters of Local Employment Land that provide an important source of land and premises to meet more localised business needs.**
  - d) 89ha of additional employment land to meet employment needs, of which 36ha will be provide on sites within Neighbourhood Growth Areas.**
  - e) An integrated and continuous (where possible) network of green infrastructure, walking and cycling routes, as well as a network of centres, health, leisure and community facilities;**
  - f) Strong and seamless links to regenerated areas in Core Regeneration Areas and Strategic Centres, via access and design improvements to spread regeneration benefits and ensure integration of existing and new communities;**
  - g) A defensible green belt to help promote urban renaissance within the urban area and that provides easy access to the countryside for local residents; with the landscape safeguarded and enhanced where**



## Policy CSP3 – Towns and Neighbourhood Areas and the green belt

**possible for its heritage, recreation, agricultural and nature conservation value.**

### Justification

- 3.40 The towns and Neighbourhoods Area form the majority of the built-up area of the Black Country and this is where most of its residents live.
- 3.41 As identified in Figure 2, these areas include housing and employment-led Neighbourhood Growth Areas, as well as a number of existing Local Employment Areas. They are supported by a range of town, district and local centres, as defined in Policy CEN1.
- 3.42 A key spatial priority of the Plan is to support the delivery of a constant supply of new housing development. A significant amount of new housing development will be accommodated in Towns and Neighbourhoods Areas.
- 3.43 These locations are intended to be places of choice for living, supported by sustainable access to job opportunities and a range of other services and facilities to meet the day to day needs of residents. They will provide housing choice for people, regardless of age and income, to help underpin the areas' economic competitiveness and support the working population.

### Housing renewal

- 3.44 An essential requirement of any strong and stable community is for residents to have access to decent and secure homes. In the past, significant housing market renewal and regeneration programmes have taken place across the Black Country to address poor quality housing and living environments.
- 3.45 These interventions have been successful, and there are now a limited number of areas where housing market intervention activity is likely to be targeted over the plan period. In particular, housing renewal, involving some demolition and rebuild, is being reviewed in parts of Dudley

### Neighbourhood Growth Areas

- 3.46 Neighbourhood Growth Areas (NGAs) are large sites, or clusters of smaller sites, which have been released from the green belt in sustainable locations on the edge of the urban area (as set out in the Site Assessment Report) for housing or employment development. The housing development NGAs provide at least 250 homes each, creating opportunities to deliver homes of various sizes, types and tenures to meet a variety of needs. The employment NGAs provide at least 36ha of land to provide for a range of investment requirements.
- 3.47 Neighbourhood Growth Areas have been allocated in a range of locations to provide a reasonable level of choice and to enable several sites to be developed simultaneously. This will help to sustain the rate of housing delivery needed across the Black Country to meet local requirements.
- 3.48 Given that the new development will generate the need for new infrastructure it is important that the individual sites (as defined in Policy CSP3) in each of the Neighbourhood Growth Areas are master-planned together, regardless of ownership. Phasing plans will be required that set out the triggers for the provision of required infrastructure and legal agreements will need to be put in place to deliver that infrastructure. Where appropriate, masterplans may be prepared through a collaborative process involving the landowner / developer(s) and the relevant BCA. The masterplanning and development requirements of these sites are set out in Chapter 13.

## Green belt

- 3.49 The Black Country is predominantly surrounded by open countryside on its northern, southern and western fringes. This is complemented by a network of green wedges and corridors which effectively bring the countryside and its landscape into the heart of the built-up area. Much of this is green belt and it provides a valuable contribution through a variety of uses. A strong green belt is critical to the Strategy in order to promote urban renaissance within the urban area and provide easy access to the countryside for local residents. The landscape, nature conservation and agricultural land will be protected and enhanced where practical and possible. Policies GB1 and GB2 provide a detailed policy framework for the Black Country Green Belt.

## Evidence

- Dudley, Sandwell, Walsall and Wolverhampton SHLAAs (2021)

- Black Country Urban Capacity Review Update (2021)
- Black Country Employment Areas Review (2021)
- Black Country Viability and Delivery Study (2021)
- Black Country Economic Development Needs Assessment (2017 and 2021)
- Strategic Transport Evidence
- Strategic Environmental Evidence

## Delivery

- Annual update of SHLAAs
- Dudley, Sandwell, Walsall and Wolverhampton Authority Monitoring Reports
- Black Country Plan Annual Monitoring Report
- Review of Local Plans covering the four strategic centres
- Housing renewal will be delivered through local authority intervention
- Securing funding to facilitate delivery
- Working with key partners and delivery agencies.

## Issues and Options Consultation Responses

3.50 Policy CSP3 is the equivalent of Policy CSP2 in the BCCS. Most respondents agreed that Policy CSP2 of the BCCS should be retained but it needed to be reviewed in the light of new evidence and reflect the location of the new sites allocated through the Plan.

## Placemaking – achieving well-designed places

3.51 The environmental transformation of the Black Country is one of the fundamental principles of the renaissance agenda. Placemaking and high-quality urban design are key mechanisms through which this transformation will be achieved

### Policy CSP4 - Achieving well-designed places

- 1) **The Black Country’s ongoing transformation will be supported by the development of places and buildings providing a range of functions, tenures, facilities, and services, intended to support the needs of diverse local communities. The design**

## **Policy CSP4 - Achieving well-designed places**

of spaces and buildings will be influenced by their context; development should enhance the unique attributes of the Black Country's character and heritage whilst responding to locally identified community needs, changes in society and cultural diversity.

- 2) Building designs will be sought that are appropriate to the Black Country, of a size, scale and type to integrate into their neighbourhood. Wherever possible, development proposals will employ sustainable modern technologies to help climate change mitigation and adaptation. The use of carbon-based products, energy and non-renewable resources will be minimised through the efficient design of buildings, choice of materials, layout and site orientation.
- 3) All development will be required to demonstrate a clear understanding of the historic character and local distinctiveness of its location and show how proposals make a positive contribution to Black Country place-making and environmental improvement.
- 4) The Black Country will move through a permeable street network that gives maximum freedom of movement and a choice of means of transport, including ongoing support for the provision and extension of walking and cycling infrastructure. To facilitate this, transport proposals of a high design quality and utility will be sought. These should, among other aspects, include connections to and between transport hubs, ensure that interventions make a positive contribution to place-making and increase accessibility and connectivity.
- 5) The Black Country will be a safe and secure place to live and work in, through organising the urban environment in ways that encourage people to act in a civil and responsible manner. Development proposals will be required to provide active frontages, well-located, safe and accessible pedestrian and cycle infrastructure and an appropriate intensity of use in centres and elsewhere. Designs should promote natural surveillance and defensible spaces.
- 6) An integrated and well-connected multifunctional open space network will be pursued throughout the Black Country, including through the design and layout of new residential and employment developments. This will deliver opportunities for sport and recreation and will help establish and support a strong natural

## Policy CSP4 - Achieving well-designed places

**environment. Properly designed and well-located open spaces will help mitigate flood risk, provide space for wildlife and encourage informal recreation for local people**

- 7) The protection and enhancement of the Black Country's historic canal network and the area's natural waterways will be sought wherever possible through the design and layout of appropriately located housing and employment development and wherever possible by the integration of waterways into those proposals to create attractive waterside development. This will act as a unifying characteristic within the Black Country's urban structure and landscape.**

### Justification

- 3.52 The aim of the Black Country Plan is to create the conditions for economic and social growth, which will take place within a safe, attractive and accessible built and natural environment. The BCP also encourages and supports the growth of locations that encourage participation and community engagement. Successful placemaking in the Black Country will foster community stability and incorporate elements that create resilience to adverse economic and environmental impacts. The Black Country enjoys a unique heritage, reflected in its urban structure, which requires a sensitive approach to place-making and an insistence on a high quality of design for proposals that affect the historic built and natural environment.
- 3.53 Vibrant streets and spaces, defined by surrounding buildings and with their own distinct character, will provide the framework for a coherent and interconnected network of places. These will support ease of movement, social interaction and a sense of personal wellbeing, and will display a clear hierarchy of private, commercial and civic functions
- 3.54 The Black Country's hierarchy of centres will provide a focus and concentration for essential local services and activities with easy access by walking, cycling and public transport to residential areas, as detailed in policies in the Centres and Transport Chapters and Policy HOU2 – Housing Density, Type and Accessibility. Its diverse, accessible, affordable and active villages, towns and neighbourhoods will encourage commercial activity, promote prosperity and support the well-being of the area's inhabitants.

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- 3.55 The importance of high-quality design in creating places where people want to live, work and invest with renewed confidence is a fundamental plank of both national and local policy. The Government have published national design guidance<sup>3</sup> that supports paragraph 130 of the National Planning Policy Framework (2019), which states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
- 3.56 The opportunity exists to transform the Black Country's strategic centres and core regeneration areas into distinctive places that provide a good quality of life for all who live in, work in and visit them. Investment in high-quality places will result in environmental, economic and social benefits, including community safety, health and well-being, inclusive communities, better public services, environmental sustainability, climate resilience, greater financial value of buildings and improved worklessness. Creating a higher quality of life for the Black Country's communities depends on many factors and will play an increasingly important role in attracting private sector investment and skilled workers.
- 3.57 The importance of high-quality design and place-making is central to the ambitions of the Local Enterprise Partnership and WMCA. The Black Country Garden City concept was launched by the LEP in 2017 and seeks to utilise existing green, cultural and economic assets to develop attractive places where people want to live, transforming the reality and perception of the Black Country, The West Midlands Design Charter, launched by WMCA in 2020, confirms the commitment of the West Midlands region as a place to drive design innovation and creativity. The Charter aims to secure high-quality design in housing, civic architecture, urban spaces, parks and transport infrastructure. The key themes from the Black Country Garden City concept and Regional Design Charter are reflected in Policy CSP4.
- 3.58 The BCA have long recognised the potential of public art to enhance the design of new development and have sought the provision of public art on new developments for many years. Public art can be free-standing or incorporated within the overall quality and design of buildings and landscaping and can involve the engagement of

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<sup>3</sup> <https://www.gov.uk/government/publications/national-design-guide>

local artists. Thresholds for eligible development and the value of contributions will be set out in Local Development Documents.

## Evidence

- HLC Report (2019)
- Art in the Public Realm Strategy & Action Plan 2020 – 2025
- Black Country Garden City Prospectus 2015
- West Midlands Design Charter 2020

## Delivery

- DM, legal and funding mechanisms.

## Issues and Options Consultation Responses

3.59 The proposed retention of an updated version of Black Country Core Strategy Policy CSP4: Place-Making was broadly supported.

## Cultural Facilities and the Visitor Economy

3.60 The Vision for the Black Country involves the delivery of transformational change whilst respecting and promoting the area's unique heritage. The protection, promotion and expansion of existing cultural facilities, visitor attractions and associated activities will ensure their role as key economic drivers stimulating and regenerating the local economy is supported and enhanced, in line with Strategic Priority 9.

3.61 As well as contributing directly to the Black Country's economy, the visitor economy generates additional demand and growth in supporting services and facilities, which will also benefit residents and businesses.

### Policy CSP5 - Cultural Facilities and the Visitor Economy

#### Development proposals

- 1) **Major cultural, tourist and leisure facilities within the Black Country will be protected, enhanced and expanded (where appropriate) in partnership with key delivery partners and stakeholders.**

## **Policy CSP5 - Cultural Facilities and the Visitor Economy**

- 2) Proposals for new development or uses that contribute to the attractiveness of the Black Country as a visitor destination will be supported in principle, subject to national guidance and policy requirements elsewhere in this Plan.**
- 3) Proposals for new or expanded facilities or uses should: -**
  - i. be of a high-quality design,**
  - ii. be highly accessible, particularly within centres,**
  - iii. not adversely impact on residential amenity or the operation of existing businesses,**
  - iv. be designed to be flexible, adaptable, and where possible be capable of alternative or community use.**
- 4) Well-designed and accessible ancillary facilities will be supported in appropriate locations. Additional facilities that support the visitor economy and business tourism sectors<sup>4</sup> will be encouraged and promoted within centres, in line with policies CEN1 - CEN4**
- 5) Development that would lead to the loss of an existing cultural / tourism facility in the Black Country will be resisted unless:**
  - i. the intention is to replace it with a facility that will provide an improved cultural or tourist offer; or,**
  - ii. it can be demonstrated that there would be significant benefits to the local and wider community in removing the use and / or redeveloping the site.**

### **The Visitor Economy**

- 6) Improvement and further development of visitor attractions will be supported where appropriate, to ensure that accessibility is maximised and to continue to raise the quality of the visitor experience throughout the Black Country. This can be achieved by: -**
  - i. enhancing / extending current attractions,**

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<sup>4</sup> This will include the provision of hotels and other accommodation with strong links to key destinations and associated facilities.



## Policy CSP5 - Cultural Facilities and the Visitor Economy

- ii. providing inclusive access, particularly within centres,
  - iii. enhancing the visitor experience, and
  - iv. delivering necessary infrastructure.
- 7) Links should be made to centres and those parts of the Black Country and beyond that are well-connected by public transport, considering the needs of business as well as leisure visitors, to encourage more local use of cultural and tourist attractions.
- 8) The canal network is also a significant visitor attraction for the Black Country, providing waterway links to Birmingham, Staffordshire, Worcestershire and beyond. Facilities adjoining and serving the canal network should be maintained and expanded to help provide a network of linked amenities and visitor hubs (see also Policy ENV7 - Canals).
- 9) Physical and promotional links to visitor attractions close to the Black Country will be enhanced and encouraged, particularly in relation to Birmingham as a Global City and a business economy destination.

### Cultural facilities and events

- 10) The Black Country has a significant cultural history of performance art, especially in relation to live music. To ensure it remains a fertile and thriving location for associated cultural and economic growth opportunities, the retention and protection of venues providing performance spaces, recording facilities and practice amenities will be sought. The provision of new venues and facilities will also be welcomed and supported, particularly within centres.
- 11) In cases where adjacent new development would prejudice the ongoing operation of a successful cultural / performance venue, the “agents of change” principle will be applied<sup>5</sup>. This will protect the amenities of incoming residents while at the same time it will preserve and protect the existing adjacent use / activity.

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<sup>5</sup> This requires the new or incoming development to mitigate and protect its incoming residents and uses against any potential impacts from the extant activities in adjacent properties.

## Policy CSP5 - Cultural Facilities and the Visitor Economy

**12) The promotion and protection of attractions and events that represent and celebrate the wide cultural and ethnic diversity across the Black Country will be encouraged, including spectator sports such as football and other activities. This will include the protection of valuable cultural and religious buildings and the promotion of cultural, religious and community festivals on a Black Country-wide basis in a range of suitable locations.**

### Justification

3.62 The Black Country has a unique past, having been at the forefront of the Industrial Revolution, which left a rich and varied industrial and cultural legacy as well as an extensive and historically significant canal network. The area's bygone industrial activity and its geological richness is also reflected in a distinctive natural and built topography, consisting of small villages and settlements that retain their individual characteristics (see policy ENV5 and supporting evidence for further details). There are other areas where attractions and facilities are clustered due to their industrial heritage or cultural value (e.g. the Glass Quarter at Stourbridge).

3.63 In addition, the Black Country contains one of the world's few urban geoparks, identified by UNESCO as a single, unified geographical area where sites and landscapes of international geological significance are located (Policy ENV6).

3.64 These assets are attracting an increasing number of visitors to the sub-region and the visitor economy is a key growth sector. Business tourism is also a growing sector, particularly in terms of high-quality hotel and conferencing facilities and the proximity of the Black Country to Birmingham, a global business destination.

3.65 The range and diversity of cultural and tourist assets in the Black Country include a historic built environment, museums and art galleries, markets, music venues and theatres, which are often part of town and city centres; parks and open spaces; and high-level sporting venues. These include, but are not limited to, the following venues and locations: -

- a) Dudley Zoo and Castle
- b) The Black Country Living Museum including Dudley Canal and Caverns
- c) Wren's Nest National Nature Reserve and Limestone Caverns

- 
- d) Walsall Art Gallery and heritage attractions centred on the leather industry
  - e) Wolverhampton Art Gallery
  - f) Wolverhampton's Grand Theatre
  - g) The Civic Hall and Wulfrun Hall concert venues in Wolverhampton city centre
  - h) Dunstall Park Race Course in Wolverhampton
  - i) Sandwell Valley and Park Farm (a working farm and country park with archaeological interest)
  - j) Sandwell Aquatics Centre
  - k) Bescot stadium – home of Walsall FC
  - l) The Hawthorns stadium – home of West Bromwich Albion FC
  - m) Molineux stadium – home of Wolverhampton Wanderers FC
  - n) The strategic centres of Brierley Hill, Walsall, West Bromwich and Wolverhampton and the town centre of Dudley
- 3.66 Over recent years, a significant amount of investment has been made at key visitor attractions, particularly associated with Dudley Town Centre such as Dudley Castle and Zoological Gardens, and the Black Country Living Museum. Such investment has increased the visitor offer. Dudley Castle, Dudley Zoological Gardens, the Black Country Living Museum and the Dudley Canal & Tunnel Trust jointly attract some 700,000 visitors per year, with an aspiration to increase visitor numbers to one million by 2023.
- 3.67 Dudley also commissioned a report by Research Solution called *Economic Impact of Tourism in Dudley Borough in 2017*, which identified some of the direct and indirect economic benefits of its attractions.
- 3.68 The sensitive development of heritage and cultural facilities appealing to the very diverse range of local communities will also contribute to social inclusion and the improvement in the quality of life for all sectors of the local population. Culture is also recognised by national government as making a significant contribution to 'place making' and delivering sustainable communities.
- 3.69 The nature and often the scale of cultural festivals and entertainment events may mean that they will be best delivered at an open-air location. In the Black Country, such sites are likely to include (but are not limited to) key outdoor venues such as

West Park, Wolverhampton, Sandwell Valley and Walsall Arboretum. Suitable locations for outdoor events will have appropriate levels of infrastructure, car parking and accessibility to local travel networks and use of them for events and activities should be in accordance with the other policies of this plan and wider legislation and guidance.

3.70 Canals are a significant part of the heritage of the Black Country and form an integral part of both its cultural history and its attraction for tourists; locations include:

- Walsall Waterfront and Strategic Centre;
- Wolverhampton Strategic Centre Canalside Quarter;
- Brierley Hill Waterfront and Canal corridor;
- Galton Valley Canal Heritage Area, Smethwick;
- Bumble Hole and Warrens Hall Park on the Sandwell / Dudley border at Netherton / Tividale;
- Dudley Canal Tunnels, limestone caverns and the Black Country Living Museum;
- Stourbridge Arm and Wharf area.

### Evidence

- Economic Impact of Tourism in Dudley Borough in 2017
- West Midlands Regional Tourism Strategy 2019-29 (2019)

### Delivery

- Planning permission
- Promotion of visitor attractions in association with Economic Development Partners in the Black Country, Birmingham and surrounding areas to promote and link cultural and tourism assets in the Black Country.

### Issues and Options Consultation Responses

3.71 There was consensus that the approach to identifying key cultural and visitor facilities as set out in BCCS Policy EMP6 should be retained and updated to reflect current priorities

## Green Belt

- 3.72 Green Belts are identified and designated to prevent urban sprawl by keeping land permanently open. The essential characteristics of green belts are their openness and their permanence. The Black Country Green Belt and its detailed boundaries are identified on the Policies Map.
- 3.73 The green belt is a policy tool that aims to prevent inappropriate development within designated areas. The following policies respond to local circumstances and provide clarity and interpretation of several of the terms set out in the NPPF.
- 3.74 The protection of the green belt, whilst ensuring the provision of sufficient land to provide for sustainable housing and economic growth, is a key aspect of the Vision and the overarching Strategic Priority of development in the appropriate and most sustainable locations whilst protecting the most vulnerable assets. The policy ensures the delivery of:
- a) Strategic Priorities 1, 3, 4, 5, 6, 7, 8, 10, 11 and 12:  
and the following Objectives (see Table 1);
  - b) Climate Change;
  - c) Housing that meets all our needs;
  - d) Improving the health and wellbeing of residents and promoting social inclusion;
  - e) Ensuring a strong, stable and inclusive economy;
  - f) Promoting sustainable transport and active travel and
  - g) Transforming our natural and built environment.

### Policy GB1 – The Black Country Green Belt

- 1) **The boundary of the Black Country Green Belt (within the four Black Country authorities of City of Wolverhampton, Dudley, Sandwell, and Walsall) is as defined on the Policies Map for each authority.**
- 2) **For sites that are removed from the Black Country Green Belt and allocated to meet housing, employment, or other needs through this Plan (as listed in Chapter 13):**

### Policy GB1 – The Black Country Green Belt

- a. **the design of development will include physical features that define the new green belt boundary in a readily recognisable and permanent way; and**
  - b. **compensatory improvements to the environmental quality, biodiversity and accessibility of remaining green belt land will be secured to offset the impact of removing the land from the green belt, in accordance with national policy.**
- 3) **The Black Country Green Belt will be preserved from inappropriate development so that it continues to maintain its openness and serve its key functions.**
  - 4) **Opportunities will be taken to enhance the value and function of the green belt, including through improving footpath and cycleway networks, and retaining and enhancing landscapes, visual amenity, biodiversity and protecting tranquil areas.**

### Justification

- 3.75 Through the preparation of this Plan, exceptional circumstances have been demonstrated to remove certain areas of land from the Black Country Green Belt to meet housing and employment land needs. Housing and employment allocations made in such areas are called “sites removed from the green belt” throughout the BCP and are listed in Chapter 13.
- 3.76 Where land has been removed from the green belt, a new defensible green belt boundary has been defined that, where possible, follows physical features such as hedgerows, woodlands, rail lines and roads that are readily recognisable and likely to be permanent. The new green belt boundary remains a robust, defensible demarcation between the open countryside and urban areas and settlements.
- 3.77 To ensure the Black Country Green Belt continues to serve its key functions, it will be protected from inappropriate development. When considering any planning application, substantial weight will be given to any harm to the green belt. inappropriate development is, by definition, harmful to the green belt and should not be approved, except in very special circumstances, where the potential harm to the

green belt is clearly outweighed by other considerations. In line with the requirements of the NPPF, compensatory improvements will be required to the environmental quality and accessibility of remaining green belt land to offset the impact of removing land from the green belt. These will be set out in future Development Plan Documents / master plans or assessed on a site by site basis. These may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies, and could for instance include:

- a) new or enhanced green infrastructure;
- b) woodland planting;
- c) landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
- d) improvements to biodiversity, habitat connectivity and natural capital;
- e) new or enhanced walking and cycle routes; and
- f) improved access to new, enhanced or existing recreational and playing field provision.
- g) linking up areas of woodland, wildlife corridors and footpath network

## **Policy GB2 – Extensions and Replacement Buildings in the Green Belt**

- 1) When considering proposals for proposed alterations and additions to buildings within the green belt, in addition to the relevant provisions of the NPPF, regard should be had to the following considerations:**
  - a) Within the Black Country a number of commercial, educational and community uses that provide local employment opportunities or important community facilities are located in the green belt. To allow for their continued operation, limited, small-scale development will be permitted providing the following criteria are met:**
    - (1) Proposals for redeveloping existing uses within the green belt will only be permitted if very special circumstances can be demonstrated or the proposal meets the criteria set out in national planning policy.**

## Policy GB2 – Extensions and Replacement Buildings in the Green Belt

- (2) Extensions to buildings or new freestanding buildings within an existing developed site and extensions or alterations to existing dwellings may be appropriate where:**
- i. Extensions are not disproportionately over and above the size of the existing building(s) as originally constructed;**
  - ii. The scale, materials and general design are in keeping with the character of the buildings and their surroundings; and**
  - iii. It does not lead to a major increase in the developed proportion of the site.**

### Justification

- 3.78 The BCA recognise that the space needs of community and commercial uses can change and evolve over time and some activities may require additional space. In order to remain in their current premises and to support a thriving community and economy, facilities currently located in the green belt may need to extend or alter their current operational buildings.
- 3.79 To ensure the openness of the green belt is maintained, any extensions or alterations to buildings in it must not result in additions that are disproportionately over and above the size of the original building. For all non-residential buildings, the 'original building' is taken to be a building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally.
- 3.80 Proposals for extensions to residential properties in the green belt should also not normally represent a disproportionate addition to the volume of the original dwelling. A statement of very special circumstances will be required if the extension is considered to be materially larger than the original building.
- 3.81 Large parts of the green belt are also identified as being of significant historic landscape character and the BCA will expect particularly high-quality design and materials in such locations, in line with Policy ENV4.



## Evidence

- Black Country Green Belt Study (2019)
- Black Country Landscape Sensitivity Assessment (2019)

## Delivery

- Through development management and master plans for strategic allocations.

## Issues and Options Consultation Responses

3.82 Through representations to the Issues and Options consultation it was made clear that the importance of the green belt in the Black Country should be recognised.

3.83 There were also representations which noted the need for the BCA to undertake a comprehensive green belt review to inform the Black Country Plan review, and those that considered that changes to the green belt boundary would be needed to accommodate the necessary growth

## Monitoring

Policy	Indicator	Target
CSP1, CSP2, CSP3	Delivery of net new homes by location, as set out in Policies CSP1, CSP2 and CSP3 and Tables 3 and 4.  Delivery of employment land development by location, as set out in Policies CSP1, CSP2 and CSP3	
CSP4	Investment in the venues and locations listed in paragraph 3.65.	Evidence of capital spending at all venues and locations.
GB2	Amount (ha) of green belt with planning permission for inappropriate development each year	Zero

## 4 Infrastructure & Delivery

### Introduction

- 4.1 A key role of the Black Country Plan is to plan for the growth required for a sustainable and prosperous Black Country. The Black Country is planning to accommodate 47,837 new houses and 355 hectares of new employment land up to 2039. Ensuring effective delivery of this amount of development will require strong collaborative working, both between the local authorities and jointly with public, private and third sector partners, involving a robust process of infrastructure planning and delivery.
- 4.2 The provision of appropriate infrastructure in a timely manner underpins the transformational and regeneration strategy of the BCP and these policies are intended to ensure the delivery of all spatial priorities.
- 4.3 The National Planning Policy Framework highlights that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. It requires planning policies and decisions to support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. The expansion of these networks in the Black Country will support the vision and spatial strategy of the Plan by supporting economic growth and sustainable development.

### Delivery Constraints

- 4.4 Physical and social infrastructure is necessary to enable and support the growth required over the Plan period. New housing and economic development will put pressure on existing services and utilities but may also create opportunities to provide robust and innovative infrastructure solutions.
- 4.5 The BCP is supported by an Infrastructure Delivery Plan (IDP), which draws upon a range of evidence including transport modelling, a Utilities Infrastructure Capacity Study, a Water Cycle Study, and a Viability and Delivery Study. This evidence underpins the BCP by identifying infrastructure investment required to support development, potential constraints to delivery and the key delivery mechanisms and partners. Masterplans will be produced to support the delivery of some Strategic Allocations.

- 4.6 The BCP adopts a brownfield-first approach to maximise delivery of development within the urban area; however, poor ground conditions that are a legacy of the Black Country's mining and industrial past are a significant constraint, in both physical and financial terms. Therefore, tackling significant and structural delivery constraints are a priority for interventions, as they affect much of the development land supply in the urban area. The BCA are working in partnership to ensure that brownfield land is prioritised for development and intervention, in particular through partnership with the West Midlands Combined Authority and Black Country LEP.
- 4.7 Where valuable mineral resources are present, and it is viable to extract them as part of a remediation scheme, this may also help offset the costs.
- 4.8 The BCP also allocates sites on the fringe of the urban area, which have been removed from the green belt. Most of these sites are greenfield and will be easier and quicker to deliver than sites within the urban area. However, some of these sites are significant in size and need to be supported by a range of new infrastructure, such as schools, shops and improved local transport infrastructure.

### Transport and Access to Residential Services

- 4.9 Parts of the Black Country's existing highway infrastructure, and the motorway network, suffer from congestion. Detailed transport modelling work is ongoing, and this evidence will be available to inform the Publication BCP. Assuming that proposals for improved public transport, walking and cycling are delivered, it is not anticipated that the development of new housing and employment land will have a significant additional impact.
- 4.10 Most new housing development in the urban area will enjoy good accessibility, including to sustainable modes of transport, centres of employment, schools, shops, health facilities and other residential services. This should help to reduce the requirement for additional travel and will also help mitigate the impact of development. New development on sites removed from the green belt will require careful consideration in terms of the sustainability and transport improvements that may be required on and off site.
- 4.11 Infrastructure investment will be required to support development, including: -
- public open space,
  - transport provision,

- school places,
- health facilities,
- affordable housing,
- sustainable drainage systems,
- wastewater treatment
- waste management.

These requirements are relatively limited in terms of both cost and extent and are unlikely to prevent development from going ahead, as evidenced by the Viability and Delivery Study.

- 4.12 Major changes may be required to the way that the Black Country is powered over the Plan period, together with an increasing reliance on digital solutions. Where gaps in service provision exist, service providers are aware of them and will work to address them, as set out in the Infrastructure Delivery Plan.
- 4.13 The detailed spatial aspects of implementation and delivery for the four Strategic Centres will be set out within the additional Development Plan Documents (DPDs) identified in each authority's Local Development Scheme.

### **Economic activity**

- 4.14 As identified in the Economic Development Needs Assessment (EDNA), the Black Country comprises a clearly defined functional economic market area (FEMA) with strong employment and labour market links to a hinterland with Birmingham and South Staffordshire districts in particular. It is a fast-growing functional economy and has the capacity to deliver significant growth, given the diversity, resilience and concentration of key national sectors located in the area. However, skills challenges are holding it back.
- 4.15 Economic development strategies including the Strategic Economic Plan (SEP) and Local Industrial Strategy seek to address these challenges to accelerate the growth of the local economy and there are major investment plans in the Black Country – including for the transport infrastructure crucial to meeting the ambitions in the West Midlands Strategic Economic Plans.
- 4.16 Key plans include:
- HS2 with its wider links into the region

- 
- Wolverhampton railway station and Metro interchange.
  - Wednesbury to Brierley Hill Rapid Transport
- 4.17 Considerable investment is taking place in the Black Country including working with the West Midlands Combined Authority. Some key projects that will take place over the life of the BCP include:
- West Midlands interchange at Four Ashes
  - Expansion of I54
  - DY5 Dudley enterprise zone
  - Dudley and West Bromwich town centres - regeneration and investment activity
  - Springfield Campus 2 Wolverhampton
  - M54 - M6/ M6 toll link improving east-west connections to the north of the Black Country
- 4.18 Many of these projects are/ will benefit from funds such as:
- Brownfield Housing Fund
  - Local Growth Fund
  - Urban transport investment (five-year) transport settlements
  - Midlands Rail Hub proposals
- 4.19 Other infrastructure likely to impact the Black Country before and during the plan period are:
- The rollout of a fast-charging network for electric vehicles, ensuring that drivers will never be further than 30 miles from a rapid charging station;
  - 5G rollout.

## Planning Obligations

- 4.20 Planning obligations currently deliver local infrastructure improvements necessary to mitigate the impact of development on the local area. Examples include affordable housing provision, access improvements, open space and residential services.

- 4.21 Financial viability has always impacted on the extent of planning obligations that can be secured in the Black Country, particularly in areas suffering from poor ground conditions. The BCP will be introducing requirements for sustainable design and to adapt to and mitigate against climate change. Viability impacts will vary according to the size, type and location of the sites involved. It is expected that greenfield sites and most brownfield sites will be able to sustain the full range of planning obligations required, as evidenced by the Viability and Delivery Study.
- 4.22 The Community Infrastructure Levy provides opportunities for local authorities to generate contributions for local and sub-regional infrastructure through a levy on a wide range of developments. This can present opportunities to provide a range of infrastructure currently beyond the scope of planning obligations. Sandwell MBC and Dudley MBC have both adopted CIL charging regimes,

### Infrastructure Provision

- 4.23 The following policy sets out how the BCA will secure infrastructure provision from future planned development. It also sets out the requirement for viability evidence where, in exceptional circumstances, proposals are unable to comply with the policies of the BCP.

#### Policy DEL1 – Infrastructure Provision

- 1) **All new developments should be supported by the necessary on and off-site infrastructure to serve its needs, mitigate its impacts on the environment and the local community and ensure that it is sustainable and contributes to the proper planning of the wider area.**
- 2) **Unless material circumstances or considerations indicate otherwise, development proposals will only be permitted if all necessary infrastructure improvements, mitigation measures and sustainable design requirements and proposals are provided and /or can be phased to support the requirements of the proposed development. These will be secured through planning obligations, the Community Infrastructure Levy, planning conditions or other relevant means or mechanisms, to an appropriate timetable that is prioritised, resourced, managed, delivered and co-ordinated across the sub-region, where appropriate.**

## Policy DEL1 – Infrastructure Provision

- 3) **The BCA will set out in Development Plan Documents, Infrastructure Delivery Plans, Supplementary Planning Documents, and where appropriate, masterplans:**
  - a. **The infrastructure that is to be provided or supported;**
  - b. **The prioritisation of and resources for infrastructure provision;**
  - c. **The scale and form of obligation or levy to be applied to each type of infrastructure;**
  - d. **Guidance for integration with adjoining local authority areas;**
  - e. **The procedure for maintenance payments and charges for preparing agreements;**
  - f. **The defined circumstances and procedure for negotiation regarding infrastructure provision.**
- 4) **The BCP has been subject to a Viability Assessment to ensure the policies are deliverable. In the exceptional circumstances where site-specific issues generate viability concerns, applicants should discuss these with the relevant Council at the earliest possible stage in the development process.**
- 5) **Proposals that are unable to comply with BCP policies on viability grounds must be accompanied by a detailed Financial Viability Assessment.**

## Justification

- 4.24 The scale of growth proposed in the Black Country Plan will have significant impacts on the local environment and the capacity of a range of infrastructure and facilities. It is important that the appropriate investment takes place to ensure, future development is sustainable. The definition of infrastructure in this context is wide, including: -
- a. affordable housing;
  - b. renewable energy;
  - c. publicly accessible open space;
  - d. sustainable drainage;

- e. sport and recreational facilities;
- f. air quality mitigation measures; and
- g. residential services<sup>6</sup>;

for which overall targets and standards are set in the BCP. There will also be locally specified requirements, such as crime prevention measures, and cross-boundary requirements, such as waste water management. Impacts on the environment can include loss of open space or wildlife habitat, which must be mitigated.

- 4.25 These requirements are set out in the appropriate sections of the BCP and in other Development Plan Documents and Supplementary Planning Documents for the BCA. Policy requirements set out in the BCP have been subject to a proportionate assessment of viability to ensure that those requirements are realistic, and the cost of meeting the needs of relevant policies will not undermine the deliverability of the Plan.
- 4.26 Each development proposal must address its own impacts through on-site and off-site provision or enhancements, secured through planning obligations or other relevant means.
- 4.27 Where the combined impact of several developments creates the need for infrastructure, it may be necessary for developer contributions to be pooled to allow the infrastructure to be secured in a fair and equitable way. Pooling may take place both between developments and also between local authorities where there is a cross-authority impact.

## Evidence

- Black Country Utilities Infrastructure Capacity Study (2019)
- Black Country Viability and Delivery Study (2021)
- Black Country Infrastructure Delivery Plan (2021)
- Infrastructure Funding Statements for the Black Country Authorities

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<sup>6</sup> Residential services refer to four priority services identified under Policy HOU2: Housing Density, Type and Accessibility and relates to access to employment, health services, fresh food retailing, and education services by sustainable transport means.



## Delivery

- Through DPDs and SPDs for various types of infrastructure and planning obligations.
- Investment will be sought through negotiations as part of the Development Management process.

## Issues and Options - Responses

- 4.28 Respondents had divided views on the level of detail needed on proposed urban extensions in the plan but there was overall agreement to address infrastructure requirements and to review the needs of each area based on its size and location.
- 4.29 For both housing and industry, consideration needs to be given to providing sites in areas with good, sustainable public transport links to meet communities' needs.

## Balance between employment land and housing

- 4.30 New housing and employment developments on previously developed land not allocated for these uses can make an important and positive contribution towards meeting future development needs. The following policy sets out the approach for assessing windfall employment and housing developments, ensuring they are located in suitable and sustainable locations. Such development proposals will also need to consider the Plan's other relevant development management policies, such as HW1 – Health and Wellbeing and ENV9 – Design Quality.

### Policy DEL2 – Balance between employment land and housing

- 1) **Development of housing or employment (E(g) (ii) (iii), B2 or B8 class uses) on previously developed land that is not allocated for these uses (“windfall sites”) will be permitted where the proposal accords with other BCP and local plan policies and strategic priorities, and subject to meeting all the following criteria:**
  - a. **They are in sustainable locations that are suitable for the proposed use;**
  - b. **They demonstrate a comprehensive approach, by making best use of available land and infrastructure;**

## Policy DEL2 – Balance between employment land and housing

- c. Incremental development will only be allowed where it would not prejudice the master-planning of the wider area;**
- d. Proposals for new development must take account of existing adjacent activities where the proposed development could have an adverse effect on or be affected by neighbouring uses. Mitigation of the impact of noise and other potential nuisances will need to be demonstrated.**

### Justification

- 4.31 Locating the right development in the right place ensures that proposals are sustainable, have a positive relationship with the surrounding area and uses and integrate well with and complement the character of their location.
- 4.32 Policies HOU1 and EMP1 allocate sites for residential and employment uses based on the anticipated availability of land for development at the time of the preparation of the Plan. However, there will always be windfall sites put forward for development in areas where it is not currently anticipated, and it is important that such development is brought forward in a comprehensive way.
- 4.33 Existing businesses wanting to grow should not have unreasonable restrictions put on them because of a change in nearby land uses since they were established. Therefore, new developments will need to reflect the 'agent of change' principle by proving that the person or business responsible for the proposed new development / change is responsible for managing the impact of that change in relation to noise and other potential nuisances generated by existing land uses in the vicinity. Similarly, where an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant will need to provide mitigation before the development has been completed.

### Evidence

- Black Country Employment Area Review (BEAR)

### Delivery

- Through the Development Management process.

## Issues and Options Consultation Responses

4.34 There were no consultation responses referring to this issue.

### Promotion of Fibre to the Premises and 5G Networks

4.35 Planning policy can play an important role in helping to address the key digital connectivity infrastructure needs of the Black Country. The following policy sets out proposals for ensuring the provision of full fibre broadband connectivity is considered in all new major development proposals. It also sets out the approach for supporting and assessing 5G Network infrastructure proposals.

#### Policy DEL3 – Promotion of Fibre to the Premises and 5G Networks

##### Fibre to the Premise

- 1) **Fibre to the Premises (FTTP) is essential infrastructure and is vital to the delivery of sustainable development. All major developments that provide ten or more new homes or more than 1,000 sqm of non-residential floorspace will be required to deliver FTTP capacity / infrastructure to all individual properties. This requirement will only be reduced where it can be clearly demonstrated that it is not practical or viable to deliver FTTP.**
- 2) **Where FTTP cannot be delivered, non-Next Generation Access technologies that can provide speeds in excess of 30MB per second should be provided as an alternative.**
- 3) **All eligible proposals should be supported by an FTTP Statement that details how FTTP will be provided to serve the development and confirms that FTTP will be available at first occupation.**

##### 5G Networks

- 4) **Any proposals for infrastructure to support the delivery of 5G networks will be supported in principle, subject to meeting the requirements of other local policies and national guidance.**
- 5) **Proposals should be sensitively sited and designed to minimise impacts on the environment, amenity, and character of the surrounding area. Proposals should not have an adverse impact on areas of ecological interest, areas of**

## Policy DEL3 – Promotion of Fibre to the Premises and 5G Networks

**landscape importance, heritage assets or conservation areas. Proposals should demonstrate that proper regard has been given to location and landscaping requirements, including the potential for innovative solutions complementary to the immediate surroundings.**

- 6) Operators proposing 5G network infrastructure are strongly recommended to enter into early discussions with the relevant local planning authority.**

### Justification

#### Fibre to the Premises

- 4.36 Full fibre broadband is the future of connectivity and increases speeds from the 30 MB available for superfast broadband to 1000 MB (1GB). Currently full fibre coverage is very low across the Black Country – 0.6% in Dudley, 0.7% in Wolverhampton, 2.1% in Sandwell and 8.1% in Walsall, compared to 11.5% across England. Full fibre is required to meet future demands for connectivity, as highlighted by a 50% increase in demand each year, and to recognise the wider economic, health and service delivery benefits.
- 4.37 At the local level, the availability, reliability and speed of broadband provision is a key consideration for house buyers and many view it to be as essential as more traditional utilities. Similarly, it is also a key concern in the public health and business sectors. However, despite the obvious benefits to developers and end-users, full fibre is not always provided in new residential and commercial properties.
- 4.38 Planning policy can play a role in helping to achieve the necessary transformation in broadband connectivity. The NPPF clearly recognises this and supports the delivery of advanced, high quality communications infrastructure and the expansion of high-speed broadband where possible.
- 4.39 The Black Country authorities are committed to supporting the rollout of digital infrastructure for the future. Wolverhampton’s Digital Infrastructure Strategy supports both the rollout of full fibre broadband and wireless connectivity including 5G. The BCA have each nominated a Digital Infrastructure Champion and Co-

- ordinator to drive this agenda forward and are working together as part of the WM5G Digital Forum to support the rollout of future proofed digital infrastructure.
- 4.40 Currently most properties in the Black Country are connected to superfast broadband (fibre to the cabinet and copper to the premises with speeds up to 30 MB) but the future is full fibre (fibre to the premises with speeds up to 1GB). Fibre to the premises (FTTP) is recognised by the Government as a Next Generation Access (NGA) technology<sup>7</sup> and as a priority for investment. While superfast speeds can be achieved on current generation copper networks, it is widely accepted that NGA technologies should be prioritised.
- 4.41 The Government has committed to gigabit-capable broadband by 2025 and it is the aspiration of the Black Country authorities to support rollout of full fibre across the Black Country as soon as possible. As part of the WM5G work, an options appraisal case is being pulled together around full fibre. By seeking FTTP, the BCA are aiming to provide a futureproof solution for broadband delivery within the Black Country. Adopting this approach will prevent the need for fibre retrofitting programmes in the future, which have significant cost implications and cause considerable disruption through road works.
- 4.42 To help deliver this aspiration, Policy DEL3 requires developers to ensure FTTP is available at every new property on all major developments, except in the limited cases where this is not practical or viable. Both on sites within the urban area and on green belt release sites, the cost of installing FTTP in the build phase of new developments is neutral or relatively small. On larger sites (around 25 or more homes) the provider will generally meet the cost voluntarily, with a contribution requested on smaller sites. Any costs to the developer could be balanced by increased sales values generated by fast and reliable broadband being available. The Viability and Delivery Study has concluded that FTTP is not costly for developers to provide and is unlikely to affect development viability.
- 4.43 By implementing this policy approach, the Black Country authorities are seeking to ensure that future developments remain at the forefront of advances in broadband

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<sup>7</sup> Next Generation Access Networks: wired access networks that consist wholly or in part of optical elements, and which are capable of delivering broadband access services with enhanced characteristics (such as higher throughput) as compared to those provided over already existing copper networks.' Commission Recommendation 2010/572/EU of 20 September 2010 on regulated access to Next Generation Access Networks (NGA)

technology, allowing the Black Country to be a market leader and remain an attractive location for businesses and residents alike.

- 4.44 Where it is considered that delivery of FTTP is not viable or practical, evidence should be provided to demonstrate that a departure from policy is justified. Such evidence could include issues of viability, the ability to undertake the physical work required to install it and proximity to the nearest breakout point on the fibre network. There may also be circumstances where the operators themselves have concluded that servicing the site is not practical. Where a FTTP solution is not deemed possible, provision of technologies capable of providing speeds in excess of 30MB should be delivered instead.
- 4.45 The intention of Policy DEL3 is not to require developers to deliver FTTP solutions themselves. Instead, it focuses on the need to conduct early dialogue with telecom providers in order to best understand what their infrastructure specifications are and how these can be accommodated as part of the new development. The involvement of multiple telecoms providers at build stage will minimise the impact later.
- 4.46 To facilitate this, any application for a qualifying development should be supported by an “FTTP Statement”, which provides details of dialogue with the telecom operators, explains how FTTP will be provided to serve the development and confirms that this process will be completed upon occupation of the first property on the development. Conditions will then be applied to any subsequent permission to ensure that FTTP will be secured as envisaged by the statement. For outline applications, the statement may be more limited on specific details relating to the imminent implementation of FTTP and provide a commitment to supply these details later, including how and when the telecom operators will be consulted.

### **5G Networks**

- 4.47 5G is mobile internet, which is as fast as fibre, with speeds up to 1GB – five to ten times faster than current home broadband connectivity. 5G benefits include huge capacity, with the ability to connect thousands of users and devices at the same time at consistently ultrafast speeds and ultra-reliable, secure, and low latency, which will be transformational for industry. The demand for mobile data in the UK is growing rapidly, and as households and businesses become increasingly reliant on mobile connectivity, the infrastructure must be in place to ensure supply does not become a constraint on future demand.

- 4.48 The Government wants to be a world leader in 5G, the next generation of wireless connectivity, and for communities to benefit from investment in this new technology. The NPPF expects planning policies and decisions to support the expansion of next generation mobile technology such as 5G. The West Midlands has been selected as the UK's first multi-city 5G test bed, paving the way for the future rollout of 5G across the UK, making the region the first in the UK ready to trial new 5G applications and services at scale.
- 4.49 To deploy 5G and improve coverage in partial "not-spots" (a place where wireless internet, especially broadband, services are not available), mobile network operators will need to strengthen existing sites to accommodate additional equipment. To extend coverage into total not-spots or to add capacity in areas of high demand, mobile network operators will also need to identify and develop new sites. Masts will need to be higher than at present to accommodate 5G, which may impact on local amenity and character in some areas. Mobile Network Operators are encouraged to have early discussions with planning authorities and to communicate and consult with local communities, especially in the case of new sites, to ensure that the best sites are selected for 5G infrastructure and that equipment is sympathetically designed and camouflaged where appropriate, in line with principles set out in the NPPF and relevant local planning policies.
- 4.50 Where larger developments are planned, developers can consider the incorporation of potential sites for telecoms equipment to ensure 5G coverage.

## Evidence

- Black Country Utilities Infrastructure Capacity Study (2019)
- Black Country Digital Infrastructure Evidence Base (2021)
- Tackling Health Inequalities – Digital Inclusion, Black Country & West Birmingham Sustainability and Transformation Partnership (2021)

## Delivery

- Development management processes

## Issues and Options Consultation Responses

- 4.51 There were no consultation responses referring to this issue.

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## Monitoring

Policy	Indicator	Target
DEL1 – DEL3	Delivery of sufficient infrastructure to support new development	Annual Infrastructure Funding Statements produced for the BCA

DRAFT



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## 5 Health and Wellbeing

### Introduction

- 5.1 The purpose of the planning system in England is to contribute to the achievement of sustainable development. The built and natural environments are key determinants of health and wellbeing. The NPPF states that one of the three overarching objectives of the planning system is supporting strong, vibrant, and healthy communities. The Health and Social Care Act (2012) gave local authorities new duties and responsibilities for health improvement and requires every local authority to use all levers at its disposal to improve health and wellbeing; Local Plans are one such lever.
- 5.2 Planning policies and decisions should make sufficient provision for facilities such as health infrastructure and aim to achieve healthy, inclusive, and safe places that support healthy lifestyles, especially where they address identified local health and well-being needs. Engagement between Local Planning Authorities and relevant organisations will help ensure that local development documents support both these aims.
- 5.3 The Black Country's unique circumstances give rise to several challenges to health and well-being, which are reflected in its related strategies. Ensuring a healthy and safe environment that contributes to people's health and wellbeing is a key objective of the Black Country Councils and their partners in the health, voluntary and other related sectors.
- 5.4 The Black Country Local Planning Authorities, Public Health Departments, Hospital Trusts and Clinical Commissioning Groups have worked together in preparation for the Black Country Plan, to ensure it is aligned with the plans of the area's Sustainability and Transformation Partnership (STP), as well as with each borough's Health and Wellbeing Strategies, informed by their Joint Strategic Needs Assessments.
- 5.5 The STP recognises that reducing health inequalities will help reduce financial burdens on the NHS. It also recognises that residents of the Black Country, on average, suffer from poorer health outcomes than people in the rest of England.
- 5.6 The STP has identified a number of key drivers that play a significant role in the development of future illness in the Black Country and which directly link to demand

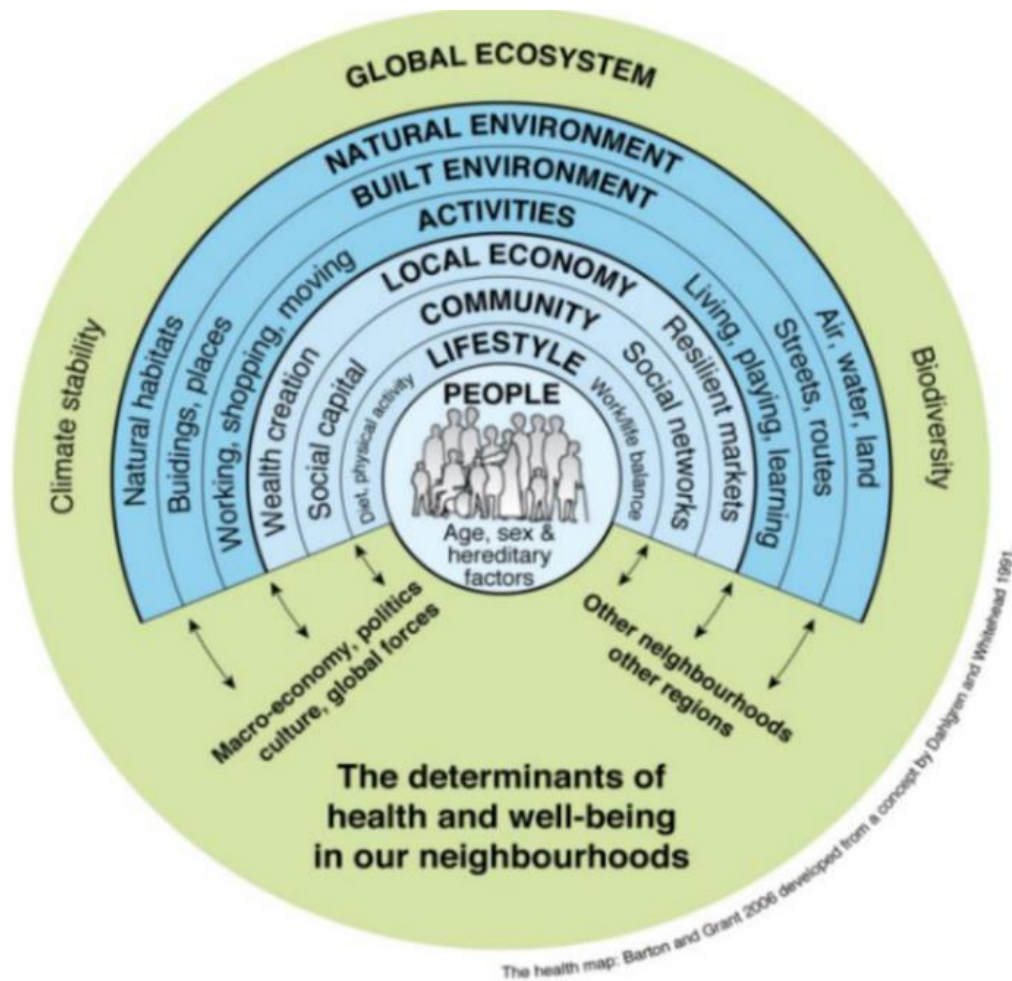
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for health provision. These are education, employment, wealth, housing, nutrition, family life, transport and social isolation. These are all influenced by the built and natural environment.

### **Linkages between health and the built and natural environment**

- 5.7 The linkages between health and the built and natural environment are long established and the role of the environment in shaping the social, economic, and environmental circumstances that determine health is increasingly recognised and understood. Climate change will have a negative impact on health and wellbeing and actions to eliminate emissions and adapt to climate change, such as promoting active travel and improving the energy efficiency of buildings, will also benefit public health through outcomes such as reduced obesity and fuel poverty.
- 5.8 An increasing body of research indicates that the environment in which people live is linked to health across their lifetime. For example, the design of neighbourhoods can influence physical activity levels, travel patterns, social connectivity, food consumption, mental and physical health, and wellbeing outcomes. These are illustrated below in the Barton and Grant (2010) Health Map.

Figure 3 - Determinants of health and wellbeing (Barton and Grant, 2010)



5.9 As outlined in more detail below, the evidence from the Sustainability and Transformation Partnership suggests that the Black Country performs worse than the England average with regards to risk factors for poor health outcomes that are linked to the built and natural environment. For example, the Black Country has lower rates of physical activity and higher rates of obesity. Poor air quality is harmful to health and unhealthy fast food is easily available. In the home, rates of falls and hip fractures in older people are high, as are households living in fuel poverty, meaning people are exposed to the risk of cold housing in winter thereby exacerbating long-term conditions.

5.10 The Black Country has lower rates of both life expectancy and healthy life expectancy than the rest of England, meaning people not only die earlier but live more of their life with ill health, which has implications for their ability to be

productive and for how they use the built and natural environment. On a broader level, the Black Country has higher rates of multiple deprivation, of children living in poverty and of unemployment than the rest of England, as well as some of the poorest academic achievement of school leavers. These factors all contribute to poorer health outcomes and are influenced by the built and natural environment.

5.11 The Black Country also has higher rates of admissions for alcohol and higher depression rates compared to the England average. Many users of adult social care say they feel socially isolated and experience poor health-related quality of life.

5.12 The Black Country's Health and Wellbeing Strategies identify the following as key priorities for tackling health and wellbeing:

- a) Healthy lifestyles including physical activity, healthy eating, and addressing tobacco and alcohol consumption and obesity;
- b) Access to employment, education, and training;
- c) Quality, affordable homes that people can afford to heat;
- d) Mental health and wellbeing, including having social connections and feeling lonely or isolated;
- e) Air quality and the wider environment.

5.13 There is therefore a need for the BCP to support initiatives aimed at encouraging healthier lifestyle choices and mental wellbeing and addressing socio-economic and environmental issues that contribute to poor health and inequalities.

## Health and Wellbeing

5.14 This policy provides a strategic context for how health and wellbeing are influenced by planning and provides links to other policies in the Black Country Plan.

### Policy HW1 – Health and Wellbeing

- 1) **The regeneration and transformation of the Black Country will create an environment that protects and improves the physical, social and mental health and wellbeing of its residents, employees and visitors and reduces health inequalities through ensuring that all new developments, where relevant:**

## **Policy HW1 – Health and Wellbeing**

- a. are inclusive, safe, and attractive, with a strong sense of place; encourage social interaction; and provide for all age groups and abilities as set out in Policies CSP4, ENV5, ENV6, ENV8 and ENV9;**
- b. are designed to enable active and healthy lives through prioritising access by inclusive, active, and environmentally sustainable form of travel and through promoting road safety and managing the negative effects of road traffic as set out in Policies CSP4 and TRAN2, TRAN4 and TRAN5;**
- c. provide a range of housing types and tenures that meet the needs of all sectors of the population including for older people and those with disabilities requiring varying degrees of care; extended families; low income households; and those seeking to self-build as set out in Policies HOU2 and HOU3;**
- d. are energy efficient and achieve affordable warmth; provide good standards of indoor air quality and ventilation; are low carbon; mitigate against climate change; and are adapted to the effects of climate change as set out in Policies CSP4, ENV9, CC1, CC2, CC3 and CC7;**
- e. are designed and located to achieve acceptable impacts by developments on residential amenity and health and wellbeing arising from: noise; ground and water contamination; flood risk; vibration; and poor indoor and outdoor air quality as set out in Policies CSP4, ENV9, CC4, CC5, MIN4 and TRAN7;**
- f. provide a range of quality employment opportunities for all skillsets and abilities along with the education and training facilities to enable residents to fulfil their potential and support initiatives to promote local employment and procurement during construction as set out in Policies HOU5, EMP2, EMP3 and EMP5;**
- g. protect and include a range of social infrastructure such as social care, health, leisure, sport and recreation, retail and education facilities close to where people live, which are accessible by means of inclusive, active**

## Policy HW1 – Health and Wellbeing

**and environmentally sustainable forms of travel as set out in Policy HOU5;**

- h. protect, enhance, and provide new green and blue infrastructure, sports facilities, play and recreation opportunities to support access for all and meet identified needs as set out in Policies CSP4 and ENV4, ENV6, ENV7 and ENV8;**
- i. protect, enhance, and provide allotments and gardens for physical activity, mental wellbeing, recreation and for healthy locally-produced food as set out in Policy ENV8;**
- j. provide high-quality broadband and other digital services to homes, educational facilities, employers, and social infrastructure, to support digital inclusion and the application of new technology to improved health care as set out in Policy DEL3;**
- k. support vibrant centres and local facilities, which offer services and retail facilities that promote choice, enable and encourage healthy choices and protect children, other young people, and vulnerable adults. Where national and local evidence exist, this will include managing the location, concentration of and operation (including opening hours) of businesses which contain uses running contrary to these aims including (but not restricted to) establishments selling hot food, shisha bars, drinking establishments, amusement arcades, betting shops and payday loan outlets as set out in Policies CEN1 - CEN6 (inclusive).**

### Justification

5.15 The Black Country Plan encourages planning decisions that help improve the overall health and wellbeing of residents and help people to lead healthier lives more easily. The aim of the policy is to improve the health impacts of new developments and minimise negative impacts. Improving the health of residents helps to reduce the burden on the National Health Service, thereby providing society with wider economic benefits.

5.16 Evidence shows that important determinants of health include:

- 
- a) inclusive environments;
  - b) physical activity including active travel;
  - c) quality homes;
  - d) good air and noise quality;
  - e) access to education and employment opportunities;
  - f) access to services and to green spaces;
  - g) healthy eating; digital inclusion;
  - h) reducing exposure to harmful and addictive behaviour.

This means that addressing health inequalities will need a comprehensive approach and joint working across various services to achieve desired outcomes.

5.17 The Marmot Review (February 2010) highlighted that socio-economic inequalities, including the built environment, have a clear effect on the health outcomes of the population. One of the key policy objectives aimed at reducing the gap in life expectancy between people of lower and higher socio-economic backgrounds, is to “*create and develop healthy and sustainable places and communities*”.

5.18 In February 2020 The Institute of Health Equity published The Health Foundation’s *Health Equity in England: The Marmot Review 10 Years On*. The report highlights that poor health is increasing, the health gap has grown between wealthy and deprived areas and that place matters to health. The review goes on to recommend:

- Investment in the development of economic, social and cultural resources in the most deprived communities
- 100% of new housing to be carbon neutral by 2030, with an increased proportion being either affordable or in the social housing sector
- Aim for net zero carbon emissions by 2030 ensuring inequalities do not widen as a result

5.19 Many of these issues are addressed in the wider policies of the Black Country Plan as indicated in the policy text, although it is important to underline here the role of these policies in addressing the wider determinants of health.

5.20 As outlined above, residents of the Black Country suffer from poorer health outcomes than the rest of England, across a broad range of indicators. The evidence from Public Health England and elsewhere suggests that the Black Country also performs worse with regards to risk factors for poor health outcomes

- that are linked to the built environment. Obesity is considered a risk factor for cancer and diabetes and maternal obesity is a risk factor for infant mortality. The Black Country has higher rates of physically inactive adults and children and higher rates of obesity than those for England as well as lower rates of the population eating 'five a day' and a higher number of fast food outlets per 100,000 population.
- 5.21 Some parts of the Black Country have higher rates of smoking and smoking-attributable mortality than England and all areas have higher rates of alcohol-related mortality. All areas of the Black Country have higher rates of adults with mental health problems than for England as a whole and most boroughs have higher rates of adults with mental health problems who smoke, which demonstrates harmful behaviour and poor mental health can be related.
- 5.22 Providing and improving a range of open space and sports and leisure facilities for physical activity, including active travel, are key to tackling obesity and improving physical and mental health and wellbeing. The protection and provision of allotments and other forms of urban horticulture provides the additional benefit of supporting healthy eating. Individual Black Country Authorities may also wish to introduce planning restrictions on uses that have a negative effect upon the population's health.
- 5.23 People with gambling problems often experience a range of negative effects including health issues, relationship breakdown and debt plus, in more severe cases, resorting to crime or suicide. Because of this, there are increasing calls for gambling to be recognised as a public health issue. Financial problems can themselves be a significant source of distress, putting pressure on people's mental health. There are also strong causal links from mental health problems to financial difficulties.
- 5.24 There is currently no evidence to show that problem gambling is worse in the Black Country than for England as a whole. There is also no evidence that debt problems arising from payday loan companies are worse than for England. Given the danger which is posed to health and wellbeing by gambling and uncontrolled debt, individual Black Country Authorities may wish to introduce planning restrictions on betting shops, amusement arcades and payday loan shops should local evidence support this, during the lifetime of the Plan. Such measures would be as part of a wider strategy to address these issues.



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## Evidence

- Dudley Health and Wellbeing Strategy, 2017-22, Dudley Health & Wellbeing Board
- Joint Health and Wellbeing Strategy 2016-2020, Sandwell Health and Wellbeing Board
- The Walsall Plan: Our Health and Wellbeing Strategy 2019-2021, Walsall Partnership
- Wolverhampton Joint Health & Wellbeing Strategy 2018-2023, City of Wolverhampton Health & Wellbeing Together
- STP Primary Care Strategy 2019/20 to 2023/24, Black Country and West Birmingham Sustainability and Transformation Partnership (STP), June 2019 (updated November 2019)
- A health map for the local human habitat, H. Barton & M. Grant, Journal of the Royal Society for the Promotion of Health, 2006
- Fair Society, Healthy Lives: The Marmot Review - Strategic Review of Health Inequalities in England post-2010, Institute of Health Equity, 2010
- Health Equity in England: The Marmot Review 10 Years On, Institute of Health Equity, 2020
- Planning for Health in the Black Country: Evidence Base for Black Country Plan Health and Wellbeing Chapter, 2021

## Delivery

- Through Development Management, tier two Development Plan Documents and Supplementary Planning Documents
- Implementation and funding will be sought through planning conditions, planning agreements and planning obligations as well as through external funding sources

## Issues and Options Consultation Responses

- There was support for incorporating health and wellbeing in the Core Strategy review and for it having its own policy, as well as being embedded into other policies which further acknowledge the wider determinants of health.

Specific suggestions included:

- The need to give due consideration to the health needs and demographics of the local area

- Design standards that promote safety as well as healthy lifestyles and environments across the life course.
- Addressing congestion and air pollution.
- The need to make the Black Country an attractive location for people and businesses by creating a pleasant environment and offering an excellent quality of life.
- Greater reference to existing green infrastructure and improved provision of public open space, including the canal network, because of the opportunities they provide for exercise, leisure, recreation and sporting activities and improvements in the quality of life.
- Encouragement of walking and cycling, provision of traffic free routes, traffic restraint and pedestrianisation.
- Juxtaposition of land-uses to encourage better home / job relationships including the promotion of working from home.

## Healthcare Infrastructure

- 5.25 This policy sets out the requirements for the provision of health infrastructure to serve the residents of new developments in support of Policies HW1 and HW3.

### Policy HW2 – Healthcare Infrastructure

- 1) New healthcare facilities should be:**
- a. well-designed and complement and enhance neighbourhood services and amenities;**
  - b. well-served by public transport infrastructure, walking and cycling facilities and directed to a centre appropriate in role and scale to the proposed development, and its intended catchment area, in accordance with Policies CEN1, CEN2, CEN3 and CEN4. Proposals located outside centres must be justified in terms of relevant BCP policies such as CEN5 and CEN6, where applicable;**
  - c. wherever possible, located to address accessibility gaps in terms of the standards set out in Policy HOU2, particularly where a significant amount of new housing is proposed;**

## Policy HW2 – Healthcare Infrastructure

- d. where possible, co-located with a mix of compatible community services on a single site.
- 2) Existing primary and secondary healthcare infrastructure and services will be protected, and new or improved healthcare facilities and services will be provided, in accordance with requirements agreed between the Local Planning Authorities and local health organisations, which will be contained in local development documents.
  - 3) Proposals for major residential developments of ten units or more must be assessed against the capacity of existing healthcare facilities and/or services as set out in local development documents. Where the demand generated by the residents of the new development would have unacceptable impacts upon the capacity of these facilities, developers will be required to contribute to the provision or improvement of such services, in line with the requirements and calculation methods set out in local development documents.
  - 4) Where it is not possible to address such provision through planning conditions, a planning agreement or planning obligation may be required.
  - 5) In the first instance, infrastructure contributions will be sought to deal with relevant issues on the site or in its immediate vicinity. Where this is not possible, however, or the sequential test is not met by the site, an offsite (commuted) contribution will be negotiated. Other contributions may include for offsite provision of health or related services.
  - 6) The effects of the obligations on the financial viability of development may be a relevant consideration.
  - 7) For strategic sites, the likely requirement for on-site provision for new health facilities is set out in Chapter 13.

### Justification

- 5.26 Meeting the Black Country's future housing needs will have an impact on existing healthcare infrastructure and generate demand for both extended and new facilities across the Plan area, as well as impacting upon service delivery as population growth results in additional medical interventions in the population.

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- 5.27 Health Services in the Black Country are currently experiencing limitations on their physical and operational capacity, which inhibit their ability to respond to the area's health needs.
- 5.28 The BCA and their partners, including other healthcare infrastructure providers, have a critical role to play in delivering high-quality services and ensuring the Black Country's healthcare infrastructure amenities and facilities are maintained, improved and, where necessary, expanded<sup>8</sup>. Healthcare infrastructure planning is necessarily an on-going process and the Councils will continue to work closely with these partners and the development industry to assess and meet existing and emerging healthcare infrastructure needs.
- 5.29 As the Black Country grows and changes, social and community facilities must be developed to meet the changing needs of the region's diverse communities. This will in turn mean that, new improved and expanded healthcare facilities will be required. It is proposed to support and work with the NHS and other health organisations to ensure the development of health facilities where needed in new development areas. Where appropriate, these will be included in Local Development Documents and masterplans. It is also proposed to explore the co-location of health and other community facilities such as community centres, libraries and sport and recreation facilities.
- 5.30 Funding for many healthcare infrastructure projects will be delivered from mainstream NHS sources, but for some types of infrastructure, an element of this funding may also include contributions from developers. This may relate to the provision of physical infrastructure, such as premises, or social infrastructure, such as the delivery of additional services. These contributions would be secured through planning agreements or planning obligations, in line with the relevant regulations in operation at the time; these are currently the Community Infrastructure Levy (CIL) Regulations 2010 (as amended). In line with the sequential test, as set out in the latest national guidance and any local guidance or requirements in tier-two plans, contributions will be sought initially to support infrastructure on-site, with alternatives being considered where this is not possible, or the sequential test is not met by the site.

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<sup>8</sup> The infrastructure strategies of these partner organisations have helped inform this policy.

- 5.31 In establishing the need for and level of any developer contribution, residential developments will be assessed against the ability of nearby primary, secondary and community healthcare provision to be delivered without being compromised by demand from additional residents. Assessment of the capacity of existing healthcare facilities to meet the demand generated by residents of new development uses an established method adopted by the Clinical Commissioning Group. Applicants should consult the CCG in advance of the submission of a planning application where a significant amount of housing is to be provided. It is proposed to produce separate guidance on the methodology used for calculating the appropriate level of developer contribution.
- 5.32 The Viability and Delivery Study indicates that, depending on the extent of other planning obligations required, such contributions may not be viable on some sites, particularly those located in lower value zones as shown on Figure 6. Where it can be proved that it is not viable for a housing developer to fund all its own healthcare needs, alternative funding sources will be sought.

## Evidence

- STP Primary Care Strategy 2019/20 to 2023/24, Black Country and West Birmingham Sustainability and Transformation Partnership (STP), June 2019 (updated November 2019)
- The Black Country STP Draft Estates Strategy, Black Country and West Birmingham Sustainability and Transformation Partnership, July 2018
- Summer 2019 STP/ICS Estates Strategy Check-point Return, Black Country and West Birmingham Sustainability and Transformation Partnership, July 2019
- Health Infrastructure Strategy, Dudley Clinical Commissioning Group, May 2016
- Primary Care Estates Strategy 2019 to 2024, Wolverhampton Clinical Commissioning Group, August 2019
- Primary Care Estates Strategy 2019 to 2024, Walsall Clinical Commissioning Group, May 2019
- Estates Strategy 2019 to 2024, Sandwell & West Birmingham Clinical Commissioning Group, October 2019

- Planning for Health in the Black Country: Evidence Base for Black Country Plan Health and Wellbeing Chapter, 2021

### Delivery

- Through Development Management and a Supplementary Planning Document
- Implementation and funding will be sought through planning conditions, planning agreements and planning obligations

### Issues and Options Consultation Responses

There were no comments relevant to this policy.

### Health Impact Assessments

- 5.33 This policy provides for the individual Black Country authorities to require Health Impact Assessments for development proposals, in line with locally determined criteria, to be set out in local development documents.

#### Policy HW3 – Health Impact Assessments (HIAs)

- 1) **Where required in individual Local Planning Authorities' local development documents, development proposals will be required to demonstrate that they would have an acceptable impact on health and wellbeing through either a Health Impact Assessment (HIA) or Health Impact Assessment Screening Report, as specified in the relevant local development document.**
- 2) **Where a development has significant negative impacts on health and wellbeing, the Council may require applicants to provide for mitigation of, or compensation for, such impacts in ways to be set out in the individual Local Planning Authorities' local development documents. Where it is not possible to provide such mitigation or compensation through planning conditions, a planning agreement or planning obligation may be required.**

### Justification

- 5.34 A Health Impact Assessment (HIA) can be a useful tool in assessing development proposals where there are expected to be significant impacts on health and wellbeing. They should be used to reduce adverse impacts and maximise positive impacts on the health and wellbeing of the population, as well as to reduce health

inequalities, through influencing the wider determinants of health. This may include provision of infrastructure for health services or for physical activity, recreation, and active travel. HIAs help to achieve sustainable development by finding ways to create a healthy and just society and to enhance and improve the places where people live.

- 5.35 HIAs can be carried out at any stage in the development process but are best undertaken at the earliest stage possible. This should ideally be prior to the submission of planning applications, to ensure that health and wellbeing issues are considered and addressed fully at the outset. Where this is not appropriate, they should form part of the material submitted to support the relevant planning application. This can be provided as a stand-alone assessment or as part of a wider Sustainability Appraisal (SA), Environmental Impact Assessment (EIA), or Integrated Impact Assessment (IIA).
- 5.36 Health Impact Assessments (HIAs) and HIA Screenings should be carried out as required in local development documents adopted by individual Local Planning Authorities.

### Primary Evidence

- Fair Society, Healthy Lives: The Marmot Review - Strategic Review of Health Inequalities in England post-2010, Institute of Health Equity, 2010
- Health Equity in England: The Marmot Review 10 Years On, Institute of Health Equity, 2020
- Planning for Health in the Black Country: Evidence Base for Black Country Plan Health and Wellbeing Chapter, 2021
- Health Impact Assessment in spatial planning, a guide for local authority public health and planning teams, Public Health England, October 2020

### Delivery

- Through Development Management, tier two Development Plan Documents and Supplementary Planning Documents produced by individual Black Country Authorities

## Issues and Options Consultation Responses

- 5.37 There was support for the use of Health Impact Assessment to consider the potential health impacts of developments, including involvement from Public Health teams. One respondent suggested that this should include design standards that promote healthy lifestyles and environments across the life course addressing areas such as: lifetime neighbourhoods; identification of an ideal high street retail offer; consideration of fully pedestrianising town centres; sustainable transport and green infrastructure networks.

### Monitoring

Policy	Indicator	Target
HW1	Compliance with supportive policies quoted  Compliance with more detailed supportive Development Plan Documents and Supplementary Planning Documents produced by each Black Country Authority	All developments within scope of the policies  All developments within scope of the policies
HW2	Location of infrastructure in compliance with the requirements outlined in the policy  Receipt of developer contributions where required to support new residential developments	All developments for health infrastructure  All developments for health infrastructure to meet demand generated by new housing developments where contributions are required (subject to viability)
HW3	Number of Health Impact Assessments produced  Number of recommendations from Health Impact Assessments implemented	All developments where required by local development plan documents  All developments where recommendations are made



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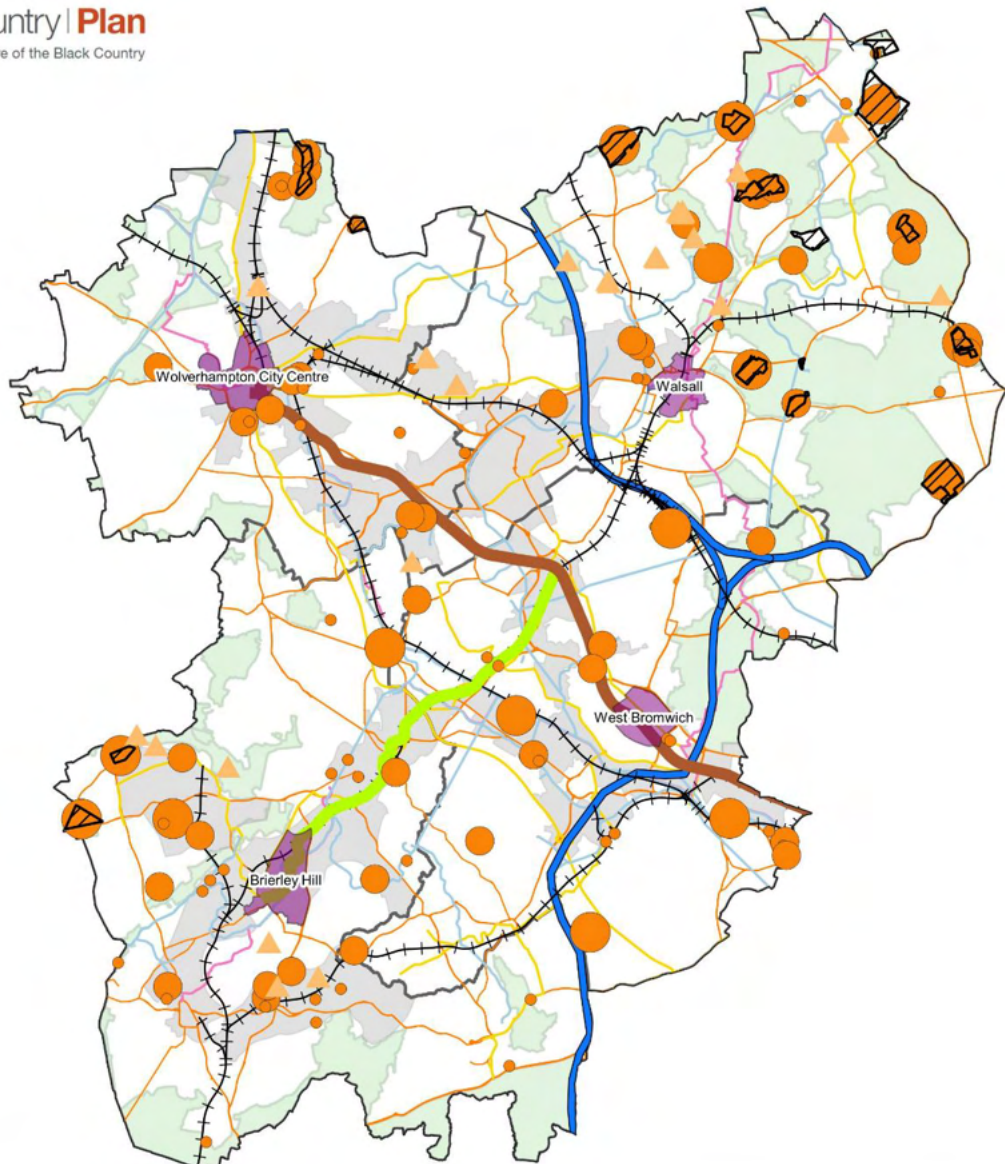
## 6 Housing

### Introduction

- 6.1 The policies in this chapter will help to create a network of cohesive, healthy and prosperous communities across the Black Country, which is a fundamental element of the vision and objectives and which will deliver the overarching strategic priority and Strategic Priorities 3 and 4. The provision of sufficient land to promote sustainable housing growth is the corner stone of this approach. However, the policies also ensure the provision of a balanced range of housing in terms of type, tenure, wheelchair accessibility and affordability, and sufficient specialist provision for gypsies, travellers and travelling show people and for those who wish to self-build or custom build. New housing will be of a high build quality and well-designed, meeting national space and water efficiency standards, and meeting high levels of energy efficiency and adaptation to climate change, as set out in Policies ENV9 and CC1 - CC6.
- 6.2 Maximising sustainable transport access to key residential services and focusing high density increases in areas of greatest accessibility is at the heart of the Spatial Strategy, helping to deliver Strategic Priorities 5, 10 and 15. Providing a balanced network of quality education facilities is a further key part of this approach and to delivering economic prosperity.

Figure 4 - Housing Key Diagram

Black Country | **Plan**  
 Planning for the future of the Black Country



Housing Key Diagram

<b>Key:</b>	
<b>Housing</b>	
Housing Allocations (HOU1)	
● 50-100 units	⚓ Rail Network
● 101-300 units	🟢 Wednesbury -Brierley Hill Metro Extension
● 300 + units	🟤 Existing West Midlands Metro
▲ Gypsy and Traveller Pitch Allocations (HOU4)	<b>Strategic Planning</b>
<b>Key Routes</b>	🟣 Tier One Strategic Centres
— Canal	▭ Local Authority Boundaries
— Key Route Network	▭ Core Regeneration Areas
— Motorways	▭ Black Country Green Belt
	▨ Neighbourhood Growth Areas

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## Delivering Sustainable Housing Growth

6.3 A key role of the BCP is to set out realistic targets for each BCA to deliver sustainable housing growth over the plan period up to 2039.

### **Policy HOU1 – Delivering Sustainable Housing Growth**

- 1) **Sufficient land will be provided to deliver at least 47,837 net new homes over the period 2020 – 2039. The key sources of housing land supply are summarised in Tables 3 and 4 and illustrated in the Housing Spatial Diagram. Housing allocations for each BCA are set out in the relevant tables of Chapter 13.**
- 2) **The majority of the requirement will be met through sites with existing planning permission and sites allocated for housing by this Plan and other local plan documents. Additional housing supply will also be secured on windfall sites throughout the Black Country urban area and through the update of local Plans covering the Strategic Centres, where appropriate. The estimated net effect of housing renewal up to 2039 will be reviewed annually and taken into account in the calculation of housing land supply.**
- 3) **The minimum housing target for each Black Country Authority over the period 2020-39 and for each of the Plan phases: 2020-29, 2029-34 and 2034-39 is set out in Table 4.**
- 4) **The development of sites for housing should demonstrate a comprehensive approach, making best use of available land and infrastructure and not prejudicing neighbouring uses. Incremental development of an allocated site will only be allowed where it would not prejudice the achievement of high-quality design on the allocation as a whole. Masterplans and Supplementary Planning Documents will be produced, where appropriate, to provide detailed guidance on the development of strategic allocations.**

**Table 3 - Black Country Housing Land Supply and Indicative Phasing 2020-39**

Source of Supply		Total	2020-2029	2029-2034	2034-2039
<b>CURRENT SUPPLY</b> as of April 2020	Sites Under Construction	<b>5,258</b>	5,258	0	0
	Sites with Planning Permission or Prior Approval <sup>▲</sup>	<b>7,380</b>	7,244	136	0
	Sites with Other Commitment (as set out in 2020 SHLAAs) <sup>⌘</sup>	<b>3,802</b>	2,002	986	814
	Existing Housing Allocations in Strategic Centres <sup>⌘</sup> (not subject to review through the Black Country Plan)	<b>4,973</b>	1,708	1,795	1,470
<b>HOUSING ALLOCATIONS IN BLACK COUNTRY PLAN<sup>9</sup></b>	Occupied Employment Land <sup>◆</sup>	<b>3,091</b>	616	1,228	1,247
	Sites released from the Green Belt	<b>7,720</b>	2,398	3,173	2,149
	Other <sup>⌘</sup>	<b>6,921</b>	4,308	1,487	1,126
<b>WINDFALL ALLOWANCES</b>	Small sites (<10 homes / 0.25 ha)	<b>7,651</b>	2,661	2,495	2,495
	Wolverhampton City Centre upper floor conversions	<b>812</b>	232	290	290
<b>ADDITIONAL SITE CAPACITY IN STRATEGIC CENTRES</b> (to be allocated in Local Plans)	Wolverhampton City Centre	<b>750</b>	0	250	500
	Walsall Town Centre	0	0	0	0
	Brierley Hill Town Centre	350	0	175	175
	West Bromwich Town Centre	200	0	100	100

<sup>9</sup> Excluding some sites with planning permission that have been allocated in the BCP to ensure they are not lost to other uses

Source of Supply		Total	2020-2029	2029-2034	2034-2039
<b>TOTAL GROSS HOMES</b>		<b>48,908</b>	26,427	12,115	10,366
<b>TOTAL LOSS HOMES</b>	Dudley Estimated Housing Renewal Demolitions	- 323	- 323	0	0
	Small-scale demolition windfalls	- 748	- 328	- 210	- 210
<b>TOTAL NET HOMES</b>		<b>47,837</b>	<b>25,776</b>	<b>11,905</b>	<b>10,156</b>

▲ discounted by 5%

⌘ discounted by 10%

◆ discounted by 15%

**Table 4 – Black Country Sources of Housing Land Supply and Phased Housing Targets for BCA 2020-39**

Source of Supply (net new homes)		Dudley	Sandwell	Walsall	Wolverhampton
<b>CURRENT SUPPLY</b> as of April 2020	Sites Under Construction	978	624	1,255	2401
	Sites with Planning Permission or Prior Approval ▲	1,867	2,577	1,105	1831
	Sites <10 homes with Other Commitment (as set out in 2020 SHLAAs)⌘	833 <sup>10</sup>	102	2,691 <sup>11</sup>	176
	Existing Housing Allocations in Strategic Centres⌘ (not subject to review through the Black Country Plan)	2,506	201	18	2,248
	Occupied Employment Land◆	732	1,882	0	477

<sup>10</sup> Including mixed use allocations that include centre uses and so are not subject to review through the Black Country Plan

<sup>11</sup> Including 833 homes on identified sites in Walsall Town Centre

Source of Supply (net new homes)		Dudley	Sandwell	Walsall	Wolverhampton
<b>HOUSING ALLOCATIONS IN BLACK COUNTRY PLAN<sup>12</sup></b>	Sites released from the Green Belt	1,117	171	5,418 <sup>13</sup>	1,014
	Other <sup>⌘</sup>	2,739	2,013	1,402	767
<b>WINDFALL ALLOWANCES</b>	Small sites (<10 homes / 0.25 ha)	2,816	1,728	1,455	1,652
	Wolverhampton City Centre upper floor conversions				812
<b>ADDITIONAL SITE CAPACITY IN STRATEGIC CENTRES</b> (to be allocated in Local Plans)	Brierley Hill Town Centre	350			
	West Bromwich Town Centre		200		
	Walsall Town Centre			0	
	Wolverhampton City Centre				750
<b>TOTAL GROSS HOMES</b>		<b>13,938</b>	<b>9,498</b>	<b>13,344</b>	<b>12,128</b>
<b>TOTAL LOSS HOMES</b>	Estimated Housing Demolitions 2020-39	- 703	- 340	0	- 28
<b>TOTAL NET HOMES (per annum<sup>14</sup>)</b>		<b>13,235</b> <b>(696)</b>	<b>9,158</b> <b>(482)</b>	<b>13,344</b> <b>(702)</b>	<b>12,100</b> <b>(637)</b>
<b>PHASED HOUSING TARGETS (NET)</b>	<b>2020-2029</b>	6,264	4,338	6,318	5730
	<b>2029-2034</b>	3,480	2,410	3,510	3185
	<b>2034-2039</b>	3,480	2,410	3,510	3185

▲ discounted by 5%

⌘ discounted by 10%

◆ discounted by 15%

<sup>12</sup> Excluding some sites with planning permission that have been allocated in the BCP to ensure they are not lost to other uses

<sup>13</sup> Excludes 1,715 homes that it is estimated will be delivered after 2039

<sup>14</sup> Rounded down

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## Justification

- 6.4 The BCP identifies sufficient land to provide 47,837 additional homes by 2039. This will deliver a 10% increase in housing stock and will accommodate 63% of current local housing need up to 2039 (76,076 homes) within the Black Country. 81% of supply is on brownfield land and 19% of supply is on greenfield land. The Housing Spatial Diagram illustrates the distribution of larger housing sites across the Black Country. A balanced range of sites has been provided, in terms of size, location and market attractiveness, which will help to maximise housing delivery over the Plan period. Across the BCA, 25%-45% of identified supply is on sites of under 1ha, well above the 10% required in NPPF para 068.
- 6.5 The detail of housing allocations for each Black Country authority is provided in Chapter 13 and all sites are shown on the Policies Map. Housing capacity has been identified in accordance with the Spatial Strategy and based on the following information:
- a) Strategic Housing Land Availability Assessments (SHLAAs) and the Black Country Employment Area Review (BEAR);
  - b) An estimate of the likely scale of housing renewal up to 2039;
  - c) An estimate of likely windfall development on small sites up to 2039;
  - d) An assessment of the likely capacity of strategic centres above existing supply, drawing on the Black Country Centres Study;
  - e) Application of a density uplift to existing allocations likely to gain permission after 2024, in line with Policy HOU2;
  - f) A comprehensive Green Belt review and site assessment process, which has identified new sites suitable and available for release for housing development, and deliverable within the Plan period and beyond.
- 6.6 The housing supply from allocations on occupied employment land has been discounted by 15% in order to take account of the multiple delivery constraints that typically affect such sites and that are likely to reduce delivery on a minority of sites. Delivery constraints include poor ground conditions and the need for large-scale master-planning, land assembly, business relocations and residential service access improvements. The supply from allocations on other land in the urban area and on small (<10 home / 0.25 ha) sites without planning permission has also been

- discounted by 10% to allow for non-implementation, as some of these sites are also affected by delivery constraints such as poor ground conditions. The supply from sites with planning permission but not yet under construction has been discounted by 5% in accordance with historic lapse rates. These discounts are balanced rates that take account of the likely availability of external funding to address constraints, as set out in the Viability and Delivery Study. Together, these discounts provide sufficient flexibility in the housing land supply to meet any unforeseen circumstances.
- 6.7 No discount has been applied to allocations on sites released from the Green Belt as evidence indicates that they will not generally be affected by delivery constraints. However, for five larger sites in Walsall (Yieldsfield Farm, Stafford Road; Queslett Road East / Aldridge Road / Doe Bank Lane; Home Farm, Sandhills; north of Coronation Road / Mob Lane; Calderfields, Aldridge Road) where the Viability and Delivery Study has indicated that housing capacity up to 2039 is likely to be limited by market delivery constraints, this has been taken into account when determining the amount of housing that it is estimated the site will deliver within the BCP Plan period. It is estimated that the remaining housing capacity on these sites, which totals 1,715 homes, will be delivered beyond 2039, and will form part of the housing land supply when the BCP is reviewed and the Plan period extended. The projected rate of delivery on these sites will be kept under review during the Plan period and housing supply estimates adjusted accordingly if required.
- 6.8 The BCP does not make or review allocations within the Strategic Centres. However, additional housing capacity above existing supply is expected to come forward within Strategic Centres over the Plan period, as set out in Tables 3 and 4. Existing allocations will be reviewed, and new allocations made in line with these targets when Local Plan documents covering Strategic Centres are updated, alongside or immediately following adoption of the BCP. A robust small windfall site allowance has been included in the supply, which reflects historic completion rates for sites of less than ten homes. Windfall sites are likely to include surplus public land, small non-conforming employment uses, sites in non-strategic centres and residential intensification sites, subject to policy, sustainability, and detailed site considerations.
- 6.9 Parts of Dudley have been identified as needing some form of housing market intervention. Selective renewal of the existing housing stock and the surrounding



residential environment will help to create more sustainable communities and support regeneration. A combination of renovation, improvement, refurbishment, and / or redevelopment is proposed, to be determined on a site-by-site basis having regard to the most sustainable approach and the needs of the borough and its community. The likely amount of demolition across current Dudley housing renewal sites has been estimated for the purposes of the BCP (see Table 3).

- 6.10 The Plan period has been divided into three phases, covering five years, ten years, and 15 years from the year of adoption - 2024. Housing targets for each Black Country authority, for each phase, are provided in Table 4. These are based on the Black Country housing trajectory set out in Appendix 17, with further detail provided in the Black Country SHLAAs. The trajectory demonstrates a steady supply of housing completions over the Plan period, justifying consistent housing targets throughout the Plan period.

### Evidence

- Dudley, Sandwell, Walsall, and Wolverhampton SHLAAs (2021)
- Black Country Urban Capacity Review Update (2021)
- Black Country Employment Areas Review (2021)
- Black Country Viability and Delivery Study (2021)

### Delivery

- Annual update of SHLAAs
- Review of Local Plans covering the four Strategic Centres
- Housing renewal will be delivered through local authority intervention
- Securing funding to facilitate delivery
- Working with key partners and delivery agencies

### Issues and Options Consultation Responses

- 6.11 Many respondents highlighted under-delivery of housing against previous targets and the need to review existing, predominantly brownfield, sources of housing land supply and to identify new sources, including greenfield land and sites in the green belt.

- 6.12 The need for a sequential approach that prioritised sites in the urban area and did not prejudice their early delivery was generally supported, together with increased external funding to support delivery. However, many acknowledged that, given the scale of housing need in the Black Country, phasing of sites outside the urban area might not be possible.
- 6.13 There was support for retaining reasonable discounts on sites in the urban area to reflect delivery issues, and the need for robust evidence to support windfall allowances was highlighted.

### **Housing Density, Type and Accessibility**

- 6.14 It is important that the new homes delivered over the plan period are located in places with good sustainable transport access to key residential services and provide a mix of types and densities which are appropriate to their location and help to meet local needs.

#### **Policy HOU2 – Housing Density, Type and Accessibility**

- 1) The density and type of new housing provided on any housing site should be informed by:**
  - a. The need for a range of types and sizes of accommodation to meet identified sub-regional and local needs;**
  - b. The level of accessibility by sustainable transport to residential services, including any improvements to be secured through development, as set out in Table 5;**
  - c. The need to achieve high-quality design and minimise amenity impacts, considering the characteristics and mix of uses in the area where the proposal is located.**
- 2) Each authority will aim to provide an overall mix of house types over the plan period, tailored to best meet local and sub-regional needs.**
- 3) Developments of ten homes or more should provide a range of house types and sizes that will meet the accommodation needs of both existing and future residents, in line with the most recently available information.**

## Policy HOU2 – Housing Density, Type and Accessibility

- 4) All developments of ten homes or more should achieve the minimum net density set out below, except where this would prejudice historic character and local distinctiveness as defined in Policy ENV5:
- a. 100 dwellings per hectare where Table 5 accessibility standards for very high-density housing are met and the site is located within a Strategic Centre or Town Centre.
  - b. 45 dwellings per hectare where Table 5 accessibility standards for high density housing are met;
  - c. 40 dwellings per hectare where Table 5 accessibility standards for moderate density housing are met.
- 5) Chapter 13 provides details of the appropriate density and, where appropriate, house type mix, to be sought on each housing allocation site, in accordance with the requirements set out in this Policy. Further details of design requirements for housing developments may be set out in Supplementary Planning Documents.

Table 5 – Black Country Housing Accessibility Standards

Density (homes per hectare net)	Very High: 100 + Only appropriate within a Strategic Centre or Town Centre	High: 45 +	Moderate: 40 +
Indicative proportion of flats	100%	>15%	0 – 15%
Indicative amount of housing suited to families	low	medium	high
<b>Accessibility (by either walking or public transport, unless stated)</b>			
Employment - Strategic Centre or other employment area	20 mins	20 mins	30 mins

Density (homes per hectare net)	Very High: 100 + Only appropriate within a Strategic Centre or Town Centre	High: 45 +	Moderate: 40 +
Health – Primary Care e.g. GP Surgery or Health Centre	10 mins	10 mins	15 mins
Fresh Food - Centre or food store	N/a	10 mins	15 mins
Education - Primary School (walking distance only)	N/a	15 mins	10 mins
Education - Secondary School	N/a	25 mins	20 mins

### Justification

- 6.15 Achieving an appropriate density and house type mix is crucial both to the success of each new housing development and the overall sustainability of the Spatial Strategy. It is important that every major development, of ten homes or more, contributes to providing an appropriate house type mix and density, aligned with current local needs. Achieving the right density and mix of house types will also help to protect and improve physical, social and mental health and wellbeing, as set out in the Health and Wellbeing Chapter.
- 6.16 The accessibility of all housing developments to a range of residential services by walking, cycling or public transport is key to achieving sustainable communities. As higher density developments tend to accommodate more people, they should generally be located in those areas with best access to services, to encourage use of sustainable transport modes. The highest densities of 100 homes per hectare should be in areas with the best access to public transport and services, but also where a high proportion of flats will provide design solutions that best reflect historic character and local distinctiveness. Therefore, such densities will only be acceptable within Strategic Centres and Town Centres. Conversely, lower density developments, accommodating more families, should have enjoy high levels of accessibility to schools. Not all developments with good sustainable access to services will be suited to the highest densities – in some cases a lower density will be more appropriate, for example in areas of historic character, to reflect the density of adjacent uses or to meet the need for a mix of housing types.

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- 6.17 Table 5 provides access standards for differing house type mixes / densities, in relation to four priority residential services: employment, health, fresh food and education. Proxies have been selected for each service. Employment is represented by Strategic Centres and retained employment areas. The proxy used for fresh food is a centre, or an existing food store outside a centre that currently provides a range and choice of fresh food. The access standards have been developed based on survey evidence regarding the distance people are prepared to travel to each service by foot and public transport and are designed to help create well-connected and walkable neighbourhoods. Although open space does not form one of the priority residential services for the purposes of establishing the appropriate density and type of housing, Policy ENV8 taken together with local standards and policies will ensure that a sufficient quantity and quality of different types of open space is available close to where people live.
- 6.18 Housing developments of ten homes or more will be expected to meet the accessibility standards set out in Table 5, which vary according to density and likely house type mix. Where there is an identified gap in service provision against one or more of these standards, investment will be sought to improve either service provision or access to existing services sufficient to ensure standards are met. New service provision, including for centre uses, should be located, and justified in accordance with Policies CEN5 and HOU5 in particular.
- 6.19 Current accessibility to residential services by sustainable transport modes across the Black Country has been modelled. This modelling shows the high levels of accessibility achieved by the Spatial Strategy. However, there are some gaps in provision that will need to be addressed through service or access improvements. For strategic allocations, the approach to be taken towards addressing any gaps, for example through service provision on site, is set out in Chapter 13. The model will be updated on a regular basis to reflect changes in service provision and public transport services. Local circumstances, such as planned changes to service provision, will be considered when assessing accessibility on a site by site basis.
- 6.20 The Black Country Housing Market Assessment (SHMA) 2021 demonstrates that new households generated by 2039 will need the following mix of home tenures and types:

	<b>One bedroom</b>	<b>Two bedrooms</b>	<b>Three bedrooms</b>	<b>Four + bedrooms</b>
<b>Owner occupied</b>	19.1%	27.9%	30.5%	22.6%
<b>Private rented</b>	22.2%	22.3%	20.3%	35.2%
<b>First Homes</b>	20.6%	26.9%	33.6%	18.9%
<b>Shared ownership</b>	25.0%	32.0%	27.5%	15.5%
<b>Social Rent / Affordable Rent</b>	25.7%	14.9%	22.2%	37.2%

It is important that housing provision reflects the needs of these new households, allowing for at least one bedroom per person, whilst also reflecting the varying needs for each of the four local authorities, as set out in the HMA.

## Evidence

- Black Country Strategic Housing Market Assessment (2021)
- Black Country Urban Capacity Review Update (2021)

## Delivery

- Through Local Plan Documents and Supplementary Planning Documents
- Through the Development Management process

## Issues and Options Consultation Responses

- 6.21 Respondents generally supported the need to increase densities in strategic centres and areas with good levels of sustainable transport access to residential services, to maximise efficient use of land, where this was in line with national guidance and backed up by robust evidence.
- 6.22 However, it was also argued that there were limits to market demand for high density housing and that flexibility should be retained to take account of local character and viability issues.
- 6.23 There were mixed views on the appropriate density for green belt release sites, with some arguing for lower densities than in the urban area and others that densities should be the same.

- 6.24 There was general support for use of up-to-date evidence, including the SHMA, to inform house type requirements, subject to flexibility to reflect local character and viability issues.

## **Delivering Affordable, Wheelchair Accessible and Self Build / Custom Build Housing**

- 6.25 In order to meet local needs, a sufficient proportion of new homes provided over the plan period should be affordable and wheelchair accessible, and enough plots should be provided to meet local demand for self-build and custom build housing. Viability should be taken into account when setting targets

### **Policy HOU3 – Delivering Affordable, Wheelchair Accessible and Self Build / Custom Build Housing**

#### **Affordable Housing**

- 1) **Developments of ten homes or more should, where financially viable, provide a range of tenures that will meet the accommodation needs of both existing and future residents, in line with the most recently available information.**
- 2) **All developments of ten homes or more should provide a proportion of affordable housing, where this is financially viable. The minimum proportion of affordable housing that should be provided is:**
  - a. **On all sites in lower value zones and brownfield sites\* in medium value zones: 10% affordable housing;**
  - b. **On greenfield sites\* in medium value zones: 20% affordable housing;**
  - c. **On all sites in higher value zones: 30% affordable housing.**
- 3) **The tenure and type of affordable homes sought will be determined on a site by site basis, based on national planning policy and best available information regarding local housing needs, site surroundings and viability considerations. Detailed guidance may be set out in Supplementary Planning Documents, where appropriate.**

#### **National Wheelchair Accessibility Standards**

## **Policy HOU3 – Delivering Affordable, Wheelchair Accessible and Self Build / Custom Build Housing**

- 4) All developments of ten homes or more should provide a proportion of wheelchair accessible housing, where this is financially viable. The minimum proportion that should be provided is:**
- a. On all brownfield sites\*, and on greenfield sites\* in lower value zones: 20% of homes to meet the optional Building Regulations Requirement M4(2): Accessible and Adaptable Dwellings<sup>15</sup>.**
  - b. On greenfield sites\* in medium or higher value zones: 15% of homes to meet the optional Building Regulations Requirement M4(3): Wheelchair User Dwellings<sup>16</sup> and all remaining homes to meet the optional Building Regulations Requirement M4(2): Accessible and Adaptable Dwellings<sup>17</sup>.**
- 5) Other than for reasons of financial viability, these requirements will only be reduced where it can be demonstrated that any of the following apply:**
- a. it is not practically achievable given the physical characteristics of the site, or**
  - b. site specific factors mean that step-free access to the dwelling cannot be achieved, or**
  - c. the homes are located on the first floor or above of a non-lift serviced multi-storey development.**

### **Self-Build and Custom Build Plots**

- 6) On developments of 100 homes or more, where there is currently a need for self-build and custom build plots identified in the self-build and custom build register for the local authority where the site is located, at least 5% of plots should be made available for self-build or custom build, or sufficient to match the current number on the register if lower. Any plots that have not**

<sup>15</sup> Or any subsequent national equivalent standard

<sup>16</sup> Or any subsequent national equivalent standard

<sup>17</sup> Or any subsequent national equivalent standard



## **Policy HOU3 – Delivering Affordable, Wheelchair Accessible and Self Build / Custom Build Housing**

been sold after 12 months of appropriate marketing will revert to the developer to build.

### **Financial Viability Assessments**

- 7) On sites where applying the affordable housing or wheelchair accessibility requirements can be demonstrated to make the development unviable, the maximum proportion of such housing will be sought that will not undermine the viability of the development, subject to achieving optimum tenure mix and securing other planning obligations necessary for the development to gain planning permission.
- 8) Financial viability assessments conforming to national guidance will be required to be submitted and, where necessary, independently appraised by an appropriate professional appointed by the local planning authority at the cost of the applicant. Flexible arrangements will be sought through planning agreements, wherever possible, to allow for changing market conditions in future years. Any viability assessment should be prepared on the basis that it will be made publicly available other than in exceptional circumstances, and in such circumstances an executive summary will be made publicly available.

\*Or parts of such sites

## **Justification**

- 6.26 Rising house prices and low average incomes over a long period have made market housing increasingly unaffordable for many Black Country households. The Black Country SHMA (2021) identifies a requirement for 15.7% of new homes to be made available for affordable or social rent, 8.3% to be shared ownership and 8.7% to be First Homes. To meet this level of need over the Plan period, 32.7% of new housing would have to be affordable.
- 6.27 The Viability and Delivery Study demonstrates that viability varies greatly according to local housing values (as set out in figure 5) and whether the site is greenfield or brownfield. Therefore, a sliding scale of affordable housing requirements, ranging



- affordable housing provision, or through a 100% market housing development with off-site provision of the affordable housing requirement.
- 6.29 There are currently 153 individuals on Black Country authority self-build and custom build registers, of which 83 are in Dudley, eight in Sandwell, 32 in Walsall and 30 in Wolverhampton. This represents a low level of demand compared to neighbouring authorities. Therefore, to meet the modest need for self-build and custom build plots across the Black Country, developers of larger sites will be expected to make available a small proportion of the development as serviced self-build and custom build plots, as defined in national guidance and legislation. These plots will not form part of the affordable housing requirement for the development. Detailed guidance for the plots, for example on design, will be provided at a local level where appropriate.
- 6.30 The Black Country authorities will work with partners to meet identified needs to accommodate older people, people with disabilities and those with other special needs. The Black Country SHMA (2021) concludes that 17,866 accessible and adaptable homes, including 1,674 wheelchair user homes, will be required by Black Country households in 2039 due to disability or old age. There is a need for these types of home across all tenures. This implies that a significant uplift will be required to the number of homes that meet these standards currently. Although some improvements to existing homes funded through Disabled Facilities Grants may contribute towards this uplift, the provision of new homes meeting the standards would reduce the need for adaptations to be retrofitted and make the housing stock more responsive to the evolving needs of the local population.
- 6.31 People's housing needs change as they get older, and homes designed in a way that makes them more easily accessible and adaptable allows people to stay in their own homes for longer. With public health and social care strategies placing more emphasis on supporting people in their own homes rather than moving to residential care it is important that more adaptable and accessible homes are provided. Studies have shown that older properties are generally less accessible, and harder to adapt.
- 6.32 Accessible and adaptable homes that meet the M4(2) Building Regulations are designed and built to a standard that meets the needs of occupants with differing needs, including some older or disabled people, and are only slightly more expensive to build than standard housing. They must also allow adaptation to meet

the changing needs of occupants over time. Homes built to this standard are more flexible and readily adaptable as people's needs change, for example if they have children and require easy access for pushchairs, if they have a temporary or permanent disability or health issue, or as they gradually age and their mobility decreases. Wheelchair user homes that meet the M4(3) Building Regulations are required by less households but involve a significantly increased cost.

6.33 Therefore, all major housing developments will be expected to provide 20% of homes at the M4(2) standard, where this is financially viable. For major housing developments on greenfield sites in medium and higher value zones, where viability is less likely to be a constraint, there will be a requirement for 15% wheelchair user homes at the M4(3) standard, with the remainder of homes required to meet the M4(2) standard.

6.34 The standards will be applied through planning conditions or section 106 agreements, which will require an agreed number of units to be constructed to the specified Building Regulations requirements.

6.35 Policy HOU3 allows for an element of flexibility in recognition of the practicalities of delivering these standards, in particular given the challenges that may arise given the topography of some sites, where access within the gradients specified in the Building Regulations Approved Document may not be achievable. Where step free access to dwellings cannot feasibly be achieved due to site specific factors, the optional standards will not be required for the homes affected. Where multi storey flats or apartments are being developed without lift provision, homes on the first floor or above will not be required to meet the M4(2) or M4(3) standards. Ground floor flats in multi storey developments will still be required to meet the optional standards. Where lifts are provided the standards will be applied in accordance with the Policy.

## Evidence

- Black Country Strategic Housing Market Assessment (2021)
- Black Country Viability and Delivery Study (2021)
- Dudley, Sandwell, Walsall, and Wolverhampton Housing Strategies
- Dudley, Sandwell, Walsall, and Wolverhampton SHLAA's (2020)

## Delivery

- Local Plan documents and negotiations with developers through the Development Management process
- Implementation of Housing Strategies
- Securing funding to facilitate delivery
- Working with key partners and delivery agencies

## Issues and Options Consultation Responses

- 6.36 There was general support for use of the most up-to-date evidence, including the SHMA, to inform housing tenure requirements. Most respondents supported retention of the 25% affordable housing requirement, and some supported an increased requirement for green belt release sites and reducing the affordable housing threshold to ten homes, where supported by up-to-date housing need and viability evidence.
- 6.37 Some respondents supported the provision of housing to meet the needs of the elderly, which is addressed through the Policy HOU3 requirement for M4(2) and M4(3) standards.
- 6.38 Most respondents did not support the introduction of a policy requiring a proportion of self-build and custom build plots on larger housing sites, preferring the allocation of specific targets and/or sites. However, given the low levels of demand in the Black Country, it is not felt reasonable or justified to require certain sites to be reserved for self or custom build.
- 6.39 The Viability and Delivery Study concludes that the 5% requirement for larger sites will not affect viability and the requirement will be flexible and responsive to local demand.

## Accommodation for Gypsies and Travellers and Travelling Show people

- 6.40 The Black Country has small settled communities of gypsies and travellers, and travelling showpeople, and also experiences unauthorised encampments on a regular basis. In accordance with national guidance, the BCP aims to provide

sufficient, appropriately designed and integrated sites to accommodate the needs of these communities over the plan period.

### **Policy HOU4 – Accommodation for Gypsies and Travellers and Travelling Show people**

- 1) Phased targets for new gypsy and traveller pitches and travelling show people plots for each Black Country authority are set out in Table 6. These targets are based on needs identified in the Black Country Gypsy and Traveller Accommodation Assessment (GTAA) 2017\*.**
- 2) These targets will be met through sites with planning permission, allocated sites and other sites granted planning permission during the Plan period in accordance with the criteria set out below. The Black Country authorities will pursue funding and / or management arrangements for new sites, where necessary.**
- 3) To meet gypsy and traveller pitch targets for Walsall, sites WAGT26 and WAGT27 have been removed from the Black Country Green Belt, as listed in Chapter 13. These are two existing sites (WAGT26 being the subject of a personal permission and WAGT27 having a temporary permission which has expired) reserved as permanent pitches for residents who meet the definition of travellers in national guidance.**
- 4) Proposals for permanent gypsy and traveller pitches and travelling show people plots will be assessed against the following criteria:**
  - a. The site should be suitable as a place to live, particularly regarding health and safety, and the development should be designed to provide adequate levels of privacy and amenity for both occupants and neighbouring uses;**
  - b. The site should meet moderate standards of access to residential services as set out in Policy HOU2;**
  - c. The site should be located and designed to facilitate integration with neighbouring communities;**

## Policy HOU4 – Accommodation for Gypsies and Travellers and Travelling Show people

- d. The site should be suitable to allow for the planned number of pitches, an amenity block, a play area, access roads, parking and an area set aside for work purposes where appropriate, including, in the case of travelling show people, sufficient level space for outdoor storage and maintenance of equipment;
- e. The site should be served or capable of being served by adequate on-site services for water supply, power, drainage, sewage and waste disposal (storage and collection).
- 5) The location, design and facilities provided on new sites will be determined in consultation with local gypsies and travellers and travelling show people and will also consider / reflect any available national guidance.
- 6) Existing traveller sites will be safeguarded and their redevelopment or use for other purposes will be opposed, unless there is evidence either that a suitable replacement with equivalent capacity has been provided elsewhere or that the existing site is no longer required to meet identified need.

\* targets in the Publication Plan will be updated in line with the GTAA Update 2021

**Table 6 - Black Country Indicative Gypsy, Traveller and Travelling Showpeople Accommodation Targets<sup>18</sup>**

	Dudley		Sandwell		Walsall		Wolverhampton		Black Country
	2016-26	2026-36	2016-26	2026-36	2016-26	2026-36	2016-26	2026-36	2016-36
Target	10	9	8	2	15	9	18	8	79

<sup>18</sup> Pitch targets exclude those living in housing and with a psychological aversion to housed accommodation

		Dudley		Sandwell		Walsall		Wolverhampton		Black Country
		2016-26	2026-36	2016-26	2026-36	2016-26	2026-36	2016-26	2026-36	2016-36
Gypsy and Traveller Pitches	Permissions / allocations	2	0	10	0	23	0	12	0	47
	Target	6	4	4	2	21	14	0	0	51
Plots for Travelling Showpeople	Permissions / allocations	0	0	0	0	0	0	0	0	0

Source: Black Country GTAA 2017

## Justification

- 6.41 A Gypsy and Traveller Accommodation Assessment (GTAA) for the BCA was completed in 2017, in accordance with national guidance, and identified the likely future local need for gypsy and traveller and travelling show people accommodation as set out in Table 6. Following completion of a new GTAA during 2021 (which has been delayed due to Covid-19 restrictions), the Publication Plan will use updated information to set targets for the first five and ten years of the Plan period, from adoption in 2024. There have historically been low overall levels of identified need for pitches and plots, reflecting the good record of the Black Country authorities in permitting and delivering pitch and plot sites within the urban area. Therefore, following removal of sites WAGT26 and WAGT27 from the green belt in Walsall, it is anticipated that allocations and permissions will provide sufficient supply to meet targets up to 2029, and small windfalls within the urban area are expected to make up the remainder of targets up to 2034.
- 6.42 Permanent gypsy and traveller pitches, and travelling show people plots, have fixed infrastructure with all the normal residential amenities, and are used as a base to travel from. They are intended to allow gypsies and travellers to obtain good access to education, health, and other services.
- 6.43 The GTAA (2017) identified that gypsies and travellers prefer small, family-sized sites with approximately 10-15 pitches, but will accept larger sites if carefully



planned and designed in consultation with the gypsy community. Local authorities may assist gypsies and travellers living on their own land without planning permission to obtain retrospective planning permission where this is deemed appropriate.

- 6.44 Travelling show people have different accommodation requirements to those of gypsies and travellers, and form part of a different community. They require large plots capable of accommodating lorries and equipment, which are more suited to mixed use areas.
- 6.45 Chapter 13 provides details of sites allocated in the BCP for gypsy and traveller pitches. These sites, together with existing permissions and small windfalls, should provide sufficient pitches and plots to meet the targets set out in Table 6. However, planning permission may also be granted for alternative sites which meet the criteria set out in Policy HOU4, where appropriate.
- 6.46 The GTAA 2017 identified a need for a transit site or sites to be provided in the Black Country to meet the needs of travellers and help prevent the occurrence of unauthorised encampments. Transit sites have since been provided in Dudley and Sandwell, a transit site has planning permission in Wolverhampton and a potential location for a transit site has been identified in Walsall. Therefore, it is anticipated that any need for transit provision identified in the GTAA 2021 will be capable of being met.

## Evidence

- Black Country and South Staffordshire Gypsy and Traveller Accommodation Assessment (2017)

## Delivery

- Allocations in Local Plan Documents and bids for Government funding where required.
- Planning applications determined through the Development Management process

## Issues and Options Consultation Responses

- 6.47 Respondents supported the use of pitch and plot targets taken from the GTAA. The National Federation of Gypsy Liaison Groups requested the inclusion of a transit

pitch target. However, need for transit pitches has now been exceeded by available and permitted sites across the Black Country.

## Education Facilities

6.48 A variety of services are required to meet the needs of new residents, including education facilities. It is important that these facilities can be easily accessed by sustainable forms of transport and meet the variety of needs for different age groups and educational needs.

### Policy HOU5 – Education Facilities

- 1) **New nursery, school and further and higher education facilities should be:**
  - a. **Well-designed and complement and enhance neighbourhood services and amenities;**
  - b. **Well-served by public transport infrastructure, walking, and cycling facilities, particularly in centres, and located to minimise the number and length of journeys needed in relation to its intended catchment area;**
  - c. **Wherever possible, located to address accessibility gaps in terms of the standards set out in Policy HOU2, particularly where a significant amount of new housing is proposed.**
- 2) **New and improved facilities will be secured through a range of funding measures. Where a housing development of ten or more homes would increase the need for education facilities to the extent that new or improved facilities would be required to meet this need, planning obligations or Community Infrastructure Levy will be secured sufficient to meet the need, where this is financially viable. For strategic allocations, the likely requirement for on-site provision of new schools is set out in Chapter 13. Where land is provided for a new school as part of a housing development, the financial contribution made by that development towards education facilities will be reduced accordingly.**
- 3) **On sites where the education facility requirement is proven not to be viable, the maximum proportion of funding will be sought that will not undermine the viability of the development, subject to securing other planning obligations necessary for the development to gain planning permission. A financial**

## Policy HOU5 – Education Facilities

**viability assessment will be required to be submitted, meeting the requirements set out in Policy HOU3.**

- 4) New and redeveloped education facilities should include provision for wider community use of sports and other facilities where appropriate.**
- 5) The existing network of education facilities will be protected and enhanced. The physical enhancement and expansion of higher and further educational facilities and related business and research will be supported where it helps to realise the educational training and research potential of the Black Country. Proposals involving the loss of an education facility will be permitted only where adequate alternative provision is available to meet the needs of the community served by the facility.**

### Justification

- 6.49 Rising demand for school places in recent years, due to a combination of high birth rates, inward migration, retention levels and housing growth, has resulted in the expansion of a significant number of existing schools and an increased need for new schools across the Black Country. This investment has largely been funded by Local Education Authorities, as housing sites within the Black Country urban area do not demonstrate sufficient viability to provide for their own educational needs.
- 6.50 Housing growth over the Plan period is likely to generate the need for further investment in education provision for all age groups, including nursery and further and higher education. National guidance sets out the presumption that housing developments will fund the provision of education facilities sufficient to meet their own needs, including the provision of land for the construction of new buildings where necessary. However, the Viability and Delivery Study indicates that depending on the extent of other planning obligations required, this may not be viable on some sites, particularly those located in lower value zones, as shown on Figure 5. Where it can be proved that it is not viable for a housing development to fund all its own education facility needs, the developer should work with the Local Education Authority or BCA concerned to investigate available options and ensure that these needs can and will be met.

- 6.51 Improvements to existing educational settings should be explored to help address low educational attainment, which is a key priority for the Black Country. It is important that any investment in educational settings is focussed to support centres, address accessibility gaps, generate maximum service improvements and secure community benefits. Increasing community use of school sports facilities would make a major contribution towards meeting open space, sport and recreation standards and improving health through increased sports participation. One or more Supplementary Planning Documents will be produced to provide guidance on the approach towards developer contributions for education facilities across the Black Country.
- 6.52 The preferred location for major education facilities, which generate a large number of trips, is the network of identified centres. However, there may be cases where a development is isolated from a centre or provision within a centre may not be possible. In such cases the priority, when selecting a location, should be addressing accessibility gaps in accordance with access standards set out in Policy HOU2, to maximise sustainable access to the facility.
- 6.53 Higher and further education institutions and research facilities, particularly the University of Wolverhampton, play a major role in the Black Country economy and have a key role in helping deliver economic and social transformation. Attracting and retaining graduates within the Black Country is also key to securing a knowledge-based economy. The higher and further education sector is a major driver of economic, social, and cultural regeneration and ongoing investment in the existing network of this sector is supported. Initiatives that strengthen linkages between the sector and the wider economy will also be supported.

## Evidence

- Black Country Viability and Delivery Study (2021)
- Black Country Infrastructure Delivery Plan (2021)

## Delivery

- Local Education Authority school expansion and improvement programmes
- National DfE Free School Programmes
- Delivery of new schools on strategic allocations and identification of sites for new education facilities in other Local Plan documents

- Use of planning obligations or other funding mechanisms to address the impact of development on the need for education facilities
- Identification of sites to support implementation of university and college estate strategies

## Issues and Options Consultation Responses

6.54 Respondents supported the extension of the approach set out in Policy HOU5 to cover health and other community facilities. Policy HW2 takes forward this approach for health facilities.

## Houses in Multiple Occupation

6.55 In recent years, as house prices have risen in comparison with local wages, the demand for houses in multiple occupation (where facilities are shared by separate households) has increased across the Black Country and now requires a policy approach.

### Policy HOU6 – Houses in Multiple Occupation

- 1) **Proposals for the creation of Houses in Multiple Occupation, including the conversion of buildings or sub-division of dwellings, will be permitted provided that:**
  - a. **the development would not result in the loss of family-sized dwellings in areas where there is a proven demand for such accommodation;**
  - b. **the development is unlikely to be detrimental to the amenities of the occupiers of adjoining or neighbouring properties by way of noise, overlooking, general disturbance, or impact on visual amenity;**
  - c. **The development would not have a significant adverse impact on the character and appearance of the area, including the historic and natural environment;**
  - d. **provision for off- and on-street car and cycle parking is sufficient and appropriately incorporated and would not have an adverse impact on the surrounding area by way of increased on-street parking, impaired highway safety or impeding proper access to the area;**

### Policy HOU6 – Houses in Multiple Occupation

- e. **the site is in an area that has good access by walking and public transport to residential services, as set out in Policy HOU2;**
- f. **the development meets Nationally Described Space Standards as set out in Policy ENV9 and provides a satisfactory standard of living accommodation, to ensure that the occupiers have adequate floor space and the internal layout is shown to be suitable for the number of units proposed in terms of daylight, outlook and the juxtaposition of living rooms and bedrooms;**
- g. **adequate provision is made for the storage and disposal of refuse and recycling; and**
- h. **adequate provision of residential amenity is made, including outdoor amenity space for sitting out, play and drying clothes and for external storage space, including cycle storage.**

### Justification

- 6.56 Houses in Multiple Occupation (HMO) are defined as homes accommodating three or more unrelated households who typically share kitchens, lounges, and bathrooms. Proposals for the conversion of an existing home to a HMO designed to accommodate three to six people do not normally require planning permission. However, where a relevant Article 4 Direction is in place, as is currently the case for the City of Wolverhampton, planning permission is required for such developments.
- 6.57 HMOs are an increasingly popular part of the housing market within many parts of the Black Country. As rooms can be rented individually, they provide additional affordable accommodation options, used primarily by students, young people, and those on lower incomes.
- 6.58 Whilst the area's stock of HMOs is contributing to meeting housing needs, increased numbers of multiple occupancy properties have the potential to create harmful impacts. Concentrations of HMOs within neighbourhoods can lead to imbalanced and unsustainable communities and harm the social mix and fabric of the area by increasing the proportion of short-term households. They can damage the residential amenity and character of surrounding areas, as the level of activity

associated with a HMO is significantly greater than a typical family house, thus increasing the potential for noise and disturbance.

6.59 Harmful impacts associated with high numbers of HMOs can include:

- a) reduced social cohesion resulting from demographic imbalance and unsustainable communities;
- b) reduced housing choice resulting from housing type / tenure imbalance (e.g. a shift from permanent family housing to more transient accommodation and a growth in the private sector at the expense of owner-occupation);
- c) reduced community engagement from residents resulting from an increase in the transient population of an area;
- d) noise and disturbance resulting from intensification of the residential use and / or the lifestyle of occupants;
- e) detriment to the visual amenity and character of the area resulting from poor or accumulative external alterations to properties and / or poor waste management;
- f) reduced community facilities resulting from a shift in the character of shops and businesses;
- g) increased anti-social behaviour and fear of crime resulting from the lifestyles of some HMO occupants, the transient nature of the accommodation and inadequately designed / maintained properties;
- h) highway safety concerns resulting from congested on-street parking.

6.60 Whilst this type of accommodation can address certain housing needs, HMOs tend to be grouped together in parts of the urban area, becoming the dominant type of housing, which can lead to social and environmental problems for local communities. Alongside this, an over-concentration of HMO properties can lead to a loss of family-sized units. This in turn can lead to a consequential increase in the overall number of units unsuited to family occupation. This can pose a serious issue for maintaining a mixed sustainable housing offer across the Black Country.

6.61 The Black Country SHMA (2021) signalled that the greatest demand in the future will be for homes of three bedrooms or more. It is important, therefore, that an approach is taken to the creation of HMOs and the sub-division of existing properties that only allows those proposals that do not impact upon the overall

supply of family-sized homes to be consented. In applying this policy, ‘family-sized dwellings’ means houses with three or more bedrooms.

6.62 Planning policy needs to balance the growing demand for HMOs with the need to avoid high concentrations which can cause a loss of amenity, increased social or environmental problems, and undermine the health and stability of communities. Ease of access to work and education provision without needing a car also needs to be considered. New HMOs should be located in sustainable locations that allow ease of access to employment and residential services by means of sustainable transport, whilst reducing the need to use the private car. Proposals for new HMOs should look to address detailed local amenity issues, including local parking pressures and impacts on neighbours.

### Evidence

- Black Country Strategic Housing Market Assessment (2021)

### Delivery

- Through Local Plan Documents and Supplementary Planning Documents
- Planning applications determined through the Development Management process

### Issues and Options Consultation Responses

6.63 It was recognised that a concentration of HMOs causes problems in some parts of the Black Country and that guidance could help to avoid these problems in future.

### Monitoring

Policy	Indicator	Target
HOU1	Annual Black Country Authority net housing completions	Phased Housing Targets for each Black Country Authority as set out in Table 4.
HOU3	% affordable housing delivery on eligible sites	Minimum %, as set out in Policy HOU3



Policy	Indicator	Target
	% wheelchair accessible housing delivery on eligible sites	Minimum % M4(2) and M4(3), as set out in Policy HOU3
	% self-build and custom build plot availability on eligible sites	5% on developments of 100 homes or more, as set out in Policy HOU3
HOU4	Annual gypsy and traveller residential pitch and travelling show people plot completions	Phased targets for each Black Country Authority as set out in Table 6.

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## 7 The Black Country Economy

### Employment Land

#### Introduction

- 7.1 The policies in this chapter (Policies EMP1- EMP6) are concerned with promoting and supporting employment in manufacturing, research and development (Use Class E(g)(ii), E(g)(iii) and B2), warehousing (Use Class B8) and other uses that are appropriately located in industrial employment areas. Offices (Use Class E(g)(i)) are not classed as an employment use for the purposes of these policies; they are covered by policies CEN1 - CEN7, which relate to uses that are more appropriately located in town centres.
- 7.2 The evidence base for the employment land policies primarily consists of a two stage Economic Development Needs Assessment (EDNA)<sup>19</sup>, and the Black Country Employment Area Review (BEAR)<sup>20</sup>. The EDNA provides an objective assessment of the industrial land needs for the Black Country to 2039, based upon an independent assessment of the area's economic development needs.
- 7.3 The key conclusions of the EDNA studies are:
- a) the Black Country is a clearly defined geographical unit. It has strong employment and labour market links to a hinterland that includes southern Staffordshire, north Worcestershire, Birmingham, and Solihull. The links with the City of Birmingham and the district of South Staffordshire are particularly significant;
  - b) the Black Country has been hit hard by the CV-19 recession but is expected to recover strongly and has the capacity to deliver significant growth, given the diversity, resilience and concentration of key national sectors located in the area;
  - c) even pre-COVID19, recent growth was achieved against a backdrop of a weak local skills base, low business start-up rates and low GVA per head in comparison with the West Midlands and UK averages;

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<sup>19</sup> Prepared by Warwick Economics & Development Limited (WECD)

<sup>20</sup> Led by the Black Country Local Planning Authorities [BCLPA]

- d) economic development strategies including the Strategic Economic Plan (SEP) and Local Industrial Strategy seek to address these challenges to accelerate the growth of the local economy;
- e) the Black Country employment land supply in 2020 was largely that inherited from the Core Strategy and the suite of Tier 2 Plans which supported it. This land supply is dominated by small sites in the urban area;
- f) going forward, attracting high-growth knowledge-based industries in line with SEP ambitions will require the provision of more prestigious sites, high-quality space with easy access to key transport hubs and good connectivity;
- g) the Plan also needs to ensure the Black Country can accommodate a variety of business needs, including start-ups and smaller businesses. This means that a mixed portfolio of sites will need to be made available, including larger and smaller sites and spaces (including areas of both higher and lower specification);
- h) it is imperative to protect the existing supply of land to meet future needs that will arise from a high growth-driven economy;
- i) there is a significant gap between the employment land supply, inherited from the Core Strategy and subsequent Tier 2 Plans, and forecast future needs.

7.4 To address these issues, the strategy that underpins the Employment Land Policies is made up of the following elements:

- a) to facilitate the growth and diversification of the economy, the Plan allocates land for new development within the Black Country, to accommodate jobs and output growth (Policy EMP1);
- b) to accommodate a variety of business needs including high technology manufacturing and logistics sectors, the Plan provides for a balanced portfolio of sites (Policy EMP1);
- c) to protect and enhance land and premises within existing employment areas where this provides for the needs of jobs and businesses (Policies EMP2, EMP3 and EMP4);
- d) to recognise that some sites will become unsuitable for continued employment uses and to facilitate their redevelopment to alternative uses including housing (Policy EMP4). However, the number of such sites is expected to be

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considerably less than was envisaged by the Black Country Core Strategy adopted in 2011;

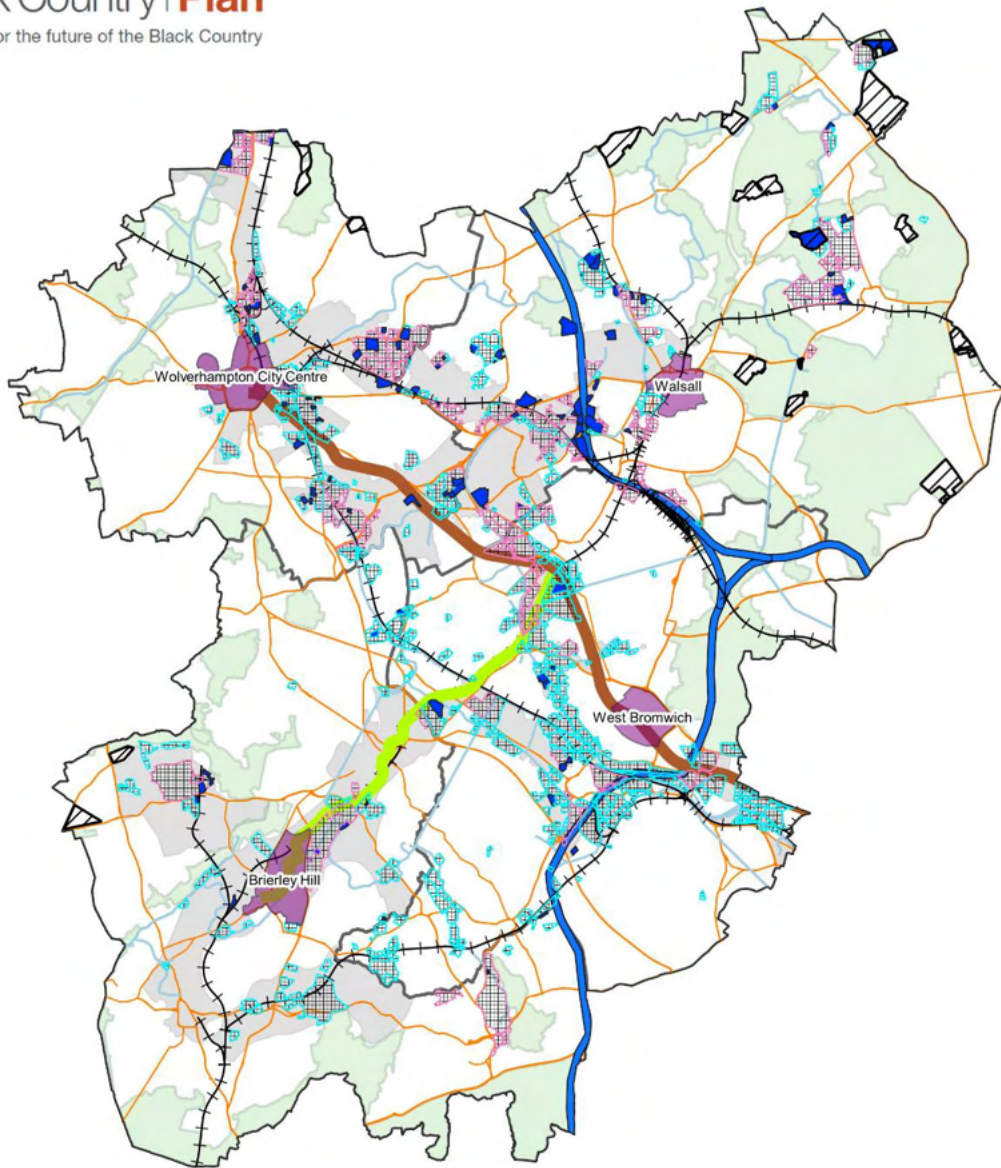
e) to enable local communities to share the benefits of economic growth (EMP6).

7.5 The spatial strategy in relation to employment land is to focus new development to sites within the Core Regeneration Areas as set out in Policies CSP1- CSP3. This will be achieved through the development of currently vacant sites allocated for development in the Plan, and the redevelopment and 'intensification' of existing premises. There are also a number of opportunities on sites within the Towns and Neighbourhoods Area within Walsall. The great majority of existing employment areas which accommodate most of the Black Country's existing manufacturing and logistics jobs and businesses are also located within the Core Regeneration Areas.

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Figure 6 - Black Country Employment Key Diagram

**Black Country | Plan**  
 Planning for the future of the Black Country



**Employment Key Diagram**

<b>Key:</b>	
<b>Employment</b>	
	Employment Development Sites (EMP1)
	Strategic Employment Areas (EMP2)
	Local Employment Areas (EMP3)
<b>Key Routes</b>	
	Key Route Network
	Existing West Midlands Metro
	Wednesbury -Brierley Hill Metro Extension
	Rail Network
	Motorways
	Canal
<b>Strategic Planning</b>	
	Tier One Strategic Centres
	Core Regeneration Areas
	Local Authority Boundaries
	Black Country Green Belt
	Neighbourhood Growth Areas

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## Providing for Economic Growth and Jobs

7.6 Policy EMP1 seeks to ensure a sufficient quantum of development opportunities are provided to meet the demand for economic growth and support the diversification of the Black Country economy. This Policy supports Strategic Priority 7.

### Policy EMP1 – Providing for Economic Growth and Jobs

- 1) **The BCA will seek the delivery of at least 355ha of employment land within the Black Country, in Use Classes E(g)(ii), E(g)(iii), B2, and B8 between 2020 and 2039, to support the growth of the sub-regional economy and increase productivity. Most of this requirement will be met through sites allocated for development in this Plan as set out below:**
  - a) **Dudley – 22ha**
  - b) **Sandwell – 29ha**
  - c) **Walsall – 164ha**
  - d) **Wolverhampton – 66ha**
  - e) **Total – 281ha**
- 2) **Additional employment development of a minimum of 74ha will be brought forward on other sites throughout the Black Country, mainly through the redevelopment, intensification and enhancement of existing employment areas and premises.**
- 3) **The Plan will deliver a portfolio of sites of various sizes and quality to meet a range of business needs. This land is in addition to sites currently occupied for employment purposes.**
- 4) **The key clusters of sites are shown on the Employment Key Diagram and individual sites listed in Chapter 13: Sub-Areas and Site Allocations. These sites will be safeguarded for industrial employment uses within Use Classes E(g)(ii), E(g)(iii), B2, and B8.**
- 5) **Within the existing employment areas subject to Policies EMP2 and EMP3, and, as appropriate, the employment areas subject to Policy EMP4, the BCA will support, with public intervention as necessary, the regeneration and renewal of such areas, including their environmental enhancement and**

## Policy EMP1 – Providing for Economic Growth and Jobs

**incorporation of sustainable measures and facilities, including circular economy approaches and their infrastructure, as well as their marketing and promotion, to enable the Black Country's employment areas to be fit-for-purpose in the long term and aid in the economic recovery and rejuvenation of the sub-regional industrial economy.**

### Justification

- 7.7 Building a strong, responsive, and competitive economy is one of the three overarching objectives of the NPPF. This should be achieved by ensuring that sufficient land of the right type is available in the right place and at the right time to support growth, innovation, and improved productivity; and by identifying and co-ordinating the provision of infrastructure.
- 7.8 The NPPF specifically advises that for forecasting future trends:
- a) Plan makers should consider forecasts of quantitative and qualitative need (i.e. the number of units and floorspace for other uses needed) but also its unique characteristics (e.g. the footprint of economic uses and proximity to infrastructure). The key output is an estimate of the scale of future needs, broken down by economic sectors.
  - b) Local authorities should develop an idea of future needs based on a range of data that is current and robust. Authorities will need to take account of business cycles and make use of forecasts and surveys to assess employment land requirements.
  - c) Emerging sectors that are well-suited to the area being covered by the analysis should be encouraged where possible. Market segments should be identified within the employment land under consideration.
  - d) The available stock of land should be compared with the particular requirements of the area so that gaps in local land provision can be identified.
- 7.9 To support the ongoing growth of the distribution sector and a strong resurgence in manufacturing, the EDNA recommends that this Plan should provide for a minimum of 565ha of land for employment development for the period up to 2039, based on

an average of 26.4ha per annum and allowing for the replacement of some poorer quality employment land and premises redeveloped for non-industrial uses.

- 7.10 The BCP allocates 280ha of employment land for the period between 2020 - 2039 and provides for a further 69ha of development to come forward through the redevelopment of existing employment land and premises. Further land is provided on other sites that have planning permission for employment development. This will therefore provide for 365ha in total and will accommodate 63% of forecast needs arising within the Black Country.
- 7.11 The main clusters of sites are shown on the Employment Land Key Diagram to illustrate the distribution across the Black Country. The detail of employment land allocations for each Black Country authority is provided in Chapter 13.
- 7.12 210ha or 37% of employment land need arising in the Black Country cannot be met solely within the Black Country. This unmet need should be exported, as far as possible, to authorities that have a strong existing or potential functional economic relationship with the Black Country, for example in terms of migration patterns, commuting links and / or connectivity through physical infrastructure such as rail and motorway. This work is ongoing and will be secured through the Duty to Co-operate and evidenced through Statements of Common Ground.

## Evidence

- Economic Development Needs Assessment Part One (2017) and Part Two (2020).
- Black Country Urban Capacity Review Update (2020)
- Black Country Plan Site Assessment Report (2020)
- Black Country BEAR
- Black Country Strategic Employment Land Reviews
- Statements of Common Ground

## Delivery

- Through the Development Management process.
- Through partnership with Economic Development Partners in promoting development opportunities and improvement programmes.



## Issues and Options responses

- 7.13 A range of comments were made to the Issues and Options consultation. There was general agreement that the Plan should support additional economic growth, but views differed on how much additional land would be needed, given economic uncertainty over such a long period. Brownfield opportunities should be prioritised but there was a general recognition that green belt land will be required to come forward for development.
- 7.14 There was support for the Plan identifying a portfolio of employment sites to meet a variety of investment needs rather than a broad brush 'reservoir' approach. There was general agreement that there is a lack of strategic sites and the Plan should provide for large, regular, and unconstrained sites with good motorway and highway access. There was also a recognition that some 'export' of growth would be required but some responses suggesting this should be an option of last resort.

## Strategic Employment Areas

- 7.15 Policy EMP2 provides for a sufficient stock of Strategic Employment Land suitable for a growing and diversified economy. This Policy supports Strategic Priority 7.

### Policy EMP2 – Strategic Employment Areas

- 1) **The Strategic Employment Areas are shown on the Policies Map. They are characterised by excellent accessibility, high-quality environments and clusters of high technology growth sector businesses. These areas will be safeguarded for manufacturing and logistics uses within Use Classes E(g)(ii), E(g)(iii), B2 and B8.**
- 2) **Within Strategic Employment Areas, high-quality development or redevelopment of sites and premises will be required, and planning applications that prejudice or dilute the delivery of appropriate employment activity, or deter investment in such uses, will be refused.**
- 3) **Strategic Employment Areas will be safeguarded from redevelopment for other non-manufacturing / logistics uses.**
- 4) **Some ancillary employment-generating non-Class E(g)(ii), E(g)(iii), and Class-B2 and B8 uses, such as childcare facilities and small-scale food and drink outlets, may also be permitted in Strategic Employment Areas, where they can**

## Policy EMP2 – Strategic Employment Areas

**be shown to strongly support, maintain or enhance the business and employment function and attractiveness of the area, and meet sequential and other national or local policy tests (particularly Policies CEN5 and CEN6) relating to appropriate uses as necessary.**

### Justification

- 7.16 Strategic Employment Areas (SEAs) are high-quality employment areas that are considered essential to the long-term success of the Black Country's economy. They correspond to areas of the strongest occupier and market demand and are of high environmental quality with excellent links to the Strategic Highway Network, and should be protected from non-employment uses that could impact upon their viability as employment locations. These areas contain, or have the potential to attract, those knowledge-based growth sector businesses whose success will be critical to the delivery of the Black Country's economic ambitions.
- 7.17 Policy EMP2 is based on the approach set out in the 2011 Core Strategy, which distinguished between Strategic High-Quality Employment Areas and Local Employment Areas. The Strategic Employment Areas in the BCP are the equivalent of the [existing and potential] Strategic High-Quality Employment Areas in the Core Strategy. The EDNA recommended that the approach set out in the Core Strategy has served the Black Country well and subject to some refinement, should be carried forward into the BCP.
- 7.18 The characteristics and extent of the Strategic Employment Areas reflect the findings of the Black Country Employment Area Review (BEAR). The BEAR re-examined the totality of the Black Country's employment areas against a set of criteria based on those set out in the Core Strategy and the recommendations of the EDNA.
- 7.19 The key characteristics of Strategic Employment Areas are as follows;
- a) To be highly accessible to the Strategic Highway Network, preferably well-located in relation to the motorway network, to provide good accessibility to international, national, and regional markets and supply chains.
  - b) To have good public transport accessibility.

- 
- c) To maintain a critical mass of active industrial and logistics sites and premises that are well suited to the needs of modern industry.
- d) To maintain an existing (or develop a potential) high-quality environment, including suitable landscaping and greenspace and an attractive and functional built environment.
- e) To be attractive to national and / or international investment.
- 7.20 The majority of the defined Strategic Employment Areas satisfy all these characteristics or are considered capable of acquiring them. The BEAR has found that it is not always necessary for an area to display all these characteristics to attract high-quality development. For example, in the Pensnett area of Dudley and parts of Aldridge in Walsall, the market has delivered high-quality investment, despite the sites being some distance from the motorway network.
- 7.21 The broad extent of the strategic employment areas is shown on the Employment Land Key diagram and the detailed boundaries on the Black Country Plan Policies Map.
- 7.22 The Plan seeks to safeguard land and premises within Strategic Employment Areas for industrial and logistics activity and supports proposals that involve the improvement and renewal of land and premises within them. This process of redevelopment, intensification and enhancement of existing Local Employment Areas will provide a significant source of land to meet future growth needs.
- 7.23 Some small-scale ancillary uses will be supported in Strategic Employment Areas where this meets the day-to-day needs of employees of businesses within the SEA. While Policy EMP2 considers development for uses that are not within an industrial employment use class, these will only be supported in exceptional circumstances as it is the BCA intention to safeguard Strategic Employment Areas from non-manufacturing / logistics uses (B Use Classes).

## Evidence

- Economic Development Needs Assessment Part One and Part Two
- Black Country Employment Areas Review [BEAR]
- BCLPA Strategic Employment Land Reviews

**Delivery**

- Through the Development Management process.
- Through partnership with Economic Development Partners in promoting development opportunities and improvement programmes.

**Issues and Options responses**

7.24 There was broad support for the Plan to continue to distinguish between Strategic and Local Employment Areas with appropriate uses in each. There was also broad support for the criteria used to define Strategic Employment Areas but including suggestions to amend the accessibility criteria to focus on good access to the strategic road network, rather than just focussing on access to the motorway network. A number of responses suggested that the Plan should contain flexibility to allow for the introduction of non-industrial employment, ancillary uses in employment areas.

7.25 A number of responses suggested that the Plan should be informed by a thorough review of employment land to evaluate the merits of existing employment areas and prevent the long-term protection of sites which may no longer be suited to meet modern requirements.

**Local Employment Areas**

7.26 In order to achieve the appropriate balance and underpin the local economy, it is essential to make provision for those types of industrial, logistics and commercial activities that do not need to be situated in Strategic Employment Areas and are not appropriate for town centres or residential locations. This Policy supports Strategic Priority 7.

<b>Policy EMP3 – Local Employment Areas</b>	
<b>1)</b>	<b>Local Employment Areas are shown on the Policies Map. They are characterised by a critical mass of industrial, warehousing and service activity with good access to local markets and employees.</b>
<b>2)</b>	<b>These areas will provide for the needs of locally-based investment and will be safeguarded for the following uses;</b>

### Policy EMP3 – Local Employment Areas

- a) **Industry and warehousing (E(g)(ii), E(g)(iii)), B2 and B8 use)**
  - b) **Motor trade activities, including car showrooms and vehicle repair**
  - c) **Haulage and transfer depots**
  - d) **Trade, wholesale retailing and builders' merchants**
  - e) **Scrap metal, timber and construction premises and yards**
  - f) **Waste collection, transfer and recycling uses as set out in Policy W3.**
- 3) **Not all areas will be suitable for all uses.**
- 4) **Some ancillary employment-generating non-Class E(g)(ii), E(g)(iii) and B uses such as childcare facilities and food and drink outlets may also be permitted in Local Employment Areas where they can:**
- a. **be shown to strongly support, maintain or enhance the business and employment function of the area; and**
  - b. **meet sequential and other national or local policy tests (particularly Policies CEN5 and CEN6) relating to appropriate uses, as necessary.**

### Justification

- 7.27 Local Employment Areas (LEAs) are particularly prevalent in the Black Country and play an important role in the local economy. They offer a valuable source of mainly low cost industrial units that are vital in providing local jobs and a balanced portfolio of sites of different sizes and quality.
- 7.28 Policy EMP3 is based on the approach set out in the 2011 Black Country Core Strategy, which distinguished between Strategic High-Quality Employment Areas and Local Quality Employment Areas. The Local Employment Areas in the BCP are the equivalent of the Local Quality Employment Areas in the Core Strategy. The EDNA recommended that the approach set out in the Core Strategy has served the Black Country well and, subject to some refinement, should be continued.
- 7.29 The characteristics and extent of the Local Employment Areas reflects the findings of the BEAR. The BEAR re-examined all of the Black Country's employment areas against a set of criteria based on those in the Core Strategy and with regard to the recommendations of the EDNA.

- 
- 7.30 The key characteristics of Local Employment Areas are as follows;
- A critical mass of active industrial and service uses and premises that are fit for purpose.
  - good access to local markets, suppliers, and employees.
  - The existing or potential use and / or the traffic generated by the use does not have an unacceptable impact on the amenity of surrounding land uses or on the highway network.
  - good public transport accessibility.
- 7.31 The broad extent of the Local Employment Areas is shown on the Employment Land Key diagram and the detailed boundaries on the Black Country Plan Policies Map.
- 7.32 The Plan seeks to safeguard Local Employment Areas as locations for industrial and logistics activity and uses that share the characteristics of Class E(g)(ii), E(g)(iii)) and B2 and B8 uses, which are typically located within industrial areas.
- 7.33 The Plan also supports proposals that involve the improvement and renewal of land and premises within them, particularly where this involves older outdated industrial premises that are no longer fit for purpose. This process of redevelopment, intensification and enhancement of existing Local Employment Areas provides a significant source of land to meet future growth needs.
- 7.34 Local Employment Areas are often vulnerable to pressure for redevelopment to other uses such as housing. However, the loss of too much local employment land will compromise the successful delivery of the BCP's employment strategy. It would inhibit economic development, endanger the viability of businesses, and affect the balance of jobs and workers; workers located at companies in Local Employment Areas who are displaced by new forms of development would have to travel increased distances to work and the viability and sustainability of firms would be put at risk. These areas will therefore be primarily safeguarded from non-employment uses.
- 7.35 Sites within Local Employment Areas may also be appropriate for uses that serve the needs of businesses and employees working in the area. Such uses include food and drink or childcare facilities. Such uses should be of a scale, nature, and

location to serve the needs of the employment area, where existing facilities are inadequate and where such needs cannot be met in adjacent town centres.

## Evidence

- Economic Development Needs Assessment Part One and Part Two
- Black Country BEAR
- Black Country Strategic Employment Land Reviews

## Delivery

- Through the Development Management process.
- Through partnership with Economic Development Partners in promoting development opportunities and improvement programmes.

## Issues and Options responses

7.36 There was broad support for the Plan to continue to distinguish between Strategic High-Quality Employment Areas and Local Employment Areas. Some respondents suggested that there will be potential for the reallocation of some local quality employment land for housing, while protecting the more important and productive sites.

## Other Employment Sites

7.37 The BCA recognise that there are a number of older employment areas across the Black Country that are not of the quality of Strategic or Local Employment Areas. Sites and premises within these areas may be suitable for redevelopment for a continued employment use, or to alternative uses such as housing. Policy EMP4 provides a flexible policy framework to guide development proposals in these areas. This Policy supports Strategic Priorities 3, 4 and 7.

### Policy EMP4 – Other Employment Sites

- 1) **For employment areas that are not designated as either Strategic Employment Areas or Local Employment Areas on the Policies Map, but comprise existing occupied employment land within the BC, development will be supported for:**

### Policy EMP4 – Other Employment Sites

- a) **new industrial employment uses or extensions to existing industrial employment uses, or**
  - b) **housing or other non-ancillary non-industrial employment uses.**
- 2) Development or uses under 1(b) will only be supported where there is robust evidence to demonstrate to the satisfaction of the relevant authority, that:**
- a) **The site is no longer required for industrial employment purposes, including the possible relocation of displaced employment uses from other parts of the Black Country;**
  - b) **The site is no longer viable for such uses;**
  - c) **There are satisfactory arrangements in place for the relocation of existing occupiers of the employment uses on the site, if suitable sites are available in the local area;**
  - d) **The site could be brought forward for housing in a comprehensive manner and would not lead to piecemeal development;**
  - e) **Residential development would not adversely affect the ongoing operation of existing or proposed employment uses on the site or nearby; and**
  - f) **The site is suitable for housing or other non-ancillary non-employment uses in accordance with local or national policies relating to these uses.**

### Justification

- 7.38 There are a number of existing employment sites / areas that are not designated as Strategic or Local Employment Areas. These tend to be older, less marketable employment sites close to or within residential areas, where proposals for redevelopment to other uses could give rise to significant regeneration benefits, and that, when assessed through the BEAR, do not meet the thresholds for being allocated as LEA. The larger areas (of over 0.4ha) subject to this Policy are shown on the Policies map.
- 7.39 Whilst the Black Country Authorities will continue to support these existing businesses, it is also necessary for the BCP to allow flexibility for them to be reused



for alternative forms of appropriate development. These sites and areas are not shown on the Policies Map. The circumstances where such redevelopment will be permitted are set out in sections 2ai – div of the Policy. In addressing criteria a and b, applicants will be required to submit an Economic and Market appraisal that demonstrates that the site is unsuitable for continued employment use. The sustainability of the location (including its accessibility by a choice of modes of transport) will be one matter that should be considered in this context. In assessing the potential of attracting continued employment use, the Economic and Market Assessment should consider whether the costs of the necessary remediation works would make the reuse or redevelopment for employment uses unviable. The Economic and Market Assessment should also include evidence that the site is vacant (unless it can be demonstrated that occupiers are to be relocated) and has been marketed over a reasonable period of time and at realistic rental and capital values.

### Evidence

- Economic Development Needs Assessment Part One and Part Two
- Black Country BEAR
- Black Country UCS
- BCLPA Strategic Employment Land Reviews

### Delivery

- Through the Development Management process.
- Through partnership with Economic Development Partners in promoting development opportunities and improvement programmes.

### Issues and Options responses

7.40 This Policy responds to those suggestions that the Plan should continue to allow active employment sites to remain, but poorer quality sites no longer needed for industry could be redeveloped.

### Improving Access to the Labour Market

7.41 Restructuring the Black Country's economy is one of the key principles of the BCP Vision, but the provision of land and premises alone will not deliver the necessary

economic transformation without new skills and training in the workforce to help it meet the challenges of changing work requirements and patterns. This Policy supports Strategic Priority 8.

### **Policy EMP5 – Improving Access to the Labour Market**

- 1) Planning applications for new major job-creating development will be required to demonstrate how job opportunities arising from the proposed development will be made available to the residents of the Black Country, particularly those in the most deprived areas of the sub-region and priority groups.**
- 2) Planning conditions or obligations will be negotiated with applicants and applied as appropriate to secure initiatives and/or contributions to a range of measures to benefit the local community, including the potential for working with local colleges and universities, to ensure:**
  - a) The provision of training opportunities to assist residents in accessing employment opportunities;**
  - b) The provision of support to residents in applying for jobs arising from the development;**
  - c) Enhancement of the accessibility of the development to residents by a choice means of transport;**
  - d) Child-care provision which enables residents to access employment opportunities;**
  - e) Measures to assist those with physical or mental health disabilities to access employment opportunities.**
- 3) In respect of the planning applications for new employment generating development the Black Country authorities may require applicants to make financial or other contributions, secured through planning obligations or the CIL Charging Schedule.**

### **Justification**

- 7.42 The Plan plays a key role in ensuring that people who suffer from social exclusion and disadvantage are able to fully contribute to the regeneration of the Black Country. It is therefore important that jobs created through new developments

across the Black Country are accessible to as many of the Black Country's residents as possible, especially those in the most deprived areas or priority groups.

- 7.43 There are several aspects to improving the accessibility of job opportunities to residents. Firstly, it may be necessary for improvements to public transport infrastructure and services to be funded, and better facilities for pedestrians and cyclists to be provided, to ensure that residents are able to travel to and from their places of employment within reasonable timescales.
- 7.44 Support may also need to be provided to assist residents, particularly those from disadvantaged groups or areas, in applying for new jobs and to receive training that will assist them in accessing employment opportunities. Childcare provision may also help in enhancing access to employment and individuals with mental or physical health difficulties may also require support to enable them to access jobs.
- 7.45 There are existing support structures and facilities in place across the sub-region to help ensure that local people can access and receive appropriate training to develop the necessary skills to compete successfully for jobs.
- 7.46 To assist with this, where major new employment-creating development is proposed, the BCA will negotiate with companies to devise suitable bespoke training and recruitment programmes that can benefit local people.
- 7.47 Attracting graduates to, and retaining them within, the Black Country will also be key to securing a knowledge-based economy. The higher and further education sector is a major driver of economic, social and cultural regeneration and ongoing investment in this sector is supported. The BCA will also support initiatives that strengthen linkages between the education sector and the wider economy.

## Evidence

- Economic Development Needs Assessment Part One and Part Two

## Delivery

- Through the Development Management process and the negotiations on planning obligations. Through recruitment programmes and partnerships working between economic and employment organisations.

## Issues and Options responses

7.48 There were mixed views on whether the Plan should continue to require large scale development to provide local recruitment and training programmes. Those in support of the Policy saw local people as an area's biggest potential and new development can create opportunities for them. Those not supporting the Policy suggested it is too restrictive as it can cause problems for companies who have their own training programmes and many developments create opportunities for local people in any case.

## Monitoring

Policy	Indicator	Target
EMP1	Total employment land completions in accordance with Policy EMP1.	363ha of employment land completions by 2039.
	Employment land completions on sites allocated through Policy EMP1	294ha of employment land completions on allocated sites by 2039.
	Employment land completions on non-allocated sites.	Minimum of 69ha 2020-39
	Annual employment land completions 2020-39	Minimum of 26ha per annum
EMP2	Redevelopment of employment land and premises by Local Authority area (ha) in Strategic Employment Areas to non-employment uses.	0ha
EMP3	Redevelopment of employment land and premises by Local Authority area (ha) in Local Employment Areas to non-employment uses.	0ha
EMP4	Employment development on land outside of Strategic High Quality and Local Employment Areas.	no target
	Redevelopment of employment land and premises in locations outside Strategic High	No target

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Policy	Indicator	Target
	Quality and Local Employment Areas for non-employment uses.	
EMP5	Proportion of major planning permissions making provision for targeted recruitment or training secured through s106 Agreements or planning conditions.	50% [based on BCCS target]

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## 8 The Black Country Centres

### Introduction

- 8.1 The unique character of the Black Country is largely defined by its network of centres. This provides the basic spatial structure for the sub-region and their importance to the Black Country's identity is reflected in Strategic Priority 9.
- 8.2 The purpose of the centres policies is to help secure the investment, jobs and regeneration needed to create a mature, balanced, and well-functioning network of centres where residents shop, work, live and spend their leisure time. Concentrating development in centres that are highly accessible by a variety of sustainable means of transport contributes towards planning priorities such as health and wellbeing and addressing climate change. Delivering a vital and viable network of centres will significantly contribute towards meeting the current and future service needs of Black Country residents, particularly serving future housing and employment growth, as well as providing a unique opportunity to improve the quality and experience of the built environment. As a result, centres are crucial to the delivery of Spatial Objectives 3, 4, 7, 8, 9 and 10.
- 8.3 Whilst the BCP does not allocate sites in tier-one strategic centres or allocate sites for centre uses, the following centres policies set out the framework for determining proposals across the whole Black Country relating to:
- a) bringing forward policies and allocations for these uses in Local Development Plans to facilitate the consolidation, diversification, enhancement, and regeneration of the Black Country's centres. Local Development Plans refer to documents that provide planning guidance such as Tier-Two Plans (e.g. AAPs SADs), SPDs, planning briefs and masterplans
  - b) appropriate uses: as set out in Appendix 16 for the purposes of determining planning applications, and policies and proposals in future Local Development Plans, related to BCP Policies CEN1-CEN6, "*appropriate uses*" include business, commercial, service and community uses and comprise:
    - i. *Centre Uses* - those uses and "sui generis" designations that should be directed to defined centres in the first instance, are subject to requirements set out in national guidance (such as the sequential test and impact assessments); local policy (particularly Policies CEN1 - CEN6), such as

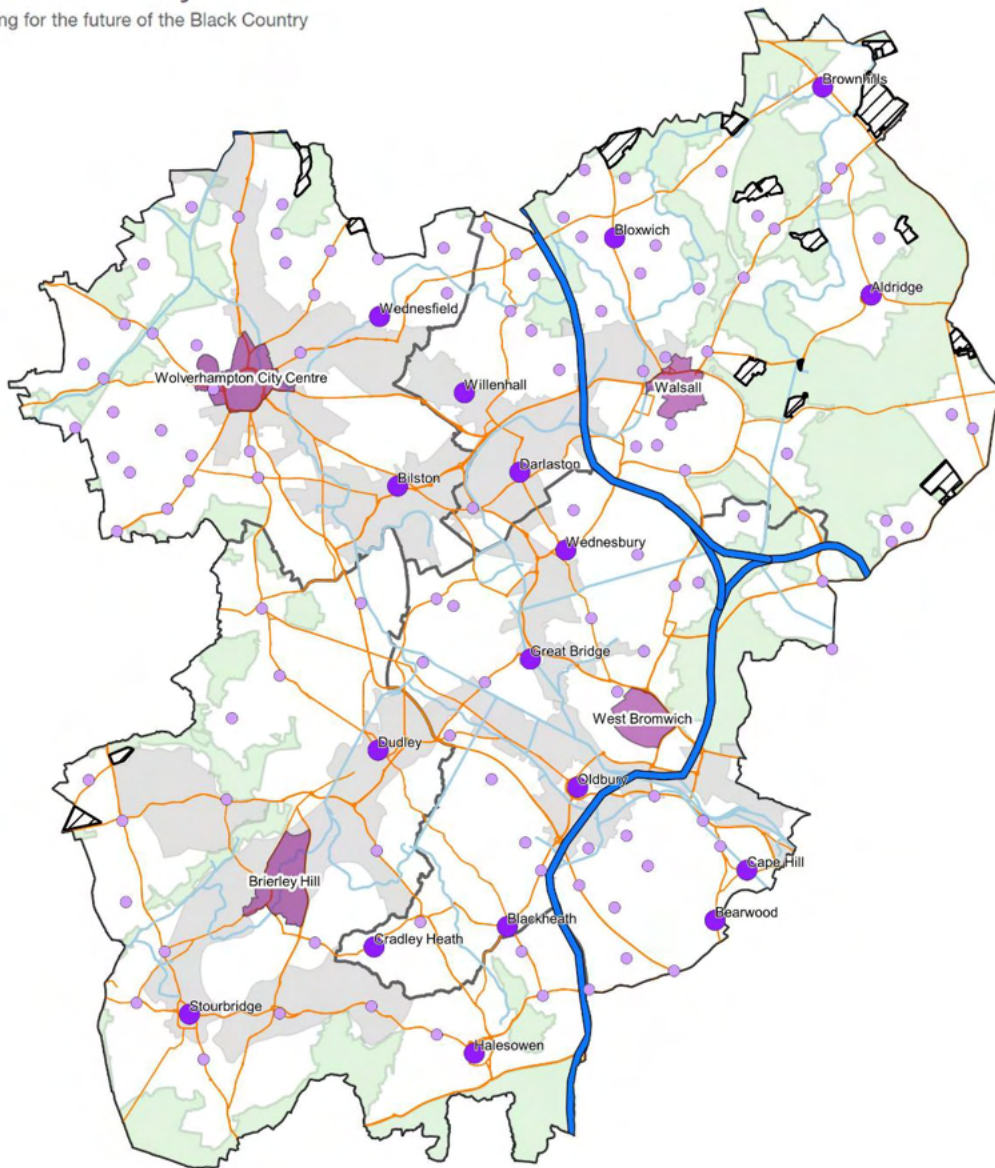
the floorspace thresholds for undertaking the impact assessments set out in national guidance; and Local Development Plan policies (such as frontage policies), defined as currently including:

- '*Main Town Centre Uses*' set out in NPPF Annex 2: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)
  - '*Additional Uses*': those uses that are highly compatible, with the previous bullet point above, such as banks, cafes and hot food takeaways (see Appendix 16)
- ii. '*Complementary Uses*': those uses well-placed to be provided in centres, and where proposals for such uses to serve centres will be supported, such as residential and social infrastructure (health, education and community uses) (see Appendix 16)

8.4 This chapter consists of three sections relating to: centre-wide proposals (Policy CEN1), in-centre proposals (Policies CEN2 - CEN4), and edge-of-centre and out-of-centre proposals (Policies CEN5 - CEN6).

Figure 7 - Centres Key Diagram

**Black Country | Plan**  
 Planning for the future of the Black Country



**Centres Key Diagram**

<b>Key:</b>	
<b>Centres</b>	
Tier One Strategic Centres (CEN2)	Motorways
BCP Tier Two Centres (CEN3)	Key Route Network
BCP Tier Three Centres (CEN4)	<b>Strategic Planning</b>
<b>Key Routes</b>	
Canal	Core Regeneration Areas
	Local Authority Boundaries
	Black Country Green Belt
	Neighbourhood Growth Areas

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## The Black Country Centres

- 8.5 The Black Country’s centres are evolving and are subject to change in different ways as the focus shifts between retail, leisure, commercial, residential, community services, health, local facilities and further education and civic uses. It is a priority to maintain and enhance them appropriate to their scale, role, and function in order to underpin the vital role they play contributing to the economic growth, character, and identity of the Black Country. The tier-one strategic centres provide the main focus for higher order sub-regional retail, office, leisure, cultural and service activities, balanced by the network of tier-two and three town, district and local centres, providing for centre uses including meeting day-to-day needs of local communities, particularly convenience (food) shopping. However, it is recognised that the repurposing and diversification of centres need to be facilitated to ensure their vitality and viability and secure their future regeneration.
- 8.6 This policy sets out the overall priorities and strategy for centres. It defines the hierarchy of centres and sets out, where subject to planning control, policy requirements and linkages to other relevant policies, related to proposals for appropriate uses identified in paragraph 8.3b above, brought forward through planning applications, other BCP policies or Local Development Plans. This policy establishes that the approach to future growth identified in Policy CSP1, particularly housing and employment growth identified in Policies HOU1 and EMP1, and allocations in Chapter 13, should have their needs met by the existing network of centres, and emphasises a flexible approach to help secure the successful future of those centres (Strategic Priority 9).

<b>Policy CEN1 – The Black Country Centres</b>	
<b>1)</b>	<b>The priority for the Black Country’s Centres is to ensure they remain focused on serving the needs of their communities, through performing a well-balanced diversity of commercial, business and service functions. This includes retail provision and an increasing mix of leisure, office, residential and other appropriate, complementary uses that are accessible by a variety of sustainable means of transport. This will enable centres to make a key contribution to regeneration, tackling climate change, fostering healthy</b>

## **Policy CEN1 – The Black Country Centres**

communities, and creating pleasant, safe public spaces to increase social interaction and cohesion.

- 2) The Black Country's defined centres comprise the hierarchy set out in Table 7, which are identified on the Centres Key Diagram (Figure 7). This hierarchy will be supported and protected by ensuring that development in centres is facilitated in a manner that reflects their scale, role, and function, and resisting proposals that would undermine this strategy.
- 3) Proposals for 'Centre Uses' (paragraph 8.3b) that are 'in-centre' (within the relevant boundaries / Primary Shopping Areas of defined centres) are subject to specific policy requirements, as set out in Table 7 and policies CEN2 - CEN4, as well as relevant policies in Local Development Plans.
- 4) Proposals for 'Centre Uses' that are not 'in-centre' (are not within the relevant boundaries / Primary Shopping Areas of a defined centre but are in edge-of-centre or out-of-centre locations), must meet the sequential test and other relevant requirements, such as impact tests (as set out in Table 7 and policies CEN5 – CEN6), as well as relevant policies in Local Development Plans.
- 5) Future growth in the Black Country, particularly housing and employment development identified in Policies HOU1 and EMP1 and allocations set out in Chapter 13, should have their service needs met by, and contribute to the regeneration of, the existing network of centres (see paragraph 8.17).
- 6) Where planning permission is granted, or Local Development Plan policies and allocations are made, effective planning conditions and policy wording must be used (see paragraph 8.12)
- 7) A land use approach will be adopted with appropriate degrees of flexibility as necessary to suit local circumstances, to encourage regeneration and to meet the challenges facing centres, particularly as little retail capacity has been identified to support additional floorspace, through supporting:
  - a) diversifying and repurposing of centres enhanced by appropriate complementary uses, particularly residential, education, health and community uses and supporting the evening economy;

### **Policy CEN1 – The Black Country Centres**

- b) the consolidation and reconfiguration of vacant floorspace into a mix of uses, especially the use of upper floors, and / or extensions to existing floorspace, with any new development being well-integrated with existing provision;**
- c) enhancing the vitality, accessibility and sustainability of centres, including maximising public realm, open space, provision of suitably-located and accessible pedestrian and cycle networks, and provision of green infrastructure and vehicle charging points.**

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**Table 7 – Black Country Hierarchy of Centres**

<b>Local Authority</b>		<b>Dudley</b>	<b>Sandwell</b>	<b>Walsall</b>	<b>Wolverhampton</b>	Relevant Centres Policies and Test requirements and thresholds for proposals subject to planning control, in addition to any local policy requirements		
<b>Tier</b>	<b>Type</b>					<b>Location</b>		
						In-centre	Edge-of-centre	Out-of-Centre
One	Strategic Centres	Brierley Hill	West Bromwich	Walsall Town Centre	Wolverhampton City Centre	<b>Policy CEN1</b>  <b>Policy CEN2</b>	<b>Policy CEN1</b> <b>Policy CEN2</b>  <b>Policy CEN5</b> (if floorspace uplift/ unit size <280sqm see paragraph 8.48 - 9)  <b>Policy CEN6</b>  <b>Policy CEN6</b>	<b>Policy CEN1</b> <b>Policy CEN5</b> (if floorspace uplift/ unit size <280sqm see paragraph 8.48 - 9)  <b>Policy CEN6</b>  <b>Sequential Test</b> <b>Impact Tests</b>

Local Authority		Dudley	Sandwell	Walsall	Wolverhampton	Relevant Centres Policies and Test requirements and thresholds for proposals subject to planning control, in addition to any local policy requirements		
Tier	Type					Location		
						In-centre	Edge-of-centre	Out-of-Centre
						(if total floorspace >280sqm see paragraphs 8.60 - 8.61)	(if total floorspace >280sqm see paragraphs 8.60 – 8.61)	
Two	Town centres in Dudley, Sandwell and Wolverhampton and district centres in Walsall	Dudley Stourbridge Halesowen	Blackheath Cradley Heath Great Bridge, Oldbury Wednesbury Cape Hill Bearwood	Bloxwich Brownhills Aldridge Willenhall Darlaston	Bilston Wednesfield	<b>Policy CEN1</b>  <b>Policy CEN3</b>	<b>Policy CEN1</b>  <b>Policy CEN3</b>  <b>Policy CEN5</b> (if floorspace uplift/ unit size <280sqm see paragraphs 8.48 – 8.49)	These requirements, particularly Policy CEN5, also apply to all proposals for relevant uses through Policy EMP3, and proposals on sites identified as having potential for an element of on-site

Local Authority		Dudley	Sandwell	Walsall	Wolverhampton	Relevant Centres Policies and Test requirements and thresholds for proposals subject to planning control, in addition to any local policy requirements		
Tier	Type					Location		
						In-centre	Edge-of-centre	Out-of-Centre
							<b>Policy CEN6</b> <b>Sequential Test</b> <b>Impact Tests</b> (if total floorspace >280sqm see paragraphs 8.60 – 8.61)	provision in Chapter 13, Policy HOU2
Three	District and local centres in Dudley, Sandwell and Wolverhampton and Local Centres in Walsall	Kingswinford Lye Sedgley Amblecote Cradley / Windmill Hill Gornal Wood	Quinton Owen Street Scott Arms Carters Green Stone Cross Smethwick High Street	Caldmore Stafford Street Pleck Pelsall Leamore Palfrey	Stafford Road (Three Tuns) Cannock Road (Scotlands) Tettenhall Village Whitmore Reans / Avion Centre	<b>Policy CEN1</b>  <b>Policy CEN4</b>	<b>Policy CEN1</b>  <b>Policy CEN4</b>  <b>Policy CEN5</b> (if floorspace uplift/unit size <280sqm see	

Local Authority		Dudley	Sandwell	Walsall	Wolverhampton	Relevant Centres Policies and Test requirements and thresholds for proposals subject to planning control, in addition to any local policy requirements		
Tier	Type					Location		
						In-centre	Edge-of-centre	Out-of-Centre
		Netherton Pensnett Quarry Bank Roseville Shell Corner The Stag Upper Gornal Wall Heath Wollaston Wordsley Hawne Oldswinford	Hill Top Brandhall Bristnall Causeway Green Charlemont Crankhall Lane Cankhall Lane Dudley Port Lion Farm Poplar Rise St.Marks Rd Vicarage Road	High St, Walsall Wood Rushall Blakenall Lane Head Streetly Queslett Lazy Hill New Invention Bentley Park Hall Moxley Fullbrook	Broadway Bushbury Lane Showell Circus Wood End Stubby Lane Heath Town Parkfield Spring Hill Penn Manor Upper Penn Penn Fields Bradmore		paragraphs 8.48 – 8.49)  <b>Policy CEN6</b>  <b>Sequential Test</b>  <b>Impact Tests</b> (if total floorspace >280sqm see paragraphs 8.60 – 8.61)	

Local Authority		Dudley	Sandwell	Walsall	Wolverhampton	Relevant Centres Policies and Test requirements and thresholds for proposals subject to planning control, in addition to any local policy requirements		
Tier	Type					Location		
						In-centre	Edge-of-centre	Out-of-Centre
			West Cross Whiteheath Gate Yew Tree Tividale Park Lane Princes End Queens Head Rood End Smethwick High St (Lower) Langley Hamstead Old Hill	Collingwood Dr, Pheasey Birchills Coalpool / Ryecroft Beechdale The Butts Spring Lane, Shelfield Beacon Road, Pheasey Brackendale Woodlands	Merry Hill Castlecroft Finchfield Tettenhall Wood Newbridge Aldersley Pendeford Park Fallings Park Ashmore Park Compton Village Warstones Road Dudley Road (Blakenhall)			



Local Authority		Dudley	Sandwell	Walsall	Wolverhampton	Relevant Centres Policies and Test requirements and thresholds for proposals subject to planning control, in addition to any local policy requirements		
Tier	Type					Location		
						In-centre	Edge-of-centre	Out-of-Centre
				Shelffield South Mossley Dudley Fields Streets Corner Buxton Road, Bloxwich Coppice Farm Turnberry Road, Bloxwich Blackwood	Chapel Ash			

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## Justification

8.7 Centres are best placed to sustainably serve their communities' needs as places to shop, work, study, spend leisure time and live. Centres therefore need to offer the best accessibility to a range of services for residents, workers and visitors, particularly by public transport, walking and cycling. The concentration of investment within centres is the basis to achieve transformation and economic growth, to make the fullest possible use of existing and future infrastructure and to deliver sustainable regeneration. Centres make crucial contributions to sustainability through helping tackle climate change (Policies CC1 – CC7), reducing the need to travel, and promoting healthy communities (Policies HW1 – HW3), well-designed public realm (Policy ENV9) and green infrastructure (such as provision of green open space) (Policy ENV8).

8.8 Appropriate uses related to centres are set out in para 8.3b and Appendix 16

### Definitions of in, edge and out-of-centre locations.

8.9 Appendix 16 sets out the specific locations that are defined by each authority as being either in, edge-of or out-of-centre for various uses, to assist with applying relevant policies and national tests highlighted in Table 7, including:

- a) In-centre locations for appropriate uses are those defined in Local Development Plans, such as primary shopping areas and centre boundaries, and are subject to Policies CEN2 - CEN4.
- b) Edge-of-centre locations for tier-one and tier-two centres are those locations defined by national guidance, currently within 300m of in-centre locations. For retail purposes, this is a location that is well-connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, this will be a location within 300 metres of a town centre boundary. For office development, this includes locations outside the centre but within 500 metres of a public transport interchange. Locations immediately adjoining the boundaries of Tier-Three Centres are defined as edge-of-centre.
- c) Out-of-centre locations are those locations not in or on the edge of a centre. Proposals in edge and out-of-centre locations need to meet the requirements of Policies CEN5 and CEN6.

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**Use of latest available evidence**

- 8.10 Supporting information and the assessment of proposed development, should be informed by the latest available evidence, especially related to quantitative evidence (such as capacity for relevant uses) and qualitative evidence (such as relating to the vitality and viability of centres), particularly from the Black Country Centres Study. Further information regarding evidence to inform impact assessments is set out in Policy CEN6 (paragraph 8.64). This is particularly important as current modelling suggests a lack of capacity to support future additional floorspace in centres; therefore, it is crucial to test the impact of proposals in edge or out-of-centre locations.

**Flexibility**

- 8.11 In addition to facilitating the short-term occupation of units for innovative uses, an appropriately flexible approach to encouraging reoccupation, reconfiguration and re-purposing of floorspace can be applied. This can include supporting hybrid uses relating to day and evening economy and material considerations such as units that has been vacant for a long period of time e.g. actively marketed for the sale of retail goods for at least six months.

**Effective Use of Conditions**

- 8.12 Where planning permission is granted, effective planning conditions and / or planning obligations will be required, and effective policy wording should be used, to support the regeneration strategy and minimise impacts. Conditions should address, for example, the definition of specific (sub) categories of uses that are acceptable and the types of goods and service to be sold, unit sizes and sales areas, including mezzanine floors, future sub-division of units, and opening hours, particularly for proposals in edge and out-of-centre locations (Policies CEN2 - CEN6) in order to minimise their impacts on centres.
- 8.13 Centres are evolving and are subject to change in different ways. Challenges facing the High Street include those from changing shopping patterns (particularly in relation to the rise of online shopping), to the closure of anchor stores run by long-standing national multiple operators, resulting in centres' viability and vitality being unduly impacted upon by, for example, evidence of high vacancy rates. Changing working patterns, including the growth of home working, means that there is uncertainty about future centres-based office activity. The increase in city living

means there is the potential for new residential development being able to contribute significantly towards regeneration, particularly as a part of mixed-use development and upper floor living, as well as on redundant and vacant in-centre sites.

8.14 Therefore, future growth and investment in centres will not necessarily be led by the retail sector.

8.15 Future investment will focus on qualitative improvements and more flexibility to protect centres, rather than additional floorspace. It will be market-led and will facilitate reoccupation, reconfiguration, and re-purposing, particularly of vacant floorspace. This approach will seek to ensure that centres are well balanced, with a mix of uses performing a variety of functions. This is reflected in this Chapter's policy approach, the Strategic Centre section in Chapter 13, which will be expanded upon in Local Development Plans, and which identifies the potential for active BCA-led intervention to secure longer-term benefits for, and growth of, centres.

Maximum opportunity should be made of structural changes to centres, such as floorspace changing to other uses (particularly residential), and an increased focus for centres:

- a) providing services/ non-transactional uses, including high activity-based uses such as health, education and civic facilities;
- b) providing an enhanced experience, a unique sense of place and well-balanced marketing, with centres functioning as community meeting and focal points, generating footfall and facilitating alternative uses (potentially mixed uses) that function both during the day and in the evening;
- c) supporting independent operators, local markets, and short-term occupation of units for innovative uses;
- d) providing enhanced connectivity and visibility and digital resilience by adapting to technological change, to help create and deliver "smart" and interconnected development and associated services in centres, such as can be achieved through the provision of 5G and super-fast fibre optic broadband (full fibre to the premises - FTTTP);
- e) supporting and providing local retail provision.

8.16 To support, protect and enhance provision to serve Black Country communities, a hierarchy of centres, consisting of three tiers, is identified in Table 7, which sets out

the relevant policies and test thresholds contained in Policies CEN2 - CEN6 for determining proposals. This policy framework will support more detailed policies in Local Development Plans, which cover a range of different issues e.g. urban design, that are structured to reflect each centre's scale and function. Proposals relating to centres will also have to meet other relevant BCP policy requirements e.g. car parking (Policy TRAN6). Relevant Local Development Plans may adjust centre boundaries, adjust Local Centre boundaries, designate new local centres, or remove existing local centres from the hierarchy (see paragraph 8.40).

- 8.17 The priority is for future growth in the Black Country, especially growth identified in BCP housing and employment allocations, to be served by the existing network of centres to ensure their future vitality and viability and secure future regeneration as emphasised in Policy CSP1. Proposals under Policy EMP2, EMP3 and HOU2 will also have to meet the relevant policy requirements, particularly of Policy CEN5.

## Evidence

- Black Country Centres Study Main Report (March 2020) and Update (August 2021) (Lambert Smith Hampton)

## Delivery

- Development Management through the determination of planning applications; Local Development Plans; Black Country Local Authority projects; and sub-regional, regional, and national schemes and funding mechanisms

## Issues & Options Consultation

- 8.18 Most centres have been identified and the existing hierarchy of centres is working. There was the view that the policies were over prescriptive on uses allowed in these locations. The option to have a prescriptive policy approach would risk losing future investment, jobs and regeneration, or the option maximising flexibility, would not give a sufficient policy steer to secure future vitality and viability of centres by facilitating a well-balanced mix of uses. The new proposed policy joins BCCS Policies CEN1 and CEN2 into a flexible but robust policy, that sets out a clear framework for further detail to be provided in other BCP policies and Local Development Plans.
- 8.19 There was the suggestion that Hardwick should be put forward as a new local centre, and that Merry Hill needed to be considered as an out-of-centre location as

it bears few of the characteristics of a town centre and clearly functions as a separate entity from Brierley Hill centre. The designation of Brierley Hill (which includes Merry Hill) as a Strategic Centre came forward through extensive regional planning work and in the adopted Black Country Core Strategy. The adopted Brierley Hill AAP provides specific local policies to facilitate the functioning of Brierley Hill as a Strategic Centre. There is no substantive evidence to justify altering tier-one and tier-two centres in the hierarchy.

- 8.20 Regarding possible adjustments to Tier Three Local Centres, this would be best placed to come forward through Local Development Plans, with the potential scope of evidence to inform this process being set out in paragraph 8.40.

### In-Centre Proposals (Policies CEN2-4)

- 8.21 In-centre locations for appropriate uses are those defined in Local Development Plans, such as primary shopping areas and centre boundaries and are set out in Appendix 16.

### Tier One: Strategic Centres

- 8.22 The four strategic centres of Brierley Hill, Walsall, West Bromwich, and Wolverhampton play a crucial role as key foci for the Black Country's economy. This policy sets out the approach and priorities for Strategic Centres in promoting appropriate levels of diversification and flexibility so that investment and regeneration can be maximised and will contribute to meeting priorities such as sustainability, tackling climate change and improving well-being and health. Whilst the BCP does not provide site allocations for strategic centres, further information about each strategic centre is provided in Chapter 13 and specific policies bespoke to each strategic centre and site allocations will be covered by Local Development Plans.

## Policy CEN2 – Tier One: Strategic Centres

### Diversification and Flexibility of Uses

- 1) It is a priority for Strategic Centres to serve the identified BCP housing and employment growth aspirations (Policy CEN1 part 5). The diversification of Strategic Centres to provide a re-purposed well-balanced mix of appropriate uses cited in paragraph 8.3b will be supported, in particular:

## **Policy CEN2 – Tier One: Strategic Centres**

- a) Residential provision will be maximised, to increase and strengthen communities, with indicative housing capacity identified for each strategic centre in Chapter 13 (see paragraph 8.27)
- b) Complementary uses as set out in paragraph 8.3bii, particularly community, health and education uses (see also Policy HOU5 and Policy HW2)

### **Centre Uses**

- 2) Development should be focussed in strategic centres (in-centre locations being defined in paragraph 8.9), particularly large-scale proposals to serve wider catchment areas, to maximise linked trips, promote the use of sustainable modes of transport and support regeneration.

#### **Retail**

- 3) Existing ‘convenience’ and ‘comparison’ retail provision will be protected and appropriate new development in this use supported, to meet both local shopping needs and large-scale provision to serve the wider catchment; focused on re-purposing vacant floorspace (Policy CEN1 point 7 and paragraph 8.15).

#### **Leisure**

- 4) Leisure uses, especially large-scale public and commercial facilities such as cinemas, hotels, and a wide range of high quality family venues and activities, will be supported where they help to diversify strategic centres, encourage linked trips and enhance the evening economy and visitor experience (see paragraph 8.25).

#### **Office**

- 5) Office provision, particularly that of high quality, will be supported, especially as strategic centres are important places of work, with it being a priority to identify and maintain a suitable portfolio of sites available to meet future demand (see paragraphs 8.24 and 8.26).

## Policy CEN2 – Tier One: Strategic Centres

- 6) **Proposals in edge-of-centre and / or out-of-centre locations (paragraph 8.9) will have to meet the relevant requirements set out in Policies CEN1 Table 7, CEN5 and CEN6 (paragraph 8.28).**

### Sustainability

- 7) **High quality public realm: strategic centres, as a focus for service provision, are highly sustainable locations and it is a priority to ensure high quality public realm is delivered, supported through environmental policies (Policy ENV9)**
- 8) **Accessibility: strategic centres should be accessible by a variety of means of transport, particularly walking, cycling and public transport. Proposals for commercial and business development that involve more than 500 sq m (gross) of floorspace within the primary shopping areas of the Black Country's strategic centres and well-linked edge-of-centre locations shall evidence the means to which they are compatible with the objectives of achieving sustainable development. This evidence must incorporate the setting out of provisions for the enablement or enhancement of sustainable means of travel and integrated modes of transport to and within individual strategic centres, with a particular focus on the management of demand for car parking and car-borne traffic, including through car parking regimes. Further details are set out in Policy TRAN6, and Local Development Plans.**
- 9) **In making planning decisions, further guidance (such as frontage policy) is set out in Local Development Plans.**

## Justification

- 8.23 The Centres Study is informed by a Household Survey that identifies changes in shopping patterns, especially the continued growth of online shopping, and health-checks are identifying that strategic centres are facing a number of challenges – particularly in relation to relatively high vacancy rates. The commercial market across all sectors, but particularly affecting the traditional High Street, has materially evolved and changed. A more pragmatic and flexible approach needs to be undertaken in addressing the future growth of the Strategic Centres, which does not necessarily place sole emphasis on the retail sector. Rather, this approach allows



for greater emphasis on services, communal or civic uses, and incorporates qualitative enhancements to the existing provision. It also supports a mix of uses in relation to new development including consideration for different types, including 'concurrent', 'meanwhile' and 'co-operative' uses of units. This means it is essential to provide appropriate flexibility to enable strategic centres to diversify and be re-purposed to ensure their future vitality and viability is maintained and enhanced. This includes prioritising high-quality public realm including, for example, provision of high-quality open space, green infrastructure, pedestrian and cycle networks and electric vehicle charging points (Policies CSP4, HW1 – HW3, TRAN5 and TRAN8, ENV8).

- 8.24 Current evidence shows there is no capacity to support additional retail, leisure, and office floorspace; it would not therefore be appropriate to include specific formal targets for different uses in policy. Planning decisions, such as applications and Local Development Plan allocations should be informed by the latest available evidence, and the Black Country authorities will seek to re-model capacity, particularly for retail, periodically in the future. The emphasis therefore is on the consolidation of core areas as opposed to expansion or identifying larger comprehensive development at in-centre or edge-of-centre sites, with any future potential for new floorspace likely to be met through infill development, reuse / reconfiguration of vacant units, change of use applications and/or extensions to existing stores, as emphasised in Policy CEN1 point 7 and Chapter 13. Local Development Plans provide more detailed, locally focused policies, such as protected frontages policy, and future allocations will be informed by the latest available evidence, particularly regarding capacity (see paragraph 8.10).
- 8.25 It is important that commercial and public leisure provision, particularly of a large scale, is focussed in Strategic Centres, to support their balanced functioning, encourage linked trips, enhance the evening economy, and diversify the experiential nature of centres. There is a priority for new cinema provision in Wolverhampton City Centre.
- 8.26 Changing working patterns, including an increase in agile and flexible working, means that future office environments are likely to be configured differently. Future office provision is likely to be predominantly market-led. Strategic centres are important places of work, with office workers making a positive contribution towards ensuring the vitality and viability of centres. The latest evidence (see paragraph

- 8.10) regarding office capacity will help inform planning decisions, and Local Development Plans can provide a more detailed steer. This could include identifying a portfolio of potential office sites, particularly as part of a mix of uses, including requiring a minimum 'reservoir' of office floorspace is maintained to ensure that sites are available for office development when demand emerges whilst ensuring other appropriate uses can also come forward.
- 8.27 City living and residential development in centres is likely to be a growth area over the plan period and will make a positive contribution to regeneration, particularly as a part of mixed-use development and upper floor living. Residential provision should therefore be maximised, to facilitate strategic centres as important places to live, supporting a resident population and local service provision. Identified residential capacity for each strategic centre is contained in Chapter 13 and will inform planning decisions and residential allocations being identified Local Development Plans.
- 8.28 The priority is for future growth in the Black Country, especially growth identified in BCP housing and employment allocations, to be served by the existing network of centres, providing the opportunity to support the network of Strategic Centres (Policy CEN1, paragraph 8.17). The fragility of centres with challenges to ensuring their vitality and viability means it's important to have robust tests for new proposals within 300m of a relevant boundary (see paragraph 8.9), as set out in Policies CEN1 point 4, Table 7 and CEN5 and CEN6.
- 8.29 It is recognised that individual Strategic Centres have their own vehicle parking regimes and approaches to parking, both within, and outside, the influence of the planning system. Nevertheless, a common approach going forward is required in order to ensure and enhance sustainability and encourage a modal shift in transport towards public transport, cycling and walking, as well as reducing the need to travel. This can help to be achieved by ensuring relevant in-centre and edge-of-centre development contributes to facilitating this objective, as well as by helping manage the demand for, and seeking an appropriate degree of parity between, car parking provision in Strategic Centres.
- 8.30 The strategic centre boundaries identified in the Proposals Map (see Chapter 13) are used for the purposes of determining what is in and out-of-scope in terms of BCP allocations, and do not necessarily reflect a boundary in policy terms. Relevant

strategic centre boundaries are contained in and may be adjusted by Local Development Plans (see CEN1 paragraph 8.16).

## Tier Two Centres

8.31 The Black Country's tier two centres, as identified in Policy CEN1 Table 7, consist of Walsall's district centres and Dudley, Sandwell, and Wolverhampton's town centres. They are a distinctive and valued part of the Black Country's character. This network of centres will help to meet needs in the most accessible and sustainable way. This policy supports the important local function provided by Tier Two Centres, particularly convenience retail provision, and their future diversification and regeneration of town centres.

### Policy CEN3 – Tier Two Centres

- 1) Proposals for appropriate uses (paragraph 8.3b) will be supported within tier-two centres (in-centre locations being defined in paragraph 8.9), particularly where they contribute to providing a diverse mix of uses, such as retail, office, leisure, residential, community, health, education and cultural facilities, and where they are of a scale that reflects the size, role and function of those centres and the catchments the centres serve.**
- 2) It is a priority for tier-two centres to serve the needs of development identified in the BCP, particularly residential and employment allocations (CEN1 point 5).**
- 3) Convenience retail development is encouraged, and proposals to extend or refurbish existing stores where they are well-integrated with the centre will be supported.**
- 4) In the assessment and determination of planning proposals, the distinctive offer, unique character, and special roles played by individual centres will be recognised and will be given appropriate weight when decisions are taken on applications that may affect the characteristics of the area.**
- 5) Proposals in edge-of-centre and/ or out-of-centre locations (paragraph 8.9) must meet the relevant requirements set out in Policies CEN1 Table 7, CEN5 and CEN6 (paragraph 8.35).**

## Policy CEN3 – Tier Two Centres

**6) In making planning decisions further guidance (such as frontage policy) is set out in Local Development Plans.**

### Justification

- 8.32 The Black Country's network of tier two centres performs an important role. In particular, the food (convenience) shopping function will be protected and supported especially as these uses help anchor the retail offer of the whole centre, encourage linked trips, and thereby help ensure the vitality and viability of centres.
- 8.33 The Centres Study health checks identify little capacity for these centres to support additional retail floorspace. The priority is for future growth in the Black Country, especially growth identified in BCP housing and employment allocations, to be served by the existing network of centres, providing the opportunity to support the network of tier two centres (as set out in Policy CEN1 and paragraph 8.17).
- 8.34 There is therefore a need for strategic interventions to enable centres to diversify further to ensure their future vitality and viability. This policy provides a framework to be supported by more detailed bespoke plans and projects that reflect the distinctiveness of tier-two centres, such as the heritage and education focus of Dudley Town Centre, the civic function of Oldbury, the role of the markets at Bilston, and the importance of independent shops in Willenhall. These can take the form of Local Development Plans (where centre boundaries can be adjusted if necessary), plus funding initiatives such as the Future High Street Fund.
- 8.35 Edge and / or out-of-centre proposals (as defined in paragraph 8.9) have to meet the relevant requirements of Policies CEN5 and CEN6 in order to protect centres from impacts of any inappropriate edge or out-of-centre proposals and ensure their vitality and viability. Local Development Plans provide more detailed, locally focused policies, such as protected frontages policy and may adjust relevant tier-two centre boundaries.

### Evidence

- Black Country Centres Study Main Report (March 2020) and Update (August 2021) (Lambert Smith Hampton)

### Delivery

- Development Management through the determination of planning applications; Local Development Plans; Black Country Local Authority projects; and sub-regional, regional, and national schemes and funding mechanisms

### Issues & Options Consultation

8.36 Feedback included that the policy should be flexible with uses in centres to allow for changes in shopping patterns and encouraging the greening of centres, including multifunctional green infrastructure such as provision of trees. Rather than adopt the option of the centres policies being silent on this, as BCP environment policies encourage green infrastructure, Policy CEN1 emphasises the importance of such provision in all centres and provides a policy cross-reference. CEN3 seeks to encourage a diverse mix of uses in the centres and extending/ refurbishing existing stores would be supported. The Centres Study identifies little capacity to support additional floorspace in these centres, so emphasis is placed on consolidation and diversification to ensure their future viability and vitality.

### Tier Three Centres

8.37 The Black Country’s tier-three centres, as identified in Policy CEN1 Table 7, consist of Walsall’s local centres and Dudley, Sandwell, and Wolverhampton’s district and local centres. This policy protects and supports the large network of centres that provide day-to-day convenience shopping and local service needs.

<b>Policy CEN4 – Tier Three Centres</b>	
1)	<b>Proposals for appropriate uses (paragraph 8.3b) will be supported within tier-three centres (in-centre locations being defined in paragraph 8.9) particularly commercial, business and service uses that meet day-to-day needs and serve local communities within the catchment area of those centres</b>
2)	<b>It is a priority for tier three centres to serve the day-to-day shopping and service needs of development identified in the BCP, particularly residential and employment allocations (Policy CEN1 point 5). Convenience retail development is encouraged and proposals to extend or refurbish existing food stores where they are well-integrated with the centre will be supported.</b>

### Policy CEN4 – Tier Three Centres

- 3) **Proposals in edge-of-centre (directly adjoining a centre boundary – paragraph 8.9) and / or out-of-centre locations have to meet the relevant requirements as set out in Policies CEN1 Table 7, CEN5 and CEN6 (paragraph 8.35).**
- 4) **In making planning decisions, further guidance (such as frontage policy) is set out in Local Development Plans.**

### Justification

- 8.38 The network of tier three centres is crucial to serving the local needs of the Black Country's existing and future communities in the most sustainable way. Existing centres are dependent on smaller supermarkets and / or convenience stores to anchor their retail offer.
- 8.39 The priority is for future growth in the Black Country, especially growth identified in BCP housing and employment allocations, to be served by the existing network of centres, providing the opportunity to support the network of tier three centres (Policy CEN1, paragraph 8.17). Edge-of-centre (where proposals do not directly adjoin a centre boundary – paragraph 8.9) and out-of-centre proposals have to meet the relevant requirements of Policies CEN5 and CEN6 in order to protect centres from the impacts of any inappropriate edge or out-of-centre proposals and ensure their vitality and viability.
- 8.40 Local Development Plans provide more detailed, locally focused policies, such as protected frontages policy. Local Development Plans may adjust local centre boundaries, designate new local centres, or remove local centres from the network and hierarchy. New local centres identified in this way would become part of the network of tier-three centres in the hierarchy (CEN1 Table 7) and would become subject to relevant BCP policies, particularly Policies CEN1 - CEN6. This process should be justified with robust evidence; for example, relating to catchment areas, physical constraints, existing and future potential provision, the vitality and viability of centres and other relevant policy considerations.

### Evidence

- Black Country Centres Study Main Report (March 2020) and Update (August 2021) (Lambert Smith Hampton)

## Delivery

- Development Management through the determination of planning applications; Local Development Plans; Black Country Local Authority projects; and sub-regional, regional, and national schemes and funding mechanisms

## Issues & Options Consultation

8.41 Responses emphasised the need for flexibility to allow Tier Three Centres to remain strong and provide services to the local community, with it no longer being appropriate for centres to be dominated by retail as vacancies remain high. The policy ensures that tier three centres are able to serve the local needs of the communities in a sustainable way. The option to remove the emphasis on retail is balanced by encouraging diversification but still acknowledging the importance smaller supermarkets/ convenience stores play in serving local communities, and particularly in the future to support the Black Country's housing growth. Local Development Plans will be able to adjust e.g. frontage policies to facilitate further diversification.

## Edge-of-Centre and Out-of-Centre Proposals (Policies CEN5 and CEN6)

8.42 Proposals in edge and out-of-centre locations need to meet the requirements of Policies CEN5 and CEN6.

8.43 As set out in paragraph 8.9, **Appendix 16** sets out the specific locations that are defined as edge or out-of-centre for various uses by the BCA, to assist with applying relevant policies and national tests highlighted in Table 7.

8.44 **Edge-of-centre** locations for tier-one and tier-two centres are those locations defined by national guidance, currently within 300m of in-centre locations. For retail purposes, this is a location that is well-connected to, and up to 300 metres from, the primary shopping area (see Appendix 16). For all other main town centre uses, this will be a location within 300 metres of a town centre boundary. For office development, this includes locations outside the centre but within 500 metres of a public transport interchange. Locations immediately adjoining the boundaries of Tier Three centres are defined as edge-of-centre.

8.45 **Out-of-centre** locations are those locations not in or on the edge of a centre.

## Provision of Small-Scale Local Facilities not in centres

8.46 This policy applies to proposals for small-scale local facilities (centre uses and complementary uses including social infrastructure and community uses – paragraph 8.3b) not in a centre (in edge and/ or out-of-centre locations as defined in paragraph 8.9), which have a proposed unit floorspace of under 280sqm (gross), as set out in paragraph 8.48 below. The priority is for local service needs, particularly that generated from the future growth identified for the Black Country (Policy CEN1 point 5), to be met by the existing network of centres, to ensure their vitality and viability. However, some small-scale provision may be justified in certain circumstances to meet local community needs.

### Policy CEN5 – Provision of Small-Scale Local Facilities

- 1) **Proposals subject to planning control for small-scale local facilities (centre uses and complementary uses set out in paragraph 8.3b), in edge or out-of-centre locations (paragraph 8.9) that have a proposed unit floorspace of up to 280sqm (gross) (paragraph 8.48) will only be permitted if all the following requirements are met:**
  - a) **The proposal does not unduly impact on the health and wellbeing of the community it is intended to serve.**
  - b) **The proposal is of an appropriate scale and nature to meet the specific day-to-day needs of a population within convenient, safe walking distance for new or improved facilities.**
  - c) **Local provision could not be better met by investment in a nearby centre (which for centre uses identified in paragraph 8.3b, is the sequential test as set out in national guidance).**
  - d) **Existing facilities that meet day-to-day needs will not be undermined.**
  - e) **Access to the proposal by means other than by car can be demonstrated and will be improved; this will be evidenced by the proposal being within convenient, safe walking distance of the community it will serve.**
- 2) **Development involving the loss of a local facility, particularly a convenience shop, pharmacy, community facility or post office, will be resisted where this**



### **Policy CEN5 – Provision of Small-Scale Local Facilities**

would result in an increase in the number of people living more than a convenient, safe walking distance from alternative provision.

- 3) In making planning decisions further guidance is set out in Local Development Plans.**
- 4) Where planning permissions are granted, effective planning conditions and / or planning obligations will be required to support the regeneration strategy and minimise impacts (Policy CEN1 point 6 and paragraph 8.12).**
- 5) Proposals where total floorspace exceeds 280sqm (gross) will also have to meet the requirements of Policy CEN6 (see paragraphs 8.49 – 8.50).**

### **Justification**

8.47 The existing network of centres plays a crucial role in serving the local needs of the Black Country. Centres are also dependent on smaller units, such as supermarkets and convenience stores, to anchor their retail and service offer. It is therefore a priority to protect and support this approach. Local facilities are also provided in existing stand-alone locations and by small parades of shops. It is recognised that stand-alone provision to serve local communities, particularly where it offers social infrastructure, plays a positive role under certain, specific circumstances.

8.48 This policy relates to proposals for small-scale local facilities (uses as defined in paragraph 8.3b) for units of up to 280sqm (gross) of floorspace and extensions (including internal floorspace increases such as the provision of mezzanine floors) where the proposed uplift in floorspace is up to 280sqm (gross) (see also paragraphs 8.49 – 8.50) and applies to new development, changes of use and variations of conditions, including:

- a) proposals related to petrol filling stations and drive-through facilities;
- b) proposals for ancillary uses under Policy EMP3;
- c) where the potential for an element of on-site provision of new local facilities is identified in Chapter 13 and / or Local Development Plans to serve the specific needs of future development, or in exceptional circumstances where such proposals are brought forward through speculative planning applications, (whereby the requirements of Policy HOU2 also have to be met particularly

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with respect to demonstrating high levels of accessibility by sustainable modes of transport).

- 8.49 Proposals that have unit sizes under 280sqm (gross) but comprise a number of units where the total floorspace of the proposal exceeds 280sqm (gross), and / or where the proposed uplift in floorspace of unit size(s) is under 280sqm but would create unit(s) over 280sqm (gross) as set out in paragraph 8.48, will also have to meet the requirements of Policy CEN6.
- 8.50 Proposals, (including paragraph 8.48, points a-c) whose unit size(s) are over 280sqm (gross) will have to meet the requirements of Policy CEN6.
- 8.51 This policy can contribute to achieving priorities such as promoting the health and well-being of local communities (Policy HW1 point k).
- 8.52 For the purposes of applying the criteria, nearby centres include those centres whose catchment areas overlap with the catchment area of the proposal, with 400m being a safe, convenient walking distance.
- 8.53 The strategy is for investment to be focussed in centres, with the priority for the existing network of centres to serve the Black Country's needs, particularly future growth identified housing and employment allocations (Policy CEN1 point 5). Therefore, strong justification is required for edge and out-of-centre schemes that could otherwise undermine the strategy for the regeneration of the Black Country and ensuring the vitality of centres. Requirement 2 in the policy notes that certain existing local facilities that are not in a centre provide an important service to a local area and will wherever possible be protected.
- 8.54 In making planning decisions, further guidance, such as hot food takeaway SPDs, are set out in Local Development Plans. Where planning permissions are granted effective planning conditions and /or planning obligations will be required to support the regeneration strategy and minimise impacts. Conditions should include, for example, clearly defining as specifically as possible the types and (sub)categories of uses that are acceptable and goods and service to be sold, unit sizes and sales areas, including relating to mezzanine floors, future sub-division of units and opening hours (Policy CEN1 point 6).

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## Evidence

- Black Country Centres Study Main Report (March 2020) and Update (August 2021) (Lambert Smith Hampton)

## Delivery

- Development Management through the determination of planning applications; Local Development Plans; Black Country Local Authority projects; and sub-regional, regional, and national schemes and funding mechanisms.

## Issues & Options Consultation

- 8.55 Views included that the current threshold is appropriate and in line with national guidance as long as the evidence base can show this, and that under the current local guidance even modest schemes would be unacceptable in out of centre locations. The LSH Centres study identifies that the Black Country's network of centres is facing challenges and in order to ensure their future vitality and viability significant adverse impacts need to be avoided, particularly as many centres serve the day-to-day needs of the local community. However, it is also acknowledged that an element of stand-alone provision within local communities can play an important role. Therefore, the options to retain the current 200sqm threshold or to remove local guidance, is balanced with a 280sqm threshold reflecting unit sizes that are not subject to trading restrictions and the new F2(a) Local Community use class, with clear criteria to determine applications.

## Edge-of-Centre and Out-of-Centre Development

- 8.56 This policy applies to proposals not in a centre (in edge and / or out-of-centre locations), which have a proposed floorspace of over 280sqm (gross), as set out in Policy CEN1 Table 7 and paragraph 8.60.
- 8.57 The approach is intended to focus appropriate uses within the existing network of centres. Very limited existing and future capacity means that any growth not in centres can cause adverse impacts on them. This policy sets out robust requirements that will ensure that investment in centres is maximised and significant adverse impacts are prevented (Strategic Priority 9).

## **Policy CEN6 – Edge-of-Centre and Out-of-Centre Development**

- 1) There is a clear presumption in favour of focusing appropriate uses (paragraph 8.3b) in centres.**

### **Sequential Test**

- 2) All edge-of-centre and out-of-centre proposals (as defined in paragraph 8.9) for centre uses (paragraph 8.3b) should meet the requirements of the sequential test set out in the latest national guidance.**
- 3) Edge and out-of-centre proposals should be assessed for accessibility by a choice of modes of transport, in particular public transport, walking and cycling, and support both social inclusion and cohesion, and the need to sustain strategic transport links. Edge of centre proposals will need to demonstrate that they will be well-integrated with existing in-centre provision.**
- 4) When assessing sequentially preferable locations, proposals will need to demonstrate flexibility in their operational requirements, particularly in terms of format and types of goods sold (paragraph 8.11).**

### **Impact Tests**

- 5) The locally-set floorspace thresholds for edge and out-of-centre retail and leisure proposals to meet the requirements of the Impact Assessment as set out in the latest national guidance is 280sqm (gross) (see Policy CEN1 Table 7). Impact tests should be proportionate to the nature and scale of proposals.**
- 6) Proposals should be informed by the latest available robust evidence.**
- 7) In making planning decisions, further guidance is set out in Local Development Plans.**
- 8) Where planning permissions are granted, effective planning conditions and / or planning obligations will be required to support the regeneration strategy and minimise adverse impacts (Policy CEN1 point 6).**
- 9) Proposals that include unit sizes under 280sqm (gross) will also have to meet the requirements of Policy CEN5 (paragraph 8.61).**

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## Justification

- 8.58 The intention of CEN6 is to ensure that investment is focused in centres, with the priority for the existing network of centres to serve the Black Country's needs, particularly future growth identified housing and employment allocations (Policy CEN1 point 5). Therefore, strong justification is required for edge-of-centre and out-of-centre schemes that could otherwise undermine the strategy for promoting the regeneration of the Black Country and ensuring the vitality of centres.
- 8.59 The Centres Study identifies little capacity to support additional floorspace, which means proposals that do not serve centres are likely to adversely impact upon their vitality and viability. The regeneration strategy for centres is focussed on bringing vacant floorspace back into use, and a consolidated retail and leisure offer is essential to facilitate diversification through e.g. encouraging linked trips. Centres are also dependent on units such as supermarkets and convenience stores to anchor their retail and service offer. It is therefore a priority to protect and support this approach. Consequently, the impact of proposals for centre uses not in centres are a cause for concern. There is a need for an appropriately robust policy approach to ensure all potential options to focus development in centres are thoroughly explored, and proposals are tested for their potential significant adverse impacts on existing centres. This is particularly the case for large-scale out-of-centre speculative retail and/ or leisure proposals.
- 8.60 For the purposes of applying the Impact Assessment, 280sqm (gross) is the locally set threshold for undertaking impact tests on retail and leisure proposals as set out in national guidance in edge and out-of-centre locations (Policy CEN1 Table 7). This applies to new development, changes of use, variations of conditions, extensions to / increase the floorspace of existing unit(s) (e.g. through increasing sales areas, mezzanine floors) that would create outlets with floorspace over 280sqm (gross), and / or proposals whose unit sizes are under 280sqm but the total floorspace of the proposal is over 280sqm (gross) (see also paragraph 8.61), including;
- proposals related to petrol filling stations and drive-through facilities;
  - proposals for ancillary retail and leisure uses under Policies EMP2 and EMP3;
  - where potential for an element of on-site provision of new local facilities are identified in Local Development Plans to serve the specific needs of future

development, or in the exceptional circumstances where such proposals are brought forward through speculative planning applications (whereby the requirements of Policy HOU2 also have to be met particularly with respect to demonstrating high levels of accessibility by sustainable modes of transport).

- 8.61 There are instances where proposals will have to meet the requirements of both this policy (particularly the impact tests) and Policy CEN5 requirements such as where proposals have a floorspace uplift or unit sizes under 280sqm (gross) but total floorspace exceeds 280sqm (gross) (Policy CEN5 paragraphs 8.48 – 8.50).
- 8.62 Flexibility should be demonstrated when assessing potential in-centre locations, including in terms of specific types of goods & services and elements of the business models of proposals, such as ‘drive through’ facilities not necessarily needing to be outside a centre solely for vehicular access and circulation reasons.
- 8.63 It is important to ensure edge-of-centre proposals do not cause significant adverse impacts, particularly as they share catchment areas with in-centre provision. Edge-of-centre proposals should support regeneration through being well integrated, particularly through direct pedestrian linkages complementing and enhancing adjacent in-centre provision.
- 8.64 Impact tests should be proportionate to the nature and scale of proposals, and to assist with the determination of proposals should include as a minimum the estimated turnover and trade draw from relevant centres of the proposal. Additional evidence should include information regarding capacity, catchment areas, the health and existing retail commitments (paragraph 8.10).
- 8.65 In making planning decisions further guidance is set out in Local Development Plans. Where planning permissions are granted effective planning conditions and/or planning obligations will be required to support the regeneration strategy and minimise impacts. Conditions should include, for example, a clear definition of the types and (sub)categories of uses that are acceptable and the goods and service to be sold, the agreed details of unit sizes and the extent of sales areas, including in relation to mezzanine floors, the potential future sub-division of units and the opening hours (as set out in Policy CEN1 point 6).

## Evidence

- Black Country Centres Study Main Report (March 2020) and Update (August 2021) (Lambert Smith Hampton)

## Delivery

- Development Management through the determination of planning applications; Local Development Plans; Black Country Local Authority projects; and sub-regional, regional, and national schemes and funding mechanisms

## Issues & Options Consultation

- 8.66 There was general consensus that this policy is acceptable. The policy aims to ensure that appropriate uses are located within defined centres in the first instance to minimise the impacts of out-of-centre development on the vitality of centres. There was a view that under the current local guidance even modest schemes would be unacceptable in out-of-centre locations and the impact test threshold should revert to the default 2,500sqm in national guidance.
- 8.67 The LSH Centres study identifies that the Black Country's network of centres are facing challenges and in order to ensure their future vitality and viability future out-of-centre proposals need to be tested to avoid significant adverse impacts, particularly as little capacity is predicted to support additional floorspace. The option to retain a variety of thresholds or to adopt the national default, is balanced by having a clear threshold of 280sqm, which reflecting unit sizes that are not subject to trading restrictions and the new F2(a) Local Community use class. The policy emphasises that any impact tests should be proportionate to the scale and nature of proposals.

## Monitoring

Policy	Indicator	Target
CEN1 - CEN6	Number / floorspace of applications determined / completions by location / use as reflected in LPA monitoring;  Number / % applications that meet the requirements of the policy	All applications/ planning permissions to meet policy requirements

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## 9 Transport

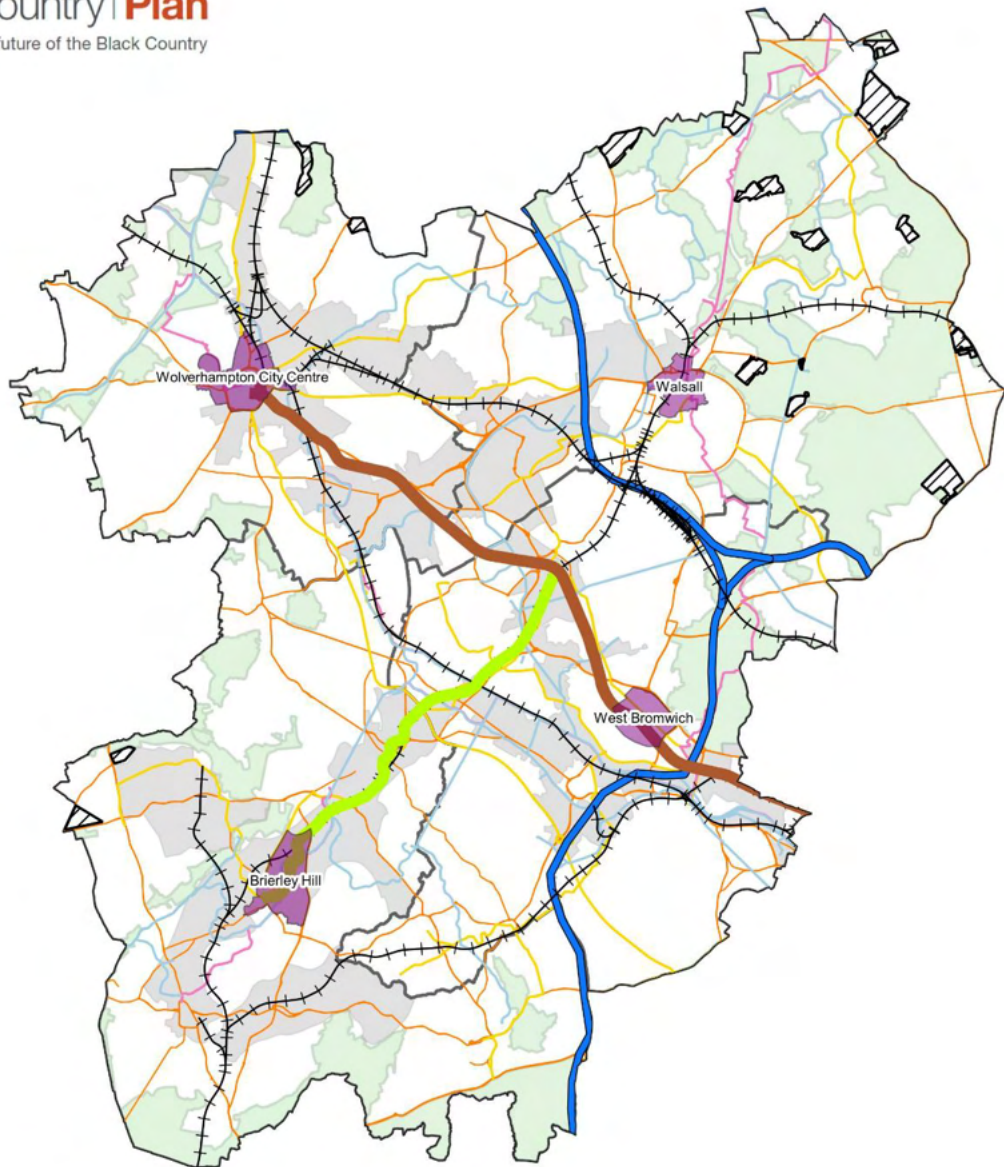
### Introduction

- 9.1 The delivery of an improved and integrated transport network both within the Black Country and in links with regional and national networks is fundamental to achieving the Vision and in helping to transform the area, deliver housing growth and improve economic performance, and thus in achieving Strategic Objective 10. The development of transport networks in the Black Country is focused on a step change in public transport provision serving and linking centres, improving sustainable transport facilities and services across the area, improving connectivity to national networks and improving the efficiency of strategic highway routes. The improvements needed to deliver the transport strategy are shown on the Transport Key Diagram.
- 9.2 To help address the climate change crisis, strategic and local transport policies, plans and programmes must emphasise the delivery of a modernised and sustainable transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, promoting walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.
- 9.3 Additionally, transport strategy in the Black Country has a key role to play in reducing carbon emissions and the impact on the natural environment. The BCP will therefore need to focus on promoting the appropriate design, location and layout of development, increasing investment in infrastructure, improving the quality, equality and accessibility of public transport, supporting walking and cycling, enhancing road safety and reducing the amount of emissions produced by transportation.



Figure 8 - Transport Key Diagram

**Black Country | Plan**  
 Planning for the future of the Black Country



Transport Key Diagram

Key:	
<b>Transport</b>	
Key Route Network (TRAN1)	Wednesbury -Brierley Hill Metro Extension (TRAN4)
Motorways	Canal
Local Cycle Networks (TRAN5)	<b>Strategic Planning</b>
National Cycle Network (TRAN5)	Tier One Strategic Centres
Rail Network (TRAN4)	Local Authority Boundaries
Existing West Midlands Metro (TRAN4)	Core Regeneration Areas
	Black Country Green Belt
	Neighbourhood Growth Areas

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## Priorities for the Development of the Transport Network

- 9.4 The delivery of an improved and integrated transport network both within the Black Country and in links with regional and national networks is fundamental to achieving the Vision and in helping to transform the area, deliver housing growth and improve economic performance, and achieving Spatial Objective 7. It is acknowledged that in the short-term, the Covid-19 pandemic and the shift towards homeworking has impacted on the way in which transport is used. In particular, there has been a significant impact on public transport patronage levels which may take a number of years to recover to pre-pandemic levels.
- 9.5 However, high-quality public transport remains at the heart of the Black Country transport strategy. The development of the transport network is focused on a step change in public transport provision serving and linking centres, improving sustainable transport facilities and services across the area, improving connectivity to national networks and improving the efficiency of strategic highway routes. The improvements needed to deliver the transport strategy are shown on the Transport Key Diagram.
- 9.6 To help address the climate change crisis, strategic and local transport policies, plans and programmes must emphasise the delivery of a modernised and sustainable transport network. Specific objectives should include reducing pollution and road congestion through improvements to public transport, promoting walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.
- 9.7 Additionally, transport strategy in the Black Country has a key role to play in reducing carbon emissions and the impact on the natural environment. The BCP will therefore need to focus on promoting the appropriate design, location and layout of development, increasing investment in infrastructure, improving the quality, equality and accessibility of public transport, supporting walking and cycling, enhancing road safety and reducing the amount of emissions produced by transportation.

## **Policy TRAN1 Priorities for the Development of the Transport Network**

- 1) Land needed for the implementation of priority transport projects will be safeguarded to allow for their future delivery.**
- 2) All new developments must provide adequate access for all modes of travel, including walking, cycling and public transport. Residential development will be expected to meet the accessibility standards set out elsewhere in this Plan**
- 3) Key transport corridors will be prioritised through the delivery of infrastructure to support active travel (walking, cycling), public transport improvements, traffic management (including localised junction improvements) and road safety.**
- 4) Key transport priorities identified for delivery during the lifetime of the BCP currently include (but are not limited to) the following<sup>21</sup>:**
  - a) Motorways:**
    - i. M6 Junction 10**
    - ii. M5 Improvements (Junctions 1 and 2 and new Smart Motorway Section)**
    - iii. M54 - M6 / M6 (Toll) Link Road**
  - b) Rail: -**
    - i. Wolverhampton - Walsall – Willenhall – Aldridge Rail Link**
    - ii. Midlands Rail Hub**
    - iii. Wolverhampton – Shrewsbury Line Improvements**
  - c) Rapid Transit:**
    - i. Wednesbury – Brierley Hill**
    - ii. A34 Walsall Road Sprint Corridor**

<sup>21</sup> Taken from “*Black Country Transport - Connected for Growth*”, Black Country LEP and TfWM, 2019

## Policy TRAN1 Priorities for the Development of the Transport Network

- iii. **Wolverhampton – New Cross Hospital**
- iv. **Walsall – Stourbridge corridor tram-train extensions**
- d) **Key Road Corridors<sup>22</sup>:**
  - i. **A454 City East Gateway Upgrade**
  - ii. **A4123 Corridor Upgrade**
  - iii. **A449 Stafford Road Corridor Upgrade**
  - iv. **A461 Black Country Corridor**
- e) **Interchanges:**
  - i. **Dudley Town Centre Interchange**
  - ii. **Dudley Port Integrated Transport Hub**
  - iii. **Walsall Interchange**

### Justification

- 9.8 Good connectivity to the wider region national transport networks and Birmingham International Airport for both passengers and freight has been identified as being necessary to support the regeneration of the Black Country. The economic growth will be supported by improved access to major global economies.
- 9.9 Movement for Growth seeks to enable all residents being able to access at least three strategic centres within 45 minutes (AM peak). It envisages this being achieved through a combination of frequent rapid transit services and high quality “turn up and go” bus services.
- 9.10 A strategic public transport “spine” comprising high quality, reliable, fast and high capacity rapid transit between the strategic centres - Brierley Hill, Walsall, West Bromwich, Wolverhampton and Birmingham remains as a crucial element of the Black Country Plan transport strategy and is necessary to support the role of these centres as a focus for employment, shopping and leisure and increasingly, housing.

<sup>22</sup> Schemes to improve general reliability, public transport, cycling and walking

- 9.11 Currently Metro line 1 provides the required standard of link between Wolverhampton, West Bromwich and Birmingham but it is important that the public transport modes of rail, metro and bus are better integrated to ensure that people can use them to travel where and when they need to. The combination of the Wednesbury to Brierley Hill metro extension and the proposed Dudley port Integrated Transport Hub will add Brierley Hill (and Dudley) to the rapid transit network.
- 9.12 The Black Country Rapid Transit study of 2016 concluded that full delivery of the Public Transport Spine would best be achieved by completing the Stourbridge to Walsall corridor as a tram-based facility (subject to the adoption of Tram-Train technology) whilst the Walsall to Birmingham link should be catered for through bus rapid transit. This is the A34 SPRINT project, Phase 1 of which is currently being delivered.
- 9.13 The completion of feasibility studies into the provision of the Stourbridge to Brierley Hill and Wednesbury to Walsall rapid transit proposals will be an early requirement for taking the strategy forward.
- 9.14 It is vital that new development has access to high quality public transport facilities and services from the outset as this will ensure that people travelling to and from these areas do not establish unsustainable travel patterns due to the initial absence of good public transport.
- 9.15 The Black Country Plan supports the delivery of an enhanced transport network for the Black Country to ensure a seamless integration of land-use and transport planning and to demonstrate the strong interdependency of future land-use decisions and adequate servicing by a variety of travel modes. The exact mode of public transport should reflect existing demand and also take account of potential future economic or housing growth points to ensure an integrated approach to sustainable development and travel patterns. This is essential to support the scale of growth proposed for the core regeneration areas and strategic centres and to create an effective transportation system to support sustainable communities. This transport network will provide communities with access to employment, leisure, education and health care and will facilitate improved access to employment sites.
- 9.16 In this regard the re-opening of rail corridors such as Walsall to Aldridge, and the delivery of an upgraded Wolverhampton to Shrewsbury line and the Midland Rail Hub (developed through Midlands Connect) will support housing growth both within

- the Black Country and in those areas meeting housing and employment need beyond the sub-region's boundaries.
- 9.17 The operation of the highway network needs to be improved to support the growth and long-term viability of the Black Country's economy whilst limiting the environmental effect of transport usage. Movement for Growth sets out a strategy of making the best of the existing highway network in a coordinated way through a programme of KRN corridor-based multi-modal improvements. Movement for Growth is being reviewed during 2021 with the aim of further strengthening the strategy to help achieve the West Midlands target for net zero carbon emissions by 2041.
- 9.18 New highway building within the Black Country will be mainly in support of regeneration, but some key junctions on the DfT's Major Road Network and the West Midlands Key Route Network such as important links for public transport and to the motorway network for freight will be improved by major construction schemes. Highway improvements will be expected to address the needs of all users especially pedestrians and cyclists and to cater for bus priority in line with current Government guidance.
- 9.19 Strategic Employment Areas are defined in terms of good access standards to the motorway network. As no new motorways are planned within the lifetime of this plan the M6, M5 and M54 motorways will remain vital transport links for Black Country business and freight.
- 9.20 Buses will continue to dominate local public transport provision in the Black Country throughout the life of the plan period. 85 % of all passenger miles were catered for by bus prior to the Covid-19 pandemic and bus services have recovered at a faster rate than either rail or metro/ by 2026. The National Bus Strategy (2021) requires bus priority to be an integral part of all highway improvements. Therefore, work on the key highway corridors identified through the Key Route Network Action plans will play a significant role in delivering this requirement through a partnership of TfWM, Local Highway Authorities and operators. Specific local measures to help buses will be delivered in other locations where appropriate along with the upgrading of bus stations in strategic and other centres where demand resulting from the concentration of new developments requires it.
- 9.21 Coaches have a role to play in providing affordable long-distance connectivity and access facilities to major Black Country destinations and will be encouraged.

- 9.22 While improvement of accessibility to bus services will be a priority, some people will have little choice but to make the first part of their journey by car. The success of Park and Ride in contributing to a sustainable travel pattern will depend on minimising the distance driven before transferring to public transport. Well located Park and Ride facilities can provide a realistic alternative for many car drivers and contribute to environmental improvement by reducing congestion on radial routes into centres at peak times and by improving public transport patronage. New Park and Ride sites will be developed in accordance with the adopted West Midlands Park & Ride strategy.
- 9.23 As transport projects reach the design stage there will be a need to safeguard the land needed for the implementation of schemes. When projects are sufficiently advanced, improvement lines will be imposed, or land will be safeguarded in the appropriate Local Plan Documents such as Site Allocations Documents or Area Action Plans.

## Evidence

- West Midlands Strategic Transport Plan - Movement for Growth (TfWM 2016)
- Movement for Growth - 2026 Delivery plan for Transport (TfWM 2017)
- Black Country Transport - Connected for Growth (BCLEP and TfWM 2019)
- West Midlands Rail Limited - Single Network Vision (WMRE 2017)
- Driving a Revolution in Rail Services for West Midlands - A 30-year Rail Investment Strategy 2018-2047 (WMRE 2018)
- Black Country Transport Priorities Document (BCA 2017)
- Black Country Plan Transport Modelling Study (2021)
- Black Country rapid Transit Study (TfWM & BCA 2016)
- West Midlands Park & Ride Strategy (TfWM 2020)
- West Midlands Freight Strategy - Supporting our Economy, Tackling Carbon (TfWM 2016)
- Midlands Connect Transport Strategy (2017)
- Midlands Rail Hub SOBC (2019)

## Delivery

- Delivery of the transport priorities will rely on several agencies and multiple funding sources. The main delivery agencies will be;
  - Transport for West Midlands (TfWM)

- West Midlands Rail Executive (WMRE)
  - Local Highway Authorities
  - Highways England
  - Network Rail
  - Midlands Connect
- The principle vehicles for delivery will be the West Midlands Strategic Transport Plan – Movement for Growth, the West Midlands Rail Investment Plan and the national Road and Rail Investment Strategies (RIS). Funding will be sought through a combination of national programmes, competitive funding streams such as the Major Route Network Fund and the Large Local Majors Fund, and through devolved local transport settlements with third party contributions wherever appropriate.

## Issues & Options Consultation

- 9.24 There was a recognition that a well-connected transport system is essential for the local economy. In achieving this there was support for the extension of the metro network and reinstatement/expansion of rail services and new stations. Particular reference was made to the reinstatement of freight and heavy rail passenger services on the Stourbridge – Walsall rail corridor and to the future need for inter-modal freight interchange facilities.
- 9.25 Comments were also received regarding the role and improvement of the Strategic Road Network i.e. motorways and trunk roads including those outside of the Black Country's geography, but which impact on it; M6Toll, A5(T) and Smart Motorways

## Safeguarding the Development of the Key Route Network

- 9.26 The West Midlands Key Route Network (KRN) caters for the main strategic demand flows of people and freight across the metropolitan area whilst providing connections to the national Strategic Road Network. Highway capacity will be used to effectively cater for movement by rapid transit and core bus routes, the Metropolitan Cycle Network, lorries, vans and private cars. This will involve the reallocation of roadspace where appropriate to provide reliable, fast high volume public transport and an enhanced role for UTMC via the West Midlands Regional Traffic Control Centre (RTCC). The KRN will play a major role in supporting Strategic Priorities 7, 8 and 10.



## Policy TRAN2 Safeguarding the Development of the Key Route Network

- 1) **The four Black Country Highway Authorities will, in conjunction with Transport for West Midlands (TfWM), identify capital improvements and management strategies to ensure the Key Route Network meets its designated function of serving the main strategic demand flows of people and freight across the metropolitan area, providing connections to the national strategic road network, serving large local flows that use main roads and providing good access for businesses reliant on road-based transport.**
- 2) **Land needed for the implementation of improvements to the KRN will be safeguarded in order to assist in their future delivery.**
- 3) **Where new development is expected to result in adverse impacts on the KRN, appropriate mitigation measures will need to be identified through transport assessments and provided through planning obligations**

### Justification

- 9.27 The West Midlands KRN not only serves the main strategic demand flows of people and freight across the metropolitan area and provides connections to the national strategic road network. It also serves large local flows which use main roads and will need to provide good access for businesses reliant on road-based transport. The network will use highway capacity effectively to cater for movement by rapid transit and core bus routes, the Metropolitan Cycle Network, lorries, vans and private cars. This will involve the reallocation of roadspace where appropriate to provide reliable, fast high volume public transport and enhanced cycling facilities.
- 9.28 The KRN has been defined on the basis of a Combined Authority definition agreed with the seven highway authorities, in consultation with neighbouring highway authorities, and features agreed performance specifications drawn up for different types of link in the network in accord with their role for movement ("link"), and their role as a destination in its own right e.g. a suburban/town centre high street ("place").
- 9.29 Improvements will be performed to meet the agreed performance specification for the links and junctions involved to support road based rapid transit proposals such

as SPRINT (Bus Rapid Transit) and Metro. Improvements will take into account guidance contained in the National Bus Strategy and the West Midlands Vision for Bus. Where routes also form part of the Metropolitan Cycle Network, the standards contained in Local Transport Note 120 will be applied.

9.30 Capital scheme improvements will be identified where appropriate, but it also is vital that this network is managed efficiently through the collaboration of all four authorities in their role as LHA.

## Evidence

- West Midlands Strategic Transport Plan - Movement for Growth (TfWM 2016)
- Movement for Growth - 2026 Delivery plan for Transport (TfWM 2017)
- Black Country Transport - Connected for Growth (BCLEP and TfWM 2019)
- West Midlands' Key Route Network Evidence Report (TfWM 2018)
- West Midlands Vision for Bus (TfWM 20??)
- Local Transport Note 120 (DfT 20??)

## Delivery

- The overarching responsibility for the development and improvement of the Key Route Network sits with the West Midlands Mayor and Transport for West Midlands. The framework for improvement forms part of Movement for Growth with implementation guided by a series of KRN Corridor Action Plans.
- Funding for individual improvements will be sought through a combination of competitive funding streams, such as the DfT's Major Route Network and Large Local Majors Funds and from devolved local transport settlements with third party contributions wherever appropriate.
- Where proposals cover key public transport routes, funding will also be sought through the Government's Better Deal for Bus initiative.

## Issues & Options Consultation

9.31 This is a new policy reflecting the role of the West Midlands KRN, which was adopted in 2016 through the creation of the West Midlands Combined Authority and the new role of West Midlands Mayor.

9.32 However, comments were received during the Issues & Options consultation relating to the need to provide clarity regarding the role of the West Midlands KRN

within the Black Country and its contribution to the competing needs of national, regional and local users.

## Managing Transport Impacts of New Development

- 9.33 To ensure that the transport elements of the Black Country Plan are deliverable, it is essential that both new developments and existing facilities identify travel and transportation impacts and proposals for mitigation. It is important that accessibility by a choice of sustainable modes of transport is maximised. Transport Assessments and Travel Plans produced by developers, employers, schools and facility operators are essential to bring about sustainable travel solutions and help deliver Strategic Priority 10.

### Policy TRAN3 Managing Transport Impacts of New Development

1. **Planning permission will not be granted for any proposals that are likely to have significant transport implications, unless accompanied by mitigation schemes that demonstrate an acceptable level of accessibility and safety can be achieved using all modes of transport to, from and through the development. Mitigation schemes must address in particular access by walking, cycling, public transport and car sharing.**
2. **These proposals should be in accordance with an agreed Transport Assessment, where required, and include the implementation of measures to promote and improve such sustainable transport facilities through agreed Travel Plans and similar measures.**

### Justification

- 9.34 All developments will be assessed both in terms of their impact on the transport network and the opportunities that could be available to ensure that the site is accessible by sustainable modes of transport. The supporting documentation will either take the form of a full Transport Assessment (TA) or a less detailed Transport Statement (TS) and will generally be determined by the size and scale of development or land use. This will be based on guidance from individual authorities with a TA sometimes being required instead of a TS based on reasons other than spatial thresholds; road safety concerns, existing congestion problems, air quality

problems, concerns over community severance or likelihood of off-site parking being generated.

9.35 TfWM's guide for developers should be routinely consulted for larger developments.

9.36 Where a development is considered to have a potential significant effect on the Strategic Road Network, Highways England will be involved.

## Evidence

- The Preparation of Transport Assessments and Travel Plans (SMBC 2006)
- Transport for West Midlands Guide for Developers (TfWM 2021)

## Delivery

- Delivery of this policy will be through the Development Management process and via Planning Obligations or other legal and funding mechanisms. Detail will be set out in appropriate Supplementary Planning Guidance.

## Issues & Options Consultation

9.37 Concerns were raised that targets for walking and cycle use and predictions used in TAs should be realistic, recognising that the area's topography and narrow roads often discourage cycle use.

## The Efficient Movement of Freight

9.38 New freight railways and rail sidings will present an economic opportunity for Black Country businesses. Improved journey times on the highway network will support economic prosperity and switching traffic to rail or inland waterways will relieve the highway network of traffic, thereby reducing congestion and improving air quality and the environment. The siting of businesses producing heavy flows of freight vehicles in locations with good access to the principal highway network will also assist with environmental improvement. Improvements to the freight network are fundamental to achieving the Vision for sustainable communities, environmental transformation and economic prosperity and to delivering Spatial Objectives 2, 6, 7, 10 and 15.

## Policy TRAN4 The Efficient Movement of Freight

- 1. The movement of freight by sustainable modes of transport such as rail and waterways will be encouraged. Road-based freight will be encouraged to use the Key Route Network whenever practicable.**
- 2. Junction improvements and routeing strategies will be focussed on those parts of the highway network evidenced as being of particular importance for freight access to employment sites and the motorway network.**
- 3. Proposals that generate significant freight movements will be directed to sites with satisfactory access to the Key Route Network.**
- 4. Existing and disused railway lines<sup>23</sup> will be safeguarded for rail-related uses.**
- 5. Sites with existing and potential access to the rail network for freight will be safeguarded for rail-related uses.**

### Justification

- 9.39 Within the Black Country, freight traffic has always been particularly important reflecting the area's past level of manufacturing and it remains significant today with industry, distribution and logistics giving rise to much freight traffic. This is reflected in both the M5 and M6 motorways, where the proportion of heavy goods vehicles can be 30% of total traffic, and the local road network where the traffic on many main routes has an exceptionally high percentage of heavy goods vehicles.
- 9.40 Heavy Goods Vehicles account for 21% of all transport emissions with Light Duty Vehicles accounting for 13%, meaning the road freight sector contributes 34% of transport emissions, despite freight representing just 19% of all vehicle miles undertaken in the UK. Making the most efficient use of the highway network whilst providing facilities to transfer freight from road to rail and inland waterways will play a major part in achieving the region's climate change targets.
- 9.41 The design and layout of much of the KRN in the Black Country dates from a period when goods vehicles were significantly smaller and lighter than those currently in use and this gives rise to problems of reliability and with deliveries and servicing. In

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<sup>23</sup> As shown on the Transport Key Diagram

many cases upgrading of these routes is neither economically viable or environmentally desirable.

- 9.42 The BCA are members of the West Midlands Freight Quality Partnership, as are freight operators and their national representative bodies. The Regional Freight Strategy sets a context for planning for freight within the Black Country. Removal of freight from the road to rail or canal will reduce congestion, and support investment in rail and canals.
- 9.43 The railway network serving the Black Country suffers from capacity problems during the day when there is high demand for passenger services and this has shifted much freight traffic to night time operation. Of the disused lines the most important is Stourbridge-Walsall-Lichfield, which has been identified in the Regional Freight Strategy as being an important link for freight moving between the south west and north east regions. Locally, four sites have been identified as being suitable for rail connection if rail freight services are reinstated. Within the West Midlands conurbation, the Stourbridge to Lichfield link would act as a bypass for the rail network around Birmingham which has severe capacity constraints. The capacity released by the reopening of Stourbridge-Walsall-Lichfield, as well as benefiting the freight network, would allow extra passenger services to operate to and through Birmingham to the benefit of the wider West Midlands.
- 9.44 The Regional Freight Strategy notes a shortage of private sidings in the West Midlands Region. Sites with existing or potential rail access along existing and proposed freight routes particularly Stourbridge - Walsall and Walsall - Lichfield will be protected for rail related uses.
- 9.45 The Freight Strategy notes the need to address the increased importance of 'last mile' logistics and the role that transport innovation can play in this; parcel hubs, EV charging for delivery vehicles. Where appropriate, locations for infrastructure to facilitate this will be identified through Site Allocations Plans and Area Action Plans.

## Evidence

- West Midlands Freight Strategy - Supporting our Economy, Tackling Carbon (TfWM 2016)
- Black Country and southern Staffordshire Regional Logistics Site Study (CBRE 2013)
- West Midlands Strategic Transport Plan - Movement for Growth (TfWM 2016)
- Movement for Growth - 2026 Delivery plan for Transport (TfWM 2017)

- Black Country Transport - Connected for Growth (BCLEP and TfWM 2019)
- West Midlands' Key Route Network Evidence Report (TfWM 2018)

## Delivery

- The West Midlands Freight Strategy will guide the delivery of measures to improve the movement of freight both within the Black Country and to markets beyond the sub-region. The rail-related elements will ultimately be delivered through a combination of Network Rail and the private sector against the background of the national Rail Investment Strategy and the regional freight strategy.
- The overarching responsibility for the development and improvement of the Key Route Network sits with the West Midlands Mayor and Transport for West Midlands. The framework for improvement forms part of Movement for Growth with implementation guided by a series of Key Route Network Corridor Action Plans.

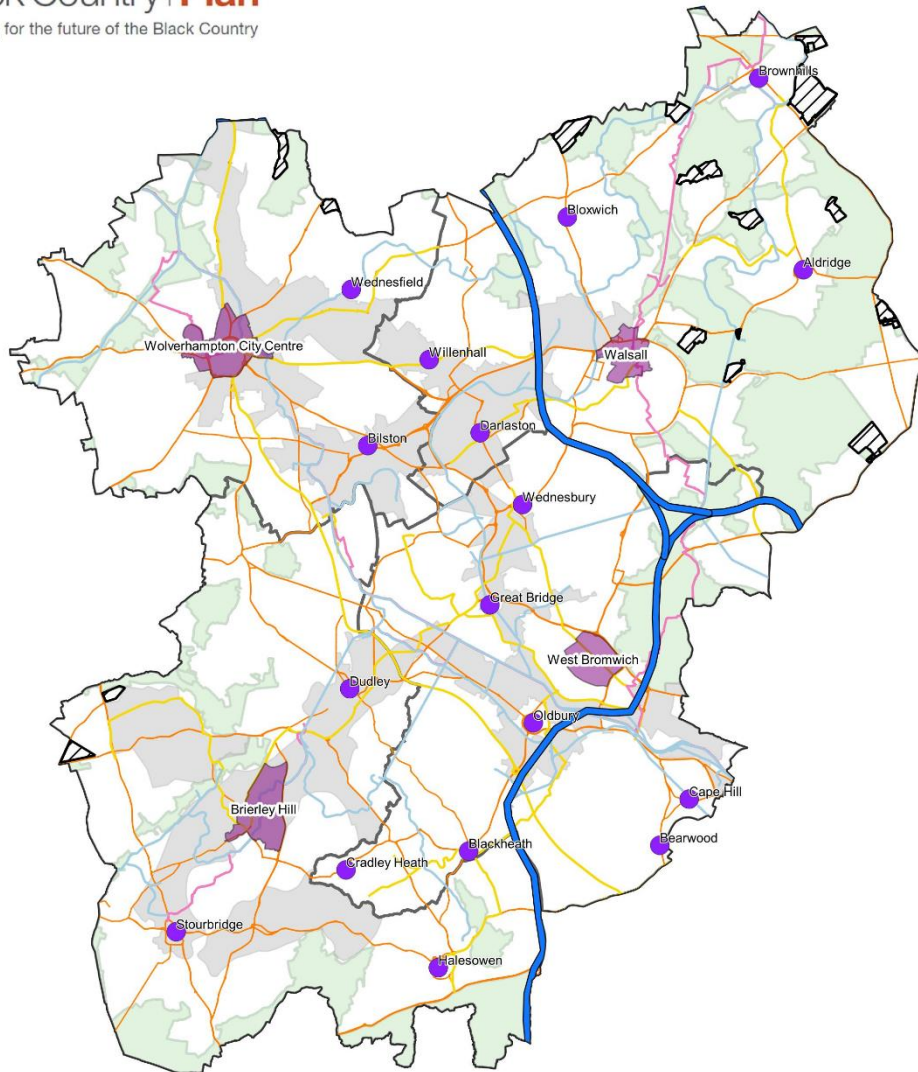
## Issues & Options Consultation

- 9.46 Comments received at Issues and Options were generally supportive of policies around the movement of freight. The reinstatement of heavy rail in the Stourbridge – Walsall corridor and the respective roles of West Midlands Interchange (in South Staffordshire) and Bescot were seen as important in supporting this policy.
- 9.47 Clarity around the role of the Key Route Network in the movement of freight was sought.

## Creating Coherent Networks for Cycling and for Walking

Figure 9 - Cycle Key Diagram

Black Country | **Plan**  
 Planning for the future of the Black Country



Cycle Key Diagram

Key:	
<b>Cycle Network (TRAN5)</b>	<b>Strategic Planning</b>
— National Cycle Network	■ Core Regeneration Areas
— Local Cycle Network	□ Local Authority Boundaries
<b>Key Routes</b>	● BCP Tier Two Centres
— Motorways	■ Tier One Strategic Centres
— Key Route Network	■ Black Country Green Belt
— Canal	▨ Neighbourhood Growth Areas

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9.48 The development of sustainable modes of travel and encouraging people out of their cars, particularly for shorter and commuter journeys, is an important element of Strategic Priorities 2, 5 and 10. Places need to be well-connected with attractive, convenient, direct and safe routes available to non-car users, thus providing real choice.

9.49 The cycle network in the West Midlands consists of three tiers;

- The National Cycle Network (NCN) – identified and developed by Sustrans in partnership with local authorities and shown on the Transport Key Diagram. This network provides long distance routes across the country linking major destinations.
- The Metropolitan Network (known as the Starley Network) – identified by WMCA in Movement for Growth and developed through the West Midlands Cycling & Walking Infrastructure Plan (WM LCWIP). These routes link strategic locations in the West Midlands and are also shown on the Transport Key Diagram.
- Local Networks – These are identified through individual authority’s LCWIPs and will be a feature of Tier 2 plans.

The emerging Black Country Cycling Strategy will provide greater detail on those sections of the Starley network and the most important links in the Local Network.

### **Policy TRAN5 - Creating Coherent Networks for Cycling and for Walking**

- 1) Joint working between the BCA will ensure that the Black Country can create and maintain a comprehensive cycle network based on the four local cycle networks, including the use of common cycle infrastructure design standards.**
- 2) Creating an environment that encourages sustainable travel requires new developments to link to existing walking and cycling networks. The links should be safe, direct and not impeded by infrastructure provided for other forms of transport.**
- 3) Where possible, existing links including the canal network should be enhanced and the networks extended to serve new developments.**
- 4) New developments should have good walking and cycling links to public transport nodes and interchanges.**

## Policy TRAN5 - Creating Coherent Networks for Cycling and for Walking

- 5) **Cycle parking facilities should be provided at all new developments and should be in convenient locations with good natural surveillance, e.g. near to main front entrances for short stay visitors or under shelter for long stay visitors.**
- 6) **The number of cycle parking spaces required in new developments and in public realm schemes will be determined by local standards set out in supplementary planning documents.**
- 7) **The design of cycle infrastructure should be in accordance with the principles and standards contained in the West Midlands Cycle Design Guidance (TfWM 2021)**

### Justification

- 9.50 It is essential that the development of walking and cycling facilities are an integral part of the transport system both on the highway network, canal corridors, Public Rights of Way and on other paths. Comprehensive cycle and walking networks within the Black Country will enable communities to access employment, public transport interchanges, services and facilities in a sustainable way. A transport network that facilitates car use and disadvantages walking and cycling can adversely affect the health and well-being of its communities. Identifying and overcoming barriers to walking and cycling during development processes will encourage a renaissance of walking and cycling within the Black Country and help improve the health and well-being of local communities by reducing the incidence of obesity, coronary heart disease, strokes, and diabetes. Both walking and cycling are active modes of travel with clear health benefits. The implementation recognises the specific requirements of each with dedicated, segregated cycling provision being the default objective along with a comprehensive network of walking opportunities available both on highway and off road.
- 9.51 Walking and Cycling Strategies are incorporated within Movement for Growth. The over-arching framework is the West Midlands Local Cycling & Walking Infrastructure Plan. The four Black Country local authorities are jointly preparing a

Cycling Strategy for the sub-region and each will develop their own Local Cycling & Walking Infrastructure Plans during the lifetime of the BCP.

9.52 All new cycle facilities will be design in accordance with guidance set out in Local Transport Note 120 and TfWM's Cycle Design Guidance

## Evidence

- West Midlands Strategic Transport Plan - Movement for Growth (TfWM 2016)
- Movement for Growth - 2026 Delivery plan for Transport (TfWM 2017)
- Black Country Transport Priorities Document (BCA 2020)
- West Midlands Local Cycling & Walking Investment Plan (TfWM 20??)
- Black Country Cycling Strategy (BCA 2021)
- Sandwell Cycling & Walking Investment Plan (SMBC 2020)
- Black Country Plan Transport Modelling Study (2021)
- West Midlands Cycle Design Guidance (TfWM 2021)

## Delivery

- The Metropolitan (Starley) Network will be delivered through the West Midlands Local Cycling & Walking Infrastructure Plan. Funding will be sought from a variety of competitive and devolved sources such as the Transforming Cities Fund and Intra-City Transport Fund.
- The delivery of the majority of local cycle links will be through individual authority's Local Cycling & Walking Implementation Plans (LCWIPs) which are either in development or, in the case of Sandwell subject of future review. Where appropriate, infrastructure will be identified through Tier 2 plans and Supplementary Planning Documents.
- The Black Country's extensive network of canals affords numerous opportunities to contribute to the delivery of a comprehensive network of safe, off-road, cycle routes. The Canal & River trust will therefore be a key delivery partner.
- Where appropriate opportunities afforded by Highways England's Designated Fund Programme will be utilised. This aims to address specific issues such as safety and severance resulting from the interface between the Strategic Road Network and local routes.

## Issues & Options Consultation

- 9.53 Comments received were generally supportive of the approach. The potential for canals to expand the network of safe, traffic free walking and cycling routes was supported along with a request that contributions for maintenance/improvement should be sought from developers where they would lead to increased use of canal network.
- 9.54 Concerns were raised that targets for walking a cycle use and predictions used in TAs should be realistic, recognising that the area's topography and narrow roads often discourage cycle use.

## Influencing the Demand for Travel and Travel Choices

- 9.55 The management of the demand for road space and car parking, together with influencing travel choices, is fundamental to achieving the Vision for sustainable communities, environmental transformation and economic prosperity and to delivering Strategic Priorities 2, 5, 8 and 10.

### Policy TRAN6 Influencing the Demand for Travel and Travel Choices

- 1) **The Black Country Authorities are committed to considering all aspects of traffic management in the centres and wider area in accordance with the Traffic Management Act 2004. The priorities for traffic management in the Black Country are:**
  - a) **identifying appropriate strategic and local Park and Ride sites on current public transport routes to ease traffic flows into centres;**
  - b) **working together with the rest of the region to manage region-wide traffic flows through the West Midlands Metropolitan Area Urban Traffic Control (UTC) scheme and further joint working;**
  - c) **promoting and implementing Smarter Choices measures that will help to reduce the need to travel and facilitate a shift towards using sustainable modes of transport (walking, cycling, public transport, car sharing).**

## Justification

- 9.56 The Spatial Strategy aims at making the network of town and city centres as attractive and accessible as possible to encourage use the most sustainable modes.
- 9.57 Other important aspects of demand management are the prioritisation of allocation of road space towards sustainable methods of travel such as walking, cycling and buses by using schemes such as traffic calming measures and full or time limited pedestrianisation so making these modes more attractive to people visiting the centres.
- 9.58 Other important elements include the promotion and marketing of sustainable transport through travel plans (refer to Policy TRAN2), planning conditions / obligations and other associated sustainable mobility initiatives, including the promotion of schemes and opportunities for walking, cycling, micro-mobility (such as e-Scooters), public transport and car sharing. These policies will reduce road traffic congestion and pollution, improve road safety, promote social inclusion and accessibility, therefore encouraging consumers to access the four strategic centres using sustainable transport.

## Evidence

- West Midlands Congestion Management Plan (TfWM 2018)
- West Midlands Park & Ride Strategy (TfWM 2020)

## Delivery

- The policy will be delivered through local authorities 'Network Management Duty Strategies' under the Traffic Management Act 2004, which places new network management duties on local highway authorities. The main duty is to secure the expeditious movement of people and goods, inclusive of cyclists and pedestrians, on the road network and on adjacent road networks for which another authority is the traffic authority.

## Issues & Options Consultation

- 9.59 There was support for policies that place a greater focus on choice of modes but that behavioural change policies are also required if congestion is to be reduced.

- 9.60 It was suggested that green belt releases should be adjacent to the existing Urban area as these locations are more sustainable in transport terms than those in village locations and afford better opportunities for active travel modes

## Parking Management

- 9.61 The management of car parking is fundamental to achieving the Vision for sustainable communities, environmental transformation and economic prosperity. It also has a key role in reducing the impact of vehicle trips on air quality and carbon emissions.

### Policy TRAN7 Parking Management

- 1) The priorities for traffic management in the Black Country include the sustainable delivery and management of parking in centres and beyond, through use of some or all of the following measures as appropriate: -**
- a. the management and control of parking - ensuring that it is not used as a tool for competition between centres;**
  - b. the type of parking – ensuring that where appropriate long-stay parking is removed from town centres, to support parking for leisure and retail customers and to encourage commuters to use more sustainable means and reduce peak hour traffic flows;**
  - c. maximum parking standards – ensuring that a consistent approach to maximum parking standards is enforced in new developments as set out in supplementary planning documents;**
  - d. the location of parking – by reviewing the location of town centre car parks through the “Network Management Duty”, to ensure that the flow of traffic around town centres is as efficient as possible.**

### Justification

- 9.62 The correct balance needs to be found between managing and pricing parking to maximise the use of sustainable travel means to enter town and city centres, whilst avoiding restricting parking to the extent that consumers are dissuaded from using town centres and deterring new development.

- 9.63 The control of and management of parking in centres will require a variety of approaches, recognising that not all publicly available car parking is in local authority control or management. The use of planning conditions to ensure that new public parking is managed appropriately will therefore be an important aspect of this policy.
- 9.64 The continued adoption of maximum parking standards for all but residential development is considered to be an important tool in managing demand for single-occupancy vehicle trips to centres and major employment destinations, leisure and other facilities.
- 9.65 Reduced levels of long-stay car parking in centres will enable more efficient use of land.

### Evidence

- Black Country Parking Study (2021)

### Delivery

- This policy will be delivered through local authorities' network management duty and parking management policies.
- The management of new privately owned and operated public car parks will be controlled through Parking Management Plans via planning conditions or planning obligations through the Development Management process.

### Issues & Options Consultation

- 9.66 Comments to be included.

### Planning for Low Emission Vehicles

- 9.67 The UK government has committed to banning the sale of petrol and diesel cars by 2030. The resultant societal shift from petrol and diesel internal combustion engine (ICE) vehicles to ULEVs will require widespread support from local authorities. It is projected that there will be an addition of 42,500 ULEVs within the Black Country by 2025. The Black Country ULEV strategy sets out a framework for how the authorities can support this transition.

## Policy TRAN8 Planning for Low Emission Vehicles

- 1) **Proposals for low emission vehicles will be supported by:**
  - a. **Ensuring that new developments include adequate provision for charging infrastructure e.g. electric vehicle charging points in car parks, measures to encourage LEV use through travel plans and other initiatives.**
  - b. **Where appropriate the BCA will facilitate the introduction of charging points in public locations.**
  - c. **Working with partners to explore support for alternative low emission vehicle technologies, such hydrogen fuel cells, across a range of modes; private cars, buses and/or small passenger and fleet vehicles.**

### Justification

9.68 In July 2019, the West Midlands Combined Authority committed to setting a 'net zero' emissions target by 2041, with a climate action plan being approved by the WMCA board by January 2020. The WMCA Board further approved a regional ULEV strategy, in February 2020. The Black Country ULEV strategy sits under this regional document. Whilst the WMCA ULEV Strategy focusses on sharing best practice, co-ordination and possible joint delivery of a large-scale network of rapid charging 'hubs', the Black Country ULEV strategy takes a more granular approach, focussing on the specifics of each authority and offering a framework for the delivery on infrastructure on the ground.

9.69 The study found that the Black Country lags behind the rest of the country when it comes to adoption of ULEVs. This is reflected in the availability of charging infrastructure across the four authorities, with around 80% of the sub-region further than one km from the nearest publicly available charge point. However, relative to median wage, all four Black Country authorities sit on or above the trend for ULEV adoption, indicating higher uptake than might be expected given the average wage across each of the four authorities.

### Evidence

- Black Country Air Quality Supplementary Planning Document (BCA 20xx)
- West Midlands ULEV strategy (TfWM 2020)



- Black Country ULEV Strategy (Cenex on behalf of BCA 2020)

## Delivery

- Delivery will be achieved through the use of the Black Country ULEV Strategy as a framework to support bids for Central Government funding for public EV charging infrastructure as well as providing guidance for the provision of infrastructure in public sector-owned locations.
- The Black Country Air Quality SPD will continue to provide guidance for the provision of charge points through the planning process.

## Issues & Options Consultation

9.70 This is a new policy which was not specifically referred to in the Issues & Options consultation. However, in the responses to former BCCS Policy TRAN5, comments were received suggesting that policies specifically aimed at encouraging low emission vehicle use and providing infrastructure to support this. Some respondents stated that switching to electric vehicles won't cut congestion.

9.71 In particular, there was support for the provision electric vehicle charging infrastructure though comments were also received that this would have an impact on the viability of some developments.

## Monitoring

Policy	Indicator	Target
TRAN1	TBC	TBC
TRAN2	TBC	TBC
TRAN3	TBC	TBC
TRAN4	TBC	TBC
TRAN5	TBC	TBC
TRAN6	TBC	TBC
TRAN7	TBC	TBC

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Policy	Indicator	Target
TRAN8	TBC	TBC

DRAFT

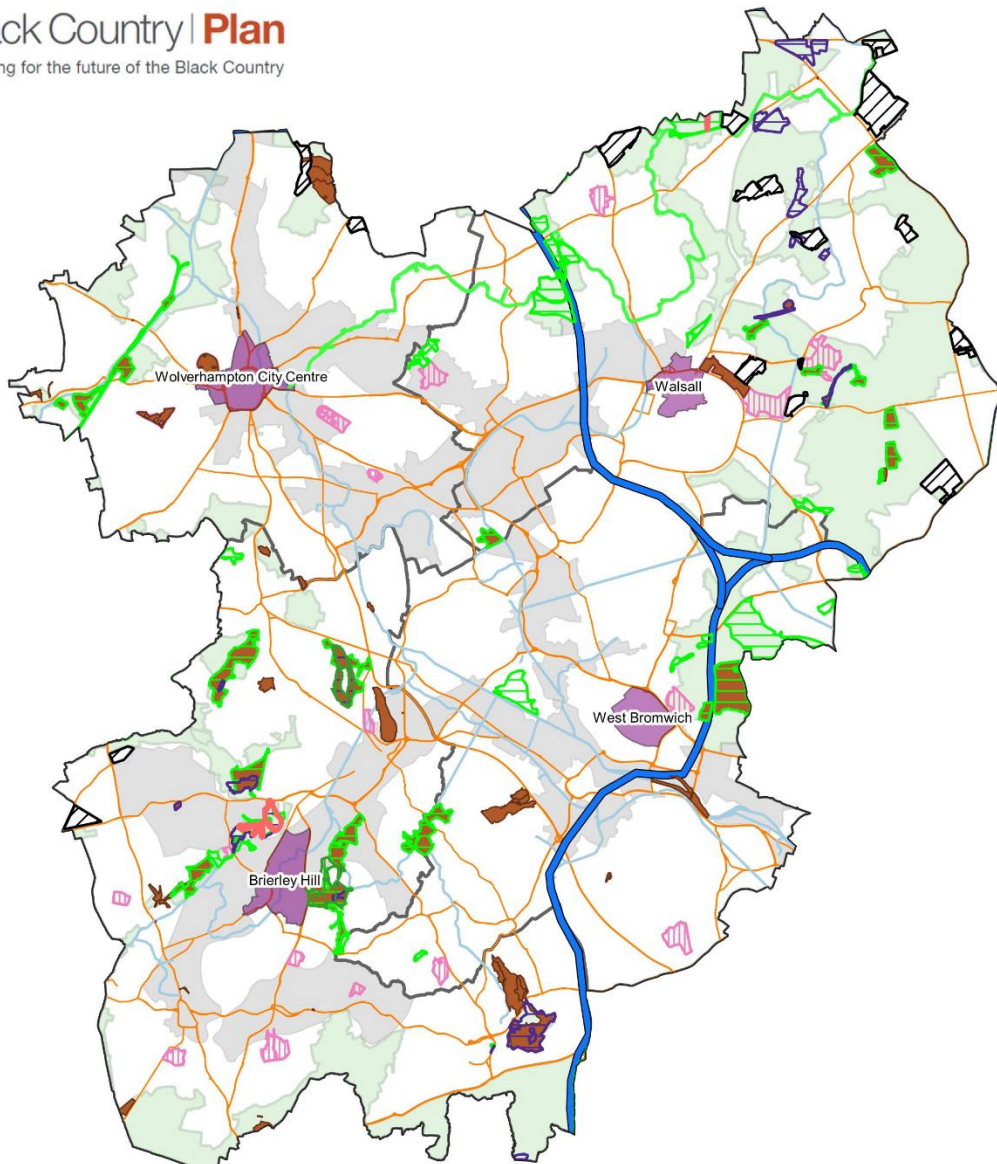
## 10 Environmental Transformation and Climate Change

### Introduction

- 10.1 The Black Country enjoys a unique physical and cultural heritage thanks to its origins as a mainstay of heavy industry and driver of the Industrial Revolution. The geological complexity of the area, its topography, its settlement pattern and the existence of significant areas of green and open space within one of the most densely-developed parts of the country require a set of robust and relevant planning policies that will help to protect and enhance what gives the Black Country its unique physical, ecological and historic character and appearance.
- 10.2 The protection and improvement of the Black Country's biodiversity and geodiversity will improve the attractiveness of the area for people to live, work, study and visit while at the same time improving the physical and natural sustainability of the conurbation in the face of climate change. This will directly contribute to achieving Spatial Objectives 1, 2, 5, 6, 11 and 12.
- 10.3 The BCP addresses a number of established and emerging topic areas, including the natural and historic environments, air quality, flooding and climate change.
- 10.4 The chapter includes a specific section containing policies designed to mitigate and adapt to a changing climate, including policies on the management of heat risk, the use of renewable energy, the availability of local heat networks and the need for increasing resilience and efficiency to help combat the changes that are affecting people and the environment.
- 10.5 The importance of green infrastructure in achieving a healthy and stable environment is reflected throughout the plan and is supported in this chapter by policies on trees and environmental net gain.
- 10.6 The importance of the Black Country in terms of its contribution to geological science and the environment is recognised by its UNESCO Geopark status, which is also reflected in a policy for the first time.
- 10.7 The Black Country contains, or has the potential to impact on, several Special Areas of Conservation (including Cannock Chase). These sites are of European importance and the Black Country has a major role to play in ensuring their special environmental qualities are not impacted adversely by development.

Figure 10 - Environment Key Diagram

**Black Country | Plan**  
 Planning for the future of the Black Country



Environment Key Diagram

Key:	
<b>Environment</b>	
	Local Nature Reserves (ENV1)
	National Nature Reserves (ENV1)
	Sites of Special Scientific Interest (ENV1)
	Special Areas of Conservation (ENV1/ENV2)
	Black Country Geopark Geosites (ENV6)
	Canal (ENV7)
	Main Parks (ENV8)
<b>Key Routes</b>	
	Motorways
	Key Route Network
<b>Strategic Planning</b>	
	Core Regeneration Areas
	Tier One Strategic Centres
	Local Authority Boundaries
	Black Country Green Belt
	Neighbourhood Growth Areas

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## Nature Conservation - Spatial Objectives

- 10.8 The protection and improvement of the Black Country's biodiversity and geodiversity will safeguard and improve the environmental attractiveness and value of the area for residents and visitors while at the same time improving the physical and natural sustainability of communities within the conurbation in the face of climate change. This will directly contribute to delivering Strategic Priority 11, which is also associated with supporting the physical and mental wellbeing of residents.

### Policy ENV1 – Nature Conservation

- 1) **Development within the Black Country will safeguard nature conservation, inside and outside its boundaries, by ensuring that:**
  - a) **development will not be permitted where it would, alone or in combination with other plans or projects, have an adverse impact on the integrity of an internationally designated site, including Special Areas of Conservation (SAC), which are covered in more detail in Policy ENV2;**
  - b) **development is not permitted where it would harm nationally (Sites of Special Scientific Interest and National Nature Reserves) or regionally (Local Nature Reserves and Sites of Importance for Nature Conservation) designated nature conservation sites;**
  - c) **locally designated nature conservation sites (Sites of Local Importance for Nature Conservation), important habitats and geological features are protected from development proposals that could negatively impact them;**
  - d) **the movement of wildlife within the Black Country and its adjoining areas, through both linear habitats (e.g. wildlife corridors) and the wider urban matrix (e.g. stepping-stone sites) is not impeded by development;**
  - e) **species that are legally protected, in decline, are rare within the Black Country or that are covered by national, regional, or local Biodiversity Action Plans will be protected as far as possible when development occurs.**
- 2) **Adequate information must be submitted with planning applications for proposals that may affect any designated site or important habitat, species, or**

## **Policy ENV1 – Nature Conservation**

- geological feature, to ensure that the likely impacts of the proposal can be fully assessed. Where the necessary information is not made available, there will be a presumption against granting permission.
- 3) Where, exceptionally, the strategic benefits of a development clearly outweigh the importance of a local nature conservation site, species, habitat or geological feature, damage must be minimised. Any remaining impacts, including any reduction in area, must be fully mitigated. Compensation will only be accepted in exceptional circumstances. A mitigation strategy must accompany relevant planning applications.
  - 4) Over the plan period, the BCA will update evidence on designated nature conservation sites and Local Nature Reserves as necessary in conjunction with the Local Sites Partnership and Natural England and will amend existing designations in accordance with this evidence. Consequently, sites may receive new, or increased, protection over the Plan period.
  - 5) All appropriate development should positively contribute to the natural environment of the Black Country by:
    - a) extending nature conservation sites;
    - b) improving wildlife movement; and / or
    - c) restoring or creating habitats / geological features that actively contribute to the implementation of Nature Recovery Networks, Biodiversity Action Plans (BAPs) and / or Geodiversity Action Plans (GAPs) at a national, regional, or local level.
  - 6) Details of how improvements (appropriate to their location and scale) will contribute to the natural environment, and their ongoing management for the benefit of biodiversity and geodiversity, will be expected to accompany planning applications.
  - 7) Local authorities will provide additional guidance on this in Local Development Documents and SPDs where relevant.

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## Justification

- 10.9 The past development and redevelopment of the Black Country, along with Birmingham, has led to it being referred to as an “*endless village*”<sup>24</sup>, which describes the interlinked settlements and patches of encapsulated countryside present today. The Black Country is home to internationally and nationally designated nature conservation sites and has the most diverse geology, for its size, of any area on Earth<sup>25</sup>. Many rare and protected species are found thriving within its matrix of greenspace and the built environment.
- 10.10 The Black Country lies at the heart of the British mainland and therefore can play an important role in helping species migrate and adapt to climate change as their existing habitats are rendered unsuitable. It is therefore very important to increase the ability of landscapes and their ecosystems to adapt in response to changes in the climate by increasing the range, extent, and connectivity of habitats. In order to protect vulnerable species, the Nature Recovery Network process, which is taking place at a national level, will allow isolated nature conservation sites to be protected, buffered, improved, and linked to others. This will be supplemented by the emerging Black Country Nature Recovery Network Strategy, which all development will be required to consider as set out under Policy ENV3. Species dispersal will be aided by extending, widening, and improving the habitats of wildlife corridors. Conversely, fragmentation and weakening of wildlife sites and wildlife corridors by development will be opposed.
- 10.11 Development offers an opportunity to improve the local environment and this is especially so in an urban area. The BCA are committed to meeting their “Biodiversity Duty” under the Natural Environment and Rural Communities Act (2006) and to delivering the principles of the NPPF by proactively protecting, restoring and creating a richer and more sustainable wildlife and geology.
- 10.12 The local Biodiversity Partnership, Geodiversity Partnership and Local Sites’ Partnership will identify, map, and regularly review the priorities for protection and improvement throughout the Black Country, in accordance with the emerging Black

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<sup>24</sup> <https://www.cabdirect.org/cabdirect/abstract/19781849297>

<sup>25</sup> Comment by Black Country Geological Society

Country Nature Recovery Network strategy. These will be used to inform planning decisions.

## Primary Evidence

- Birmingham and Black Country EcoRecord
- Birmingham and Black Country Local Sites Assessment Reports
- Biodiversity Action Plan for Birmingham and the Black Country (2009)
- Geodiversity Action Plan for the Black Country (2005)
- An Ecological Evaluation of the Black Country Green Belt (2019)

## Delivery

- Biodiversity and Geodiversity Action Plans.
- Development and implementation of Black Country Nature Recovery Network
- Updated ecological surveys and Local Sites Assessment Reports, as appropriate.
- Preparation of Local Development Documents.
- Development Management process.

## Issues and Options consultation response

- 10.13 Policy ENV1 has worked effectively to protect and enhance biodiversity
- 10.14 Support from a number of respondents for including ancient woodland in list of nationally designated sites
- 10.15 The Policy should allow for appropriate mitigation or off-setting so that development sites are not sterilised unduly
- 10.16 The overall consensus from issues and options was that ENV1 worked well at protecting nature conservation and could be strengthened with the addition of reference to ancient woodlands,

## Special Areas of Conservation

- 10.17 There are a number of Special Areas of Conservation (SAC) within and close to the Black Country which may be adversely affected by development within the Black Country over the Plan period. A policy approach is required to address any identified potential impacts.



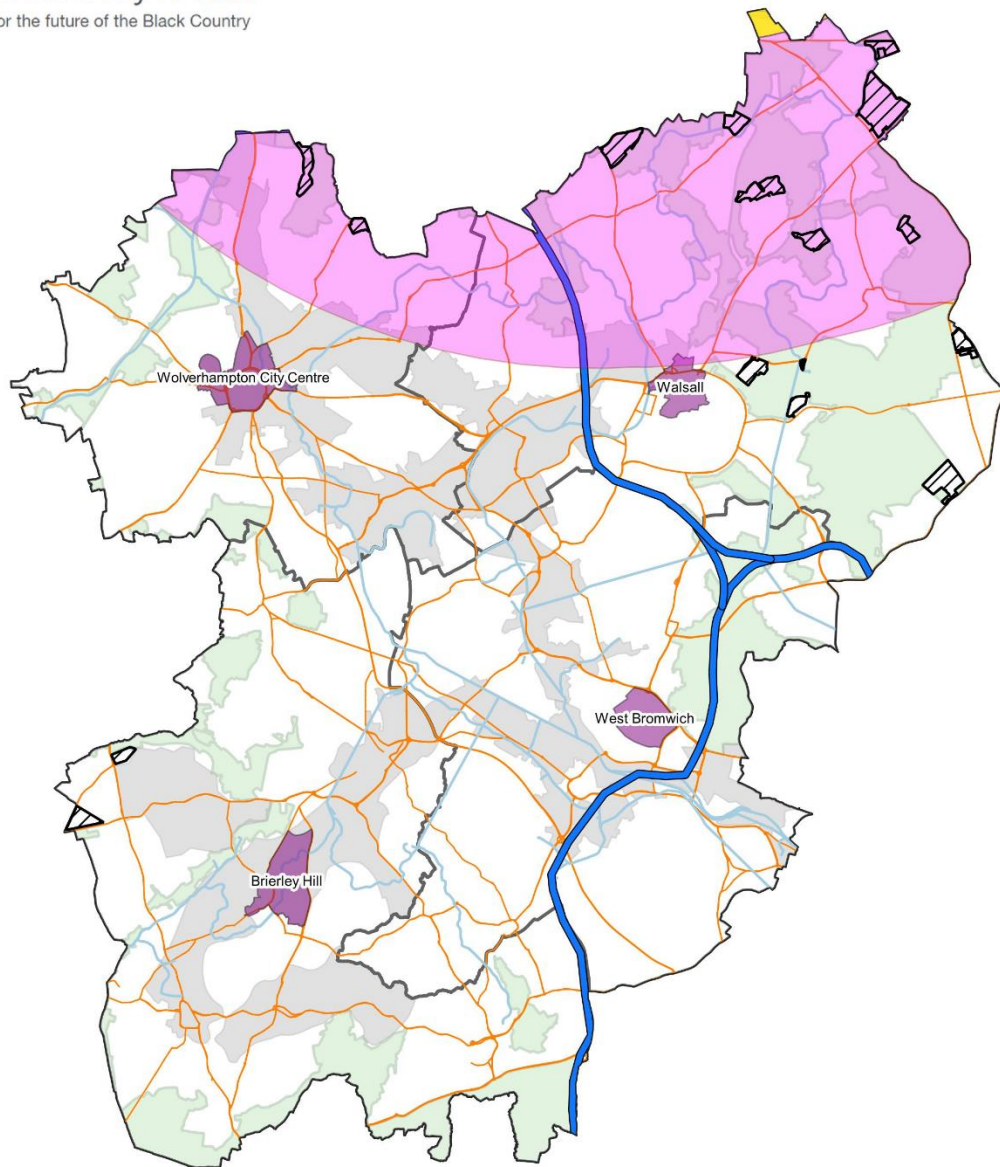
## **Policy ENV2 - Development Affecting Special Areas of Conservation (SACs)**

### **Cannock Chase SAC**

- 1) An appropriate assessment will be carried out for any development that leads to a net increase in homes or creates visitor accommodation within 15 km of the boundary of Cannock Chase SAC, as shown on the Policies Maps for Walsall and Wolverhampton.**
- 2) If the appropriate assessment determines that the development is likely to have an adverse impact upon the integrity of Cannock Chase SAC, then the developer will be required to demonstrate that sufficient measures can be provided to either avoid or mitigate the impact.**
- 3) Acceptable mitigation measures will include proportionate financial contributions towards the current agreed Cannock Chase SAC Partnership Site Access Management and Monitoring Measures (SAMMM).**

Figure 11 - Cannock Chase SAC

**Black Country | Plan**  
 Planning for the future of the Black Country



**Cannock Chase SAC Zones of Influence**

<b>Key:</b>	
<b>Zones of Influence (ENV2)</b>	
Cannock Chase SAC Zone of Influence – 15km	Canal
Cannock Chase SAC Zone of Influence – 8km	<b>Strategic Planning</b>
<b>Key Routes</b>	
Motorways	Tier One Strategic Centres
Key Route Network	Local Authority Boundaries
	Core Regeneration Areas
	Black Country Green Belt
	Neighbourhood Growth Areas

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## Justification

10.18 There are a number of Special Areas of Conservation (SAC) within and close to the Black Country. Fens Pool SAC is located in Dudley and the Cannock Extension Canal extends between Walsall and Cannock. Cannock Chase SAC, located to the north of the Black Country, is one of the best areas in the UK for European dry heath land and is the most extensive area of dry heath in the Midlands.

### **Cannock Chase SAC**

10.19 Walsall and Wolverhampton Councils are part of the Cannock Chase SAC Partnership, which works together to prevent damage to the SAC. Other members of the Partnership include Natural England, Staffordshire County Council, Cannock Chase District Council, Lichfield District Council, East Staffordshire Borough Council, South Staffordshire District Council, the Forestry Commission and the Area of Outstanding Natural Beauty (AONB) Partnership. A key role of the Partnership is to ensure no adverse effect on the integrity of the SAC arises from new housing development via recreational pressure.

10.20 A Visitor Survey and Planning Evidence Base Review (PEBR) completed by the Partnership during 2019-21 demonstrated that any development within 15 km of Cannock Chase SAC that could increase visitor use of Cannock Chase may have a significant impact on the integrity of the SAC. The PEBR recommended a package of Site Access Management and Monitoring Measures (SAMMM), which are considered necessary to mitigate the cumulative impact of maximum potential housing development within the 15 km zone up to 2040. These measures include habitat management and creation; access management and visitor infrastructure; publicity, education and awareness raising; provision of additional recreational space within development sites where they can be accommodated; and measures to encourage sustainable travel. Completion of an updated Cannock Chase SAC Partnership Memorandum of Understanding (MOU) to reflect this new evidence is anticipated by 2022.

10.21 Parts of northern Walsall and Wolverhampton, as shown on Figure 11 and the Policies Maps, fall within 15 km of Cannock Chase SAC. Any development within this area over the Plan period that results in new homes or creates visitor accommodation, such as a hotel or caravan site, may lead to adverse effects on the SAC through increased visitor activities. Therefore, Walsall and Wolverhampton

Councils will seek contributions towards the total cost of the Cannock Chase SAC SAMMM in proportion to the amount of housing development anticipated to take place within the 15 km zone.

- 10.22 Given the significantly higher frequency of visits to Cannock Chase SAC from households living within 8 km of the SAC, a higher level of contributions may be sought from housing developments within this zone. Also, given the need to create an effective contributions system that secures a reasonable minimum level of contributions from each development, it is likely that, within the Black Country, only developments of ten homes or more will be expected to make a payment towards the Cannock Chase SAC SAMMM. Guidance will be produced to set out the detailed procedure and the level of financial contributions required. This guidance will come into effect following completion of the MOU.
- 10.23 Policy ENV2, supported by guidance, will ensure that decisions made on planning applications in the Black Country will not have adverse effects on Cannock Chase SAC. If there are any potential adverse impacts, the development must be refused unless there are appropriate mitigation measures in place. Any proposals that comply with the current guidance are likely to result in a conclusion of no adverse impact on the integrity of Cannock Chase SAC.

#### **Nitrous Oxide (NOx) Deposition**

- 10.24 A number of different types of development can increase the levels of Nitrous Oxide (NOx) deposition that may affect designated SACs, both directly (via increasing industrial emissions) or indirectly (for example, via increasing traffic usage on main roads that run within close proximity of the boundary of the SAC). Where it is possible that a development may result in harm to a SAC by significantly increasing the level of NOx deposition, then the relevant Council will carry out an appropriate assessment and may require the developer to provide sufficient measures to either avoid or mitigate adverse impacts.
- 10.25 A partnership approach is being developed to address NOx deposition impacts on SACs in the West Midlands area. When the Partnership is established, evidence collected, and a system developed to address NOx deposition avoidance and mitigation, it is anticipated that this will provide an effective mechanism to deal with NOx impacts, similar to that developed for Cannock Chase SAC visitor impacts.

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## Fens Pools SAC

- 10.26 The Fens Pools SAC extends to approximately 20 hectares and is located in Dudley. The site comprises three canal feeder reservoirs and a series of smaller pools and a wide range of other habitats from swamp, fen and inundation communities to unimproved neutral and acidic grassland and scrub. Great crested newts (*Triturus cristatus*) occur as part of an important amphibian assemblage which comprises the qualifying species feature of the SAC.
- 10.27 Fens Pools SAC is sensitive to changes in air quality and vulnerable to water pollution, as these may affect nutrient neutrality at the site. The Habitats Regulations Assessment Screening of the draft BCP has concluded that further evidence is needed on current air quality and modelling of potential traffic movements close to the site before a conclusion can be drawn on the potential impact of the draft BCP proposals on Fens Pool SAC and any necessary policy response. This evidence will be available to inform the Publication BCP and may require the inclusion of a specific approach in Policy ENV2. Habitat fragmentation has been identified as a threat to the '*great crested newt*' qualifying feature of the site.

## Cannock Extension Canal SAC

- 10.28 The Cannock Extension Canal SAC covers an area of approximately 5.47 hectares and is partially situated within north Walsall. It is an example of anthropogenic, lowland habitat that is fed by the Chasewater Reservoir SSSI. Its qualifying feature is floating water-plantain (*Luronium natans*) and the canal supports the eastern limit of the plant's natural distribution in England. A very large population of the species occurs in the canal, which has a diverse aquatic flora and rich dragonfly fauna, indicative of good water quality.
- 10.29 Air quality has been identified as a threat to the 'floating water-plantain' qualifying feature of Cannock Extension Canal SAC. Of particular concern is atmospheric nitrogen deposition and ground level ozone. The Habitats Regulations Assessment Screening of the draft BCP has concluded that further evidence is needed regarding air quality and modelling of potential traffic movements close to the site before a conclusion can be drawn on the potential impact of the draft BCP proposals and any necessary policy response. This evidence will be available to inform the Publication BCP.

## Evidence

- Cannock Chase SAC Planning Evidence Base Review: Stage 1 (Footprint Ecology, 2018)
- Cannock Chase Visitor Survey (Footprint Ecology, 2018)
- Cannock Chase SAC Planning Evidence Base Review: Stage 2 (Footprint Ecology, 2021)
- Habitats Regulations Assessment Screening of Draft Black Country Plan (Lepus, 2021)
- Draft Black Country Plan Duty to Cooperate Statement (2021)

## Delivery

- Completion of Cannock Chase SAC Partnership Memorandum of Understanding
- Preparation of Cannock Chase SAC Mitigation Guidance for Wolverhampton and Walsall
- Completion of air quality and transport modelling evidence for Fens Pool SAC
- Development Management process

## Issues and Options Consultation Responses

10.30 Respondents requested that the Plan should make reference to the updated evidence base on Cannock Chase SAC (CCSAC) and include a policy to address CCSAC issues to align with other CCSAC Partnership authorities.

## Nature Recovery Network and Biodiversity Net Gain

10.31 The Nature Recovery Network (NRN) is a major commitment in the government's 25 Year Environment Plan. The Government has set out in the Environment Bill 2019 - 21 that a Local Nature Recovery Strategy (LNRS) is to be prepared locally and published for all areas of England, and that these will:

- a) agree priorities for nature's recovery;
- b) map the most valuable existing habitat for nature using the best available data; and
- c) map specific proposals for creating or improving habitat for nature and wider environmental goals.

- 10.32 LNRS will help restore many ecosystem functions and improve the services upon which society depends, benefitting nature, people and the economy, and helping to address three of the biggest challenges society faces: biodiversity loss, climate change and human wellbeing.
- 10.33 LNRS will support delivery of mandatory biodiversity net gain and provide a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity, which is also being introduced by the Bill. They will underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into incentives and land management actions.
- 10.34 Biodiversity net gain is a process that attempts to leave the environment in a more valuable and richer condition than it was found to be in previously. The Government has set out in the Environment Bill 2019 - 21 that development proposals are required to provide a minimum 10% uplift in habitat quality where sites are being developed.
- 10.35 This process involves the use of a metric as a proxy for recognising the negative impacts on habitats arising from a development and calculating how much new or restored habitat, and of what types, is required to deliver sufficient net gain.
- 10.36 The Environment Bill 2019 - 21 is scheduled to progress to the draft legislation stage and be laid before Parliament in Autumn 2022. Policy ENV3 sets out how development proposals would be required to consider the Nature Recovery Network Strategy and how biodiversity net gain would be secured

**Policy ENV3 – Nature Recovery Network and Biodiversity Net Gain**

- 1) All development shall deliver the Local Nature Recovery Network Strategy in line with the following principles:**
  - a) take account of where in the Local Nature Recovery Network the development is located and deliver benefits appropriate to that zone;**
  - b) follow the mitigation hierarchy of avoidance, mitigation and compensation, and provide for the protection, enhancement, restoration and creation of wildlife habitat and green infrastructure;**
  - c) follow the principles of Making Space for Nature and recognise that spaces are needed for nature and that these should be of sufficient**

## **Policy ENV3 – Nature Recovery Network and Biodiversity Net Gain**

**size and quality and must be appropriately connected to other areas of green infrastructure, to address the objectives of the Black Country Nature Recovery Network Strategy.**

- 2) All development shall deliver a minimum 10% net gain in biodiversity value when measured against baseline site information.**
- 3) Losses and gains as a result of proposed development will be calculated using the national Biodiversity Metric.**
- 4) Development that is likely to have an impact on biodiversity will be considered in accordance with the mitigation hierarchy set out in the NPPF.**
- 5) Biodiversity net gain shall be provided in line with the following principles:**
  - a) a preference for on-site habitat provision / enhancement wherever practicable, followed by improvements to sites within the local area, and then other sites elsewhere within the Black Country;**
  - b) the maintenance and where possible enhancement of the ability of plants and animals (including pollinating insects) to move, migrate and genetically disperse across the Black Country;**
  - c) the provision / enhancement of priority habitats identified at the national, regional, or local level, having regard to the scarcity of that habitat within the Black Country;**
- 6) Exemptions to the need to provide biodiversity net gain on all development will be as set out in the relevant legislation and national guidance.**
- 7) Compensation will only be accepted in exceptional circumstances. Provision of off-site compensation should not replace or adversely impact on existing alternative / valuable habitats in those locations and should be provided prior to development.**

### **Justification**

10.37 Locally developed Nature Recovery Network strategies are due to be introduced through the Environment Bill. LNRS will help to map the NRN locally and nationally,



- and will help to plan, prioritise and target action and investment in nature at a regional level across England.
- 10.38 The Environment Bill (when enacted) will introduce a new duty on all public bodies to have regard to any relevant LNRSs, creating an incentive for a wide range of organisations to engage with the creation of LNRSs and to take steps to support their delivery. Local authorities and other public bodies designated by the Secretary of State will also have to report on what steps they have taken, at least every five years.
- 10.39 The Black Country Authorities have commenced work on a Local Nature Recovery Network Strategy. This has produced draft opportunities mapping that future development proposals will be required to consider in demonstrating how they deliver benefits appropriate to the zones identified. The draft Nature Recovery Network Opportunities Map (April 2021) is shown at Appendix 18 alongside a description of the components of the opportunities map.
- 10.40 The Environment Bill underpins the government's approach to establishing the NRN. The Environment Bill: sets the framework for at least one legally binding biodiversity target; establishes spatial mapping and planning tools to identify existing and potential habitat for wildlife and agrees local priorities for enhancing biodiversity in every area of England (LNRS); creates duties and incentives, including mandatory biodiversity net gain.
- 10.41 Biodiversity net gain has been described as a measurable target for development projects where impacts on biodiversity are outweighed by a clear mitigation hierarchy approach to first avoid and then minimise impacts, including through restoration and / or compensation.
- 10.42 Net gain is an approach to development, and / or land management, which aims to leave the natural environment in a measurably better state than beforehand (DEFRA Biodiversity Metric 2.0 Dec 2019).
- 10.43 Mandatory biodiversity net gain will provide a financial incentive for development to support the delivery of LNRSs through an uplift in the calculation of biodiversity units created at sites identified by the strategy. LNRSs have also been designed to help local planning authorities deliver existing policy on conserving and enhancing biodiversity and to reflect this in the land use plans for their area.
- 10.44 The Environment Bill 2019 - 21 proposes that new developments must demonstrate a minimum 10% increase in biodiversity on or near development sites. New

development should always seek to enhance rather than reduce levels of biodiversity present on a site. This will require a baseline assessment of what is currently present, and an estimation of how proposed designs will add to that level of biodiversity, supported by evidence that a minimum 10% net gain has been delivered.

- 10.45 Development generates opportunities to help achieve an overall nature conservation benefit. It will often be possible to secure significant improvements through relatively simple measures, such as the incorporation of green infrastructure and features including bird / bat boxes and bricks that can enable wildlife to disperse throughout the Black Country.
- 10.46 Biodiversity features of value frequently occur beyond designated sites and should be conserved, enhanced and additional features created as part of development.
- 10.47 On-site biodiversity improvements will also be vital to enhancing the liveability of urban areas, and improving the connection of people to nature, particularly as development densities increase. Development should also contribute to wildlife and habitat connectivity in the wider area, in line with the Biodiversity Action Plan and the developing Black Country Local Nature Recovery Strategy.
- 10.48 The ways in which developments secure a net gain in biodiversity value will vary depending on the scale and nature of the site. On some sites, the focus will be on the retention of existing habitats. For others, this may be impracticable, and it may be necessary instead to make significant provision for new habitats either on- or off-site.
- 10.49 It can be challenging to establish new habitats. It is essential that the most important and irreplaceable habitats in the Black Country are protected, and so mitigation rather than retention will not be appropriate in some circumstances.

## Evidence

- The Environment Bill 2019 – 2021
- The Government's 25 Year Environment Plan
- Nature Networks Evidence Handbook - Natural England Research Report NERR081
- Making Space for Nature (Lawton et al. 2010)
- DEFRA Biodiversity Metric 2.0 (Dec 2019)

- Biodiversity Net Gain – Principles and Guidance for UK Construction and Developments – CIEEM

## Delivery

- Development Management, legal and funding mechanisms.

## Issues and Options Consultation Responses

10.50 This is a new policy produced in response to emerging national legislation and thus was not addressed previously.

## Provision, retention and protection of trees, woodlands, and hedgerows

10.51 The BCA will support and protect a sustainable, high-quality tree population and will aim to significantly increase tree cover across the area over the Plan period.

10.52 A main theme of the Government's 25-Year Environment Plan is the need to plant more trees. This is to be achieved not only as part of the creation of extensive new woodlands but also in urban areas; this will be accomplished in part by encouraging businesses to offset their emissions in a cost-effective way through planting trees. The national ambition is to deliver one million new urban trees and a further 11 million new trees across the country.

10.53 It is important to encourage and support the delivery of green infrastructure and ecological networks through urban areas, especially in relation to their role in climate change mitigation and adaptation and to mitigate the health problems associated with air pollution. The provision of new trees and the protection of existing ones throughout the Black Country will be a key component of this approach.

10.54 The aim will be to increase the Black Country's canopy cover to at least 18% over the plan period<sup>26</sup>, based on data establishing its current levels of provision<sup>27</sup> and identifying opportunities for doing so derived from the Nature Recovery Network and biodiversity net gain targets.

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<sup>26</sup> See also the Woodland Trust's Emergency Tree Plan 2020 - <https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/british-trees/how-trees-fight-climate-change/>

<sup>27</sup> Tree cover in the Black Country is currently around 14.5% of the total area (source: EcoRecord, June 2021)

## **Policy ENV4 – Provision, retention and protection of trees, woodlands and hedgerows**

### **Retention and protection of trees and woodland**

- 1) Development that would result in the loss of or damage to ancient trees, ancient woodland or veteran trees will not be permitted. Development adjacent to ancient woodland will be required to provide an appropriate landscaping buffer, with a minimum depth of 15m and a preferred depth of 50m.**
- 2) Provision should also be made for the protection of individual veteran or ancient trees likely to be impacted by development, by providing a buffer around such trees of a minimum of 15 times the diameter of the tree. The buffer zone should be 5m from the edge of the tree's canopy if that area is larger than 15 times its diameter.**
- 3) There will be a presumption against the removal of trees that contribute to public amenity and air quality management unless sound arboricultural reasons support their removal<sup>28</sup>. Where removal is unavoidable, replacement trees should be provided to compensate for their loss, on a minimum basis of three for one.**
- 4) The planting of new, predominantly native, trees and woodlands will be sought, in appropriate locations, to increase the extent of canopy cover in the Black Country to around 18% over the period to 2039.**
- 5) Tree Preservation Orders will be used to protect individual(s) or groups of trees that contribute to the visual amenity and / or the character of an area and that are under threat of damage or removal.**

### **Habitat Creation**

<sup>28</sup> The tree is a clearly identified and immediate threat to human safety; disease is significantly impacting the tree's longevity and safety; the tree is causing clearly evidenced structural damage to property where remedial works cannot be undertaken to alleviate the problem; the tree is creating a clearly identified danger or causing significant damage to the adopted highway / footpath network.

## **Policy ENV4 – Provision, retention and protection of trees, woodlands and hedgerows**

- 6) All available data on extant tree cover and associated habitat<sup>29</sup> will be considered when making decisions on the proposed loss of trees and woodland to accommodate infrastructure and other development proposals. In areas where evidence demonstrates that current levels of tree cover are low, proposals that incorporate additional tree planting, to increase existing levels of habitat and canopy cover, will be considered positively, as part of the wider contribution to biodiversity net gain.**
- 7) A majority of native tree species able to withstand climate change should be used in landscaping schemes or as replacement planting, to maximise habitats for local wildlife / species and maintain and increase biodiversity. In circumstances where non-native tree species are also considered to be appropriate, a mix of native and non-native species should be provided, to help maintain a healthy and diverse tree population.**
- 8) Opportunities for increasing tree provision through habitat creation and the enhancement of ecological networks, including connecting areas of ancient woodland, will be maximised, in particular by means of the biodiversity net gain and nature recovery network initiatives (see Policy ENV3).**

### **Trees and development**

- 9) An arboricultural survey, carried out to an appropriate standard, should be undertaken prior to removal of any vegetation or site groundworks and used to inform a proposal's layout at the beginning of the detailed design process.**
- 10) Development should be designed around the need to incorporate trees already present on site, using sensitive and well-designed site layouts to maximise their retention.**

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<sup>29</sup> E.g. from the local ecological records centre

## **Policy ENV4 – Provision, retention and protection of trees, woodlands and hedgerows**

- 11) Existing mature trees<sup>30</sup>, trees that are ecologically important, and ancient / veteran trees, must be retained and integrated into the proposed landscaping scheme, recognising the important contribution of trees to the character and amenity<sup>31</sup> of a development site and to local green infrastructure networks.**
- 12) In addition to meeting the requirements for replacement trees on sites and biodiversity net gain, new tree planting should be included in all new residential developments and other significant proposals<sup>32</sup>, as street trees or as part of landscaping schemes. Development proposals should use large-canopied species where possible, which provide a wider range of health, biodiversity and climate change mitigation and adaptation benefits because of their larger surface area and make a positive contribution to increasing overall canopy cover<sup>33</sup>.**
- 13) New developments should make a minimum contribution of 20% canopy cover across the development site and a recommended contribution of 30% canopy cover across the development site<sup>34</sup>.**
- 14) New houses and other buildings must be carefully designed and located to prevent an incompatible degree of shade<sup>35</sup> being cast by both existing and new trees that might result in future pressure for them to be removed.**
- 15) The positioning of trees in relation to streets and buildings should not worsen air quality for people using and living in them. Care should be taken to position trees and / or design streets and buildings in a way that allows for**

<sup>30</sup> Health and status as assessed in a report produced by an accredited arboriculturist

<sup>31</sup> National planning guidance identifies trees worthy of retention on amenity grounds (through use of a TPO) as those that are visible in part or whole from a public place and / or those with individual, collective and wider impact (in terms of size, form, future potential, rarity, cultural / historic value, landscape contribution and / or contribution to a conservation area). Other factors such as value for nature conservation and climate change may also be considered.

<sup>32</sup> E.g. new infrastructure, non-residential development, town centre regeneration and other similar schemes

<sup>33</sup> The area of ground covered by trees when seen from above.

<sup>34</sup> Emergency Tree Plan for the UK – The Woodland Trust 2020

<sup>35</sup> This will be in the context of the requirements outlined in policies elsewhere in this plan on the role of trees in mitigating climate change and providing appropriate levels of shade and cooling.

## **Policy ENV4 – Provision, retention and protection of trees, woodlands and hedgerows**

street-level ventilation to occur, to avoid trapping pollution between ground level and tree canopies (see Policy CC4).

- 16) Where planning permission has been granted that involves the removal of trees, agreed replacement trees of a suitable species must be provided onsite. Where sufficient and suitable onsite replacements cannot be provided, off-site planting or woodland enhancement, including support for natural regeneration, in the near vicinity of the removed tree(s) must be provided, in line with the mitigation hierarchy set out in Policy ENV3. Appropriate planning conditions will be used to secure timely and adequate alternative provision and ongoing maintenance.**
- 17) Replacement trees located off-site should not be planted where they would impact on areas designated as ecologically important unless this has been specifically agreed with the relevant authority and its ecological officers / advisers.**
- 18) Trees proposed for removal during development should be replaced at a ratio of at least three for one. The species, size and number of replacement trees will be commensurate with the size, stature, rarity, and public amenity of the tree(s) to be removed. Where trees to be replaced form a group of amenity value (rather than individual specimens), replacement must also be in the form of a group commensurate with the area covered, size and species of trees and established quality of the original group and, where possible, located in a position that will mitigate the loss of visual amenity associated with the original group<sup>36</sup>.**
- 19) Trees on development sites must be physically protected during development. Care must be taken to ensure that site engineering /**

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<sup>36</sup> I.e., as close as possible to the site of the removed trees.

## **Policy ENV4 – Provision, retention and protection of trees, woodlands and hedgerows**

**infrastructure works<sup>37</sup>, the storage of plant and machinery, excavations and new foundations do not adversely impact their continued retention, in line with current arboricultural and Building Regulation requirements.**

- 20) New trees on development sites should be planted in accordance with arboricultural best practice, including the use of suitably sized planting pits<sup>38</sup>, supporting stakes, root barriers, underground guying, and appropriate protective fencing during the construction phase.**
- 21) Appropriate conditions will be included in planning permissions to ensure that new trees that fail on development sites are replaced within a specified period by trees of a suitable size, species, and quality.**
- 22) Where proposed development will impact on the protection, safety and / or retention of a number of trees, or on the character and appearance of trees of importance to the environment and landscape, the use of an arboricultural clerk of works<sup>39</sup> will be required, to be made subject to a condition on the relevant planning permission.**
- 23) A presumption should be applied that replacement trees are UK and Ireland sourced and grown, to help limit the spread of tree pests and diseases, while supporting regional nurseries where possible when acquiring them.**

### **Hedgerows**

- 24) There will be a presumption against the wholesale removal of hedgerows for development purposes, especially where ecological surveys have identified them to be species-rich and where they exist on previously undeveloped land.**

<sup>37</sup> I.e. The installation of buried services, drainage systems (such as swales and storage crates for SuDS), the installation of both temporary and permanent means of access, etc.

<sup>38</sup> To allow for an appropriate volume of soil in which to develop a viable root system and to prevent future stress that might affect the trees' long-term health and lifespan

<sup>39</sup> The Arboricultural Clerk of Works is a suitably qualified arboriculturist acting on behalf of the developer. They will be engaged to monitor and oversee the implementation of the works required within the protection area of a retained tree / trees.



## **Policy ENV4 – Provision, retention and protection of trees, woodlands and hedgerows**

- 25) Hedgerow retention and reinforcement will be of particular importance where hedgerows form part of an established ecological network enabling the passage of flora and fauna into and out of rural, suburban, and urban areas. If hedgerow removal is needed to accommodate a high-quality site layout, replacement hedgerow planting will be required.**
- 26) Protection of hedgerows before and during development must be undertaken. This will include: the provision of landscape buffers where appropriate; protective fencing; and careful management of plant and materials on site to avoid damage to the hedgerow(s) and its root system.**
- 27) New hedgerows will be sought as part of site layouts and landscaping schemes.**

### **Justification**

10.55 Section 15 of the NPPF (2019) identifies the importance of trees in helping to create an attractive and healthy environment. The NPPF expects local plans to identify, map and safeguard components of ecological networks and promote their conservation, restoration, and enhancement. Ancient woodlands and ancient and veteran trees are an irreplaceable aspect of both the ecological and historic landscape and the NPPF is very clear about the need to protect such resources where they occur. Hedgerows are also a finite and vulnerable resource and their provision, retention and enhancement will be expected when new development is proposed.

10.56 Tree canopy cover across the Black Country is currently 13.6%, using information from local and national sources that is regularly updated. The % canopy cover is available at a ward level<sup>40</sup>, and varies across the Black Country. There is a need to increase total tree canopy cover to 18%, to help prevent the further fragmentation of habitats across the Black Country, support the Nature Recovery Network, and provide more equal canopy cover across all wards.

<sup>40</sup> [GB Wards Canopy Cover Map](#)

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- 10.57 Wildlife corridors are important in helping overcome habitat fragmentation, by ensuring that species can reach the resources they need and that their populations do not become isolated, inbred, and prone to the adverse impacts of climate change. Supporting wildlife corridors will mean:
- a) creating and maintaining a diverse tree population (including trees of all ages and sizes),
  - b) controlling invasive species,
  - c) promoting the reintroduction of native species in locations where they are appropriate and would have a positive impact on biodiversity,
  - d) retaining dead wood,
  - e) making sure that any new planting is in the right location and of the right species, and
  - f) recognising that woodlands are not simple monoculture habitats and will also contain glades, wet areas, understoreys, and grassland.
- 10.58 The requirement to plant trees on development sites will also help support and deliver increased biodiversity and green network opportunities on sites that at present do not contain tree cover, e.g. some sites currently in managed agricultural use where trees and hedgerows have previously been removed.
- 10.59 An example of the importance of trees in helping to manage and mitigate adverse impacts relating to air quality and climate change can be found in the report produced for the London iTree<sup>41</sup> project in 2015 (highlighting the value of London's tree population). This identified that the tree population of inner and outer London (8.5 million trees) held nearly 2.4 million tonnes of carbon and was sequestering an additional 77,000 tonnes per annum, equivalent to the total amount of carbon generated by 26 billion vehicle miles. The project also reported significant value and benefits provided by trees in terms of pollution removal, storm water alleviation, building energy savings and amenity.

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<sup>41</sup> VALUING LONDON'S URBAN FOREST Results of the London i-Tree Eco Project 2015  
<https://www.treeconomics.co.uk/wp-content/uploads/2018/08/London-i-Tree-Report.pdf>

- 10.60 The loss of trees from urban environments has been demonstrated to have negative outcomes for human health. Social costs, such as an increase in crime, have also been associated with the loss of trees<sup>42</sup>. There is a growing body of evidence that the presence of trees in and around urban environments provides major public health and societal benefits.
- 10.61 Trees in the urban landscape have a vital role to play in delivering ecosystem services<sup>43</sup>, such as in:
- a) helping to improve residents' physical health<sup>44</sup>
  - b) helping to improve residents' mental health by reducing stress levels
  - c) helping to mitigate climate change by sequestering carbon dioxide
  - d) providing shading and cooling benefits (including associated savings to the NHS from avoided skin cancer and heat stroke<sup>45</sup>)
  - e) improving air quality and reducing atmospheric pollution
  - f) reducing wind speeds in winter, thereby reducing heat loss from buildings
  - g) reducing noise
  - h) Improving local environments and bringing people closer to nature
  - i) supporting ecological networks and green infrastructure
  - j) maximising people's enjoyment of and benefits from their environment
  - k) contributing towards the aesthetic value of the urban area

### **Trees on development sites**

- 10.62 The BCP is delivering a significant quantum of new development and redevelopment in both urban and semi-rural areas and it will be important to ensure

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<sup>42</sup> <https://www.mdpi.com/1660-4601/17/12/4371> Urban Trees and Human Health: A Scoping Review - Published: 18 June 2020

<sup>43</sup> A term for the benefits humans receive from natural processes occurring in ecosystems, such as providing clean drinking water and decomposition of waste. In 2004 the UN grouped services into four categories: provisioning - e.g. water supply; regulating - e.g. influence on climate; supporting - e.g. crop pollination; cultural - e.g. outdoor activities.

<sup>44</sup> A 2015 study in the city of Toronto revealed that people who lived in areas with higher street tree density reported better health perception and fewer cardio-metabolic conditions than their peers living in areas with lower street tree density - Kardan, O. et al. Neighbourhood greenspace and health in a large urban center. Sci. Rep. 5, 11610; doi: 10.1038/srep11610 (2015)

<sup>45</sup> Health Benefits of Street Trees - Vadims Sarajevs, The Research Agency of the Forestry Commission, 2011

that the existing stock of trees and woodlands is protected, maintained, and expanded as far as possible. Developers will be expected to give priority to the retention of trees and hedgerows on development sites, and existing landscaping should also be kept and protected where possible.

10.63 There will be a requirement to: -

- a) replace trees and woodlands that cannot be retained on development sites with a variety of suitable tree specimens (species and size);
- b) require developers to both retain trees on sites as part of comprehensive landscape schemes and to provide suitable new trees in locations that will enhance the visual amenity of a development;
- c) where individual or groups of trees are of landscape or amenity value, they are retained and that developments are designed to fit around them;
- d) encourage diversity in the tree population to help to counter ecological causes of tree loss, such as diseases, pests, or climate change; and
- e) balance the impacts of the loss of trees on climate change and flooding by identifying opportunities to plant replacements via appropriate tree and habitat enhancement and creation schemes.

10.64 As part of the requirement for biodiversity net gains (see Policy ENV3) developers and others will need to pursue adequate replacements for trees and woodlands lost to allocated and approved development, as well as additional trees and other habitat creation to achieve appropriate compensatory provision on sites. The main imperative will be to ensure that trees are maintained in good health on development sites in the first instance but where this is not possible, the grant of planning permission will be conditional upon the replacement and enhancement of tree cover nearby.

10.65 Tree species specified in submitted planting plans should be evaluated by either a chartered Landscape Architect or accredited arboriculturist employed by the local authority. This will ensure that a suitable variety of species and standard / size of tree is being planted and will deliver the most appropriate solution for a specific location.

10.66 Normally, for every tree removed from a development site a minimum of three replacement trees will be required to be planted on the site. There will be

circumstances where the ratio of replacement planting will be greater than this – especially in cases where significant / mature trees contributing to the visual and ecological amenity of an area and its character are to be removed. Where a development site cannot accommodate additional planting, replacement trees will be expected to be planted in an appropriate off-site location.

- 10.67 The clearance of trees from a site prior to the submission of a planning application is discouraged. If the Local Planning Authority have robust evidence to prove that trees were until recently present on a cleared site, there will still be a requirement to provide suitable and sufficient replacement trees, either within the proposed scheme or on an alternative identified site. This is also addressed in the amended Environment Bill 2019 - 2021, which makes provision for sanctions against the clearance of sites prior to a planning application being submitted in relation to the requirement for biodiversity net gain.
- 10.68 To ensure that good tree protection measures are maintained through the construction project, the BCA will support and encourage the use of arboriculture clerks of work on development sites where trees are to be managed, removed and / or planted on the site. Where the likelihood of trees being adversely affected by construction activity is significant, the BCA will use appropriate conditions to require this level of oversight.

#### **Ancient woodland and veteran trees<sup>46</sup>**

- 10.69 The NPPF defines ancient woodland and veteran trees as an irreplaceable habitat. Ancient woodland is an area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites. An ancient or veteran tree is a tree which, because of its age, size, and condition, is of exceptional biodiversity, cultural or heritage value. Veteran trees are of exceptional value culturally, in the landscape, or for wildlife, due to their great age, size or location. The soils in which these trees sit has been identified as having a high biodiversity value, given the length of time the trees have been successfully established.
- 10.70 Individual trees can have historic and cultural value and can be linked to specific historic events or people, or they may simply have importance because of their

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<sup>46</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences> - national guidance on ancient woodland and veteran trees

appearance, contribution to landscape character and local landmark status. Some heritage trees may also have great botanical interest, for example as rare native trees or cultivars of historic interest.

- 10.71 Very few trees of any species can be classed as ancient or veteran. Such trees / areas are a finite resource of great biodiversity value. For this reason, the BCA consider that it is essential to provide absolute protection for ancient and veteran trees and ancient woodland sites in the Black Country.

### Hedgerows

- 10.72 The planting of hedgerows not only enhances opportunities for wildlife but can also significantly improve the appearance of new development. It is particularly suitable on frontages and along plot and site boundaries, both softening the appearance of the built form and supplementing the design of the overall scheme.
- 10.73 Hedgerows are integral to ecological networks, given their linear form, and will be essential elements of habitat linkages within and beyond the Black Country. Planting additional hedgerows will help to support and increase the movement of wildlife and plants through the Black Country. The planting of bare root plants is an economical way of providing green infrastructure on sites.

### Evidence

- Valuing London's Urban Forest - Results of The London I-Tree Eco Project 2015
- Neighbourhood Greenspace and Health in A Large Urban Center. Sci. Rep. 5, 11610; Doi: 10.1038/Srep11610 (2015)
- Health Benefits of Street Trees - Vadims Sarajevs, The Research Agency Of The Forestry Commission, 2011
- GB Wards Canopy Cover Map
- GB 25-Year Environment Plan
- The Environment Bill 2019 - 2021

### Delivery

- Development Management, legal and funding mechanisms.
- Infrastructure Delivery Plan

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## Issues and Options Consultation Responses

10.74 This is a new policy produced in response to emerging national legislation and thus was not addressed previously.

### Historic Character and Local Distinctiveness of the Black Country

10.75 Environmental transformation and promoting sustainable development are two of the underpinning themes of the Black Country Plan Vision, which in turn requires a co-ordinated approach to the conservation and enhancement of the built and natural environment. The protection and promotion of the historic character and local distinctiveness of the Black Country's buildings, settlements and landscapes are key elements of sustainability and transformation and in particular help to deliver Strategic Priority 12, to protect, sustain and enhance the quality of the built and historic environment, whilst ensuring the delivery of distinctive and attractive places.

10.76 Local distinctiveness arises from the cumulative contribution made by many and varied features and factors, both special and commonplace. It is the ordinary and commonplace features of the Black Country that, in fact, give it its distinctiveness and help to create a unique sense of place. This is beneficial for community identity and wellbeing as well as making places attractive to investment.

10.77 The Black Country Historic Landscape Characterisation (2009), along with other urban historic landscape characterisation studies, has provided a key evidence base to inform an understanding of the historic character of the Black Country. This work has been built upon with the preparation of the Black Country Historic Landscape Characterisation Study (2019), and this evidence should be used in considering how new development proposals and the enhancement of existing townscapes and landscape should respect the local character and distinctiveness of the Black Country.

10.78 Policy ENV5 aims to ensure that where physical evidence of local character persists, it should be conserved. Where development is proposed, every effort should be made to ensure that the Black Country's historic environment is fully appreciated and enhanced in terms of its townscape, landscape and individual heritage assets, and that new development makes a positive contribution to the local character and distinctiveness of the Black Country.

## **Policy ENV 5 - Historic Character and Local Distinctiveness of the Black Country**

- 1) All development proposals within the Black Country should sustain and enhance the locally distinctive character of the area in which they are to be sited, whether formally recognised as a designated or non-designated heritage asset. They should respect and respond to its positive attributes in order to help maintain the Black Country's cultural identity and strong sense of place.**
- 2) Development proposals will be required to preserve and enhance local character and those aspects of the historic environment - together with their settings - that are recognised as being of special historic, archaeological, architectural, landscape or townscape quality.**
- 3) Physical assets, whether man-made or natural that contribute positively to the local character and distinctiveness of the Black Country's landscape and townscape should be retained and, wherever possible, enhanced and their settings respected.**
- 4) The specific pattern of settlements (urban grain), local vernacular and other precedents that contribute to local character and distinctiveness should be used to inform the form, scale, appearance, details, and materials of new development.**
- 5) New development in the Black Country should be designed to make a positive contribution to local character and distinctiveness and demonstrate the steps that have been taken to achieve a locally responsive design. Proposals should therefore demonstrate that:**
  - a. all aspects of the historic character and distinctiveness of the locality, including any contribution made by their setting, and (where applicable) views into, from, or within them, have been fully assessed and used to inform proposals; and**
  - b. they have been prepared with full reference to the Black Country Historic Landscape Characterisation Study (BCHLCS) (October 2019), the Historic Environment Record (HER), and to other relevant historic**



## **Policy ENV 5 - Historic Character and Local Distinctiveness of the Black Country**

landscape characterisation documents, supplementary planning documents (SPD's) and national and local design guides where applicable.

- 6) All proposals should aim to sustain and reinforce special character and conserve the historic aspects of locally distinctive areas of the Black Country, for example:**
- a. The network of now coalesced but nevertheless distinct small industrial settlements of the former South Staffordshire Coalfield, such as Darlaston and Netherton;**
  - b. The civic, religious, and commercial cores of the principal settlements of medieval origin such as Wolverhampton, Dudley, Wednesbury and Walsall;**
  - c. Surviving pre-industrial settlement centres of medieval origin such as Halesowen, Tettenhall, Aldridge, Oldbury and Kingswinford;**
  - d. Rural landscapes and settlements including villages / hamlets of medieval origin, relic medieval and post-medieval landscape features (hedgerows, holloways, banks, ditches, field systems, ridge and furrow), post-medieval farmsteads and associated outbuildings, medieval and early post-medieval industry (mills etc.) and medieval and post-medieval woodland (see Policy ENV4). The undeveloped nature of these areas means there is also the potential for evidence of much earlier activity that has largely been lost in the urban areas;**
  - e. Areas of Victorian and Edwardian higher-density development, which survive with a high degree of integrity including terraced housing and its associated amenities;**
  - f. Areas of extensive lower density suburban development of the mid-20th century including public housing and private developments of semi-detached and detached housing;**

## **Policy ENV 5 - Historic Character and Local Distinctiveness of the Black Country**

- g. Public open spaces, including Victorian and Edwardian municipal parks, often created from earlier large rural estates or upon land retaining elements of relict industrial landscape features;**
  - h. The canal network and its associated infrastructure, surviving canal-side pre-1939 buildings and structures together with archaeological evidence of the development of canal-side industries and former canal routes (see Policy ENV7);**
  - i. Buildings, structures and archaeological remains of the traditional manufacturing and extractive industries of the Black Country including glass making, metal trades (such as lock making), manufacture of leather goods, brick-making, coal mining and limestone quarrying;**
  - j. Geosites of geological, historic, cultural, and archaeological significance within the UNESCO Black Country Geopark (see Policy ENV6);**
  - k. The Beacons and other largely undeveloped high prominences lying along the Sedgley to Northfield Ridge (including Sedgley Beacon and Wrens Nest), Castle Hill and the Rowley Hills (Turners Hill), and the Queslett to Shire Oak Ridge (including Barr Beacon) and views to and from these locations.**
- 7) In addition to designated heritage assets<sup>47</sup>, attention should be paid to the following non-designated heritage assets<sup>48</sup> including the Historic Environment Area Designations (HEADS) described and mapped in the Black Country Historic Landscape Characterisation Study (BCHLCS, 2019 – see evidence section for link):**

<sup>47</sup> NPPF 2019 Annex 2 Designated heritage asset: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation

<sup>48</sup> NPPF 2019 Annex 2 Heritage asset: A building monument, site, place, area, or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

## **Policy ENV 5 - Historic Character and Local Distinctiveness of the Black Country**

- a. **Areas of High Historic Townscape Value (AHHTV) that exhibit a concentration of built heritage assets and other historic features that, in combination, make a particularly positive contribution to local character and distinctiveness;**
  - b. **Areas of High Historic Landscape Value (AHHLV) that demonstrate concentrations of important wider landscape elements of the historic environment, such as areas of open space, woodland, watercourses, hedgerows, and archaeological features, that contribute to local character and distinctiveness;**
  - c. **Designed Landscapes of High Historic Value (DLHHV) that make an important contribution to local historic character but do not meet the criteria for inclusion on the national Register for Parks and Gardens;**
  - d. **Archaeology Priority Areas (APA) that have a high potential for the survival of archaeological remains of regional or national importance that have not been considered for designation as scheduled monuments, or where there is insufficient data available about the state of preservation of any remains to justify a designation;**
  - e. **Locally listed buildings / structures and archaeological sites;**
  - f. **Non-designated heritage assets of archaeological interest;**
  - g. **Any other buildings, monuments, sites, places, areas of landscapes identified as having a degree of significance<sup>49</sup>.**
- 8) Development proposals that would potentially have an impact on the significance of any of the above distinctive elements, including any contribution made by their setting, should be supported by evidence that the historic character and distinctiveness of the locality has been fully assessed and used to inform proposals. Clear and convincing justification should be**

<sup>49</sup> NPPF Annex 2 Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic, or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

## **Policy ENV 5 - Historic Character and Local Distinctiveness of the Black Country**

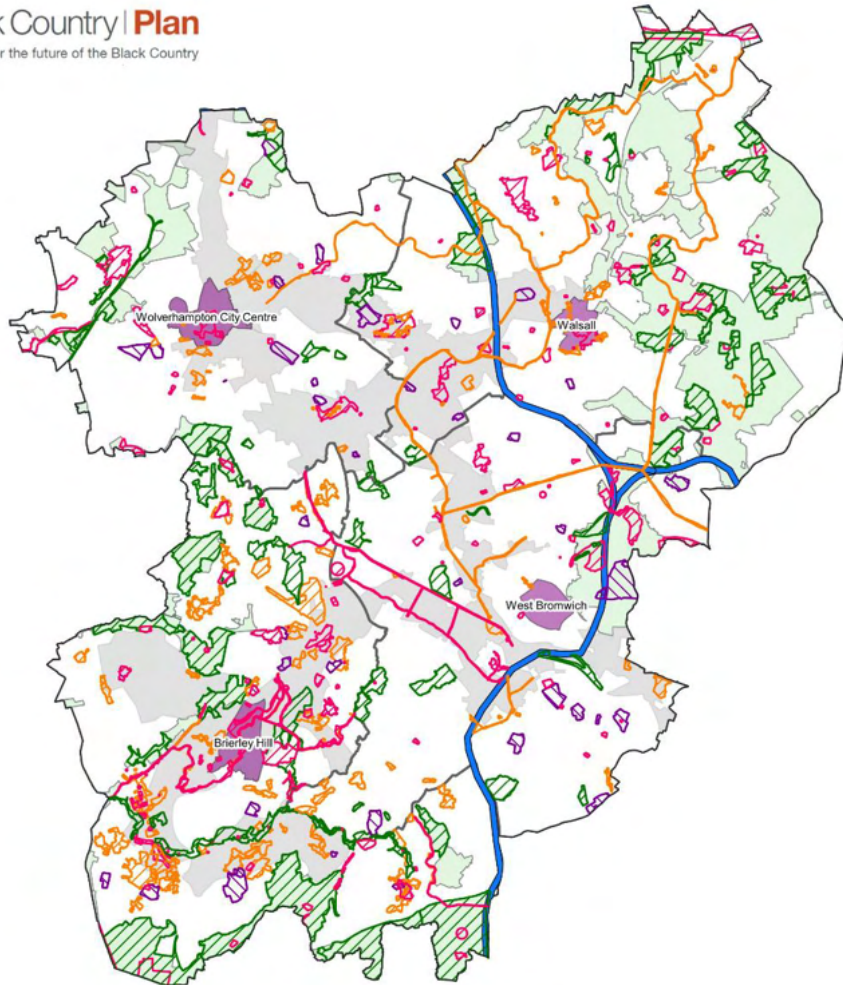
provided, either in Design and Access Statements, Statements of Heritage Significance, or other appropriate reports.

- 9) In some instances, local planning authorities will require developers to provide detailed Heritage Statements and / or Archaeological Desk-based Assessments to support their proposals.
- 10) For sites with archaeological potential, local authorities may also require developers to undertake Field Evaluation to support proposals.

**DRAFT**

Figure 12 - Historic Landscape Characterisation Policies Map<sup>50</sup>

Black Country Plan  
 Planning for the future of the Black Country



Historic Landscape Characterisation Policies Map (ENV5)

Key:	
<b>Historic Landscape Characterisation (ENV5)</b>	<b>Strategic Planning</b>
Areas of High Historic Landscape Value	Tier One Strategic Centres
Areas of High Historic Townscape Value	Local Authority Boundaries
Archaeological Priority Areas	Core Regeneration Areas
Designed Landscapes of Historic Value	Black Country Green Belt
<b>Key Routes</b>	
Motorways	

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## Justification

10.79 The Black Country has a rich and diverse historic environment, which is evident in the survival of individual heritage assets and in the local character and

<sup>50</sup> Unhatched lines on plan represent canals and other linear features

distinctiveness of the broader landscape. The geodiversity of the Black Country underpins much of the subsequent development of the area, the importance of which is acknowledged by the inclusion of the Black Country Geopark in the UNESCO Global Geopark Network<sup>51</sup>. The exploitation of abundant natural mineral resources, particularly those of the South Staffordshire coalfield, together with the early development of the canal network, gave rise to rapid industrialisation and the distinctive settlement patterns that characterise the area.

- 10.80 Towns and villages with medieval origins survive throughout the area and remain distinct in character from the later 19th century industrial settlements, which typify the coalfield and gave rise to the description of the area as an “*endless village*” of communities, each boasting a particular manufacturing skill for which many were internationally renowned.
- 10.81 Beyond its industrial heartland, the character of the Black Country can be quite different and varied. The green borderland, most prominent in parts of Dudley, Walsall, and the Sandwell Valley, is a largely rural landscape containing fragile remnants of the ancient past. Undeveloped ridges of high ground punctuate the urban landscape providing important views and points of reference that define the character of the many communities. Other parts of the Black Country are characterised by attractive, well-tree'd suburbs with large houses in substantial gardens and extensive mid-20th century housing estates designed on garden city principles.
- 10.82 This diverse character is under constant threat of erosion from modern development, some small scale and incremental and some large scale and fundamental. As a result, some of the distinctiveness of the more historic settlements has already been lost to development of a “homogenising” character. In many ways the Black Country is characterised by its ability to embrace change, but future changes will be greater and more intense than any sustained in the past. Whilst a legislative framework supported by national guidance exists to provide for the protection of statutorily designated heritage assets the key challenge for the future is to manage change in a way that realizes the regeneration potential of the proud local heritage and distinctive character of the Black Country.

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<sup>51</sup> See also Policy ENV7 - Geodiversity

- 10.83 To ensure that heritage assets make a positive contribution towards the wider economic, social and environmental regeneration of the Black Country, it is important that they are not considered in isolation but are conserved and enhanced within their wider context. A holistic approach to the built and natural environment maximises opportunities to improve the overall image and quality of life in the Black Country by ensuring that historic context informs planning decisions and provides opportunities to link with other environmental infrastructure initiatives.
- 10.84 An analysis and understanding of the local character and distinctiveness of the area has been made using historic landscape characterization (HLC) principles. Locally distinctive areas of the Black Country have been defined and categorised as Areas of High Historic Townscape Value, Areas of High Historic Landscape Value, Designed Landscapes of High Historic Value, and Archaeology Priority Areas (BCHLCS, 2019). This builds on the work of the original Black Country Historic Landscape Characterization (2009), other local HLC studies and plans, and the Historic Environment Records.

## Evidence

- Black Country Historic Landscape Characterisation Study (2019) – available online at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> Black Country HLC Final Report 30-10-2019-LR
- Historic Environment Record (HER)
- <https://www.gov.uk/government/publications/national-design-guide> .

## Delivery

- Historic Landscape Characterisation documents prepared by individual local authorities in support of their Local Plan
- Adopted Conservation Area Character Appraisals
- Development Management process including Design and Access Statements and Statements of Heritage Significance
- Supplementary Planning Documents
- A regularly updated and maintained Historic Environment Record (HER).

## Issues and Options consultation responses

10.85 Among the issues raised during the consultation, the idea of a heritage policy was broadly supported. The importance of Heritage Statements, and non-designated heritage assets was noted. Greater recognition of nature and natural features in terms of local distinctiveness and historic character was sought, and concerns were expressed about impacts on the Green Belt.

### Geodiversity and the Black Country UNESCO Global Geopark

10.86 The geology of the Black Country is very rich in industrial minerals. Limestone, ironstone, fireclay, coal and other industrial minerals provided the ingredients to make iron and paved the way for an intense and very early part of the Industrial Revolution to begin in the area.

10.87 The Black Country UNESCO Global Geopark was declared on Friday 10 July 2020. The Executive Board of UNESCO confirmed that the Black Country had been welcomed into the network of Global Geoparks as a place with internationally important geology, because of its cultural heritage and the extensive partnerships committed to conserving, managing and promoting it.

10.88 A UNESCO Global Geopark uses its geological heritage, in connection with all other aspects of the area's natural and cultural heritage, to enhance awareness and understanding of key issues facing society in the context of the dynamics of modern society, mitigating the effects of climate change and reducing the impact of natural disasters. By raising awareness of the importance of the area's geological heritage in history and society today, UNESCO Global Geoparks give local people a sense of pride in their region and strengthen their identification with the area. The creation of innovative local enterprises, new jobs and high-quality training courses is stimulated as new sources of revenue are generated through sustainable geotourism, while the geological resources of the area are protected.

### Policy ENV6 - Geodiversity and the Black Country UNESCO Global Geopark

**1. Development proposals should:**

- a. wherever possible, make a positive contribution to the protection and enhancement of geodiversity, particularly within the boundaries of the**



## Policy ENV6 - Geodiversity and the Black Country UNESCO Global Geopark

**Black Country UNESCO Global Geopark and in relation to the geosites identified within it;**

- b. be resisted where they would have significant adverse impact on the Geopark geosites or other sites with existing or proposed European or national designations in accordance with Government guidance;**
  - c. give locally significant geological sites<sup>52</sup> a level of protection commensurate with their importance;**
  - d. take into account, and avoid any disruption to, the importance of the inter-connectivity of greenspace and public access between geosites within the boundary of the Black Country UNESCO Global Geopark.**
- 2. In their local plans, the BCA should:**
- a. establish clear goals for the management of identified sites (both individually and as part of a network) to promote public access to, appreciation and interpretation of geodiversity;**
  - b. ensure geological sites of international, national or regional importance are clearly identified.**

### Justification

10.89 Paragraph 170 of the NPPF (June 2019) requires local authorities to protect sites of geological value, “... *in a manner commensurate with their statutory status or identified quality in the development plan*”. The Overarching National Policy Statement for Energy<sup>53</sup> states that development should aim to avoid significant harm to geological conservation interests and identify mitigation where possible; effects on sites of geological interest should be clearly identified.

<sup>52</sup> Many of which are identified as Sites of Local Importance for Nature Conservation (SLINCs) or Sites of Importance for Nature Conservation (SINCs) – see policy ENV1, and / or lie within areas of significant historic value, such as conservation areas, registered parks and gardens or other parts of the Black Country’s historic landscape – see Policy ENV5 - Historic Character and Local Distinctiveness.

<sup>53</sup> Paragraph 5.3.7

- 10.90 Areas of geological interest also form significant facets of the industrial landscapes of the Black Country. They reflect the area's history of mining and extraction and will often co-exist with, and form part of the setting of, protected / sensitive historic landscapes. In many cases they also form an intrinsic part of the green infrastructure network, contributing to landscape and ecological diversity as part of the wider natural environment.
- 10.91 As part of this strategic network of green infrastructure, geosites should be retained wherever possible and their contribution to GI recognised and taken into account when development is proposed that would affect the areas they form part of.
- 10.92 New development should have regard to the conservation of geological features and should take opportunities to achieve gains for conservation through the form and design of development.
- 10.93 Where development is proposed that would affect an identified geological site the approach should be to avoid adverse impact to the existing geological interest. If this is not possible, the design should seek to retain as much as possible of the geological Interest and enhance this where achievable, for example by incorporating permanent sections within the design, or creating new interest of at least equivalent value by improving access to the interest.
- 10.94 The negative impacts of development should be minimised, and any residual impacts mitigated.

### **UNESCO Global Geoparks**

- 10.95 A UNESCO Global Geopark<sup>54</sup> is a single, unified geographical area where sites and landscapes of international geological significance are located. It is an area of geological significance, managed with three main objectives in mind:
- a) to protect the geological landscape and the nature within it;
  - b) to educate visitors and local communities; and
  - c) to promote sustainable development, including sustainable tourism.
- 10.96 All the UNESCO Global Geoparks contain internationally significant geology and are managed through community-led partnerships that promote an appreciation of

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<sup>54</sup> <https://www.unesco.org.uk/geoparks/>

natural and cultural heritage while supporting the sustainable economic development of the area.

10.97 UNESCO Global Geopark status is not itself a statutory designation.

## Evidence

- <https://blackcountrygeopark.dudley.gov.uk/bcg/>

## Delivery

- Geopark Management Team, delivering aims of the Geopark

## Issues and Options Consultation Responses

10.98 This is a new policy produced in response to the Black Country Geopark being declared by UNESCO in July 202 and was not subject to consultation during issues and options.

## Canals of the Black Country

10.99 The Black Country's canal network is one of its most defining historical and environmental assets and its preservation and enhancement remains a major objective in the Vision for environmental transformation across the area and in the delivery of Strategic Priorities 11 and 12. Canals play a multifunctional role, providing economic, social, environmental and infrastructure benefits. They form a valuable part of the green infrastructure and historic environment of the Black Country and have a significant role to play in mental wellbeing and physical health, allowing people opportunities for exercise and access to nature.

### Policy ENV7 – Canals

- 1) **The Black Country canal network comprises the canals and their surrounding landscape corridors, designated and undesignated historic assets, character, settings, views and interrelationships. The canal network provides a focus for future development through its ability to deliver a high-quality environment and enhanced accessibility for pedestrians, cyclists, and other non-car-based modes of transport.**
- 2) **All development proposals likely to affect the canal network must:**

## **Policy ENV7 – Canals**

- a. **safeguard the continued operation of a navigable and functional waterway;**
  - b. **ensure that any proposals for reinstatement or reuse would not adversely impact on locations of significant environmental value where canals are not currently navigable;**
  - c. **protect and enhance its special historic, architectural, archaeological, and cultural significance, including the potential to record, preserve and restore such features;**
  - d. **protect and enhance its nature conservation value including habitat creation and restoration along the waterway and its surrounding environs;**
  - e. **protect and enhance its visual amenity, key views and setting;**
  - f. **protect and enhance water quality in the canal.**
  - g. **reinstate and / or upgrade towpaths and link them into high quality wider pedestrian and cycle networks, particularly where they can provide links to transport hubs, centres and opportunities for employment.**
- 3) Where opportunities exist, all development proposals within the canal network must:**
- a. **enhance and promote its role in providing opportunities for leisure, recreation and tourism activities;**
  - b. **enhance and promote opportunities for off-road walking, cycling, and boating access, including for small-scale commercial freight activities;**
  - c. **preserve and enhance the historical, geological, and ecological value of the canal network and its associated infrastructure;**
  - d. **positively relate to the opportunity presented by the waterway by promoting high quality design, including providing active frontages onto the canal and by improving the public realm;**

## **Policy ENV7 – Canals**

- e. sensitively integrate with the canal and any associated canal-side features and, where the opportunities to do so arises, incorporate canal features into the development.
- 4) Development proposals must be fully supported by evidence that the above factors have been fully considered and properly incorporated into their design and layout.
- 5) Where proposed development overlays part of the extensive network of disused canal features, the potential to record, preserve and restore such features must be fully explored. Development on sites that include sections of disused canals should protect the line of the canal through the detailed layout of the proposal. Development will not be permitted that would sever the route of a disused canal or prevent the restoration of a canal link where there is a realistic possibility of restoration, wholly or in part.

### **Residential Canal Moorings**

- 6) For residential moorings, planning consent will only be granted for proposals that include the provision of:
- a. the necessary boating facilities (a minimum requirement of electrical power, a water supply and sanitary disposal);
  - b. dedicated car parking provided within 500m of the moorings, suitable vehicular access, including access by emergency vehicles and suitable access for use by people with disabilities;
  - c. appropriate access to cycling and walking routes;
  - d. an adequate level of amenity for boaters, not unduly impacted upon by reason of noise, fumes or other nearby polluting activities.
- 7) In determining a planning application for residential moorings, account will be taken of the effect that such moorings and their associated activities may have on the amenities or activities of nearby residential or other uses.

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## Justification

- 10.100 The development of the Black Country's canal network had a decisive impact on the evolution of industry and settlement during the 18th, 19th, and 20th centuries. It was a major feat of engineering and illustrates a significant stage in human history - development of mercantile inland transport systems in Britain's industrial revolution during the pre-railway age. As such, the historic value of the Black Country's canal network today should be acknowledged, promoted, protected, and enhanced. The network also plays a major part in the Black Country Geopark, as the mineral wealth of the area meant that canals were a vital link to areas within and beyond the Black Country and continue to provide this link today.
- 10.101 The canal network is a major unifying characteristic of the Black Country's historic landscape. The routes of the canals that make up the network have created landscape corridors with a distinctive character and identity based on the industries and activities that these transport routes served and supported. The network has significant value for nature conservation, tourism, health and wellbeing and recreation and the potential to make an important contribution to economic regeneration through the provision of high-quality environments for new developments and a network of pedestrian, cycle and water transport routes.
- 10.102 It is also important for development in the Black Country to take account of disused canal features, both above and below ground. Only 54% of the historic canal network has survived in use to the present day; a network of tramways also served the canals. Proposals should preserve the line of the canal through the detailed layout of the development. Where appropriate, opportunities should be explored for the potential to preserve the line of the canal as part of the wider green infrastructure network. Where feasible and sustainable, proposals should consider the potential for the restoration of disused sections of canal.
- 10.103 It is acknowledged that there are aspirations to restore disused sections of the canal network within the Black Country. However, it is also recognised that there are very limited opportunities to reinstate such canal sections as navigable routes because of the extensive sections that have been filled in, built over or removed making their reinstatement (and necessary original realignment) financially unviable and unachievable within the Plan period.

- 10.104 There are also areas within the disused parts of the canal network that have naturally regenerated into locations with significant ecological and biodiversity value; to re-open or intensify use on these sections of the network could have an adverse impact on sensitive habitats and species.
- 10.105 Any development proposals that come forward to restore sections of the canal network will be expected to demonstrate that the proposals are sustainable, sufficient water resources exist, and that works will not adversely affect the existing canal network or the environment.
- 10.106 Residential moorings must be sensitive to the needs of the canalside environment in conjunction with nature conservation, green belt and historic conservation policies but also, like all residential development, accord with sustainable housing principles in terms of design and access to local facilities and a range of transport choices.

## Evidence

- Black Country Historic Landscape Characterisation Study (2019)
- Historic Landscape Characterisation documents prepared by individual local authorities in support of their Local Plan
- Adopted Conservation Area Character Appraisals
- Historic England Good Practice Advice Notes (GPAs) and Historic England Advice Notes (HEANs)

## Issues and Options consultation responses

- Recognise the difficulties that have emerged from the inclusion of local projects and whilst generally supports the principle of such initiatives, understand difficulties relating to the viability of such policies on grounds of technical challenges, support removal of reference to specific projects, proving text to support such initiatives would be forthcoming.
- As the Hatherton Branch Canal is safeguarded in Walsall's SAD it is considered appropriate to remove reference from the BCCS and for this to be considered at a local level.
- The benefits of the current policy are welcomed, would benefit from additional reference of wider opportunities provided by a waterside location

- Waterways span several local authority boundaries and it is therefore important to ensure that there is a clear and consistent strategic policy approach to development that affects existing waterways or proposals for restoration.
- Beneficial for the CS to recognise in principle the benefits that canal restoration can bring to the BC recognise feasibility and technical issues should be considered at the appropriate stage and local level.

## Open Space, Sport and Recreation

10.107 The principles of national planning policy on open space, sport and recreation need to be applied in a Black Country context to support the vision for urban renaissance and environmental transformation and in particular to deliver opportunities for safe, attractive, functional, linked and accessible green spaces for people to exercise and play sport in and enjoy. This resource also promotes the enhancement of the natural environment to support greater biodiversity, maximises benefits for health and well-being, helps to mitigate and adapt to climate change and promotes economic regeneration.

### Policy ENV8 – Open Space, Sport and Recreation

- 1) **All development proposals should recognise the values and functions of open space as set out in Government policy and guidance and also address as appropriate the following functions of open space that are of particular importance in the Black Country:**
  - a. **Improving the image and environmental quality of the Black Country;**
  - b. **defining and enhancing local distinctiveness;**
  - c. **preserving and enhancing industrial, geological, archaeological and architectural heritage, including canals;**
  - d. **enhancing visual amenity;**
  - e. **providing buffer zones between incompatible uses;**
  - f. **mitigating the effects of climate change, through reducing potential urban heat island effects and providing opportunities for additional landscaping and tree planting;**



## **Policy ENV8 – Open Space, Sport and Recreation**

- g. preserving and enhancing diversity in the natural and built environment and preventing the fragmentation of habitat networks;**
  - h. strengthening (through extension, increased access and enhanced value) and providing components of a high quality, multifunctional green space and greenway network;**
  - i. providing outdoor sport and physical activity facilities, including footpath and cycle networks and areas for informal recreation and children’s play;**
  - j. providing opportunities for people to grow their own food on allotments and encouraging urban horticulture;**
  - k. enhancing people’s mental and physical health and well-being.**
- 2) Development that would reduce the overall value of the open space, sport and recreation network in the Black Country will be resisted. Development that would increase the overall value of the open space, sport and recreation network will be supported, especially in areas of proven deficiency against adopted quantity, quality and accessibility standards.**
- 3) Each local authority will set out, in their Local Plans and on Policies Maps, proposals for specific open space, sport and recreation facilities and planning requirements for open space, sport and recreation, to:**
- a. move towards the most up-to-date local open space, sport and recreation standards for each local authority, in terms of quantity, quality and access. In order to balance the realisation of these standards, in some cases a loss in quantity of open space or facilities may be acceptable if compensatory gains in quality and / or accessibility of other open spaces / facilities can be secured that would be of a greater value in the local area;**
  - b. address the priorities set out in the Black Country Nature Recovery Network Strategy;**
  - c. make more efficient use of urban land by:**

## **Policy ENV8 – Open Space, Sport and Recreation**

- i. **creating more multifunctional open spaces;**
  - ii. **protecting the existing greenway network for recreation and biodiversity and taking opportunities to strengthen and expand the network;**
  - iii. **significantly expanding community use of open space, sport, play and recreation facilities provided at places of education (see Policy HOU5);**
  - iv. **providing opportunities to increase accessible public open space, sport and recreation use of the Green Belt;**
  - v. **making creative use of land exchanges and disposing of surplus assets to generate resources for investment;**
  - vi. **increasing access to open space, sport and recreation facilities for all, including people with disabilities and other target groups with limited access at present; and**
  - vii. **where there is a cross-boundary impact, identifying the most appropriate location to maximise community access and use of new facilities.**
- 4) The existing network of built sports facilities will be protected and enhanced. Proposals involving the loss of a built sports facility will be permitted only where adequate alternative provision is available to meet the needs of the community served by the facility.**
- 5) New built sports facilities should be:**
- a. **Well-designed, including through the provision of high-quality landscaping and public realm enhancements, and well-related to neighbourhood services and amenities;**
  - b. **Well-linked to public transport infrastructure and footpath and cycleway networks and directed to a centre appropriate in role and scale to the proposed development and its intended catchment area. Proposals**

## Policy ENV8 – Open Space, Sport and Recreation

**located outside centres must be justified in terms of relevant national policy.**

- 6) Where a housing development would increase the need for built sports facilities to the extent that significant new or improved facilities would be required to meet this need, proportionate planning obligations or Community Infrastructure Levy will be secured to help address this need, where this is financially viable and appropriate and long-term management arrangements can be secured and funded.**
- 7) Where land is provided for a new built sports facility as part of a housing development, the financial contribution made by that development towards built sports facilities will be reduced accordingly.**

### Justification

- 10.108 All open spaces and sport and recreation facilities in the Black Country, both existing and proposed, are subject to the policies and requirements of national planning guidance and also to detailed policies in Local Plans covering the four local authorities. These policies apply to existing sites that have an open space, sport or recreation function, regardless of whether they are shown on local authorities' Policies Maps.
- 10.109 Separate local standards for different types of open space, sport and recreation facilities have been developed for Dudley, Sandwell, Walsall and Wolverhampton, based on robust audits and needs assessments. These standards will form the basis for the application of national planning guidance in each local authority area. Open space, sport and recreation standards and detailed local policies on open space, sport and recreation, including planning obligations for new housing development, will be set out in Development Plan Documents and SPDs for the BCA and will be subject to review as evidence is updated over the Plan period. Playing pitch strategies for the Black Country authorities will be updated during 2021/22 and this new evidence will feed into amendments to the BCP for Publication, where appropriate. Built facilities strategies will also, where applicable, inform decisions by the BCA.

- 10.110 Publicly accessible urban open space, play and sports facilities all have a vital role to play in helping to promote healthy lifestyles. As sports participation rates in the Black Country are below the national average, standards set for sports facilities, including in any built facilities strategies, will consider the need to increase sports participation and improve health as well as meet existing needs. Existing and potential cross-boundary effects will also be considered when setting standards and when developing proposals which would affect sports facility provision. Cross-boundary issues particularly affect facilities with large catchment areas, such as swimming pools.
- 10.111 The provision of high-quality open space to serve new residential developments and the improvement of existing open spaces is critical to the overall aims of urban renaissance and environmental transformation across the Black Country. Policy ENV8 therefore identifies the functions of open space that are of particular importance to the Black Country, in addition to those set out in national guidance.
- 10.112 Chapter 13 sets out broad, strategic open space, sport and recreation proposals for strategic allocations in the Black Country Plan. These proposals aim to address current deficiencies against existing local standards and meet the needs of new development, whilst taking into account cross-boundary issues and emerging strategic priorities in the Black Country Nature Recovery Network Strategy (see Policy ENV3).
- 10.113 The provision of open space, sport and recreation facilities within new development, as required by local policies, will not be sufficient in themselves to fully address gaps in open space, sport and recreation provision, which may be exacerbated by population growth. Consequently, the policy sets out ways in which the BCA can make more efficient use of scarce land resources within the urban area to help meet quantity, quality and access standards.
- 10.114 The policy recognises that, in some circumstances, for example where there is a significant gap in provision of built sports facilities such as sports courts and swimming pools, it may be necessary for housing developments to contribute towards improvements to such facilities. However, given the high capital and revenue costs of such facilities and the challenges of securing appropriate, long-term management and maintenance for them, it is recognised that this may not always be possible or viable.

10.115 Greenways are defined as linear features of mostly open character, including paths through green spaces, canal corridors and disused railway lines (although some of these could be brought back into rail use in the future), which act as wildlife corridors and provide attractive and safe off-road links for pedestrians and cyclists. They form an important network throughout the Black Country but in some cases are of poor quality or are severed by other infrastructure or barriers. The restoration of towpaths, bridges, public rights of way and the creation of cycle and pedestrian links to enhance the greenway network will be sought through planning conditions and obligations, transportation funding, and the support of other organisations such as the Canal & River Trust. Blue infrastructure features such as rivers and streams also provide opportunities for physical activity.

10.116 To promote healthy living, it is important that open space and sports facilities, and places that people visit every day such as shops and schools, are located and designed so that people are encouraged to walk or cycle to them from their homes. This can be achieved through:

- a) Location of key facilities in the most accessible locations, as set out in Policies HOU5 and HW2;
- b) Meeting open space quantity, quality and access standards, as set out in Policy ENV8;
- c) Setting of accessibility standards for new housing developments, as set out in Policy HOU2;
- d) Co-location of key facilities and promotion of community use, such as dual use schools, as set out in Policies HOU5 and HW2;
- e) On and off-site measures such as signage and cycle storage, as set out in Policy TRAN5.

## Evidence

- Open Space Audits, Needs Assessments and Action Plans for the Black Country Authorities
- Playing Pitch Assessments, Strategies and Action Plans for the Black Country Authorities (updates to be completed 2021/22)
- Sport England Active Design Policy

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## Delivery

- Open Space and Playing Pitch Strategies and Action Plans for the Black Country Authorities, in partnership with Sport England
- Local Transport Plan
- Through the Development Management process

## Issues and Options Consultation Responses

10.117 There was general support for retaining the principles of the current BCCS policy, whilst extending the policy to cover trees, woodland and nature conservation (this is now addressed in new policies ENV3 and ENV4); and sports facilities (now addressed in the revised policy).

## Design Quality

10.118 High quality design is an essential element both in placemaking and in reflecting the distinctive character of the area and will help deliver the Spatial Objectives by setting challenging but appropriate standards. Achieving sustainable development is fundamental to the Vision for transforming the Black Country environmentally, socially and economically. Each area in the Black Country is distinct and successful place-making will depend on understanding and responding to their unique identities through high-quality and sensitive design proposals. Development proposals across the Black Country will deliver successful urban regeneration and expansion through high quality design that provides economic, social and environmental benefits.

10.119 High-quality, innovative and modern design will also have a significant part to play in mitigating and adapting to climate change. This is achieved by ensuring that buildings and landscaping are designed to offer comfortable and attractive living environments reflecting the traditional design qualities and features of the Black Country, while also addressing issues around climate change in the form of the use of green energy technologies, a reduction in carbon generation and the efficient and effective use of water, planting and materials.

## Policy ENV9 – Design Quality

- 1) **Development proposals must demonstrate that the following aspects have been addressed, through design and access statements that reflect their Black Country context:**
  - a) **implementation of the principles of the National Design Guide<sup>55</sup> to ensure the provision of a high-quality network of streets, buildings and spaces;**
  - b) **implementation of the principles of “Manual for Streets<sup>56</sup>” to ensure urban streets and spaces are designed to provide a high quality public realm and an attractive, safe and permeable movement network;**
  - c) **use of the Building for a Healthy Life<sup>57</sup> criteria (or subsequent iterations) and local housing design SPDs for new housing developments, to demonstrate a commitment to achieve the highest possible design standards, good place-making and sustainable development;**
  - d) **consideration of crime prevention measures and Secured by Design principles, in addition to the requirements of Part Q of the Building Regulations 2010 or any successor legislation;**
  - e) **accordance with the agent of change<sup>58</sup> principle in relation to existing uses adjacent to proposed development sites.**
- 2) **Development will be designed to the highest possible standards, creating a strong sense of place. Development proposals must address as appropriate:**
  - a) **the townscapes and landscapes of the Black Country;**
  - b) **the need to maintain strategic gaps and views;**

<sup>55</sup> <https://www.gov.uk/government/publications/national-design-guide>

<sup>56</sup> To be supplemented by Manual for Streets 2 in 2022 - <https://www.ciht.org.uk/knowledge-resource-centre/resources/revising-manual-for-streets/>

<sup>57</sup> <https://www.udg.org.uk/publications/othermanuals/building-healthy-life>

<sup>58</sup> Paragraph 182 of the NPPF (July 2019) states that both planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (e.g. places of worship, pubs, music venues and sports clubs). Unreasonable restrictions should not be placed on existing businesses because of development permitted after they were established.

## Policy ENV9 – Design Quality

- c) the built and natural settings of development and the treatment of ‘gateways’;
  - d) the Black Country’s industrial and vernacular architecture and links with the wider rural hinterland;
  - e) the need to ensure development has no harmful impacts on key environmental assets (see Policies ENV1 and ENV3).
- 3) New residential development (including conversions from non-residential properties) and houses in multiple occupation will be required to meet water efficiency standards<sup>59</sup> of 110 litres per person per day, as set out in Part G2 of current Building Regulations 2010 or any successor legislation.
- 4) All new residential development (including the conversion of buildings) and the creation of houses in multiple occupation will be required to meet the Nationally Described Space Standards (NDSS)<sup>60</sup>, except where it can be clearly evidenced that the implementation of the NDSS would cause harm to the significance of a heritage asset. The space standards will apply to all tenures.
- 5) Major development proposals should contribute to the greening of the Black Country by:
- a) including urban greening as a fundamental element of site and building design;
  - b) incorporating measures such as high-quality landscaping (including trees), other soft landscaping and planting, green roofs, green walls and sustainable drainage and conserving existing green spaces and natural resources;

<sup>59</sup> <https://www.gov.uk/government/publications/sanitation-hot-water-safety-and-water-efficiency-approved-document-gov>

<sup>60</sup> <https://www.gov.uk/guidance/housing-optional-technical-standards#internal-space-standards>



## Policy ENV9 – Design Quality

- c) **optimising the use of multi-functional green infrastructure (including water features, green roofs and planting) for urban cooling, local flood risk management and to provide access to outdoor space and shading.**
- 6) **Development should reflect National Design Guide principle H1<sup>61</sup> in delivering functional, healthy and sustainable homes and buildings, particularly in relation to creating healthy, comfortable and safe internal and external environments.**
- 7) **Development must not cause a detrimental impact on the living environment of occupiers of existing residential properties, or unacceptable living conditions for future occupiers of new residential properties, in terms of:**
  - a) **privacy and overlooking**
  - b) **access to sunlight and daylight;**
  - c) **artificial lighting;**
  - d) **vibration;**
  - e) **dust and fumes;**
  - f) **smell;**
  - g) **noise;**
  - h) **crime and safety;**
  - i) **wind, where the proposals involve new development of more than eight storeys.**

## Justification

10.120 Urban areas, settlements, towns and villages in the Black Country all possess their own distinct character. Successful place-making will depend on understanding and responding to these unique localities through the delivery of high-quality design proposals that are complementary to local character and vernacular.

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<sup>61</sup> Or any succeeding guidance or legislation on design standards.

- 10.121 High-quality design will help to stimulate economic, social and environmental benefits, including ensuring that new homes and other buildings are designed and built to help to mitigate and minimise climate change impacts. Ensuring good design is embedded across the Black Country will help support regeneration and the delivery of an inclusive and robust economy, attracting people and businesses to both relocate to and remain in the area.
- 10.122 The Government published an updated National Design Guide in January 2021 that set out a series of aims and objectives for achieving well-designed places. The document identified the key themes of good design and goes on to set out a list of ten characteristics<sup>62</sup> that drive it. Paragraph 36 of the Guide was clear that the ten characteristics reflect the Government's priorities and so provide a common overarching framework within which issues around good design should be considered:
36. *'Well-designed places have individual characteristics which work together to create its physical **Character**. The ten characteristics help to nurture and sustain a sense of **Community**. They work to positively address environmental issues affecting **Climate**. They all contribute towards the cross-cutting themes for good design set out in the National Planning Policy Framework'*
- 10.123 The National Planning Policy Framework (2019) addresses the issue of good design throughout, including in paragraph 130, which states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
- 10.124 Locally, the West Midlands Combined Authority (WMCA) have published a West Midlands Design Charter<sup>63</sup>. The Charter was produced in collaboration with the various public bodies that make up the WMCA and was tested with developers, designers and investors from the private sector.

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<sup>62</sup> Context; Identity; Built form; Movement; Nature; Public spaces; Uses; Homes and buildings; Resources; Lifespan.

<sup>63</sup> <https://www.wmca.org.uk/media/3647/wmdesigncharter.pdf>

10.125 The Charter represents a regional commitment to good place-making and will be used to support applications for WMCA funding for new development (including residential, commercial and mixed use). Its key themes include:

- a) character;
- b) connectivity and mobility;
- c) future readiness;
- d) health and wellbeing;
- e) engagement;
- f) stewardship and delivery;

which in turn encompass 12 further principles of good placemaking<sup>64</sup>.

10.126 The BCA will support urban regeneration by ensuring all new development exhibits high quality design. The BCP emphasises that the ideas and principles behind successful place-making and urban design will be a key factor in the renaissance of the sub-region. A high-quality environment is also an essential prerequisite for economic competitiveness and housing choice. This will support the Black Country Garden City principles adopted by the Black Country LEP<sup>65</sup>. Developments will be encouraged to seek accreditation through the Garden City Scheme to achieve an exemplar standard of development.

10.127 Great opportunities exist across the Black Country to transform areas into high quality places for people to live, work and invest in. This will involve, in some cases, the reinforcement or reinvention of a sense of place and local identity within the Black Country. The Black Country needs a collective commitment to high-quality design if it is to maximise the benefits from the opportunities offered by transformation on this scale.

10.128 At the same time, the Black Country has a strong tradition of providing live music and entertainment; and this aspect of its character and economy should be protected by the application of the agent of change principle in relation to existing

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<sup>64</sup> Regional Ambition; Local Distinctiveness; Regional Network; Modal Shift; Climate Resilience; Delivering Low Carbon Development; Technological Resilience; Building Active Communities; Promoting Wellbeing; Engagement; Stewardship; Securing Social Value.

<sup>65</sup> Black Country LEP Garden City Principles: <https://www.blackcountrylep.co.uk/our-strategy/place/black-country-garden-city/garden-city-principles/>

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uses adjacent to proposed development sites, which can be found in Paragraph 182 of the NPPF (2019).

- 10.129 This policy seeks to integrate key design principles with an approach that interprets and reflects both local distinctiveness and the overall character of the Black Country. High-quality design relates to buildings, architecture, the spaces within which buildings sit, the quality of the public realm reflected in its streets and spaces and the relationship between the development and the surrounding area. Places should be designed with Active Design principles to increase opportunities for physical activity.
- 10.130 There are three optional national technical standards for housing which can be adopted through planning policy<sup>66</sup>. Policy ENV9 adopts two of these standards for new housing in the Black Country, covering internal space standards and water efficiency standards, and Policy HOU3 adopts the third (accessibility and wheelchair user housing standards) in defined circumstances. The Viability and Delivery Study demonstrates that the introduction of these standards is unlikely to have a significant impact on development viability.
- 10.131 The BCA believe that everyone has the right to a high standard of residential accommodation, with sufficient space to meet their needs. Black Country overcrowding rates are higher than the national average. In order to address this, Policy ENV9 adopts national space standards covering internal floor area and dimensions for key parts of the home. The standard is modest and is generally met in most new build housing across the Black Country; however, in a minority of cases the standard would help to achieve better living conditions. The requirement for a minimum space standard can also add to the attractiveness of a development and increase the marketability of properties. The standard will apply to all tenures. Evidence provided by the Black Country Viability and Delivery Study (2021) suggests that introduction of this standard is very unlikely to impact on development viability, given the relatively modest increases in room sizes.

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<sup>66</sup> Government guidance on optional technical standards: <https://www.gov.uk/guidance/housing-optional-technical-standards>

- 10.132 Introduction of the higher water efficiency standard for all new homes in the Black Country is justified by evidence provided in the Water Cycle Study (2020). This standard will be enforced through the building regulations system.
- 10.133 To ensure that development proposals accord with policy requirements, the Design and Access Statements accompanying planning applications should follow Commission for Architecture and the Built Environment guidance.
- 10.134 A key objective for new developments should be that they create safe and accessible environments where crime, or the fear of crime, and anti-social behaviour do not undermine the quality of life, health or community cohesion. Good design, layout and spatial relationships (including the use of sensitively designed and located landscaping that reduces opportunities for anti-social behaviours) can make a positive contribution towards improving community safety in an area. It is the intention of the BCA and the police to work together towards the reduction of crime and the fear of crime, and anti-social behaviour across the Black Country. This will be a material consideration in all planning proposals.
- 10.135 The fifth principle of the West Midlands Design Charter refers to the need to address climate change through good design;

#### **Principle 5 – Climate Resilience**

*Developments should incorporate climate adaptation measures that respond to the short and long-term impacts of climate change and address the environmental impact of the proposal across its lifecycle.*

- 10.136 Climate change mitigation and adaptation measures will be addressed through the specific climate change policies in the BCP and the renewable energy and BREEAM requirement for new development, which are set out in Policy CC7.

### **Primary Evidence**

- National Design Guide (2019)
- Broadening Horizons – A Vision of the Black Country Urban Park, Lovejoy (2004)
- Dudley New Housing Development SPD (2007)
- Walsall Design Guide SPD (2008)
- Sandwell Residential Design Guide (2014)

- Wolverhampton Residential Development SPG (1996)
- Housing Audit: Assessing the Design Quality of New Housing in the East Midlands, West Midlands and the South West, CABI (2007)
- Black Country Water Cycle Study 2020

## Delivery

- Development Management process including Design and Access Statements.
- Through AAPs

## Issues and Options consultation responses

- 10.137 Consultees requested retention of Secured by Design references. Several respondents supported removal of references to Code for Sustainable Homes, as this has been deleted from the NPPF. There was support for high design quality, particularly for green belt release sites but also for brownfield and urban sites.
- 10.138 Support was expressed for the need to reduce water consumption through the national standards. However, some felt that the draft BCP should not place unnecessarily burdensome requirements, such as national space standards, on developments impacting viability and deliverability.
- 10.139 Some of the content of the policy has been updated to reflect changes to the NPPF and other legislation or guidance that has been published since the Issues and Options Consultation in 2017, such as the National Design Guide.

## Monitoring

Policy	Indicator	Target
ENV1	Change in areas of biodiversity importance	No net reduction in the area of designated nature conservation sites through development
ENV2	Amount of new homes completed within 15 km of Cannock Chase SAC.	Estimated housing for Wolverhampton and Walsall as set out in Cannock Chase SAC Partnership MOU.

Policy	Indicator	Target
	Annual financial contributions secured from eligible developments to meet the requirements of the Cannock Chase SAC Partnership MOU.	Total financial contributions for Wolverhampton and Walsall as set out in Cannock Chase SAC Partnership MOU.
ENV3	All development sites to provide biodiversity net gain	Minimum 10% net gain, subject to national guidelines
ENV4	Increase in tree cover across the BC by 2039.	Tree canopy cover up to 18% of surface area of Black Country by 2039
	Area of ancient woodland / number of veteran trees lost by 2039	No areas of ancient woodland / no veteran trees lost in Black Country by 2039
	Area of hedgerow created by 2039	? km of new hedgerow created by 2039
ENV5	Proportion of planning permissions granted in accordance with Local Planning Authority Historic Environment Section or Advisor recommendations	100%
ENV6	n/a	n/a
ENV7	n/a	n/a
ENV8	Hectares of accessible open space per 1,000 population for each Black Country Authority	Dudley: 4.66 (2019 Baseline: 4.66) Sandwell: 4.42 (2007 Baseline: 3.42) Walsall: 5.00 (2006 Baseline: 5.00) Wolverhampton: 4.38 (2018 Baseline: 4.38)
ENV9	n/a	n/a

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## Climate Change

### Introduction

#### Climate Change Adaptation and Mitigation

- 10.140 The West Midlands Combined Authority declared a climate change emergency in June 2019. In July 2019, it committed to net zero carbon emissions by 2041. This means that the Black Country will be working towards meeting these targets through the timescale of the Black Country Plan.
- 10.141 Information from the Met Office<sup>67</sup> indicates that under projections looking at potential climate change over land to the 2070s, a location in the middle of England is likely to experience changes in precipitation and temperature in both summer and winter<sup>68</sup> equating to: -
- Summer rainfall change**
    - 41% drier to 9% wetter [low emissions scenario].
    - 57% drier to 3% wetter [high emissions scenario]
  - Winter precipitation change**
    - 3% drier to 22% wetter [low emissions scenario].
    - 2% drier to 33% wetter [high emissions scenario]
  - Summer temperature change**
    - No change to 3.3 °C warmer [low emissions scenario].
    - 1.1°C warmer to 5.8 °C warmer [high emissions scenario]
  - Winter temperature change**
    - 0.1 °C cooler to 2.4 °C warmer [low emissions scenario].
    - 0.7 °C warmer to 4.2 °C warmer [high emissions scenario]

- 10.142 Local planning authorities are bound by the legal duty set out in Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by the 2008 Planning

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<sup>67</sup> <https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18-infographic-headline-findings-land.pdf>

<sup>68</sup> All results are for the 10th-90th percentile range for the 2060-2079 period relative to 1981-2000



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Act, to ensure that planning policy contributes to the mitigation of, and adaptation to, climate change.

- 10.143 The issues around adapting to and mitigating the effects of climate change form a major theme of the NPPF and its associated guidance (NPPG, National Design Guidance). The most recent version of the NPPF (updated June 2019) requires sustainable development to mitigate and adapt to climate change, including through moving to a low carbon economy (paragraph 8c). Paragraph 20d requires strategic policies to identify planning measures to address climate change mitigation and adaptation.
- 10.144 NPPF chapter 14 addresses in more detail the duty of planning in helping to contend with a changing climate and the vulnerabilities it generates in the built and natural environments. This includes planning for zero and low carbon development, requiring renewable and low carbon energy supply, reducing emissions and greenhouse gases, the mitigation of flood risks and employing appropriate policy and design solutions to address rising temperatures, ventilation, the need for additional green infrastructure and the protection of the natural environment.
- 10.145 Addressing climate change using strategic policies and requiring development to meet and sometimes exceed current standards makes economic sense both for the local authorities themselves and for homeowners and businesses potentially impacted by climate change:
- a) ensuring projects, plans and processes are resilient to climate change strengthens the ability to achieve identified objectives over the long-term, helping local authorities and other organisations achieve their wider plans and ambitions.
  - b) screening public and strategic regeneration plans for climate risks can make them more attractive to inward investors by ensuring mitigation and adaptation aspects are considered at an early stage, while ensuring buildings provide adequate heating and cooling supports workforce health and productivity;
  - c) appropriate adaptation and mitigation allow assets and activities to continue performing during climate changes and will help to protect occupiers and users of buildings to continue to use them during times of environmental stress, such as flooding;

- d) pre-emptive adaptation action is generally more cost effective over time<sup>69</sup> than the costs incurred in responding to the outcomes of extreme weather events;
- e) through careful planning, adaptation actions can deliver multiple benefits to projects / activities, such as improving health and wellbeing, increasing property values, skills, and employment, reducing emissions, and supporting biodiversity.

10.146 To help the Black Country become a more efficient and resilient place, policies in the BCP will encourage development to: -

- a) improve energy efficiency and move towards becoming zero carbon, in accordance with national targets and with the aims of the West Midlands Combined Authority commitment to **achieve net zero carbon by 2041**;
- b) ensure buildings and infrastructure are designed, landscaped, and made suitably accessible to help adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, and avoiding contributing to the urban heat island effect.
- c) create a safe and secure environment that is resilient to the impacts of climate-related emergencies.
- d) take an integrated approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together. Factors which may lead to the exacerbation of climate change (through the generation of more greenhouse gases) must be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected.

### Increasing efficiency and resilience

10.147 The Government have stated that all buildings need to be net zero carbon by 2050. Section 19 of the Planning and Compulsory Purchase Act (2004), Section 182 of the Planning Act (2008), the Planning and Energy Act (2008), and section 14 of the NPPF (2019) all empower local planning authorities to enforce policies that seek to reduce carbon emissions from new homes.

10.148 The NPPF (2019) in particular states that plans should take a proactive approach to mitigating and adapting to climate change. As part of this, new development should

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<sup>69</sup> [https://ec.europa.eu/clima/policies/adaptation\\_en](https://ec.europa.eu/clima/policies/adaptation_en)

be planned for in ways that can help to eliminate greenhouse gas emissions, such as through careful consideration of its location, orientation and design. The following Climate Change policies aim to ensure that future development address national energy and climate change objectives.

- 10.149 Policy CC1 sets out how new development proposals will be required to demonstrate they are designed to maximise resistance and resilience to climate change through a range of design requirements

### **Policy CC1 – Increasing efficiency and resilience**

- 1) Development should be designed to mitigate climate change impacts and provide adaptations that will help communities and individuals to continue to avoid or mitigate adverse effects on human health. Proposals for development will need to demonstrate how they have been designed to maximise resistance and resilience to climate change through addressing the following requirements: -**
  - a. wherever feasible, new buildings will be orientated to maximise opportunities for both natural heating and ventilation and to reduce exposure to wind and other elements;**
  - b. development proposals that include and / or impact on transport infrastructure and / or which generate a significant number of person trips will need to meet the needs of all sections of the community by including a range of sustainable and low carbon transport modes as alternatives to private car use (see Policy TRAN6);**
  - c. use of trees and other planting in landscaping schemes will be required throughout the Black Country, to provide for the shading of amenity areas, buildings and streets, mitigate against poor air quality and help connect fragmented habitats and protect and support biodiversity networks;**
  - d. landscaping schemes should be designed using a mix of native tree species and plants where appropriate and should also use species that are able to adapt to changing climate conditions (see Policy ENV4 Trees, Woodland and Hedgerows);**

### Policy CC1 – Increasing efficiency and resilience

- e. **all development will need to minimise the impact of surface water runoff through the design of proposed drainage systems, including where possible grey water recycling and rainwater collection, and the use of permeable surfaces. Schemes should also make provision for sustainable drainage infrastructure, which should be built into landscaping schemes / open space provision as appropriate (see Policies CC5 and CC6);**
- f. **development will be required to incorporate mitigation and resilience measures designed to reduce the risk of river and surface water flooding (see Policies CC5 and CC6);**
- g. **the conversion of non-domestic buildings to residential use will be expected to employ high environmental standards, incorporating improved thermal insulation, appropriate levels of natural ventilation and measures to improve water efficiency;**
- h. **proposals for increasing the energy efficiency and resilience to climate change of designated heritage assets will be supported only where this will not cause demonstrable harm to the historic fabric, character, setting or appearance of the asset.**

### Justification

10.150 Buildings, services, and infrastructure need to be able to cope with the impacts of climate change. Part of this will relate to ensuring that development is able to cope with more intense rainfall, the possibility of flooding, heat waves and droughts. The design of development therefore needs to address shading, insulation and ventilation, surface water runoff and storage and the use of appropriate tree planting and landscaping, to futureproof schemes against more extreme weather conditions.

10.151 Where possible and appropriate, the retrofitting of residential and other properties to achieve higher standards of energy and water efficiency will be encouraged and supported.

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- 10.152 This policy should be read in conjunction with Policy CC7, which covers the use of renewable and low carbon energy and energy-saving measures.
- 10.153 BCP policies demonstrate that adaptation to and mitigation of climate change can be achieved across all forms of development. Policies that set out the detailed requirements sitting under Policy CC1 include ENV1, ENV5 and ENV7 as relevant.
- 10.154 The PPG section on climate change<sup>70</sup> identifies examples of mitigating climate change:
- a) reducing the need to travel and providing for sustainable transport;
  - b) requiring good design to enable the focus of travel to move away from the motor car to modes of “active travel” such as safe cycling and walking routes especially on new housing estates;
  - c) providing opportunities for renewable and low-carbon energy technologies;
  - d) providing opportunities for decentralised energy production and district heat networks;
  - e) promoting zero-carbon design approaches to reduce energy consumption in buildings, such as utilising passive solar design features.
- 10.155 The provision of trees and other green infrastructure will be essential in helping to mitigate and adapt to changing climates; their positive impacts on air quality, heat reduction and ecological networks and habitats will be vital in helping to deliver sustainable and comfortable living and working environments across the Black Country. Development will be expected to increase the Black Country’s tree canopy cover through habitat creation, landscaping, and biodiversity net gain.
- 10.156 Examples of adapting to climate change include:
- a) considering future climate-related risks when allocating development sites, to ensure risks are understood and accounted for over the development’s lifetime;
  - b) considering flood risk in the design of developments;
  - c) considering the availability of water and water infrastructure, and design to promote water efficiency and protect water quality;

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<sup>70</sup> Paragraph: 003 reference ID: 6-003-20140612

- d) promoting adaptation in design policies, developments and works in the public realm.

## Evidence

- Planning and Compulsory Purchase Act (2004)
- Planning Act (2008),
- Planning and Energy Act (2008)
- UKCP18 Climate Change Projections Overland - Meteorological Office
- UK Climate Change Risk Assessment – Climate Change Committee
- CCC Sixth Carbon Budget<sup>71</sup>
- National Design Guidance
- West Midlands Combined Authority WM2041 Programme and Actions
- Historic England Energy Efficiency and Historic Buildings

## Delivery

- Delivery will be secured through the development management processes, specifically through Planning and Design statements, energy plans and evidence accompanying planning applications.
- Planning conditions, CIL and Section 106 contributions.

## Issues and Options Consultation Responses

10.157 This is a new policy produced in response to emerging national legislation and thus was not addressed previously.

## Energy Infrastructure

10.158 The NPPF (2019) states that plans should take a proactive approach to mitigating and adapting to climate change. Development should be planned for in ways that help eliminate greenhouse gas emissions, such as through consideration of its location, orientation and design.

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<sup>71</sup> <https://www.theccc.org.uk/publication/sixth-carbon-budget/>

- 10.159 To help increase the use and supply of renewable and low carbon energy and heat, plans should provide a positive strategy for energy from these sources. Policy CC2 sets out how energy infrastructure will be considered, including how opportunities for decentralised energy and communal heating will be identified.

## Policy CC2 – Energy Infrastructure

### Decentralised energy networks and communal heating provision

- 1) Any development including ten homes or more, or non-residential floorspace of 1,000 sq m or more must include opportunities for decentralised energy<sup>72</sup> provision within the site, unless it can be demonstrated that the development is not suitable, feasible or viable for district heat<sup>73</sup> or decentralised power networks.
- 2) Where there is existing decentralised energy provision available close to the site, the development will be expected to link into it or should be designed to accommodate a subsequent connection<sup>74</sup> if a source has not yet become operational. Information on this linkage should be included in a design and access or planning statement, which should also explain how access to a decentralised network can be achieved in the future if it is not currently operational or available.
- 3) Where developers can demonstrate to the satisfaction of the relevant BCA that a link to an existing or committed decentralised energy source nearby is not viable, the local authority will support the provision of alternative onsite carbon elimination measures that can be incorporated into the scheme (see Policy CC7).

### Onsite energy provision

<sup>72</sup> Energy that is generated off the main grid, including micro-renewables, heating and cooling. It can refer to energy from waste plants, combined heat and power, communal or district heating and cooling, as well as geothermal, biomass or solar energy. Decentralised heat or power networks can serve a single building or a whole community, even being built out across entire cities - [Carbon Trust - decentralised energy definition](#)

<sup>73</sup> <https://www.gov.uk/guidance/heat-networks-overview>

<sup>74</sup> Where a decentralised energy source is extant or will become operational during the construction of the development, and a proposed linkage has been agreed, suitable means of access / connection should be provided along roads / footpaths as a minimum form of infrastructure.

## **Policy CC2 – Energy Infrastructure**

- 4) Developers should engage with relevant energy companies and bodies at an early stage in the development process to establish the likely future energy and infrastructure requirements arising from large-scale development proposals including 100 homes or more, or non-residential floorspace of 10,000 sq m or more. Proposals for addressing energy provision on such sites should be developed and agreed between the local planning authority and developer(s) to establish the lowest lifetime carbon energy provision. Information to support the preferred solution(s) should identify and address:**
- a) current and future major sources of demand for heat (e.g. sites such as industrial / manufacturing sites, universities, large-scale sporting or leisure development, hospitals and social housing);**
  - b) demands for heat from existing buildings that can be connected to future phases of a heat network;**
  - c) major heat supply plant;**
  - d) possible opportunities to utilise energy from waste or waste heat from industrial processes;**
  - e) opportunities for heat networks;**
  - f) opportunities for private wire electricity supply;**
  - g) possible land for energy centres and / or energy storage;**
  - h) possible heating and cooling network routes;**
  - i) infrastructure and land requirements for electricity and gas supplies;**
  - j) implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector.**
- 5) The BCAs' local plans will, where applicable:**
- a) identify any necessary energy infrastructure requirements, including upgrades to existing infrastructure;**



## Policy CC2 – Energy Infrastructure

- b) identify existing heating and cooling networks and opportunities for expanding existing networks and establishing new ones.**

### Heating / hot water systems

- 6) Heat sources for a communal heating system should be chosen to minimise likely emissions and to make best use of any local decentralised networks, in preference to other solutions.**
- 7) Where a communal heating system is provided, development proposals must provide evidence to show that NO<sub>x</sub> emissions related to energy generation will be equivalent to or lower than those of an ultra-low NO<sub>x</sub><sup>75</sup> gas boiler.**

## Justification

- 10.160 The ways in which heating and power are delivered to / used in development will need to change to meet the requirements of a zero carbon future and the intended elimination of greenhouse gas emission. The use of fossil fuels and traditional forms of energy generation will need to be phased out and replaced by zero carbon, non-polluting and energy-efficient sources. These methods will include the use of heat networks and communal heating systems wherever possible.
- 10.161 The policy requires that the feasibility of incorporating opportunities for decentralised energy provision is considered for all applicable development proposals. If low-carbon decentralised power and heating systems do not currently exist or are still in the process of being delivered, developers should ensure that new housing and employment schemes are provided with the infrastructure to link into those networks when they become available.
- 10.162 Where a link to an existing or committed decentralised energy source is not viable, the relevant Black Country authority will support the provision of alternative on-site zero carbon measures. This may include, for example, the provision of built-in renewable energy generation for individual buildings or other forms of decentralised energy provision within the site.

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<sup>75</sup> Ultra-low NO<sub>x</sub> boiler Standard specified in the Black Country Air Quality Supplementary Planning Document.

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## Heating and hot water systems

10.163 There is a broad hierarchy of provision that should be followed when considering and providing for communal heating systems on major residential schemes and where non-residential development would be of a scale to warrant some element of on-site provision. As an illustration, an appropriate hierarchical approach might be as follows: -

- a) local existing or planned heat networks;
- b) use available local secondary heat sources (in conjunction with heat pumps, if required, and a lower temperature heating system);
- c) generate clean heat and / or power from zero-emission sources;
- d) use of fuel cells. If using natural gas in areas where legal air quality limits are exceeded, all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent to or lower than those of an ultra-low NO<sub>x</sub> gas boiler;
- e) use low-emission combined heat and power (CHP);
- f) use ultra-low NO<sub>x</sub> gas boilers only if more sustainable alternatives are unavailable;
- g) CHP and ultra-low NO<sub>x</sub> gas boiler communal or district heating systems, designed to ensure that there is no significant impact on local air quality.

### Evidence

- Powering Growth: Black Country Energy Strategy (AECOM) (February 2018)
- West Midlands Regional Energy Strategy (November 2018)
- Black Country Utilities Infrastructure Capacity Study (September 2019)

### Delivery

- Delivery will be secured through the development management processes, specifically through Planning and Design statements, energy plans and evidence accompanying planning applications.
- Planning conditions, CIL and Section 106 contributions.

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## Issues and Options Consultation Responses

10.164 This is a new policy produced in response to emerging national legislation and thus was not addressed previously.

### Managing Heat Risk

10.165 As part of the plan's proactive approach towards mitigating and adapting to climate change, Policy CC3 sets out the requirements for managing heat risk within new development proposals.

#### Policy CC3 – Managing Heat Risk

- 1) **Development proposals<sup>76</sup> should minimise both internal heat gain and the impacts of urban heat islands<sup>77</sup> by using appropriate design, layout, orientation and materials.**
- 2) **Development proposals will be expected to demonstrate how their potential for overheating and reliance on artificial cooling systems will be reduced, in accordance with the following cooling hierarchy:**
  - a) **minimise internal heat generation through energy-efficient design;**
  - b) **reduce the amount of heat entering a building through orientation, shading, albedo<sup>78</sup>, fenestration, insulation and the provision of green roofs and walls (see also Policy ENV10 - Design);**
  - c) **manage heat within a building through exposed internal thermal mass<sup>79</sup> and high ceilings;**
  - d) **provide passive ventilation;**
  - e) **provide mechanical ventilation;**

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<sup>76</sup> Excluding domestic extensions.

<sup>77</sup> Caused by extensive built-up areas absorbing and retaining heat.

<sup>78</sup> The reflectivity of a surface. A high albedo surface reflects the sun's heat back into the atmosphere; low albedo surfaces absorb it. Pale-coloured surfaces have a high albedo and can help to minimise heat gain.

<sup>79</sup> 'Thermal mass' is a material's capacity to absorb, store and release heat.

## Policy CC3 – Managing Heat Risk

- f) provide active cooling systems<sup>80</sup>.

### Justification

10.166 Global temperatures are rising, and this has been paralleled by changes in the weather in the UK. The Met Office published a document<sup>81</sup> in 2019 outlining current trends and predictions in the UK, including the following:

*The average temperature over the most recent decade (2009-2018) has been on average 0.3°C warmer than the 1981-2010 average and 0.9°C warmer than the 1961-1990 average. All the top ten warmest years for the UK, in the series from 1884, have occurred since 2002. (paragraph 2.1)*

10.167 The urban heat island effect<sup>82</sup> is caused by extensive built-up areas absorbing and retaining heat during the day and night, leading to those areas being several degrees warmer than their surroundings. With higher temperatures across the country, the likelihood of heat being trapped in this way is very likely to increase.

10.168 Retained heat can become problematic, to the point where circumstances can lead to physical discomfort and disruption, but for those with certain health conditions, the very young or the elderly, the effects can be serious. The use of green roofs and / or walls can provide some mitigation by shading roof surfaces and through the mechanism of evapotranspiration.

10.169 The concept of thermal inequity<sup>83</sup> will also have relevance in areas of the Black Country, whereby because of uneven social geographies, urban heating effects impact disproportionately on poorer / marginalised communities living in urban environments. This is exacerbated by a planning policy approach that concentrates development in urban areas, at higher densities and in taller forms. The removal of urban greening and trees to facilitate increased development densities will have further adverse effects on ambient temperatures in the vicinity.

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<sup>80</sup> Systems using energy to provide cooling. They circulate a coolant (gas, fluid) to transfer heat from one place to another.

<sup>81</sup> UK Climate Projections: Headline Findings (September 2019) Version 2

<sup>82</sup> [www.metlink.org/fieldwork-resource/urban-heat-island-introduction/](http://www.metlink.org/fieldwork-resource/urban-heat-island-introduction/)

<sup>83</sup> [Jason Byrne et al 2016 Environ. Res. Lett. 11 095014](https://doi.org/10.1016/j.envreslett.2016.09.014)

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- 10.170 Certain aspects of building design intended to increase energy efficiency and reduce heat demand, such as increased glazing and airtightness, can also exacerbate heat risk and cause uncomfortable living conditions. Design solutions can be found in the hierarchy proposed in Policy CC3.
- 10.171 Means of minimising heat risk may include, though not be limited to, inclusion of mitigation measures such as: -
- a) solar shading, for instance through landscaping or brise-soleil<sup>84</sup>,
  - b) using appropriate materials in areas exposed to direct sunlight,
  - c) using landscaping and permeable surfaces to mitigate against flooding / run-off, counter poor air quality and allow for heat absorption.
- 10.172 Mechanical air conditioning will utilise more energy and generate significant amounts of additional greenhouse gases and thus should be avoided where possible.
- 10.173 As addressed in Policy ENV4 - Trees, Woodlands and Hedgerows, the use of trees in landscaping schemes can generate significant natural shading. The layout and orientation of new houses should also be considered carefully, to avoid existing or newly-planted trees creating excessive shading during cooler, darker times of the year.

## Evidence

- UK Climate Projections: Headline Findings September 2019
- Research into Overheating in New Homes MHCLG September 2019
- Overheating in Dwellings BRE Guidance Document 2016
- Historic England Energy Efficiency and Historic Buildings

## Delivery

- Development Management and Building Regulations processes.

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<sup>84</sup> Architectural feature that reduces heat gain within a building by deflecting sunlight

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## Issues and Options Consultation Responses

10.174 This is a new policy produced in response to emerging national legislation and thus was not addressed previously.

### Air Quality

10.175 Promoting healthy living is a key element of the Black Country Plan. Reducing exposure to poor air quality will improve the health and quality of life of the population and support the BCP aims and objectives<sup>85</sup>. The need to address climate change and its associated impacts will include the need to tackle pollution and poor air quality, especially where it has impacts on both human and environmental health.

10.176 The WHO published data on the impacts of ambient and household air pollution on human health for the European High-Level Conference on Non-Communicable Diseases held in April 2019. The paper stated that more than 550,000 deaths in the WHO European region were attributable to the joint effects of household and ambient air pollution in 2016, with over 500,000 being due to ambient air pollution and more than 50,000 to household air pollution<sup>86</sup>.

10.177 According to the 2019 Clean Air Strategy published by DEFRA<sup>87</sup>,

*Air pollution is the top environmental risk to human health in the UK, and the fourth greatest threat to public health after cancer, heart disease and obesity. It makes us more susceptible to respiratory infections and other illnesses, and we estimate that the actions outlined in this document could cut the costs of air pollution to society by £1.7 billion every year by 2020, rising to £5.3 billion every year from 2030.*

10.178 Paragraph 4.1 of the same publication outlines the impacts of air quality on economic growth. Cleaner air helps to reduce the likelihood of workplace absences through ill-health; the strategy identifies that particulate matter; nitrogen dioxide and ozone were estimated to be responsible for total productivity losses of up to £2.7

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<sup>85</sup> [https://uk-air.defra.gov.uk/assets/documents/reports/cat09/2006240802\\_Impacts\\_of\\_Net\\_Zero\\_pathways\\_on\\_future\\_air\\_quality\\_in\\_the\\_UK.pdf](https://uk-air.defra.gov.uk/assets/documents/reports/cat09/2006240802_Impacts_of_Net_Zero_pathways_on_future_air_quality_in_the_UK.pdf)

<sup>86</sup> [http://www.euro.who.int/data/assets/pdf\\_file/0005/397787/Air-Pollution-and-NCDs.pdf?ua=1](http://www.euro.who.int/data/assets/pdf_file/0005/397787/Air-Pollution-and-NCDs.pdf?ua=1)

<sup>87</sup> <https://www.gov.uk/government/publications/clean-air-strategy-2019>

billion in 2012. Clean air also helps to create and sustain a pleasant and attractive living and working environment, which is more likely to encourage growth and investment in an area.

10.179 Following adoption of the Black Country Core Strategy in 2011 further guidance and advice was provided through the adoption of the Black Country Air Quality Supplementary Planning Document (SPD) in 2016. This built on work undertaken on the West Midlands Low Emissions Towns and Cities Programme, including the West Midlands Good Practice Air Quality Planning Guidance (2014). The planning guidance offered further advice on issues around ambient and indoor air quality and model conditions for use by the local planning authorities. This document will be revised and republished following adoption of the Black Country Plan.

## **Policy CC4 – Air Quality**

### **Strategic Approach**

- 1) The BCP will promote a diverse approach to addressing the issue of poor air quality across the Black Country, including:**
  - a) requiring development and other land use proposals to promote the integration of cycling, walking, and electric charging points as part of their transport provision;**
  - b) promoting and supporting (including through continued joint working with authorities outside the Black Country) a modal shift from private vehicles to clean, fast and accessible public transport alternatives such as rail, the Metro and bus transport networks;**
  - c) requiring the provision and protection of green open spaces and significant additional tree cover;**
  - d) ensuring the sustainable location of new residential and employment development to minimise commute times; and**
  - e) as part of an integrated zero-emission public transport system, promoting and requiring the use of sustainable technologies, zero-emission vehicles, design and materials and providing new or extended bus services to meet demand when development of a strategic nature is planned and constructed.**

## **Policy CC4 – Air Quality**

- 2) New development must be at least air quality neutral. Planning permission for new development or changes of use will be refused where data assessment indicates that development will:**
- a) lead to deterioration of existing poor air quality;**
  - b) create any new areas that exceed air quality objectives; or**
  - c) delay compliance being achieved in areas that are currently in exceedance of legal limits unless sufficient mitigation can be achieved.**

### **Improving air quality**

- 3) Residential or other sensitive development such as schools, hospitals / health care and care facilities should be sited in areas where air quality already meets national objectives, or where compliance with those objectives can be achieved with suitable mitigation proposed as part of the development proposal and verified as being achieved before occupation of the development.**
- 4) Developments that will have a moderate air quality impact, and which can be dealt with through standard mitigation measures, will not require an air quality assessment.**
- 5) Whenever development is proposed in locations where air quality does not / will not meet national objectives, or where significant air quality impacts are likely to be generated onsite or elsewhere by the development itself or its subsequent use / activities, an appropriate Air Quality Assessment will be required to demonstrate that the proposed development will improve air quality in order that it will meet air quality objectives once the development is completed and occupied / operational:**
- a) the assessment must take into consideration the potential cumulative impact on air quality of all extant planning permissions in the locality, for both large / strategic and small schemes;**
  - b) the impact of point source emissions of pollutants to air on the scheme (pollution that originates from one place) must also be considered;**



### Policy CC4 – Air Quality

- c) **the assessment must take into consideration the types of pollutant emissions likely to be generated by the development and its future use / associated activities that will have an impact on human health;**
  - d) **where assessments show that a development is likely to result in exposure to pollutant concentrations that exceed national objectives, a mitigation plan will be required to determine that the development will improve air quality, in order that it will meet air quality objectives once it is complete and occupied / operational;**
  - e) **adequate and satisfactory mitigation measures that are capable of implementation, including the planting of additional and replacement trees in appropriate locations, must be identified, submitted as part of an application, and made subject to appropriate conditions before planning permission is granted.**
- 6) **Developments should not include materials or be positioned or ventilated in a way that would result in poor indoor air quality. Guidance will be provided to detail how such issues should be addressed.**

### Justification

10.180 National planning guidance identifies the need for local planning authorities to address the problems created by pollution, in terms of poor air quality and its impacts on human and environmental health. Major air pollutants that impact on human health include particulate matter (PM10 and PM2.5 and fine / very fine particulates) and nitrogen oxides (NOx). These gases may also combine to create ozone, a greenhouse gas that impacts on the atmosphere.

10.181 The main cause of poor air quality in the Black Country is transport-related. Locations have been identified that do not comply with current national objectives and that will result in relevant exposure; there are several air quality hotspots where on-going monitoring is required. The BCA are working to reduce pollutant concentrations and to minimise exposure to air quality that does not meet with national objectives. The authorities have declared air quality management areas in each borough to try to address the government's national air quality objectives, which have been set to provide protection for human health.

- 10.182 It is important that development likely to have a negative impact on air quality is fully assessed and measures taken to make it acceptable, particularly in parts of the Black Country where air quality is, or is likely to become, a concern. The majority of developments will have a moderate air quality impact which can be dealt with through standard mitigation measures, without the need for an Air Quality Assessment (AQA), as detailed in the Black Country Air Quality SPD. These standard mitigation measures are designed to deal with the cumulative impact of many moderate impact developments over time and over a wide area.
- 10.183 AQAs should be proportionate to the type and scale of development proposed, in accordance with the guidance provided by the Black Country Air Quality Supplementary Planning Document and relevant national standards for air quality. National planning policy guidance on air quality offers several examples of what might usefully be incorporated in such assessments, including baseline conditions, specific concerns, the assessment methods to be adopted, the basis for assessing impact and determining the significance of an impact and mitigation<sup>88</sup>.
- 10.184 For some developments a basic screening assessment of air quality is all that will be required, whereas for other developments a full AQA will need to be carried out, using advanced dispersion modelling software. An appropriate methodology informed by the Black Country Air Quality SPD should be agreed with the relevant development management team / officer on a case by case basis.
- 10.185 Where a potentially adverse impact on air quality is identified, mitigation measures may include:
- a) increasing the distance between the development and the pollution source;
  - b) using green infrastructure, particularly trees, to help absorb dust and other pollutants (see Policy ENV4 - Trees – care must be taken to ensure the type and location of such trees do not exacerbate air pollution by trapping it close to the street<sup>89</sup>);
  - c) using ventilation systems to draw cleaner air into buildings;
  - d) improving public transport access to all development;

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<sup>88</sup> NPPG, Paragraph: 007 Reference ID: 32-007-20140306

<sup>89</sup> <https://www.nice.org.uk/guidance/ng70>

- e) implementing travel plans to reduce the number of trips generated;
- f) implementing low emission strategies;
- g) controlling dust and emissions from construction, demolition and working projects.

## Evidence

- National Clean Air Strategy 2019
- Black Country Air Quality SPD
- [Turning Houses into Homes fit for 2050, SHAP \(2019\)](#)

## Delivery

- Development Management, legal and funding mechanisms.

## Issues and Options consultation responses

10.186 There were no objections to the policy and only two comments; the West Midlands has the poorest air quality outside of London; and ENV08 also needs to be updated to reflect work undertaken regionally on clean air and low emissions:

## Flood Risk and Sustainable Drainage

10.187 This policy sets out the purpose of the chapter and how it addresses the Plan's Spatial Vision and Objectives.

## Flood Risk

10.188 In recent years floods, storms and droughts have shown how vulnerable the UK is to extremes of weather, resulting in significant economic, social, and environmental cost. Climate change also means that extreme weather events will become more frequent and have the potential to cause damage to affected communities.

10.189 The most significant sources of flood risk in the Black Country are fluvial and surface water flooding. The primary fluvial flood risk lies along the River Tame, Stour and Smestow Brook and the tributaries of these watercourses. Surface water flooding is mostly caused by intense rainfall events. There are many areas at high risk of surface water flooding in the Black Country, due to the heavily urbanised nature of the area that impedes natural infiltration and drainage.

10.190 Climate change projections show an increased chance of warmer, wetter winters and hotter, drier summers, with a higher likelihood of more frequent and intense rainfall. This is likely to make severe flooding occur more often; effective flood risk management is one of the most important ways of adapting to intensive rainfall events. Ensuring that developments are planned to avoid vulnerability and manage risks with suitable adaptation measures where required will help to mitigate against related adverse impacts and disruptions.

### **Policy CC5 – Flood Risk**

- 1) The BCA will seek to minimise the probability and consequences of flooding by adopting a strong risk-based approach to site allocations and the granting of planning permission, in line with the National Planning Policy Framework.**
- 2) The sequential test<sup>90</sup> will:**
  - a. be applied to all developments to ensure that development takes place in areas with the lowest flood risk;**
  - b. take account of the most up-to-date information available on river (fluvial) flooding and all other sources of flooding, making use of the information provided in the 2020 Strategic Flood Risk Assessment (SFRA);**
  - c. consider the impact of climate change over the lifetime of that development.**
- 3) Developers should apply the Sequential Test to all development sites, unless the site is:**
  - a. a strategic allocation and the test has already been carried out by the LPA; or**
  - b. a change of use (except to a more vulnerable use); or**
  - c. a minor development (householder development, small non-residential extensions with a footprint of less than 250m<sup>2</sup>); or**

<sup>90</sup> NPPF (2019), paragraph 158



## **Policy CC5 – Flood Risk**

**site-specific flood risk assessment should accompany a planning application.**

- 8) To pass the Exception Test, developments will need to:**
- a. provide a demonstrable benefit to the wider sustainability of the area. Matters such as biodiversity, green infrastructure, historic environment, climate change adaptation, flood risk, green energy, pollution, health and transport should be considered;**
  - b. detail the sustainability issues the development will address and how doing so will outweigh the flood risk concerns for the site;**
  - c. prove that the development will be safe from flooding for its lifetime, taking account of the vulnerability of its users;**
  - d. prove that the development can be achieved without increasing flood risk elsewhere, and, where possible, will result in a reduced flood risk overall.**
- 9) All new developments in the following locations should be accompanied by a flood risk assessment and surface water drainage strategy that sets out how the development will provide a betterment in flood risk terms i.e. help to reduce flood risk both on and off site:**
- a. where any part of the site is within Flood Zone 2 or Flood Zone 3;**
  - b. where the site is greater than one hectare and is within Flood Zone 1;**
  - c. where the site is a minerals or waste development;**
  - d. where the site is within five metres of an ordinary watercourse;**
  - e. where the site is within 20m of a known flooding hotspot;**
  - f. where the site is within the 1 in 100-year flood extent based on the Risk of Flooding from Surface Water Map.**
- 10) Surface water drainage strategies are also required for all major developments. These should consider all sources of flooding to ensure that**

## **Policy CC5 – Flood Risk**

**future development is resilient to flood risk and does not increase flood risk elsewhere.**

### **Groundwater Source Protection Zones**

- 11) No development will be permitted within a groundwater Source Protection Zone that would physically disturb an aquifer, and no permission will be granted without a risk assessment demonstrating there would be no adverse effect on water resources.**

### **Watercourses and flood mitigation**

- 12) Developments should, where possible naturalise urban watercourses (by reinstating a natural, sinuous river channel and restoring the functional floodplain) and open up underground culverts, to provide biodiversity net gain as well as amenity improvements.**
- 13) Developers should set out how their mitigation designs will ensure that there is no net increase to fluvial flood risk downstream and where practicable how the development could help mitigate against downstream fluvial flood risk.**
- 14) Development should not take place over culverted watercourses.**
- 15) There should be no built development within five metres of an ordinary watercourse and within ten metres of the top of the bank of a main river. This is to enable the preservation of the watercourse corridor, wildlife habitat, flood flow conveyance and future watercourse maintenance or improvement.**
- 16) Where there is a known or suspected culverted watercourse either on or immediately downstream of a site, where the SFRA highlights there may be a risk of flooding, developers should:**
  - a. confirm the location and presence of a watercourse (or otherwise) through ground-truthing strategic datasets and undertaking an assessment of the culvert extent and condition;**
  - b. confirm by survey, modelling and mapping, the flood extents of the watercourse(s), as many of the flood outlines associated with such watercourses have been carried out at a broad scale and may not take**

## Policy CC5 – Flood Risk

into account specific local features, such as culverts, bridges and detailed topographical survey;

- c. design the development to accommodate the floodplain of the watercourse and mitigate against flooding to properties on the site. This should include a consideration of residual flood risk e.g. if a culvert were to block downstream.

- 17) All developments should seek to provide wider betterment by demonstrating in site-specific flood risk assessments and surface water drainage strategies (where required) what measures can be put in place to contribute to a reduction in overall flood risk downstream. This may be by provision of additional storage on site e.g. through oversized SuDS, natural flood management techniques, green infrastructure and green-blue corridors and / or by providing a partnership funding contribution towards wider community schemes (both within the Black Country and in shared catchments with Southern Staffordshire and Birmingham). Consultation on the site-specific requirements should be undertaken with the BCA, the Environment Agency, and Severn Trent Water (where this is a sewer flooding issue) at the earliest opportunity.

## Justification

- 10.191 The Black Country is a densely populated and, in places, steeply sloping urban area. This makes it prone to rapid surface water flooding following heavy rainfall and flooding from smaller watercourses that are tributaries of the Rivers Tame and Severn. The industrial legacy has left complex urban drainage challenges, with many watercourses that have been heavily modified and culverted in places providing little if any biodiversity benefit and being prone to blockages.
- 10.192 Climate change will increase the likelihood of surface water and localised flooding from smaller and culverted watercourses. Alongside this the condition of many culverted watercourses are failing as they age, and where they lack maintenance, and therefore the likelihood of blockages or failure increases. Sustainable Drainage Systems provide an opportunity to replicate natural drainage systems through new development, which will help to reduce flood risk, improve water quality, and



provide wider environmental benefits. Hence an approach is needed to new development that recognises local flood risk constraints and contributes wherever possible to wider environmental and flood risk improvements.

10.193 The NPPF and Planning Practice Guidance requires that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, applying the Sequential Test and if necessary, applying the Exception Test. Where development is necessary the NPPF and technical guidance recognises that there may be exceptions for certain at-risk sites where there are no suitable and reasonably available lower risk sites. In exceptional circumstances, where development is necessary in areas of risk and an alternative site at lower risk cannot be found, appropriate mitigation measures will be required to make it safe. These must not increase or displace flood risk elsewhere.

### Evidence

- Black Country Level 1 Strategic Flood Risk Assessment (SFRA) 2020
- Black Country Water Cycle Study Stage 1 2020

### Delivery

- Through Development Management and LLFA processes.

### Issues and Options consultation responses

10.194 The waterway network presents a number of opportunities to support and enhance urban development, with particular reference to water management.

10.195 The implications upon site layout and viability do need to be considered. A flexible approach will be required from the Local Authorities when assessing individual schemes.

10.196 Consideration of the use of canals and restored sections of canal for the purposes of storm water flow attenuation

10.197 Flood risk is a key issue at the national policy level due to the number and severity of recent floods across the country

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## Sustainable drainage and surface water management (SuDS)

### Policy CC6 - Sustainable drainage and surface water management (SuDS)

- 1) All new developments should incorporate SuDS and all development proposals should provide details of adoption, ongoing maintenance, and management of SuDS.
- 2) SuDS shall be designed in line with the Black Country Local Standards for SUDS. Preference will be given to systems that contribute to the conservation and enhancement of biodiversity and green infrastructure in the wider area.
- 3) For all major developments, surface water flows must be reduced back to equivalent greenfield rates. If greenfield runoff rates are not considered to be feasible for viability reasons, then the developer must submit evidence demonstrating what the constraints to achieving this are and how their development will accommodate runoff rates that are as close as reasonably possible to greenfield rates.
- 4) Under no circumstances will post-development runoff rates that are greater than pre-development runoff rates be permitted.
- 5) Surface water drainage strategies are required for all major developments, regardless of their size and the flood zone and catchment they are in to meet the requirements of the Lead Local Flood Authority(s). These should take into account all sources of flooding to ensure that future development is resilient to flood risk and does not increase flood risk elsewhere.
- 6) A hydrogeological risk assessment is required where infiltration SuDS is proposed for anything other than clean roof drainage in a SPZ1.

### Justification

10.198 The incorporation of Sustainable Drainage Systems (SuDS) into new developments helps to manage and minimise surface water. SuDS generally are landscaped facilities such as wetlands, retention ponds, soakaways, swales and/or permeable

surfaces, the primary function being to reduce the volume and peak rates of water run-off from new development, but they should also fulfil their potential to provide new wildlife habitats and amenity spaces in to developments, they should be multifunctional.

10.199 SuDS can also improve water quality by increasing the filtration of pollutants, and thereby helping to support the objectives of the Water Framework Directive. They allow the management of diffuse pollution generated in urban areas by treating water and reducing the level of pollutants that enter rivers and other watercourses therefore resulting in less wastewater requiring treatment.

10.200 The NPPF makes it clear that:

*Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.*

10.201 LLFAs will advise on the suitability and requirements of SuDS on an individual site basis and local guidance will need to be followed to ensure the most appropriate schemes are delivered.

10.202 Due to the legacy of contaminated land in the Black Country from historic mining and heavy industry there is a risk of causing contamination of groundwater and/or surface water if SuDS are not properly designed. The presence of contaminated land needs to be considered when design SuDS features, national guidance such as the CIRIA SuDS Manual C753 provides guidance for the application of SuDS on contaminated land.

## Evidence

- Black Country Level 1 Strategic Flood Risk Assessment (SFRA) 2020
- Black Country Water Cycle Study Stage 1 2020

## Delivery

- Through Development Management and LLFA processes.

## Issues and Options consultation responses

10.203 Support the SUDS proposal to prioritise natural green space.

10.204 Strongly agree with the principal of prioritising natural SUDs as this provides greater opportunity for SUDs to provide multiple functions and provide biodiversity features.

10.205 Welcome the inclusion of a requirement for long-term maintenance arrangements for all SuDS to be in place for the lifetime of development and agreed with the relevant risk management authority.

10.206 Revised Core Strategy should make references to the WFD and its objectives.

## Renewable and Low Carbon Energy and BREEAM Standards

10.207 It is essential for the successful delivery of the BCP that a high standard of sustainable design is secured on all new developments over the Plan period. This will reduce carbon emissions from new development, improve design quality and create a high-quality environment which will maximise economic competitiveness and housing choice.

### Policy CC7 – Renewable and Low Carbon Energy and BREEAM Standards

#### Renewable and Low Carbon Energy

- 1) **Proposals involving the development of renewable or low carbon energy sources will be permitted where the proposal accords with local and national guidance and would not significantly harm the natural, historic or built environment or have a significant adverse effect on the amenity of those living or working nearby, in terms of visual, noise, odour, air pollution or other effects. The potential for inland waterways to promote low carbon technologies is recognised and supported.**
- 2) **Small developments creating between one and nine homes or non-residential floorspace of less than 1,000 sqm gross (whether new build or conversion) must incorporate generation of energy from renewable or low carbon sources sufficient to off-set at least 10% of the estimated residual energy demand<sup>91</sup> of the development on completion.**
- 3) **Major developments creating ten or more homes or non-residential floorspace of 1,000 sqm gross or more (whether new build or conversion) must:**

<sup>91</sup> Residual energy demand means that the estimated energy demand for the operational development after allowance has been made for the full range of energy efficiency measures required under Building Regulations (at the time of construction) and the 19% carbon reduction improvement required for major developments under policy CC7.

## Policy CC7 – Renewable and Low Carbon Energy and BREEAM Standards

- a) achieve a 19% carbon reduction improvement upon the requirements within Building Regulations Approved Document, Part L 2013, or achieve any higher standard than this that is required under new national planning policy or building regulations;
- and, in addition
- b) incorporate generation of energy from renewable or low carbon sources sufficient to off-set at least 20% of the estimated residual energy demand of the development on completion.
- 4) A variety of renewable and low-carbon energy sources and generation methods should be assessed and costed, including on-site and off-site sources where appropriate, and the use of district heat and / or decentralised energy networks. An energy assessment must be submitted with the planning application to demonstrate that these requirements have been met.
- 5) The renewable energy target will only be reduced if it can be demonstrated that achievement of the target would:
- a) make the proposal unviable through submission of an independently assessed financial viability appraisal; or
- b) would not be feasible due to practical constraints.

### BREEAM Standards

- 6) All new build non-residential developments, student housing and care homes of 1,000 sqm gross or more should achieve the following standards of BREEAM New Construction certification, including full credits for category Wat 01 (water efficiency) in line with Policy ENV9:

Size	Standard	Year
1,000-5,000 sqm gross:	BREEAM Very Good	up to 2029*
	BREEAM Excellent	2029-2039*

## Policy CC7 – Renewable and Low Carbon Energy and BREEAM Standards

>5,000 sqm gross:	BREEAM Excellent	
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\* Year refers to date planning permission is granted

- 7) **BREEAM requirements may be varied if it can be demonstrated that achievement of the standard would make the proposal unviable, through submission of an independently assessed financial viability appraisal.**

### Justification

- 10.208 The Planning and Compulsory Purchase Act of 2004 requires local plans to include policies designed to secure the contribution of development towards the mitigation of, and adaptation to, climate change. Currently, the NPPG specifically allows local authorities to set energy efficiency standards up to the equivalent of a 19% improvement on 2013 Building Regulations. Given the large amount of development planned for the Black Country up to 2039, it is important that the maximum 19% improvement is applied to all major developments, where financially viable.
- 10.209 The Government has recently carried out a number of consultations on proposed changes to Building Regulations, which would significantly improve energy efficiency standards. Any such changes that are brought into effect will be taken into account when preparing the BCP for Publication.
- 10.210 Although there is currently limited renewable energy generation in the Black Country, evidence shows that there is considerable untapped capacity to produce and export renewable energy at a local level. Therefore, it is important that all new developments should contribute towards renewable and low carbon energy generation, where this is financially viable and feasible to implement.
- 10.211 Assuming energy use under current Building Regulations, it is generally not practical to provide more than 20% renewable energy generation within a site. In particular, solar power is the most suitable technology on most sites, and solar energy generation is limited by the orientation and extent of roofs within a development. The Viability and Delivery Study has demonstrated that this level of requirement will not prejudice the delivery of most major developments in the Black Country. To limit the financial burden on smaller developers, a lower requirement of

10% has been set for small developments. Where a number of smaller developments are taking place in close proximity and it is considered that these form phases of a major development, the 20% requirement will be sought. For major developments, the requirement should be applied to the residual energy demand of the development, after application of the 19% carbon reduction improvement required by policy CC7. Residual energy demand means that the estimated energy demand for the operational development should be calculated after allowance has been made for the full range of energy efficiency measures required under Building Regulations (at the time of construction) and the 19% carbon reduction improvement required for major developments under policy CC7. The Black Country local authorities and Housing Associations will lead by example by seeking to maximise energy efficiency and incorporation of renewable and low carbon energy generation through the refurbishment and redevelopment of land and buildings in their ownership.

- 10.212 Many types of renewable and low carbon energy generation can be developed in the Black Country, including solar photovoltaics, solar thermal, air, water and ground source heat pumps and other technologies (see Policy CC2). The Utilities Infrastructure Capacity Study concludes that there are no parts of the Black Country that would be suitable for large-scale wind turbine development. However, there is no evidence to suggest that any other type of renewable or low carbon energy technology would not be appropriate in any part of the Black Country. Therefore, any renewable or low carbon energy proposal will be treated on its merits in accordance with Policies ENV7 and W4, national guidance, and any Local Plan policies.
- 10.213 The BCP includes a range of policy aspirations for high quality design and climate change mitigation and adaptation, particularly those set out in Policies CC1, CC2, CC3 and ENV9. As set out in national guidance, an effective way of ensuring these aspirations are delivered in a consistent manner is through the use of tools for assessing and improving design quality. The Building Research Establishment (BRE) administers a range of robust, national standards which can support this approach. BREEAM standards are well established and certify quality and sustainability in the built environment, including running costs, health and wellbeing and environmental impact. Minimum standards are first applied – these will include the national water efficiency and space standards for housing set out in Policy

ENV9. Developers are then able to choose from a menu of other measures to reach the total credits necessary to achieve certification to the required level.

10.214 Application of the BREEAM New Construction standards set out in Policy CC7 will ensure that all major developments in the Black Country meet a minimum level of quality and sustainability that is independently certified throughout the planning and construction process and, in most cases, following completion. In order to allow for an improvement in standards over time, the level of certification required for medium-sized developments of 1,000-5,000 sqm gross will be increased after 2028 in line with larger developments. The use of other standards, such as Passivhaus and the BRE Home Quality Mark, which use third party assessment and certification to robustly verify that the quality of approved development is not materially diminished between permission and completion, will also be supported.

## Evidence

- Black Country Utilities Infrastructure Capacity Study (2019)
- Wolverhampton Renewable and Low Carbon Energy SPD (2011)
- Black Country Viability and Delivery Study (2021)
- Historic England Energy Efficiency and Historic Buildings

## Delivery

- Development management and Building Regulations processes
- BREEAM certification process

## Issues and Options Consultation Responses

10.215 The potential for the inland waterway network to promote low carbon technologies should be recognised and supported. Opportunities to improve energy efficiency should be explored, where national guidance allows, and prioritised over renewable energy requirements. Increased energy performance standards for non-domestic buildings are supported. Any increased requirements should be justified and supported by evidence, including from the Viability and Delivery Study.



## Monitoring

Policy	Indicator	Target
CC1	n/a	n/a
CC2	Proportion of qualifying development proposals that incorporate decentralised energy provision.	100%
	National air quality data (available at <a href="http://uk-air.defra.gov.uk/data/data-catalogue">uk-air.defra.gov.uk/data/data-catalogue</a> ).	Improve air quality in the Black Country from baseline levels.
CC7	Proportion of qualifying developments meeting the renewable and low carbon energy and BREEAM New Construction standards set out in Policy CC7.	100%

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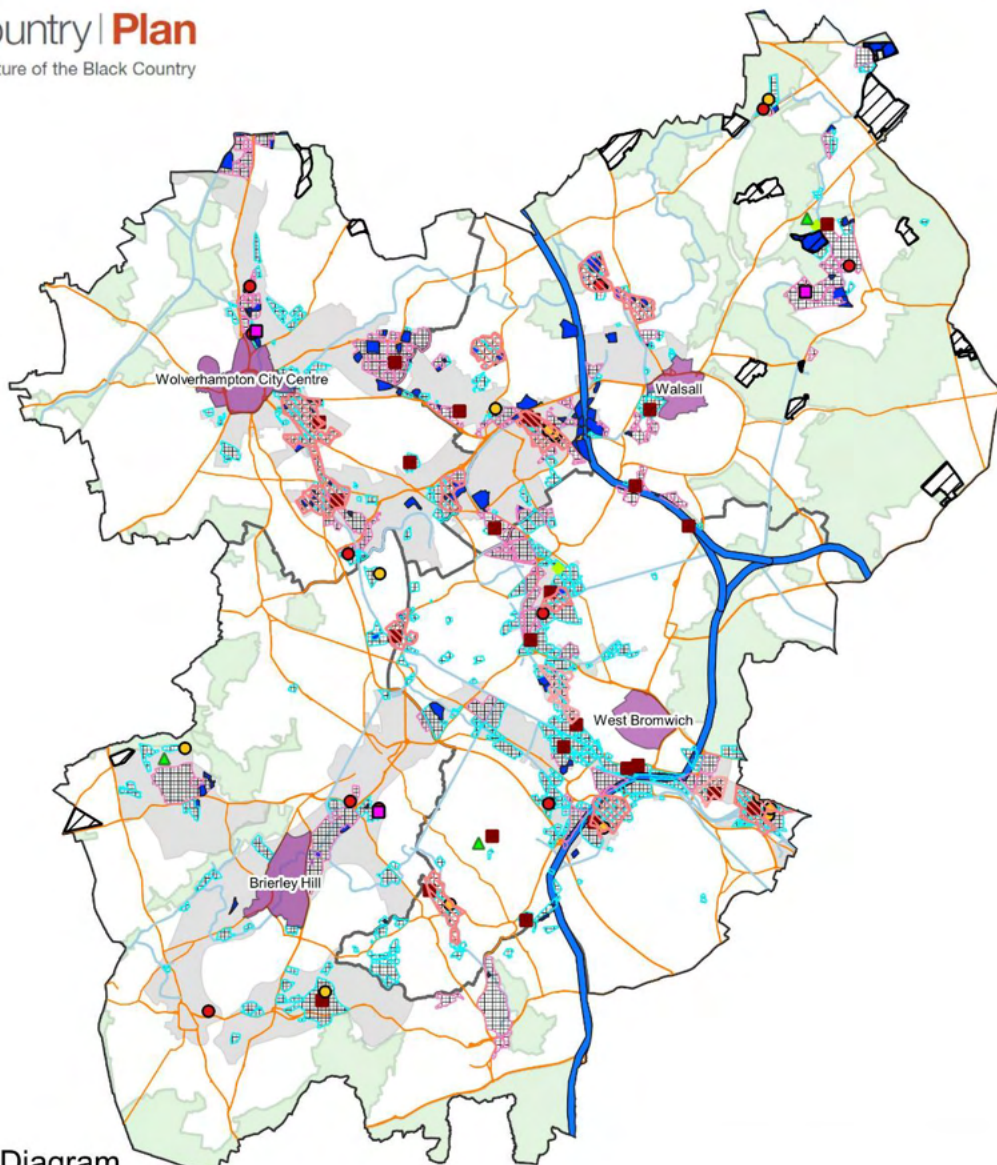
## 11 Waste

### Introduction

- 11.1 The BCA are the Waste Collection, Waste Disposal and Waste Planning Authorities for their respective administrative areas.
- 11.2 The key driver across the four authorities is to minimise the amount of waste generated across all sectors and increase the re-use, recycling, and recovery rates of waste material.
- 11.3 The following policy aims are likely to be important for the Black Country going forward:
- a) the proposed introduction of a requirement to segregate certain municipal wastes for collection, which implies a need for a review and the revision of collection regimes for local authorities and businesses producing commercial waste;
  - b) continued focus on measures to encourage waste prevention including, in line with national policy, the introduction of produce responsibility obligations for packaging wastes and reduction of single use plastics; and
  - c) continued focus on the protection of the environment and human health and tackling waste disposal crime.

Figure 13 - Waste Key Diagram

**Black Country | Plan**  
 Planning for the future of the Black Country



Waste Key Diagram

<u>Key:</u>	
<u>Waste</u>	
Hazardous Waste Treatment Infrastructure (W2)	Local Employment Areas (EMP3)
Waste Disposal Installations (W2)	<u>Key Routes</u>
Other Significant Waste Management Infrastructure (W2)	Motorways
Metal Recycling Sites (MRSs) (W2)	Key Route Network
Municipal Waste Recovery-Supporting Infrastructure (W2)	Canal
Municipal Waste Recovery Installations (W2)	<u>Strategic Planning</u>
Preferred Areas of Search for new Waste facilities (W3)	Tier One Strategic Centres
<u>Employment</u>	Core Regeneration Areas
Employment Development Sites (EMP1)	Local Authority Boundaries
Strategic Employment Areas (EMP2)	Black Country Green Belt
	Neighbourhood Growth Areas

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## Waste Infrastructure – Future Requirements

- 11.4 This policy sets out the overall strategy and principles for waste management in the Black Country and the types of waste development that will support this. It also identifies how much new waste management capacity the Black Country is likely to need to support planned levels of housing and growth over the plan period, and to help deliver the Strategic Priority of meeting the Black Country's resource and infrastructure needs.

### Policy W1 – Waste Infrastructure – Future Requirements

- 1) **Proposals for relevant, major development shall evidence how its operation will minimise waste production, as well as facilitating the re-use and recovery of waste materials including, for example, through recycling, composting and energy from waste.**
- 2) **Proposals for waste management facilities will be supported based upon the following principles;**
  - a) **managing waste through the waste hierarchy in sequential order. Sites for the disposal of waste will only be permitted where it meets a need which cannot be met by treatment higher in the waste hierarchy;**
  - b) **promoting the opportunities for on-site management of waste where it arises and encouraging the co-location of waste developments that can use each other's waste materials;**
  - c) **ensuring that sufficient capacity is located within the Black Country to accommodate the waste capacity requirements during the plan period and reducing the reliance on other authority areas;**
  - d) **enabling the development of recycling facilities across the Black Country, including civic amenity sites, and ensuring that there is enough capacity and access for the deposit of municipal waste for re-reuse, recycling, and disposal;**
  - e) **waste must be disposed of, or be recovered in, one of the nearest appropriate facilities, by means of the most appropriate methods and**

### Policy W1 – Waste Infrastructure – Future Requirements

**technologies, to ensure a high level of protection for the environment and public health;**

- f) ensuring new waste management facilities are located and designed to avoid unacceptable adverse impacts on the townscape and landscape, human health and well-being, nature conservation and heritage assets and amenity;**
- g) working collaboratively with neighbouring authorities with responsibilities for waste who import waste into, or export waste out of, the Black Country, to ensure a co-operative cross boundary approach to waste management is maintained.**

### Justification

- 11.5 In line with national waste planning guidance, the Plan will where necessary make provision for the suitable management of non-hazardous waste; Local Authority Collected Waste (LACW) and Commercial and Industrial Waste (C & I); construction, demolition and excavation waste (CD&E); hazardous waste such as asbestos or batteries, low-level radioactive waste, agricultural waste and waste water produced from water treatment.
- 11.6 Findings in the Black Country Waste Study (2020) show that the waste industry has grown quickly over the past twenty years and makes a significant contribution to the national economy. The past two decades has seen growth of around 55% in employment and incomes in the sector.
- 11.7 The waste sector is of particular importance to the Black Country, where it makes a far more significant contribution to the economy (0.88% of its jobs) when compared with a national figure of 0.55%. It is expected that this sector's contribution to the Black Country's GVA will grow by nearly 250% by 2030. To deliver these environmental and economic benefits, the Plan will have an important role in providing the land use policy in its support.
- 11.8 Housing and employment land are projected to increase in the Black Country as the regeneration of the urban area progresses, to help meet strategic housing and employment targets. The needs of new waste infrastructure will be required to be

balanced with those of housing and employment for suitable development sites. In seeking to identify development sites for waste infrastructure, priority shall be given to the safeguarding of existing and allocated sites for their continued use and the retention of the local employment areas in which they occur.

- 11.9 Waste reduction and resource efficiency improvements will have a significant influence on future waste growth. Waste per household decrease from a peak of 1,244 kilograms per household per year (kg/hh/yr) in 2002/03 to 984 kg/hh/yr in 2017 - 18 (a reduction of over 20%). This has been driven by a range of factors, including household income, increased resource efficiency and changes in consumer behaviours. Similar factors are also thought to be driving reductions in C&I waste.
- 11.10 In addition, the transition towards a circular economy, the approach to economic development designed to benefit businesses, society and the environment, is expected to significantly change the way waste will be managed in future. In particular, the quantities of waste reused, recycled, and composted are expected to increase substantially.
- 11.11 Transitioning towards the circular economy will involve a significant reduction in the amount of waste produced by households and businesses, because avoidable waste will be 'designed out' of products at the manufacturing stage. It will also mean a significant shift away from methods of managing unavoidable waste at the bottom of the 'waste hierarchy' (waste disposal and energy recovery) and towards those at the top of the hierarchy which can 'close the loop' (re-use and recycling).
- 11.12 As waste facilities are an essential part of the infrastructure of an area, it is not only important that they are appropriately located, but also that policy protection is applied to areas suitable for waste uses, to help achieve the objectives of moving waste up the hierarchy.
- 11.13 A different set of assumptions have been applied to the CD&E stream, based on the construction waste targets set under the Waste Framework Directive (2009/98/EC), the management of current CD&E arisings and the likely targets to be set in the future.
- 11.14 Total waste management capacity in the Black Country is driven by decreasing disposal capacity as existing landfill and other disposal sites run out of void space. The capacities include both internal and external capacity for recycling and transfer,

based on exports of waste from the Black Country; the capacities of these site categories are not anticipated to increase or decrease significantly over the plan period.

- 11.15 To account for likely changes in operational capacity at the waste management sites, internal capacity is based on five-year average (mean) tonnages of 'waste received' at permitted sites and operational incinerators by site category, 2013-2017. Material legislative and collection approach changes have been minimal over this time period, so a five-year average is a more reliable figure than using the longer ten-year average. It should be noted that external capacity is based on 2017 input tonnages of 'waste received' at permitted sites and operational incinerators, by site category.

### Expected Changes – Waste Management

- 11.16 The waste projections have also considered a range of waste management scenarios based on the recycling rates that may be achieved, and these are summarised in Table 8 below. The BCWS considers that Waste Management Scenario 2 (WMS2) is the most likely scenario for the Black Country.
- 11.17 WMS2 (Circular Economy) assumes that the targets for reuse and recycling of municipal waste will be achieved for household and C&I waste over the plan period (i.e. 65% of waste from these streams will be recycled by 2030). A different set of assumptions has been applied to the CD&E waste stream, based on existing CD&E waste management rates in the Black Country and potential future recycling targets suggested in the 'Circular Economy Package' proposals.

**Table 8 - Black Country Waste Study – Waste Management Scenarios**

Scenarios	Household Waste	C&I Waste	CD&E Waste
Waste Management Scenario (WMS1): no change in recycling performance	No change in household waste recycling	No change in C&I waste recycling	No change in CD&E waste recycling <sup>92</sup>

<sup>92</sup> It is estimated that the recycling and recovery rate achieved for CD&E waste in the Black Country in 2017 was around 33% (see BCWS, Table 3.10). This suggests that the Black Country is currently not meeting the existing Waste Framework Directive (2009/98/EC) target to recycle or recover 70% of non-hazardous C&D waste by 2020. The likely reasons for this are identified above.

Scenarios	Household Waste	C&I Waste	CD&E Waste
Waste Management Scenario (WMS2): meet indicative EU Circular Economy targets	65% household waste reuse, recycling and composting by 2030	65% C&I waste reuse recycling and composting by 2030	c.85% CD&E waste recycling or recovery by 2030
Waste Management Scenario 3 (WMS3): progress towards EU Circular Economy targets	55% household waste reuse, recycling and composting by 2030	55% C&I waste reuse, recycling and composting by 2030	c. 80% CD&E waste recycling or recovery by 2030

Source: BCWS, Table 4.7

### Waste Imports and Exports

- 11.18 The BCWS waste projections also took into account net waste imports. Around 4.90 million tonnes of waste were received at permitted waste sites (including landfill sites) and operational incinerators in the Black Country in 2017 (BCWS Tables 3.11, 3.15). The total tonnage of waste received in 2017 was exceptionally high compared to previous years and compared to the tonnage received in 2018. Analysis of past trends shows it is more typical for around four million tonnes to be received at Black Country sites annually. If this is compared to the estimated 2.01 million tonnes of waste from the Black Country managed at permitted sites and operational incinerators in 2017, it is clear that the Black Country is a significant net importer of waste.
- 11.19 More than 80% of the waste received at permitted waste facilities in the Black Country (excluding incinerators) in 2017 by tonnage originated within the former West Midlands region (BCWS Appendix J, Table J4). However, the originating authority of more than half of this waste (56%) is not known. 25% of the waste is recorded as originating from within the Black Country, and 14% from adjacent authority areas (8% from Birmingham, 4% in Staffordshire and 2% from Worcestershire).
- 11.20 Similarly, more than 80% of the waste received at permitted sites in England which was recorded as having originated in the Black Country in 2017 (by tonnage) did not travel beyond the former West Midlands region, and most of the rest was



received at sites in the East Midlands (6%) and South West (7%). Because the precise origin of so much of the waste arising in the West Midlands is not known, more waste is likely to have arisen in the Black Country than is actually recorded.

- 11.21 The waste figures arising above include an estimate of how much of the waste of unknown origin is likely to have arisen in the Black Country. As much of the waste is C&I waste, the 'apportionment' of this waste has been based on the percentage of business enterprises in the West Midlands that were in the Black Country in 2017 (NOMIS Labour Market Statistics, 'Business Counts').

### **'Capacity Gaps' and Need for New Waste Infrastructure 2018 – 2039**

- 11.22 Based on the assumption that the 'Circular Economy' recycling targets identified in Table 7 above will either be met (WMS2) or partially met (WMS3), the BCWS (Table 4.9) predicts that the following additional waste management capacity will need to be delivered in the Black Country between 2018 and 2038 to maintain net self-sufficiency:

- a) Re-use/ Recycling (non-hazardous municipal waste) – 0.75 to 1.0 million tpa
- b) Re-use/ Recycling (inert C&DE waste) – 0.75 to 1.0 million tpa<sup>93</sup>
- c) Energy Recovery (residual municipal waste) – 1.0 to 1.2 million tpa

(Source - BCWS, 4.5.1 – 4.5.29, Table 4.9)

- 11.23 Although the BCWS does not identify a need for additional waste transfer capacity, Dudley MBC is looking to provide an additional HWRC to the north or centre of the borough to complement its existing Stourbridge HWRC. Walsall Council is looking to replace its waste transfer station and one of its HWRCs (BCWS, Table 3.17), hence these requirements are identified in the policy. Up to 0.21 million tpa of additional energy recovery capacity would also be required if either of the energy from waste plants (EfWs) in Dudley and Wolverhampton should close.
- 11.24 The BCWS identifies that the Dunton Environmental soil treatment 'hub' at Horsley Fields in Wolverhampton has an operational capacity of around 40,000 tpa (BCWS,

<sup>93</sup> As no breakdown is provided in the BCWS, the BCAs have assumed that around half of the total Re-use/ Recycling requirement of between 1.5 and 1.9 million tpa will be for non-hazardous household/ similar C&I waste (e.g. glass, metal cans, plastics, card and paper), and around half for inert C&DE waste. This is on the basis that nearly half of the existing Treatment - Recycling capacity at permitted sites in the Black Country is predominantly for recycling of inert C&DE waste (BCWS, Table 3.16, 4.5.8). It is not envisaged that any composting or anaerobic digestion (AD) facilities will be developed in the Black Country due to the difficulty of providing sufficient distance separation from 'sensitive receptors.'

4.4.11). However, this facility is operating under a temporary permission that ends in September 2020, so there is likely to be a need to replace the capacity lost once it closes, to support the remediation of brownfield sites (BCWS, 4.5.15). The BCWS also identifies that there are permitted/ former mineral working sites in Walsall that may come forward as inert only landfills during the plan period (BCWS, Table 3.13).

11.25 Table 9 below summarises the requirements identified in the policy and what this is likely to mean in terms of the number of new waste sites required, the potential annual throughput capacity per site, and the land take per site, based on examples of facilities of similar type from published sources. Annual monitoring of new waste developments coming forward, and losses in waste capacity, will provide an indicator of progress on meeting the indicative waste capacity targets in the policy.

**Table 9 - Black Country Waste Capacity Requirements 2018 - 2039**

Management Method	Types of Waste	Total Capacity Requirement (tpa)	Operational Throughput Capacity Per Site (tpa)	Number of Facilities / Location	Land Take Per Site
Re-Use and Recycling	Non-hazardous municipal waste	Up to 1,000,000	MRF - Between 100,000 and 250,000	4 - 10 (Black Country)	1.5 – 3.0 hectares
Re-Use and Recycling	Inert CD&E waste	Up to 1,000,000	Between 50,000 and 150,000	7 - 20 (Black Country)	1.0 – 1.5 hectares
Recovery	Residual municipal waste	Up to 1,200,000	EfW - Between 150,000 and 400,000  <i>EfW - Around 100,000</i>	3 - 8 (Black Country)  1 – 2	2.0 – 3.0 hectares

Management Method	Types of Waste	Total Capacity Requirement (tpa)	Operational Throughput Capacity Per Site (tpa)	Number of Facilities / Location	Land Take Per Site
				(Dudley and/ or Wolverhampton) <sup>94</sup>	
Transfer	Municipal waste	Around 150,000	Around 150,000	1 (Walsall)	1.0 – 2.0 hectares
HWRC	Municipal waste	Around 65,000	Around 25,000 Around 40,000	1 (Dudley) 1 (Walsall)	0.5 - 1.0 hectare
Treatment	Contaminated soil	Around 40,000	Around 40,000	1 (Black Country)	Variable
Inert Landfill	Residual Inert CD&E waste	Not known	Depends on void space available	Subject to demand (Walsall)	Variable

Source: BCWS Tables 3.17, 4.9 and 5.1, BCWPS 4.6 and Appendix F, Surrey Waste Local Plan - Types of Waste Management Facilities: An Explanation Note (January 2019 v2), Surrey County Council

11.26 Most of the new capacity requirements identified in the policy are expected to be delivered by the waste industry rather than by the BCAs. Delivery will therefore depend on whether new projects are financially viable and attractive to investors. This will in turn depend on demand from waste producers, the effectiveness of government initiatives to incentivise re-use and recycling of waste in preference to energy recovery and disposal to landfill, and the availability of suitable sites within the Black Country where the new facilities can be built (see Policy W3).

<sup>94</sup> May be required to replace capacity lost if either or both of the EfWs is decommissioned once the existing waste contracts end.

## Evidence

- Black Country Core Strategy Waste Planning Study (BCWPS) (2008), Atkins
- Black Country Plan Waste Study (BCWS) (2020), Wood
- Black Country Plan – Waste Technical Appendix (2020)
- Black Country Plan - Duty to Co-operate: Waste and Minerals - Strategic Matters (2020)
- Environment Agency Waste Data Interrogator (WDI) 2007 - 2018
- Environment Agency Hazardous Waste Interrogator (HWI) 2007 – 2018
- Defra Local Authority Collected Waste Statistics 2006/07 – 2018/19
- National Planning Policy for Waste (NPPW) (2014), MHCLG
- National Planning Practice Guidance (NPPG) – Waste (2015), MHCLG
- Industrial Strategy: Building a Britain Fit for the Future November 2017), HM Government
- A Green Future: Our 25 Year Plan to Improve the Environment (January 2018), HM Government
- Our Waste, Our Resources: A Strategy for England (December 2018), HM Government
- Environment Bill 2019 – 2021
- Surrey Waste Local Plan – Types of Waste Management Facilities: An Explanation Note (January 2019 v2), Surrey County Council

## Delivery

- UK Government – introduce updated national planning policy and regulations for waste, continue with/ introduce new fiscal and other incentives to encourage more efficient use of waste and resources, e.g. Landfill Tax
- Waste Industry – develop new waste management infrastructure in locations that are well placed to meet demand from waste producers
- Investors – support delivery of new/ upgraded waste infrastructure

- Waste Disposal Authorities – deliver new/ upgraded WTS/ HWRC/ MRF capacity needed to support separate collection of waste glass, metal, paper, card and food from households and increased recycling of these wastes
- Manufacturers and Retailers - maximise use of re-used and recycled materials in production, reduce and where feasible eliminate difficult to recycle packaging waste
- BCA Planning Services – determine planning applications for new waste infrastructure and upgrading or expansion of existing waste infrastructure within the prescribed/ agreed target dates
- Planning Inspectorate (PINS) – determine applications for consent of NSIPs for waste (i.e. energy recovery facilities and hazardous waste treatment/ disposal facilities falling within the thresholds in S104 (3) of Planning Act 2008 (as amended)) where applicable.

### Issues and Options consultation responses

- 11.27 Policy W1 will replace the existing BCCS Policy WM1. The Issues & Options Report (2017) recognised that the indicative waste capacity requirement figures in Policy WM1 would need updating but did not identify a need to change the policy approach (Table 1). The rewritten policy has had regard to the representations received and the recommendations of the BCWS.
- 11.28 There has been no change to the approach set out in existing policy WM1 except for the updating of waste capacity requirements to reflect planned housing and employment growth in the Black Country to 2039 and the associated projected future waste capacity requirements that flow from the planned levels of growth and development.
- 11.29 As well as updating waste capacity requirements to 2039, the policy approach and general principles have been revised to reflect current national policy and guidance on waste.
- 11.30 The BCAs agree with the comments received at the Issues and Options stage that the strategy for waste should reflect the significant changes to national policy on waste and in particular, the adoption of the 'Circular Economy' approach. The policy therefore assumes that the Black Country will move towards a more 'circular

economy' and that there will be a significant demand for new recycling infrastructure over the plan period to support this.

## Waste Sites

- 11.31 This policy seeks to safeguard and retain the capacity of existing waste facilities in order to maintain the existing waste management capacity and address the Strategic Priority of meeting the Black Country's resource and infrastructure needs.

### Policy W2 – Waste Sites

#### Protecting Waste Sites

- 1) **The BCA will safeguard all existing strategic and other waste management facilities from inappropriate development, in order to maintain existing levels of waste management capacity and meet Strategic Objective 13, unless it can be demonstrated that:**
  - a) **there is no longer a need for the facility; and**
  - b) **capacity can be met elsewhere; or**
  - c) **appropriate compensatory provision is made in appropriate locations elsewhere in the Black Country; or**
  - d) **the site is required to facilitate the strategic objectives of the Black Country.**
- 2) **This policy will also apply to all new waste management sites that are implemented within the lifetime of the plan.**

#### New development near existing waste facilities

- 3) **Proposals for housing and other potentially sensitive uses will not be permitted near to or adjacent to an existing waste management site where there is potential for conflict between the uses,**
  - a) **unless a temporary permission for a waste use has expired, or the waste management use has otherwise ceased, and the site or infrastructure is considered unsuitable for a subsequent waste use;**
  - b) **or redevelopment of the waste site or loss of waste infrastructure would form part of a strategy or scheme that has wider environmental, social and /**

## Policy W2 – Waste Sites

**or economic benefits that outweigh the retention of the site or infrastructure for the waste use and alternative provision is made for the displaced waste use;**

**c) or a suitable replacement site or infrastructure has otherwise been identified and permitted.**

**4) Waste Site Impact Assessments will be expected to demonstrate that at least one of the above criteria applies. Applications should also identify any ‘legacy’ issues arising from existing or former waste uses, and how these will be addressed through the design of the development and the construction process.**

## Justification

### Waste Sites

11.32 The existing pattern of waste management infrastructure is illustrated in the Black Country Waste Study, which shows the location of all known waste management facilities in the Black Country.

11.33 The existing strategic sites are identified on the Waste Diagram and listed in Chapter 13 are the significant waste management facilities operating in the Black Country. They have been identified through a detailed analysis of all known licenced and exempt facilities in each authority area and include waste treatment, waste transfer, waste to energy and landfill facilities.

11.34 The definition of a strategic waste management site is;

- a) all facilities that form a vital part of the Black Country’s municipal waste management infrastructure, e.g. energy from waste plants, waste transfer facilities and HWRCs, depots;
- b) all commercial waste management facilities that fulfil more than one local role, e.g. they are part of a nationwide or regional operation linked to other facilities elsewhere and take in waste from all over the Black Country and / or beyond;
- c) all commercial facilities specialising in a particular waste stream or waste management technology, of which there are no others, or very few other of the same type operating elsewhere in the Black Country;

- d) all facilities likely to make a significant contribution towards existing waste management capacity;
- e) a site with sufficient capacity to recover, treat or dispose of at least 20,000 tonnes of waste per annum;
- f) a facility forming part of the UK's network of installations for waste disposal, such as landfill sites;
- g) a hazardous waste recovery facility of sufficient size to qualify as a Nationally Significant Infrastructure Project (NSIP).

11.35 The Strategic Waste sites are listed in Chapter 13 of the BCP.

### **Safeguarding Existing and Planned Waste Sites**

11.36 The Black Country is expected to see significant housing and employment land growth between now and 2039. However, the need for new housing and employment development has to be balanced against the need to retain the infrastructure needed to support local households, businesses, and the construction industry. This includes the infrastructure that manages the waste they generate. Waste Planning authorities must therefore ensure that the impact of non-waste development on existing and planned waste facilities is acceptable, and "*does not prejudice the implementation of the waste hierarchy and/ or the efficient operation of such facilities*" (NPPW, para. 8).

11.37 The BCWS therefore recommends a safeguarding policy for existing strategic and other waste sites and preferred industrial areas, identified for the development of new waste infrastructure (BCWS, 5.6.1 – 5.6.5 and 6.2.1). However, it also recognises that the redevelopment of existing or former waste management sites with new housing, employment or other land uses is sometimes justified and the policy reflects this. For example, redevelopment is likely to be acceptable where the waste facility has already closed, or the operator is proposing to close it or relocate the operations to another site.

11.38 Another important material consideration will be whether or not the waste operations are lawful, i.e. whether they have planning permission or a lawful development certificate. For example, if the waste operations are unauthorised and unsuitable for the location, the Council will normally consider taking enforcement action to stop them.



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### Potential Losses of Waste Management Capacity

11.39 When determining applications for non-waste development within a short distance or adjacent an existing waste management facility, regard will be had to any potential adverse impacts the proposed development might have on the future of the site as a location for the continuation of waste management activities. If a development is likely to have an unacceptable impact on the future of the site as a location for waste management, it will be refused.

### Waste Site Impact Assessments

11.40 Taking on board the BCWS recommendations, the policy requires applications for non-waste development, which could be sensitive to the operation of a waste management site, on or near to an existing or planned waste site to include a Waste Site Impact Assessment. This should:

- a) identify the waste site potentially affected;
- b) explain the spatial relationship between the application site and the waste site;
- c) provide a brief description of the waste site, which should include:
  - i. its operational status and any proposed changes;
  - ii. the facility type;
  - iii. whether the site is a strategic waste site;
  - iv. the types of waste managed;
  - v. the waste operations permitted on the site.
- d) summarise the main effects of the waste operations
- e) identify any effects that could be harmful to the health, wellbeing, and amenity of the occupiers of the new development;
- f) consider how the occupiers of the new development could be affected;
- g) consider how the waste site could be affected by the development;
- h) demonstrate how the development complies with the policy and the measures proposed to ensure that the waste site and the proposed development can co-exist without compromising each other.

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## Evidence

- Black Country Plan Waste Study (BCWS) (2020), Wood
- Black Country Councils Water Cycle Study: Phase 1 (2020), JBA Associates
- National Planning Policy for Waste (NPPW) (2014), MHCLG
- National Planning Practice Guidance (NPPG) – Waste (2015) MHCLG
- A Green Future: Our 25 Year Plan to Improve the Environment (January 2018), HM Government
- Our Waste, Our Resources: A Strategy for England (December 2018), HM Government
- Making Space for Waste: Designing Waste Management in New Developments (June 2010), Association of Directors of Environment, Planning and Transport (ADEPT)
- The Town and Country Planning (Use Classes) Order 1987 (as amended)
- Planning Act 2008 (as amended)
- Environment Bill 2019 – 2021

## Delivery

- Local Planning Authority – planning applications
- Waste Industry – engage positively with developers and the local planning authority on proposals to change the use of existing or planned waste sites and proposals for non-waste development near to existing or planned waste sites
- Developers – ensure that new developments near to existing or planned waste sites have regard to the potential effects on both developments, ensure that proposals for non-waste development make efficient use of resources and are designed to include sufficient space for secure waste storage, management and collection to meet the needs of the occupiers.

## Issues and Options consultation responses

- 11.41 Policy W2 has replaced the previous BCCS Policy WM2. The Issues and Options Report (2017) identified a need for a stronger approach towards safeguarding all waste sites in existing Policy WM2, to reflect concerns expressed by stakeholders

about land use conflicts that may arise where non-waste development is proposed near to existing waste sites.

11.42 The BCAs are seeking to no longer promote the change of use of employment land to housing on the scale previously required under the provisions of the BCCS. This is because demand for employment land has been more buoyant than anticipated. The cost of remediation of some employment sites to a standard capable of supporting housing has also been a factor. The significant shortfall in readily available employment land compared to demand identified in the Employment Demand Needs Assessment (EDNA), as part of the BCP evidence base, points to a need to retain as much as possible of the Black Country’s remaining employment land to support the local economy and enable local businesses to grow and invest.

11.43 Monitoring shows that no Strategic Waste Sites identified in the BCCS have been lost as a direct result of changes of use to housing. However, the BCWS identifies that housing has encroached into some established employment areas that include existing waste sites, and that there is a continuing need for waste sites to be safeguarded.

11.44 The BCAs therefore agree with the comments received at the Issues and Options stage that housing should not normally be developed near to existing or planned waste sites, to avoid land use conflicts that could be difficult to mitigate against once planning permission is granted. The policy also needs to set out how such conflicts should be managed if housing proposals do come forward near to waste sites.

**Preferred Areas for New Waste Facilities**

11.45 The identification and delivery of new waste management facilities will make a significant contribution towards meeting new capacity requirements set out in W1 and will meet the Strategic Priorities of the Plan.

<b>Policy W3 – Preferred Areas for New Waste Facilities</b>	
<b>1)</b>	<b>The preferred locations for waste management facilities are the Local Employment Areas shown on the BCP map, Waste Key Diagram and Local Authority Plan Maps.</b>

### Policy W3 – Preferred Areas for New Waste Facilities

- 2) All proposals for new waste management facilities should demonstrate how they will contribute to Spatial Objective 13 and the strategic objectives of Policy W1, such as the contribution they will make to landfill diversion, delivery of new waste management capacity and diversification of the range of facilities currently available.
- 3) All applications for waste development will be expected to comply with the requirements in Policy W4.

### Justification

- 11.46 The BCA consider that as the Black Country Plan is a strategic plan, it should continue to focus on safeguarding Strategic Waste Sites, which account for nearly 75% of the Black Country's estimated operational waste management capacity by tonnage, while also giving appropriate protection to other waste sites.
- 11.47 Waste facilities are an essential part of the infrastructure of an area; hence provision must be made in the BCP to deliver facilities and enable the objectives of moving waste up the hierarchy.
- 11.48 Certain forms of waste infrastructure are relatively specialised or of strategic scale or are in other ways particularly important in terms of the contribution they make to the overall network. However, and in combination, all facilities can contribute to delivering these objectives.
- 11.49 National Planning Policy for Waste (NPPW) requires the Waste Management Authorities to identify suitable sites and areas for waste management in Local Plan documents. A number of specific locations have been identified in the Black Country Waste Study 2020, where new waste management facilities could be located.
- 11.50 When deciding which areas should be allocated waste planning authorities should assess their suitability against a range of criteria;
- a) the extent to which the site or area will support the other policies set out in the NPPW;
  - b) physical and environmental constraints on development, including existing and proposed neighbouring land uses;

- c) the capacity of the existing and potential transport infrastructure to support the sustainable movement of waste and products arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport, and;
- d) the cumulative impact of existing and proposed waste disposal facilities on the well-being of local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential.
- 11.51 The NPPW advises that when identifying suitable sites and areas for waste, waste planning authorities should consider opportunities for on-site management of waste where it arises. This has been addressed in Policy W1 part 2b.
- 11.52 The NPPW also recommends looking at a broad range of locations for the development of new waste infrastructure, including industrial sites (particularly where there are opportunities to co-locate waste management facilities together). Priority should be given to the re-use of previously developed land, sites allocated for employment use and redundant agricultural buildings (NPPW, paragraph 4).
- 11.53 As the strategy towards sustainable waste management involves broadening the range of waste management facilities available in the Black Country it is necessary to identify a range of opportunities that can accommodate different types of operation and technology. Many waste operations are similar to industrial processes and can be accommodated in Local Employment Areas.

#### **Identification of Preferred Sites**

- 11.54 It is not proposed to allocate specific sites for waste in the BCP because no new sites likely to be deliverable within the plan period have been identified, apart from sites that already have planning permission (NPPF, 16, 35, Annex 2). To have sufficient confidence to allocate a site, it would need to be actively promoted for waste management use by one or more of the BCAs, other waste planning authorities, a landowner, or a commercial waste operator.

#### **Identification of Preferred Areas**

- 11.55 A number of employment areas have been identified in the BCWS as being most suited to the development of new waste recovery, treatment, and transfer infrastructure. These sites were identified through a three-stage screening process followed by an assessment of employment locations and selected sites promoted

through the 'call for sites' which fell outside of the excluded areas (BCWS, Chapter 5). The methodology is summarised in Table 10 below.

**Table 10 - Black Country Potential Areas for Waste – Screening Criteria**

Stage	Objectives	Criteria
Stage 1	Identification and mapping of <b>Positive Locational Objectives</b> (preferred locations for waste uses)	Brownfield sites, existing industrial areas, co-location of existing waste facilities, existing infrastructure, within five minutes' drive of motorway junction at peak times, close to strategic highway network/ key route network, potential for rail link
Stage 2	Identification and mapping of <b>Spatial Exclusionary Objectives</b> (constraints that rule out waste development as a matter of policy)	Sites allocated for other uses in adopted plans, surface water bodies, Groundwater SPZ Inner Zone, undefended Flood Zone 3 / 3b, nationally and internationally important sites for nature conservation and cultural heritage
Stage 3	Identification and mapping of <b>Spatial Discretionary Objectives</b> (constraints that may rule out waste development as a matter of policy)	Green Belt, open space, Grade 1, 2, 3a agricultural land, Groundwater SPZ outer zone, undefended Flood Zone 2, locally/ regionally important sites for nature conservation and cultural heritage, areas of NO2 exceedance, Noise Action Plan 'Important Areas,' MSAs

Source: BCWS (2020), 5.2.3 – 5.2.15, Tables 5.1 – 5.4 and Figures 5.1 – 5.3

- 11.56 Waste site options within the resulting 'refined study area' were then identified in consultation with the BCA. These were then subjected to two further rounds of assessment:
- a) Stage 4: **Positive Local Factors** - using criteria similar to Stage 1 to identify characteristics likely to be attractive to waste operators and to encourage delivery of new waste infrastructure; and
  - b) Stage 5: **Detailed Non-Spatial Assessment** – focusing on site constraints, potential land use conflicts and transport/ access constraints likely to be a potential barrier to delivery of new waste infrastructure.
- 11.57 The results of the assessments are presented in Appendix M of the BCWS and are summarised in Table 5.10 of the main report. The preferred areas identified in the policy are those recommended in the study and are listed in the individual local authority sections of Chapter 13 of the plan. These areas are considered least likely to give rise to land use conflicts, and in several cases, there is already co-location of existing waste facilities to which new sites would contribute.
- 11.58 While most types of waste facilities are likely to be acceptable in all Local Employment Areas, the list of facilities acceptable on Strategic Employment Areas is much shorter. They will normally be restricted to fully enclosed operations that fall within Use Classes B1 (c) or B2 and are already classified as employment uses, or *sui generis* operations that would be compatible with a Strategic Employment Area location and would not compromise existing or potential future employment uses falling within Use Classes E(g)(ii), E(g)(iii), B2 or B8 (Policies EMP2 and EMP3).
- 11.59 Certain waste operations may be acceptable on 'Other Employment' land not identified as strategic or local employment areas for long-term retention in employment land use. However, given the status of these sites and the potential that they will be developed for a non-employment use, the BCA are only likely to grant a temporary permission for waste development in these types of location.
- 11.60 The policy recognises that some types of waste operation involve the processing of waste in the open air and are therefore unlikely to be suitable on employment sites, for example, the disposal of inert waste onto or into land.

## Evidence

- Black Country Plan Waste Study (2020), Wood

- Black Country Employment Area Review (BEAR) (2020), Black Country Local Authorities
- National Planning Policy for Waste (NPPW) (2014), MHCLG
- National Planning Practice Guidance (NPPG) – Waste (2015) MHCLG
- Dudley Statement of Community Involvement (SCI) (February 2017), Dudley MBC
- Sandwell Statement of Community Involvement (SCI) (July 2016), Sandwell MBC
- Walsall Statement of Community Involvement (SCI) (November 2018), Walsall Council
- Wolverhampton Statement of Community Involvement (SCI) (October 2018), City of Wolverhampton Council
- Dudley, Sandwell, Walsall, Wolverhampton Authorities' Monitoring Reports

## Delivery

- DM, legal and funding mechanisms.

## Issues and Options consultation responses

- 11.61 The Issues and Options Report (2017) identified that references to specific sites in Policy WM3 would need to be updated but proposed to maintain the existing policy approach.
- 11.62 The following Options for the updated policy were considered, having regard to the representations received and the findings of the BCWS:
- 1 No change to approach in existing policy WM3.
  - 2 Identify preferred areas for enclosed waste facilities the Black Country as well as strategic waste infrastructure projects, preferably within employment area.
  - 3 Identify preferred areas for waste facilities that cannot be expected to locate in employment areas such as facilities requiring an open site.
  - 4 Move locational guidance for different types of waste facilities in existing policy WM4 into this policy and update it to reflect changes to employment land categories and the waste operations likely to be compatible with each land category.



- 11.63 Option One was considered a reasonable option because there is a need for more specific guidance for waste operators on the locations where new waste infrastructure is likely to be supported in principle.
- 11.64 Monitoring has identified several outstanding permissions for new waste infrastructure of a strategic scale, which could make a significant contribution towards the additional capacity requirements identified in Policy W1. It would therefore be appropriate for these existing 'commitments' to be identified in the plan.
- 11.65 Following a detailed analysis of opportunities and constraints across the Black Country, the BCWS has also identified the employment locations considered to be most suitable for waste development (excluding landfill). The BCAs consider the outcomes of the assessment are robust and that the preferred options for waste development should be identified in the plan.
- 11.66 This has been updated to reflect the employment land categories proposed in the Plan as a result of the survey work and assessment undertaken through the Black Country Employment Area Review (BEAR).

### Locational Considerations for New Waste Facilities

- 11.67 Steering waste management facilities towards the most suitable locations where they are likely to generate maximum benefits in terms of co-location, provide supporting infrastructure for other uses and minimise potential harmful effects on the environment and local communities will support the Strategic Priorities of the Plan.

#### Policy W4 – Locational Considerations for New Waste Facilities

##### Key Locational Considerations for All Waste Management Proposals

- 1) **Proposals should demonstrate how they will contribute to Spatial Objective 13 and the strategic objectives of Policy W1, such as the contribution they will make towards landfill diversion, delivery of new waste management capacity and diversification of the range of facilities currently available.**
- 2) **Development for new build waste management facilities should be focused in local employment areas and will be required to meet the following criteria:**

## **Policy W4 – Locational Considerations for New Waste Facilities**

- a) **evidence the need for the facility;**
- b) **all waste processes and operations must be contained, processed and managed within buildings unless there are acceptable operational reasons why these processes cannot be contained in buildings;**
- c) **proposals must accord with all other policies in relation to the protection of the environment and public amenity, or demonstrate that other material considerations outweigh any policy conflicts;**
- d) **consideration will be given to the potential impacts of waste management proposals on;**
  - i. **minimising adverse visual impacts;**
  - ii. **potential detrimental effects on the environment and public health;**
  - iii. **generation of odours, litter, light, dust, and other infestation;**
  - iv. **noise, excessive traffic and vibration;**
  - v. **risk of serious fires through combustion of accumulated wastes;**
  - vi. **harm to water quality and resources and flood risk management;**
  - vii. **land instability;**
  - viii. **land use conflict; proposals should demonstrate compatibility with the uses already present within / adjacent to the area;**
  - ix. **where necessary mitigation measures should be identified to reduce any adverse effects to an acceptable level.**
  - x. **whether the proposal would provide opportunities for co-location of related uses and / or generate other benefits (for example; produce a range of waste types or streams, produce high quality aggregates or other useful raw materials, or supply heat and power or other forms of energy to adjacent uses).**

### **Waste Applications – Supporting Information**

- 3) **Planning applications for waste development (Note 1) should include a supporting statement that clearly describes the key characteristics of the**

## Policy W4 – Locational Considerations for New Waste Facilities

development. It should also explain how the development aligns with Spatial Objective 13 and the General Principles and Preferred Methods of managing waste in Policy W1. In particular, the application should explain the contribution the development would make towards driving waste up the waste hierarchy, supporting the development of a more circular economy, meeting the Black Country's additional waste capacity requirements, and broadening the range of waste facilities currently available in the plan area.

- 4) The following information should also be included in the supporting statement and / or on the planning application form:
- a) the type of waste facility or facilities proposed;
  - b) the waste streams and types of waste to be managed;
  - c) the types of operation to be carried out on the site;
  - d) whether waste would be sourced locally, regionally or nationally;
  - e) the maximum operational throughput in tonnes per annum;
  - f) for waste disposal, the total void space to be infilled in cubic metres;
  - g) the outputs from the operations, including waste residues;
  - h) the expected fate and destination of the outputs;
  - i) the number of associated vehicular movements;
  - j) the number of jobs created.

### Notes:

- (1) This includes applications for new build waste developments, changes of use to waste developments, applications for new operational development and other material changes to existing waste sites, and 's73' applications to vary a condition attached to an existing waste permission. For definitions of 'waste development' and 'waste' see the Policy Justification.

## Justification

- 11.68 National policy guidance requires the BCA to identify suitable sites and areas for waste management in development plan documents. When deciding which sites should be allocated, their suitability should be assessed against a range of criteria,

- including physical and environmental constraints, cumulative impacts, and transport effects.
- 11.69 A number of specific sites and locations suitable for the development of new waste management facilities have been identified in Policy W3 and on the Local Plan Policies Map. The Black Country Waste Study has been undertaken to review the existing operating capacity of waste infrastructure across the Black Country and to assess future requirements over the Plan period.
- 11.70 There are a number of spatial issues common to all waste management proposals that should be addressed in all cases. The relationship of a proposal to the strategy for waste, as set out in Spatial Objective 13 and Policy W1, is of paramount importance and all proposals should demonstrate how they will contribute towards this. They should also address other locational issues such a proximity to the source of waste, relationships to adjoining / neighbouring uses, visual impacts and other potential effects on the surrounding area. Potentially harmful environmental / amenity impacts will be minimised where operations are contained within a building or enclosure, so facilities should always be enclosed where feasible.
- 11.71 As the strategy towards sustainable waste management involves broadening the range of waste management facilities available in the Black Country, it is necessary to identify a range of opportunities that can accommodate different types of operation and technology.
- 11.72 Many of the waste management facilities have operations that are similar to industrial processes and therefore may be located in retained employment areas. Operators seeking a location for new waste management facilities should be focusing their search on areas to be retained as employment land and should avoid those areas proposed to change to housing. The Waste Study identifies a number of areas across the Black Country that are considered suitable for locating new waste management facilities.
- 11.73 There are certain types of waste management facilities that require an open site and will therefore be difficult to accommodate within the urban areas of the Black Country due to the lack of suitable sites (e.g. open window composting facilities). These types of facility are subject to strict regulation by the Environment Agency and must be located at least 250m away from sensitive receptors.

11.74 The last part of the policy sets out the criteria against which new waste management proposals will be assessed.

### **Waste Applications – Supporting Information**

11.75 All waste applications should be accompanied by a supporting statement which provides a general description of the development. There are a number of other issues common to all waste developments that should also be addressed in all cases. For example, the relationship of the proposal to the strategy for waste and resources as set out in Spatial Objective 13 and in the General Principles and Preferred Methods of managing waste in Policy W1 is of paramount importance, and all applications should explain how the proposed development is aligned with these principles.

11.76 Applicants will be required to provide a certain amount of information about their proposed development on the planning application form, including information about the waste streams to be managed and the maximum annual throughput in tonnes and/ or void space in cubic metres. However, as the space available on the form is limited, a more comprehensive description of the proposed waste operations should be provided in the main supporting statement.

11.77 To assist applicants, the policy sets out the key pieces of information they should provide to enable the Local Planning Authority to understand the types of operation proposed and the potential effects of the development on the environment and on the health, wellbeing and amenity of people living or working near the site. This information should be collated together into the summary included in the supporting statement.

11.78 The most appropriate place to set out, describe in detail and assess such a proposal against relevant planning policies is within a Planning Statement. In addition, if the development is 'EIA development' (meaning it requires an Environmental Impact Assessment), as Schedule 1 or 2 development, details should be included in an Environmental Statement (ES).

### **Evidence**

- Black Country Plan Waste Study (2020), Wood
- Black Country Employment Area Review (BEAR) (2020), Black Country Local Authorities

- 
- National Planning Policy for Waste (NPPW) (2014), MHCLG
  - National Planning Practice Guidance (NPPG) – Waste (2015), MHCLG
  - Guidance on the Legal Definition of Waste and its Application (August 2012, Part 2 updated 2016), Defra
  - European Council Directive 2008/97/EC (Waste Framework Directive) (as amended)
  - The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations), SI 2017 No. 571 (as amended)
  - Town and Country Planning (Development Management) (Procedure) Order 2015 (as amended) (DMPO), SI 2015 No. 595
  - Environmental Handbook for the Fire and Rescue Service (2015), Environment Agency and MHCLG
  - Reducing Fire Risk at Waste Sites (2017), Waste Industry Safety and Health (WISH) Forum
  - National Operational Guidance (NOG): Fires in Waste Sites (online guidance), UK Fire and Rescue Service

## Delivery

- Delivery of new facilities in accordance with the policy will primarily be through Site Allocations DPDs, Area Action Plans, other area regeneration frameworks and planning applications. Whereas municipal waste facilities will be driven by the needs of the WDAs, which may be identified through MWMs or other mechanisms. Commercial facilities will be brought forward as and when the market allows, in some cases through the Local Plan as site allocations and other through planning applications. Compliance with the locational criteria will be through an assessment of planning applications and pre-application discussions with waste operators.
- Waste Operators – seek pre-application advice from WPA Development Management Team before submitting planning applications for new waste infrastructure projects, ensure that applications address policy requirements before they are submitted.

- Environment Agency, Council Pollution Control and Public Health Teams – provide appropriate advice to waste operators and WPA Development Management Teams on the potential environmental and health effects of proposed waste developments at pre-application and application stage.
- Local Planning Authorities – engage positively with waste operators when pre-application advice is sought, check that waste applications include all the information required in the policy as part of the validation process, request any missing information from applicants where necessary, assess compliance with policy when evaluating waste applications.

### Issues and Options consultation responses

11.79 Policy W4 is intended to replace that part of the existing BCCS Policy WM4 dealing with the general requirements for new waste applications. The Issues and Options Report (2017) identified that the existing policy has been successful in raising the quality of new waste facilities and did not identify any need for change.

11.80 The following Options for the policy were considered, having regard to the representations received and the findings of the BCWS:

- 1 No change to requirements in existing policy WM4.
- 2 Move locational guidance for different types of waste facilities in existing policy WM4 into new Policy W4, and update remainder of policy to reflect current guidance on the potential environmental effects of waste development.

11.81 Option One was considered the best option because the locational guidance had been successful in the existing Core Strategy.

### Resource Management and New Development

11.82 Managing material resources – including waste - in a responsible way is an important element of sustainable development and will support Spatial Objective 13 of the Plan.

#### Policy W5 – Resource Management and New Development

##### Waste Management in new developments

- 1) All new developments should;

**Policy W5 – Resource Management and New Development**

- a. **address waste as a resource;**
  - b. **minimise waste as far as possible;**
  - c. **design sites with resource and waste management in mind;**
  - d. **manage unavoidable waste in a sustainable and responsible manner;**  
**and**
  - e. **maximise use of materials with low environmental impacts.**
- 2) **Where a proposal includes uses likely to generate significant amounts of waste, these should be managed either on-site or in as close a proximity as possible to the source of the waste.**
- 3) **Resource and waste management requirements should be reflected in the design and layout of new development schemes. Wherever possible building, engineering and landscaping projects should use alternatives to primary aggregates, such as secondary and recycled materials, renewable and locally sourced products and materials with low environmental impacts. Consideration should also be given to how waste will be managed within the development once it is in use.**
- 4) **Where redevelopment of existing buildings or structures and / or remediation of derelict land is proposed, construction, demolition and excavation wastes (CD&EW) should be managed on-site where feasible and as much material as possible should be recovered and re-used for engineering or building either on-site or elsewhere.**

**Justification**

- 11.83 The management of material resources including ‘waste’ in a responsible way is an important element of sustainable development. This policy sets out general principles on waste management and resource efficiency to be addressed by new developments, including requirements to manage large amounts of waste on site or nearby, recycle and re-use products as far as possible.
- 11.84 The “waste hierarchy” ranks waste management options according to what is best for the environment. It gives top priority to preventing waste arising in the first place.



When waste is created, it gives priority to preparing it for re-use, then recycling, then recovery, and last of all disposal (e.g. landfill).

- 11.85 Achieving zero waste growth and driving waste up the “waste hierarchy” are important objectives of national policy guidance and the strategy for waste management in the Black Country. Delivering on site-waste management of waste and making better use of waste generated through development are critical to the delivery of these objectives.
- 11.86 The scale of development across the Black Country presents a major opportunity to influence decisions over how resources are managed and to develop a more integrated and holistic approach towards this at a local level. This policy sets out the minimum requirements for planning applications for all developments to demonstrate how they have addressed waste and resource issues.
- 11.87 Residential developments should include adequate storage for recyclable and non-recyclable waste pending collection, including storage for recyclable wastes and access for waste collection vehicles. As the Black Country is not a single Waste Authority, applicants for housing development should therefore liaise with the relevant Waste Disposal Authority at the earliest opportunity to check requirements for the storage of recyclable and non-recyclable waste, and to understand requirements for waste collection vehicles.
- 11.88 The resources and waste management requirements of businesses will be an important consideration in development projects to improve employment areas, town, and district centres. Where feasible, regeneration schemes should include provision for on-site waste management.
- 11.89 Where organisations are generating significant amounts of a particular type of waste, which is not currently managed in the Black Country, consideration should be given towards waste being disposed of or being recovered at the nearest appropriate facility(s).
- 11.90 Opportunities for symbiosis – matching waste producers with organisations who might have a use for the waste produced - should be explored.

## Evidence

- Black Country Plan Waste Study (BCWS) (2020), Wood
- Black Country Councils Water Cycle Study: Phase 1 (2020), JBA Associates

- 
- National Planning Policy for Waste (NPPW) (2014), MHCLG
  - National Planning Practice Guidance (NPPG) – Waste (2015) MHCLG
  - A Green Future: Our 25 Year Plan to Improve the Environment (January 2018), HM Government
  - Our Waste, Our Resources: A Strategy for England (December 2018), HM Government
  - Making Space for Waste: Designing Waste Management in New Developments (June 2010), Association of Directors of Environment, Planning and Transport (ADEPT)
  - The Town and Country Planning (Use Classes) Order 1987 (as amended)
  - Planning Act 2008 (as amended)
  - Environment Bill 2019 – 2021
  - Dudley MBC website – online planning application search
  - Dudley MBC website – Bins and Recycling (accessed April 2020)
  - Sandwell MBC website – online planning application search
  - Sandwell MBC website – Bins and Recycling (accessed April 2020)
  - Walsall Council website – online planning application search
  - Walsall Council website – Bins (accessed April 2020)
  - City of Wolverhampton Council website – online planning application search
  - City of Wolverhampton Council website – Waste and Recycling (accessed April 2020)
  - Environment Agency Public Register

## Delivery

- Waste Industry – engage positively with developers and the local planning authority on proposals to change the use of existing or planned waste sites and proposals for non-waste development near to existing or planned waste sites
- Developers – ensure that new developments near to existing or planned waste sites have regard to the potential effects on both developments, ensure that proposals for

non-waste development make efficient use of resources and are designed to include sufficient space for secure waste storage, management and collection to meet the needs of the occupiers

- Waste Collection Authorities – provide advice to developers and the local planning authority on the waste bins and storage space required in residential developments
- Local Planning Authorities – planning applications
- Indicator and Target.

### Issues and Options consultation responses

11.91 The existing policy WM5 is supported in its approach of aiming to reduce waste and deal with waste within the sub-region as close to where it arises as is practical.

### Monitoring

Policy	Indicator	Target
W1	% of LACW recycled / recovered per annum (DeFRA LACW Statistics)	50% of municipal waste to be recycled by 2020  55% of municipal waste to be recycled by 2025  60% of municipal waste to be recycled by 2030  65% of municipal waste to be recycled by 2035
	New waste recycling, recovery and transfer capacity (tonnes per annum)  New landfill capacity (cubic metres / tonnes)  Waste capacity lost (tonnes per annum) (BCA Annual Monitoring)	As specified in Policy W1 d) – l) and Table

Policy	Indicator	Target
	Waste received annually (tonnes) at permitted sites and operational incinerators by site category  (Environment Agency waste data - interrogator and operational incinerators data, which is published separately in an Excel workbook by the Environment Agency / DeFRA)	
W2	Number of planning applications for housing development near to a Strategic Waste Site / % of proposals compliant with policy  (BCA Annual Monitoring)	100% of housing developments near to a Strategic Waste Site to include effective measures to manage land use conflicts
	Number of planning applications for new housing development per annum / % of proposals compliant with policy  (BCA Annual Monitoring)	100% of new housing developments to include sufficient household waste storage areas
W3	Implementation of permissions on preferred sites	100% of preferred sites delivered
	Total number of planning applications for waste development approved, number of applications approved within the preferred areas or other retained employment areas	100% of planning permissions for waste development (excluding landfill sites) to be in preferred areas or other retained employment areas
	Net change in waste capacity – significant losses in capacity /	100% of indicative waste capacity requirements in Policy W1 delivered

Policy	Indicator	Target
	significant gains from development of new infrastructure  (BCA Annual Monitoring)	
W4	Total number of planning applications for waste development submitted, number of applications held in abeyance / invalid  (BCA Annual Monitoring)	100% of waste applications include information required by the policy
W5	Total number of planning applications	100% of waste applications include information required by the policy

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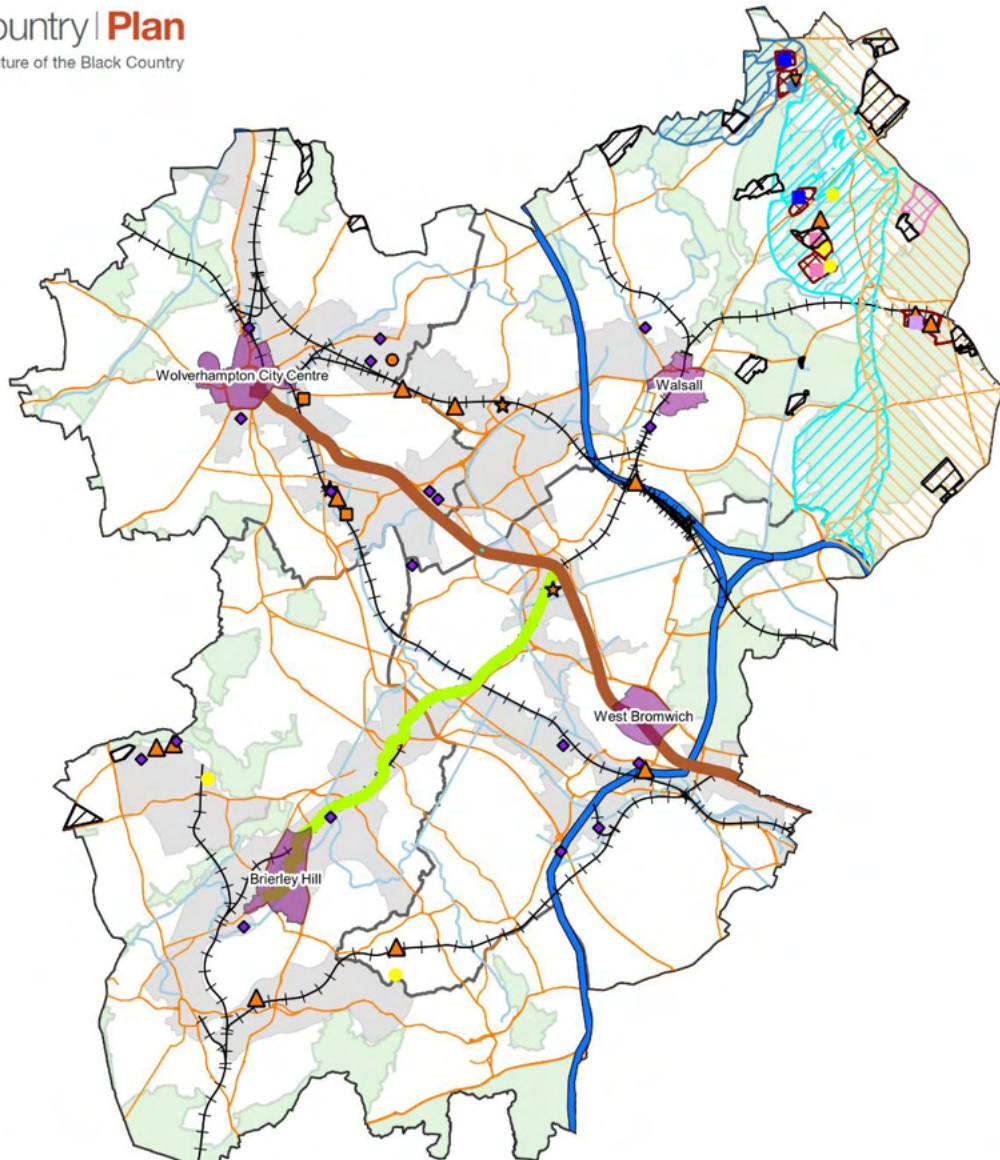
## 12 Minerals

### Introduction

- 12.1 Strategic plans are expected to make sufficient provision for all kinds of development, including for minerals (NPPG paragraph 20b). The policies for minerals in this Chapter also support the overall Vision, Objectives and Strategic Priorities, notably Strategic Objective **Meeting our resources and infrastructure needs** and Strategic Priority 14 for the plan, by ensuring that in 2039, the Black Country will:
- a) use its remaining mineral resources responsibly, including maximising the use of alternatives to produce a steady and adequate supply of minerals and mineral products to support the local economy and growth;
  - b) ensure that other development does not needlessly prevent mineral resources from being worked in the future if it is feasible and economically viable to do so; and
  - c) manage and produce mineral products in ways that avoids significantly harming the environment and the health and wellbeing of local communities.

Figure 14 - Minerals Key Diagram

Black Country | **Plan**  
 Planning for the future of the Black Country



Minerals Key Diagram

Key			
<b>Mineral Safeguarding Areas (MIN2)</b>			
Fireclay Mineral Safeguarding Area	Dry Silo Mortar Plant	Wednesbury -Brierley Hill Metro Extension	
Sand and Gravel Mineral Safeguarding Area	Fireclay Stockpile	Rail Network	
Brick Clay Minerals Safeguarding Area	Brickworks	Key Route Network	
<b>Existing Mineral and Mineral Infrastructure Sites (MIN2)</b>			
Mineral Extraction Sites	Pot Clay Factory	Motorways	
Rail Linked Aggregates Depot	Dormant Quarry	Canal	
Aggregates Recycling Facilities	Active Quarry	<b>Strategic Planning</b>	
Coating Plant	Pre-operational Quarry	Regeneration Growth Corridors	
Manufacture of Concrete Products	<b>Preferred Areas for Mineral Development (MIN3)</b>		Local Authority Boundaries
Concrete Batching Plant	Preferred Area for Sand Gravel	Tier One Strategic Centres	Black Country Green Belt
<b>Key Routes</b>			Neighbourhood Growth Areas
Existing West Midlands Metro			

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## Mineral Production – Requirements

12.2 This policy identifies the requirements for production of aggregate minerals and industrial minerals in the Black Country over the plan period, having regard to national policy guidance on provision for these minerals, the likely demand for them over the plan period, the constraints to working them in the Black Country, and the contribution likely to be met through imports of these minerals from other areas.

### Policy MIN1 - Mineral Production – Requirements

- 1) **To enable the Black Country to make an appropriate contribution towards identified local and regional requirements, the following provision is identified for minerals over the plan period.**

#### **Construction Aggregates**

##### **Primary Land Won Sand and Gravel**

- 2) **Sufficient provision has been identified in this plan to enable the Black Country to supply at least 25% of the seven-year sand and gravel landbank for the West Midlands Metropolitan Area (WMMA)<sup>95</sup> over the plan period. This equated to 6.2 million tonnes in total at the end of 2017, sufficient to provide for an average annual production rate of 120,000 tonnes per annum<sup>96</sup>. The other resources in the Minerals Safeguarding Areas (MSAs) also have the potential to contribute towards future sand and gravel production.**

##### **Secondary and Recycled Aggregates**

- 3) **At the end of 2017, the Black Country was estimated to be producing around 720,800 tonnes of secondary and recycled aggregates per annum at permitted production sites<sup>97</sup>. As a minimum, the Black Country will aim to maintain this level of production throughout the plan period. In support of this, permitted**

<sup>95</sup> The West Midlands Metropolitan Area (WMMA) comprises the seven unitary authorities of Birmingham, Coventry, Dudley, Sandwell, Solihull, Walsall, and Wolverhampton.

<sup>96</sup> This is based on the potential production rate of the Branton Hill Quarry extension site which has permitted reserves of just over 1 million tonnes and is expected to be worked over seven years up to 2027. Provision for sand and gravel requires careful consideration as well as engagement with other MPAs in the West Midlands that produce sand and gravel, particularly given the potential impact of HS2 on Solihull's permitted sand and gravel reserves and future production capacity.

<sup>97</sup> This is an estimate of annual production at fixed processing sites only and does not include an estimate for recycled aggregates produced and used on-site at construction projects.



## **Policy MIN1 - Mineral Production – Requirements**

secondary and recycled aggregate sites expected to continue in production up to 2039 will be safeguarded (see Policy MIN2).

### **Efficient Use of Mineral Resources**

- 4) All new developments will be encouraged to be resource-efficient, by making the maximum possible use of recycled mineral products in construction, to reduce reliance on quarried products and help maintain existing supplies for longer.

### **Industrial Minerals**

#### **Brick Clay (Etruria Marl)**

- 5) Sufficient brick clay provision has been identified in this plan to meet the supply requirements of the operational brick manufacturing plants in the Black Country over the plan period, allowing for continued imports from other areas. At the end of 2017 there were around 10 million tonnes of permitted reserves of Etruria Marl in Walsall. Subject to availability and assuming continued importation of material this would be sufficient to provide a 25-year supply to Aldridge, Atlas and Sandown brickworks in Walsall, based on the expected future annual consumption rates of these factories. This brick clay resource should therefore be safeguarded from inappropriate development (see also Policy MIN2).

#### **Fireclay**

- 6) Sufficient fireclay provision has been identified in this plan to meet the supply requirements of Swan Works in Walsall over the plan period. The existing stockpile and permitted reserves identified in Policy MIN3 and the other potential resources within the MSA have the capability to provide a 25-year supply of fireclay to this factory. They could also provide a long-term supply to brick manufacturing plants in Walsall, assuming that the fireclay present meets the requirements of the operators. This Fireclay resource should therefore be safeguarded (see also Policy MIN2).

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## Justification

- 12.3 Planning policies for minerals should provide for the extraction of minerals of “local and national importance” (NPPF paragraph 204), including sand and gravel, brick clay and fireclay, which occur naturally in the Black Country.
- 12.4 Mineral Planning Authorities<sup>98</sup> are expected to maintain a landbank of at least seven years of permitted reserves of sand and gravel (NPPF paragraph 207) to ensure a steady and adequate supply of aggregates for the construction industry. This means that sites with planning permission for sand and gravel extraction need to have enough minerals left in them to sustain the expected demand over the whole of the plan period plus seven years beyond that. If the permitted reserves are not sufficient to meet this requirement, planning policies are expected to identify other sand and gravel resources that could be worked to make up the shortfall.
- 12.5 For brick clay, Mineral Planning Authorities are expected to maintain a stock of permitted reserves sufficient to meet the needs of each brick manufacturing plant over the next 25 years (NPPF paragraph 208). It is assumed (though it is not explicit) that the same requirement also applies to fireclay, which is used by brick manufacturers for blending with brick clay for the production of buff-coloured facing bricks and pavers. It is also used locally to manufacture pot clay blends at Swan Works in Brownhills, Walsall.

## Construction Aggregates

### Expected Demand over the Plan Period

- 12.6 Current national policy guidance on minerals identifies past sales as an indicator of current demand for aggregate minerals (NPPF paragraph 207), but as it is not necessarily a reliable indicator of future demand, “other relevant local information” should also be taken into account when planning for future supplies. This evidence has been reviewed as part of the 2020 Black Country Minerals Study and is summarised below.

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<sup>98</sup> In the Black Country, whilst each constituent authority is a Minerals Planning Authority, for minerals planning purposes, past trends and future provision is planned at the West Midlands Metropolitan Area (WMMA) level. Consequently, the data in this chapter assesses the extent to which the BCAs can contribute to the wider identified WMMA minerals requirements.

12.7 The economic recession has clearly had a significant effect on sales of sand and gravel in the West Midlands Metropolitan Area (WMMA) and wider West Midlands Region over the ten years up to 2017, which was the latest information available at the time the 2020 Black Country Minerals Study was prepared. Table 11 shows that there was a steep fall in sales in 2009 in the WMMA, followed by a gradual increase up to 2016, with sales falling back again in 2017.

**Table 11 – Ten -Year Rolling Average Annual Sand and Gravel Sales in the West Midlands Metropolitan Area (WMMA) 2008 – 2017 (million tonnes)**

Year	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
<b>Annual Sales</b>	0.500	0.375	0.451	0.401	0.461	0.491	0.498	0.529	0.577	0.480
<b>Rolling ten-year average sales</b>	0.526	0.516	0.513	0.500	0.495	0.494	0.492	0.487	0.489	0.476

Source: Table 5.3 2020 Black Country Minerals Study; West Midlands Aggregates Working Party Annual Monitoring (AM) Reports 1999 - 2017

12.8 Based on the last ten-year average sales figure, the WMMA would need to identify nearly 13 million tonnes of permitted sand and gravel reserves and other potential sand and gravel resources to provide a 'rolling' landbank over the Black Country Plan period. Table 12 below shows how this has been calculated.

**Table 12 - Sand and Gravel – West Midlands Metropolitan Area (WMMA) Landbank Requirement (million tonnes), December 2017**

Sand and Gravel Landbank Requirement in West Midlands	Million tonnes
Ten-year average sales 2008 – 2017	0.48
20-year requirement to the end of the BCP Period in 2039 <sup>99</sup> (ten-year average sales x 20 Years)	9.60
Requirement for Landbank	3.36

<sup>99</sup> Trends in annual sales and landbank supplies of construction aggregates are monitored by calendar year (1 January – 31 December) rather than by the usual monitoring years (1 April – 31 March), therefore the sand and gravel requirement for the plan period runs from the 2019 calendar year to the 2039 calendar year.

(ten-year average sales x seven years)	
<b>Total Landbank Requirement (20 years + 7 Years)</b>	<b>12.96</b>

Source: Table 5.3 2020 Black Country Minerals Study

- 12.9 However, as Table 11 shows, the past ten years' average sales have been lower than sales prior to 2009 and are therefore not a reliable indicator of likely future demand in the Black Country, where significant housing and employment growth is planned over the plan period.
- 12.10 Another indicator of current demand for construction aggregates in the WMMA is provided by the national aggregate minerals surveys, which record consumption of construction aggregates by region and sub-region. The last survey to have been carried out in 2014 found that the WMMA consumed around 1.9 million tonnes of sand and gravel and around 1 million tonnes of crushed rock in that year. By comparison, consumption of sand and gravel in 2009 was estimated to have been around 1.6 million tonnes, and consumption of crushed rock around 1.3 million tonnes<sup>100</sup>.
- 12.11 Reliable consumption figures for the pre-recession period are not available for the WMMA. However, data from the 2005 national survey indicates that Birmingham and the Black Country alone consumed at least 1 million tonnes of sand and gravel and at least 1.7 million tonnes of crushed rock<sup>101</sup>.
- 12.12 The planned housing and employment growth in the Black Country over the plan period will increase the demand for minerals and will impact on mineral consumption. However, as established in the 2020 Black Country Minerals Study, it is difficult to quantify what the projected housing and employment growth mean in terms of the amount of minerals that needs to be planned for, specifically construction aggregates. The minerals provision in this plan will therefore be continually monitored in conjunction with continued liaison with those Minerals Planning Authorities who form the wider West Midlands region.

<sup>100</sup> CLG (2011), Collation of the results of the 2009 Aggregate Minerals Survey for England and Wales, Table 11 and CLG (2016), Collation of the results of the 2014 Aggregate Minerals Survey for England and Wales, Table 11. This includes an estimate of the aggregates sales assigned to the West Midlands region only, which are likely to have been consumed in the WMMA on the basis of a pro rata apportionment by population.

<sup>101</sup> CLG (2007), Collation of the results of the 2005 Aggregate Minerals Survey for England and Wales, Table 11. This does not include any apportionment of the sales assigned to the West Midlands only, some of which must have been consumed in Birmingham and the Black Country.

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- 12.13 Notwithstanding the above, the requirement to maintain a ‘rolling’ landbank over the Black Country Plan period of nearly 13 million tonnes for sand and gravel (as set out in Table 12) remains unaffected.

### **Sand and Gravel Supply**

- 12.14 Walsall is the only authority in the Black Country with sand and gravel resources that have the capability to be worked over the plan period. The main resource area is in the eastern part of Walsall Borough, in Aldridge and Stonnall.
- 12.15 Historically, Walsall has contributed up to 10% of the WMMA’s annual sand and gravel production<sup>102</sup>, although production in Walsall reduced significantly following the closure of the former Aldridge Quarry in 2008 and ceased completely when Branton Hill Quarry closed in 2013. This means that the majority of the WMMA’s sand and gravel production is currently (2019) in Solihull, the only other authority in the sub-region with workable sand and gravel resources.
- 12.16 At the end of 2017, Solihull had nearly 4 million tonnes of permitted sand and gravel reserves. However, a high proportion of these reserves are expected to be sterilised by HS2 if it goes ahead, and this has already led to the closure of one site (Stonebrook Quarry). It is therefore unlikely that Solihull will be able to sustain the same rates of sand and gravel sales seen over the last ten years, at least in the short-term until new sites come forward.
- 12.17 The Draft Solihull Local Plan (2016) identified Preferred Areas and Areas of Search for sand and gravel, including in areas not affected by HS2. The Draft Plan estimates that there are around 2.5 million tonnes of sand and gravel resources within the Preferred Areas at Marsh House Farm, Hornbook Farm and west of Berkswell Quarry, but the full extent of the resource within the wider Areas of Search has not been quantified<sup>103</sup>. There is no guarantee that any of these reserves will come forward to replace those lost as a result of HS2.
- 12.18 If the landbank requirement is to be met, it is for the Black Country Plan to provide for as much sand and gravel production as possible to help reduce the shortfall created by the expected fall in production in Solihull.

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<sup>102</sup> Actual annual production figures for aggregate minerals are not available, therefore annual sales figures, which are available, are used as a ‘proxy.’

<sup>103</sup> Solihull Local Plan Review – Draft Local Plan (November 2016), Policy P13: Minerals

- 12.19 At the end of 2018, the only permitted sand and gravel extraction site in Walsall was the Branton Hill Quarry Extension site, which received planning permission in August 2018 (application reference BC64995P). This site is identified in Policy MIN3 and on the Minerals Key Diagram (ref MX1). The site is estimated to have just over 1 million tonnes of permitted reserves of sand. The existing mineral permission has an end date of 31 December 2027, meaning that the site has the capability to produce up to 120,000 tonnes per annum over its eight-year life.
- 12.20 A Preferred Area for sand and gravel extraction has also been identified at Birch Lane around the former Aldridge Quarry, which remains unrestored. This area corresponds to the Area of Search identified in the Walsall Site Allocation Document (SAD) 2019 and is designated on the Policies Map for Walsall and is estimated to have around 5.2 million tonnes of unpermitted sand and gravel resources. If proposals come forward for sand and gravel working in this area it would enable production to continue beyond the current end date for the Branton Hill site.
- 12.21 The plan has therefore identified provision for up to **6.2 million tonnes** of sand and gravel in total. This would in theory provide around half of the WMMA's current landbank requirement identified in Table 12 above. However, as there is only one permitted site and no guarantee that others will come forward, it is unlikely that all of these resources are capable of being worked during the plan period. A more realistic assumption would be that the anticipated production rate of 120,000 tonnes per annum at Branton Hill might be sustained to the end of the plan period if a new site comes forward within the Preferred Area at Birch Lane or elsewhere within the MSA. This would be equivalent to around 25% of the current WMMA supply requirement.

### **Crushed Rock Supply**

- 12.22 The last quarry in the Black Country to produce crushed rock (dolerite), Edwin Richards in Sandwell, closed in 2008. As detailed in the 2020 Black Country Minerals Study, there are no winnable crushed rock resources remaining anywhere in the Black Country, therefore no provision is identified for this mineral.
- 12.23 Coating plants and construction projects in the Black Country are expected to continue to rely on imports of crushed rock from outside the area. The latest information available suggests that most of the crushed rock imported into the West

Midlands Metropolitan Area is imported from Leicestershire, Shropshire, and Derbyshire.

### Supply of Secondary and Recycled Aggregates

12.24 Secondary and recycled aggregate sites expected to continue in production up to the end of the plan period will be safeguarded (see Policy MIN2). Due regard should also be had to the relevant Black Country Plan waste policies (notably Policies W1 and W2).

### Evidence

- Walsall SAD & AAP Minerals Study (2015), Amec Foster Wheeler
- Walsall Site Allocation Document: (2019), Walsall Council
- Black Country Minerals Study: Review of the Evidence Base for Minerals to support the preparation of the Black Country Plan (2020), Wood

### Delivery

- **Development Management** – evaluation of minerals applications as they come forward.
- **Duty to Co-operate** – continued liaison with WMMA authorities as part of duty to cooperate obligations and liaison with the wider Minerals Planning Authorities in the West Midlands region.

### Issues and Options consultation responses

12.25 Policy MIN1 will replace the relevant sections of existing BCCS Policies MIN2, MIN3 and MIN4. The policy seeks to bring together the mineral production requirements for all minerals in the Black Country under a single policy – construction aggregates (i.e. sand and gravel, secondary and recycled aggregates) and industrial minerals (i.e. brick clay and fireclay).

12.26 The mineral production requirements for each of the Black Country's minerals in the policy are set out in the supporting Black Country Minerals Study.

### Minerals Safeguarding

12.27 This policy sets out how the most important mineral resources in the Black Country, and sites that are expected to be producing, processing or transporting minerals

and mineral products, will be protected from other types of development that could compromise their continued operation over the plan period.

## **Policy MIN2 - Minerals Safeguarding**

### **Minerals Safeguarding Areas (MSAs)**

- 1) Minerals safeguarding areas (MSAs) have been defined around the following mineral resources in Walsall Borough:**
  - a. sand and gravel - Bedrock (Triassic, Sherwood Sandstone);**
  - b. brick clay - Etruria Formation (principal brick clay resource within Carboniferous Upper Coal Measures); and**
  - c. fireclay (potentially winnable resources underlying the principal coal seams within the Carboniferous - Upper Coal Measures).**
- 2) The MSAs are identified on the Minerals Key Diagram and on the Policies Map and are listed in each of the BCA sections in Chapter 13.**
- 3) Planning applications for non-mineral development will only be supported in an MSA where the development will not compromise existing or future mineral working within the MSA, and the following conditions are met:**
  - a. the development will involve the extraction of some or all of the mineral resource prior to development, where is practicable to do so; or**
  - b. it can be demonstrated that the site does not contain any mineral resources of economic value; or**
  - c. it can be demonstrated that the 'prior extraction' of minerals is not feasible.**
- 4) Applications for non-mineral development in an MSA should include supporting evidence demonstrating that one of the above criteria applies. Exceptions to this policy will apply to householder developments, conversions, and changes of use of existing buildings, and other forms of development that do not involve any new building or excavation works likely to sterilise mineral resources.**

### **Non-minerals developments outside the MSAs**



## Policy MIN2 - Minerals Safeguarding

- 5) **Outside MSAs, mineral deposits that are identified as being, or may become of, economic importance will be safeguarded from unnecessary sterilisation.**
- 6) **Where development is proposed, encouragement will be given to the extraction of the mineral resource prior to or in conjunction with, development, where this would not have unacceptable impacts on neighbouring uses. Developments over five hectares should be accompanied by supporting information (as set out in the Justification) demonstrating that mineral resources will not be needlessly sterilised.**

### Existing Minerals Sites

- 7) **The location of all permitted mineral extraction and mineral infrastructure sites are identified on the Minerals Key Diagram, and these sites are also listed in each of the BCA sections in Chapter 13. Applications for development within a 150m buffer zone of these sites will need to demonstrate they will not have any unacceptable impacts on these sites that would prevent them from continuing to operate.**

## Justification

### Minerals Safeguarding Areas (MSAs)

- 12.28 The Black Country is geologically very diverse. A wide range of mineral resources occur within the Plan area, including sand and gravel, brick clay, coal, fireclay, limestone and hard rock (dolerite), which are identified in national policy guidance as minerals of 'local and national importance (NPPF Annex 2 Glossary).
- 12.29 The exploitation of these resources in the past has had a significant impact on the history and development of the area. For example, the canal network was developed during the C18th and early C19th to improve the transportation of raw materials such as coal and limestone to important industrial centres. Historic coal, limestone and sand and gravel working has also left a legacy of sites of importance for geological conservation and biodiversity, as well as sites affected by ground instability.
- 12.30 Most of the Black Country's mineral resources are now either exhausted or sterilised by other development and are therefore not capable of being worked on a

commercial scale. However, mineral working is still feasible in the eastern parts of Walsall where large-scale urban development has not yet taken place. The BCP seeks to safeguard those mineral resources in the Walsall area where there is a realistic potential for mineral extraction to take place over the plan period through the identification of MSAs for sand and gravel, brick clay (Etruria Marl), and fireclay. These MSAs have been identified following the review and refinement of the British Geological Society (BGS) mineral resource safeguarding maps and on information from the minerals industry (where this was provided). The adopted Walsall Site Allocations Document (2019) provides full details of the methodology employed to arrive at the MSAs.

### **Non-Minerals Developments outside the MSAs**

- 12.31 To prevent the unnecessary sterilisation of minerals resources outside the identified MSAs, the prior extraction of these resources is encouraged where non-mineral development is proposed (except for conversions /changes of use that do not involve any new building or excavation works).
- 12.32 Mineral sterilisation issues will only generally come into play when larger development sites are concerned, i.e. those generally above **five** hectares, and such developments should be accompanied by supporting information demonstrating that mineral resources will not be needlessly sterilised. The supporting information should include details of a prior extraction scheme or, where this is not considered feasible, evidence that:
- a) mineral resources are either not present, are of no economic value or have already been extracted as a result of a previous site reclamation scheme or other development; or
  - b) extraction of minerals is not feasible, for example due to significant overburden or because mineral extraction would lead to or exacerbate ground instability; or
  - c) prior extraction of minerals would result in abnormal costs and / or delays which would jeopardise the viability of the development; or
  - d) there is an overriding need for the development which outweighs the need to safeguard the mineral resources present; or

- e) extraction of minerals would have unacceptable impacts on neighbouring uses, the amenity of local communities or other important environmental assets.

12.33 Where prior extraction is proposed, conditions will be imposed on any grant of permission requiring applicants to provide details of the types and tonnages of minerals extracted once the scheme has been completed.

### Existing Minerals Sites

12.34 Minerals can only be worked where they are found and in seeking to plan for a steady and adequate supply, the Plan must make provision to not only safeguard minerals resources, but also to deliver mineral sites and associated mineral infrastructure sites. As such, existing mineral sites and mineral infrastructure sites need to be safeguarded for continued use and to retain the potential of the areas in which they occur. This is particularly important with the demand for housing and employment land, which is set to increase over the plan period with the planned housing and economic growth in the Black Country.

12.35 The 2020 Black Country Minerals Study identifies 'buffer zones' around existing mineral extraction and mineral infrastructure sites. Given the proximity of permitted mineral sites to existing development in the Black Country, it is considered that the application of the Mineral Products Association's recommended 250m buffer zone around every existing mineral site is unrealistic. A 150m buffer has been applied instead. Any non-mineral development within this 150m buffer zone will need to demonstrate it will not have any unacceptable impacts on these sites that would prevent them from continuing to operate.

### Evidence

- Black Country Joint Core Strategy: Minerals Study 2008, RPS
- Walsall SAD & AAP Minerals Study (2015), Amec Foster Wheeler
- Walsall Site Allocation Document: (2019), Walsall Council
- Black Country Minerals Study: Review of the Evidence Base for Minerals to support the preparation of the Black Country Plan (2020), Wood

## Delivery

- **Development Management** – evaluation of applications for non-mineral development within the MSAs and within the ‘buffer zones’ around mineral extraction sites, preferred areas and mineral infrastructure.
- **Developers** – will be expected to consider the impact of proposed development on mineral resources and mineral operations in accordance with the policy.

## Issues and Options consultation response

- 12.36 Policy MIN2 will replace the relevant sections of existing BCCS Policy MIN1. The Issues and Options Report (2107) recognised the need to safeguard minerals resources in the Black Country but that this needs to be balanced against the need to bring forward housing and employment growth.
- 12.37 Having regard to the representations received to the Issues & Options consultation and the recommendations of the Black Country Minerals Study the following preferred policy options for minerals in the Black Country were identified:
- 1) Adopt more tightly defined MSAs for both sand and gravel and brick clay focused on the mineral resource in Walsall;
  - 2) Make policy provision to enable prior extraction of minerals within the MSAs, where feasible and economically viable, to prevent the sterilisation of mineral resources by non-mineral development; and
  - 3) Safeguard existing mineral and mineral infrastructure sites and include an appropriate ‘buffer zone’, in accordance with good practices to ensure a consistency of approach.

## Preferred Areas for New Mineral Development

- 12.38 This policy identifies the preferred areas for mineral extraction and other types of mineral development in the Black Country during the plan period, having regard to the requirements identified in Policy MIN1, the availability of mineral resources and the constraints to mineral working and processing in the plan area.

### **Policy MIN3 - Preferred Areas for New Mineral Development**

- 1) The preferred areas for new mineral development over the plan period are identified below and are shown on the Minerals Key Diagram and the Policies Map. New mineral extraction proposals will be supported in these locations, provided that the development would comply with Policy MIN4, and would not conflict with other policy requirements or site allocations in this plan or in any other adopted development plan.

#### ***Aggregate Minerals***

##### **Sand and Gravel**

- 2) Sand and gravel production are currently only permitted at the Branton Hill Quarry Extension site in Walsall (MX1). Further sand and gravel extraction will be supported in principle in the following Preferred Area:
  - a) MP1: Birch Lane, Aldridge, Walsall.
- 3) Sand and gravel extraction will also be acceptable elsewhere within the MSA for sand and gravel (see Policy MIN2). When considering new sand and gravel extraction proposals, significant weight will be given to the contribution this would make towards the sand and gravel supply requirements identified in Policy MIN1.

##### **Borrow Pits**

- 4) Short-term, time-limited excavation of fill material for specific engineering projects ('borrow pits') will be supported in principle. Such proposals should be supported by evidence that they are as near as possible to the project they will be supplying, and that secondary or recycled materials are either not available or are insufficient to meet the identified need for fill.

##### **Industrial Minerals**

##### **Brick Clay**

- 5) The extraction of brick clay (Etruria Marl) is currently permitted at the following sites in Walsall:
  - a) MX2: Atlas Quarry

### **Policy MIN3 - Preferred Areas for New Mineral Development**

- b) **MX3: Sandown Quarry**
- c) **MX4: Highfields North**
- 6) **Atlas and Sandown Quarries are active clay pits which are supplying the adjacent brickworks, whereas Highfields North is a 'dormant' site.**
- 7) **Due to the constraints on the Etruria Formation resource areas in the Black Country, there is unlikely to be scope for further clay extraction outside of the permitted sites. However, if such proposals should come forward within the Brick Clay MSA during the plan period, significant weight will be given to the contribution that they would make towards providing or maintaining a 25-year supply of clay to a brick manufacturing plant.**

#### **Fireclay**

- 8) **There is a stockpile of fireclay remaining from the former Birch Coppice site in Walsall (MS1). This is the main source of supply to the adjacent Swan Works, which manufactures pot clay blends. The same mineral permission for clay and coal working also applies to another site nearby, Land at Brownhills Common (MX5). Due to the constraints of the Brownhills Common site, mineral working is not expected to take place during the plan period.**
- 9) **Proposals for clay and coal extraction elsewhere within the Fireclay MSA identified on the Key Diagram, and for the stocking of fireclay following extraction, will be supported in principle where it can be demonstrated that this is essential to maintain supplies of fireclay to brickworks over the long-term, and that there are no alternative sources of supply available. Significant weight will also be given to proposals that would allow for the revocation of the existing 'dormant' permission at Brownhills Common.**
- 10) **Proposals for fireclay and coal working in the vicinity of the Cannock Extension Canal must be accompanied by a Habitats Regulations Assessment (HRA) demonstrating that they would not harm the integrity of the SAC.**

#### **Building Stone**

- 11) **Building stone has not been worked in the Black Country for many years and is unlikely to be substantially worked again during the plan period. However,**

### Policy MIN3 - Preferred Areas for New Mineral Development

**short-term, time-limited extraction of Dudley (Wenlock) Limestone, Barr Limestone, Gornal Stone, Halesowen Sandstone and Sherwood Sandstone for the repair and conservation of heritage assets constructed of these materials will be supported in principle.**

#### Energy Minerals

##### Coal

- 12) There is a general presumption against deep mining of coal, surface coal working (except where this is in relation to the working of fireclay) and colliery spoil disposal in the Black Country, unless the proposal would meet the tests of environmental acceptability set out in national policy guidance. Any such proposals will be expected to be fully justified in terms of the economic and energy benefits they will generate. Proposals for the working of coal will also be expected to extract maximum value from other mineral resources associated with coal deposits.**

### Justification

- 12.39 Planning policies for minerals should provide for the extraction of minerals of “local and national importance (NPPF paragraph 204), including sand and gravel, brick clay, fireclay and coal, which occur naturally in the Black Country.

#### Preferred Areas for Sand and Gravel Extraction

- 12.40 The Branton Hill Quarry Extension site was granted permission in August 2018 (application reference BC64995P). This site is estimated to have just over 1 million tonnes of permitted sand reserves. The extant mineral permission has an end date of 31 December 2027.
- 12.41 No sites have been submitted for sand and gravel extraction in response to the ‘call for sites’ between July 2017 and August 2020, and a number of sites have been put forward for housing development within the MSA.
- 12.42 The Preferred Area at Birch Lane is the same as the Area of Search identified on the Policies Map for Walsall and in the adopted Walsall Site Allocation Document (SAD) 2019. This was itself based on the Area of Search identified in the 2011 Black Country Core Strategy. The identification of this area as a preferred area is

justified because there are potentially winnable resources in this area. The preferred area includes a former sand and gravel site in this area which was worked until 2008. As this site remains unrestored, any new sand and gravel extraction proposals in this area will be expected to help facilitate the restoration of this site.

### **Preferred Areas for Brick Clay Extraction**

- 12.43 The only two active brick clay (Etruria Marl) quarries in the Black Country are Atlas Quarry and Sandown Quarry, both in Walsall. Atlas Quarry supplies Etruria Marl to both the Aldridge and Atlas brickworks. There is also a dormant brick clay site at Highfields North, which is highly constrained by the Jockey Fields SSSI designation and thus considered unlikely to be worked during the plan period. Due to the limitations of the Etruria Formation resource areas in the Black Country, there is unlikely to be scope for further clay extraction outside of the permitted sites.
- 12.44 No sites have been submitted for brick clay (Etruria Marl) extraction in response to the 'call for sites' between July 2017 and August 2020, and a number of sites have been put forward for housing development within the MSA.

### **Preferred Areas for Fireclay and Coal Extraction**

- 12.45 There are no sites producing fireclay in the Black Country but extracted fireclay is still being stockpiled at the former Birch Coppice site in Walsall. This is the main source of supply to the adjacent Swan Works, which manufactures pot clay blends. The same mineral permission for fireclay and coal working also applies to the nearby site at Brownhills Common but this site has not been working and as there are no modern working conditions in place, the permission covering this site is dormant.
- 12.46 Due to the constraints at the Brownhills Common site, mineral working is not expected to take place during the plan period.
- 12.47 Much, if not all, of the coalfield within the Black County lies in urban areas and therefore the resource is largely sterilised (2020 Minerals Study). Future opencast operations can only occur in association with the redevelopment of large industrial sites.

### **Alternative Hydrocarbons**

- 12.48 The potential for exploitation of coal bed methane (CBM) will be considered if a petroleum exploration development licence (PEDL) is issued in the Black Country



(no PEDLs have been issued within the Black Country to date as set out in the 2020 Black Country Minerals Study). At that stage, appropriate guidance will be incorporated into LDFs either through a review of this plan or through another DPD. Proposals coming forward in advance of this will be assessed against the guidance in Policy MIN4 and the following conditions will apply:

- a) Any permission granted for the extraction of CBM will be temporary, and subject to conditions limiting the duration of the operation.
- b) Proposals should include details of the area covered by the PEDL, the scale and type of operation, the drilling apparatus to be used (including the height of the rig or wellhead), and the site where the wellhead will be stationed.
- c) A separate application may be required to relocate a wellhead.
- d) Drilling apparatus should be appropriately screened and sited to minimise noise and potentially harmful visual impacts (see Policies ENV2 and MIN4).

12.49 The 2020 Black Country Minerals Study identifies that Black Country geology is unsuitable for fracking. Furthermore, in November 2019 the UK Government issued a moratorium on all fracking activity in England.

## Evidence

- Walsall SAD & AAP Minerals Study (2015), Amec Foster Wheeler
- Walsall Site Allocation Document: (2019), Walsall Council
- Black Country Minerals Study: Review of the Evidence Base for Minerals to support the preparation of the Black Country Plan (2020), Wood

## Delivery

- **Development Management** – evaluation of application for non-mineral development within the MSAs and within the 'buffer zones' around mineral extraction sites, preferred areas and mineral infrastructure.
- **Developers** – will be expected to consider the impact of proposed development on mineral resources and mineral operations in accordance with the policy.

## Issues and Options consultation response

- 12.50 Policy MIN3 will replace the relevant sections of existing BCCS Policies MIN2, MIN3 and MIN4. The policy sets out those preferred areas for new mineral development and should be read in conjunction with the new Policy MIN4.
- 12.51 In response to the representations received in response to the Issues & Options consultation, the policy includes a presumption in favour of borrow pits as well as support in principle for the use of identified building stone materials for the repair and conservation of heritage assets constructed from those materials.

## Managing the Effects of Mineral Development

- 12.52 This policy sets out the requirements that planning applications for mineral working and minerals infrastructure will be expected to address. The policy identifies some general requirements that mineral development proposals will need to satisfy, and then lists several additional criteria against which such proposals will be further assessed. The policy applies to both proposals at existing sites and those at new ones.

### Policy MIN4 - Managing the Effects of Mineral Development

#### General Requirements for Minerals Developments

- 1) All mineral proposals at both new and existing sites should demonstrate how they will contribute towards Strategic Objective 'Meeting our resources and infrastructure needs', Strategic Priority 14 and the strategic objectives of Policy MIN1.
- 2) Proposals should minimise waste and provision should be made for the extraction, re-use, or recycling of any other potentially useable materials.
- 3) Working plans and restoration proposals should include measures to maintain the stability of the working face, site, and surrounding area.
- 4) When working ceases, all plant and equipment should be removed, and sites should be restored as soon as possible.
- 5) The working, processing or recycling of minerals must accord with all other policies in relation to the protection of the environment, public amenity and health, and surrounding land uses as set out in this plan or in any other

## **Policy MIN4 - Managing the Effects of Mineral Development**

**adopted development plan – or otherwise demonstrate that other material considerations outweigh any policy conflict.**

- 6) Restoration programmes and after-uses for former mineral workings should reflect local character, include provision for after care, and where appropriate contribute towards environmental quality and infrastructure.**
- 7) Long-distance transport or haulage of material should be avoided wherever possible, and the potential for transporting material by rail or inland waterways should be explored where feasible.**
- 8) Proposals should address the impact of transporting minerals and mineral products on the highway network and should be accompanied by a Transport Assessment if generating a significant number of vehicle movements.**

### **Additional Assessment Criteria for Minerals Developments**

- 9) In addition to the general requirements set out above, proposals for mineral working or mineral-related infrastructure at both new and existing sites will be further assessed in terms of:**
  - a) minimising any adverse visual impacts;**
  - b) effects on natural, built, and historic (including archaeological) environments and on public health;**
  - c) generation of noise, dust, vibration, lighting, and excessive vehicle movements;**
  - d) compatibility with neighbouring uses – taking into account the nature of the operations, hours of working, the timing and duration of operations and any cumulative effects;**
  - e) harm to water quality and resources and flood risk management;**
  - f) ground conditions and land stability;**
  - g) land use conflict – proposals should demonstrate compatibility with the uses already present within the surrounding area;**
  - h) impacts on the highway, transport, and drainage network;**

## Policy MIN4 - Managing the Effects of Mineral Development

- i) where necessary, mitigation measures should be identified to reduce any adverse effects to an acceptable level.
- 10) The above criteria will be used to identify and select sites for inclusion in other development plan documents (where appropriate) as well as for assessing planning applications.

### Justification

#### National Guidance

- 12.53 The National Planning Policy Framework (NPPF paragraph 203) stresses the importance of ensuring a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs, and therefore that best use needs to be made of these minerals to secure their long-term conservation.
- 12.54 To this end, the NPPF (paragraph 204) requires that planning policies should:
- a) set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health; and
  - b) ensure that worked land is reclaimed at the earliest opportunity, and that high-quality restoration and aftercare of mineral sites takes place.
- 12.55 The NPPF (paragraph 205) then places a number of requirements on minerals planning authorities when considering proposals for mineral extraction – including as to adverse impacts on the natural and historic environment and on human health, cumulative effects of multiple mineral facilities, control and mitigation of noise, dust and vibration, and restoration and aftercare at the earliest opportunity and to a high environmental standard.

#### General Requirements for Mineral Developments

- 12.56 This policy sets out the general requirements that will apply to all proposals involving the development of mineral infrastructure and mineral working.
- 12.57 Mineral infrastructure proposals are defined as storage, handling, and processing facilities (such as depots and recycling facilities) and transportation facilities (such as rail sidings, rail heads and canal wharves). Mineral working proposals include

activities such as prior extraction in advance of a redevelopment scheme, extensions to existing quarries, new quarries, borrow pits, stockpiles, and exploitation of coal bed methane.

- 12.58 Mineral developments differ and early discussion with the mineral planning authority is recommended to clarify the scope and detail of information that will be required. It will be important that the applicant demonstrates the proposal to be consistent with national policy guidance and the overall Spatial Strategy.

### **Environmental and Amenity**

- 12.59 Although a temporary activity, quarrying can have negative impacts on the areas affected. Such impacts need to be carefully managed, to maintain the environmental quality and amenity of neighbouring uses. For example, proposals should consider the potential:
- a) impacts on air quality arising from the transportation of material or dust and particles from excavation and processing;
  - b) impacts on important environmental assets such as sites designated for their importance for biodiversity / geodiversity, historic buildings, conservation areas, and important archaeological remains;
  - c) visual impacts on the local landscape, particularly on prominent and highly visible sites;
  - d) impacts on local communities (including their health) near to mineral handling or production sites.

### **Cumulative Impacts**

- 12.60 The cumulative impact on the amenity of local communities already affected by quarrying is also an important issue. One of the main sources of complaint is noise and dust from heavy goods vehicles, so haulage routes should minimise these impacts where possible. Without proper management and mitigation, a concentration of quarries and related activities may make particular areas less attractive to live in.

### **Transportation**

- 12.61 There is little scope for the transportation of minerals by modes other than road in the Black Country, as the rail network does not reach the main mineral resource areas, and the canal network is generally not considered suitable for transporting

minerals other than on a short-term temporary basis. Nevertheless, and in the interests of moving towards more sustainable transport, proposals should consider the potential for moving mineral products by rail or inland waterways where feasible.

## Monitoring

12.62 The BCA have a statutory duty to monitor aggregates production and will also need to monitor brick clay production if they are to establish whether their policies are being implemented successfully. Where relevant, applicants should provide information on the extent of reserves and the quantities of material likely to be produced and used per annum. Where regular updates are required for monitoring purposes, conditions may be imposed requiring operators to provide this information.

## Evidence

- Black Country Joint Core Strategy: Minerals Study 2008, RPS.
- Responses to the BCP Issues and Options stage consultation (3 July to 8 September 2017).
- Black Country Minerals Study: Review of the Evidence Base for Minerals to support the preparation of the Black Country Plan (2020), Wood.

## Delivery

- **Development Management** – pre-application discussions and subsequent evaluation of applications for mineral working and minerals infrastructure within the Black Country.
- **Developers** – will be expected to consider and satisfy the general requirements and additional assessment criteria set out in this policy when submitting their minerals development proposals.

## Issues and Options consultation response

- 12.63 No Issues and Options (I&O) consultation stage representations or comments were made regarding the adopted Black Country Core Strategy (BCCS) Policy MIN5 '*New Proposals for Mineral Developments*'.
- 12.64 A lack of any objections or concerns made to BCCS Policy MIN5 suggests that this policy as currently exists is considered appropriate and satisfactory – there is

therefore no I&O consultation stage requirement that the emerging BCP replacement Policy MIN4 'Managing the Effects of Mineral Development' should be significantly different.

## Monitoring

Policy	Indicators	Targets
MIN1	Maintenance of 25% contribution made to the WMMA sand and gravel landbank as reported through the annual Local Aggregate Assessment (LAA).	n/a
	Maintenance of 2017 levels of aggregates produced from secondary and recycled sources, as reported through the annual LAA.	n/a
MIN2	Applications for non-mineral development within the MSAs and within the 'buffer zones' (identified in the 2020 Black Country Minerals Study) around mineral extraction sites and mineral infrastructure that comply with the safeguarding policy.	100%
MIN3	Number of applications for minerals extraction within the MSAs and Preferred Areas compared to the number of applications for minerals extraction outside MSAs and Preferred Areas.	100% of applications within MSAs and Preferred Areas.
MIN4	Percentage of applications for mineral related development satisfying the requirements set out in Policy MIN4.	100%

## 13 Sub-Areas and Site Allocations

### A. Dudley

#### Introduction

- A1 Dudley has a rich cultural and industrial heritage and is often referred to as the historic capital of the Black Country, a name derived from its industrial past of coal mines and blast furnaces used for iron and steelmaking.
- A2 Whilst once a key industrial town, a range of high quality and varied attractions now contribute to its historic landscape and heritage value, including: Dudley Castle, which dates back to the 11<sup>th</sup> Century; the internationally renowned Zoological Gardens; the open-air Black Country Living Museum; and Dudley Canal Trust, which has a sixteen-mile canal network. The tourism sector in Dudley makes a significant economic impact to the borough the wider sub-region, supporting 10,440 jobs and generating some £400 million in the local economy<sup>104</sup>.
- A3 The borough is predominantly urban in character, but also contains extensive green space, natural assets and nature reserves. The southern and western fringes of the borough form part of the West Midlands Green Belt, which also extends into the urban area as a series of green 'corridors'. Some 18% of the land in the borough is designated as green belt; with a further 14% being public green space. The borough is home to one Special Area of Conservation (SAC), ten Sites of Special Scientific Interest (SSSIs), two National Nature Reserves and seven Local Nature Reserves. Dudley, along with the other districts of the Black Country, achieved UNESCO Global Geopark status in July 2020.
- A4 Dudley has a growing and diverse population of over 320,000 residents, the second largest population across the BCA, of which 19.4% are young people; 60.2% are working age and 20.4% are aged 65 and above. There is an equal mix of male and females and in 2016 it was estimated that 12.6% of residents were from Black and Minority Ethnic groups<sup>105</sup>. At 72%, the borough's employment rate is higher than the average of 68.3% across the Black Country.

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<sup>104</sup> Economic Impact of Tourism in Dudley Borough, Research Solutions, 2017

<sup>105</sup> ONS Population Estimates by ethnic group and religion Research Report, 2016



- A5 Dudley was once a key industrial town generating wealth from coal and limestone mining, glass, iron and steel production. Despite a decline in activity since the 1970s, the area has retained manufacturing as a core industry, and today the sector employs 18,000 people in Dudley and contributes 15% of the local economy's GVA. The service sector in Dudley accounts for almost 80% of total employment with Public Administration, Education and the Health sector accounting for the highest proportion of employment.
- A6 The Covid-19 pandemic had an immediate and significant impact on the UK economy in 2020, with a particular effect on the retail, tourism and hospitality sectors, as well as the manufacturing and construction sectors. Given the predominance of these sectors in Dudley, the pandemic has had a disproportionate adverse impact on the borough. Dudley Council has pro-actively responded to the challenges presented by Covid-19 and is shaping interventions across the borough to address the impact of the pandemic.

## The Strategy

- A7 Notwithstanding the key issues outlined above, Dudley Council is continuing to provide a framework which includes placemaking as a tool in order to support, promote and deliver economic and social regeneration, with significant public and private sector investment planned across the borough. In addition to recent investment, the area has the following key strengths to build on:
- People and communities – diverse, healthy and safe communities; thriving community and voluntary sector; and strong civic pride and community resilience;
  - Place – world renowned cultural and heritage assets; strategic transport investments; a growing learning quarter; excellent digital connectivity and commitment to a sustainable environment;
  - Business – sectoral strengths (health, retail, manufacturing, education); Dudley Enterprise Zone; Dudley Business First.

### Dudley Borough's Vision

- A8 '*Forging a future for all*' is a shared vision for Dudley borough, developed in 2018, following extensive consultation with key partners and stakeholders. It is built around seven aspirations and goals to be reached by 2030:
- Towns – Dudley will have thriving, regenerated town centres where people are proud, work, shop and spend leisure time;

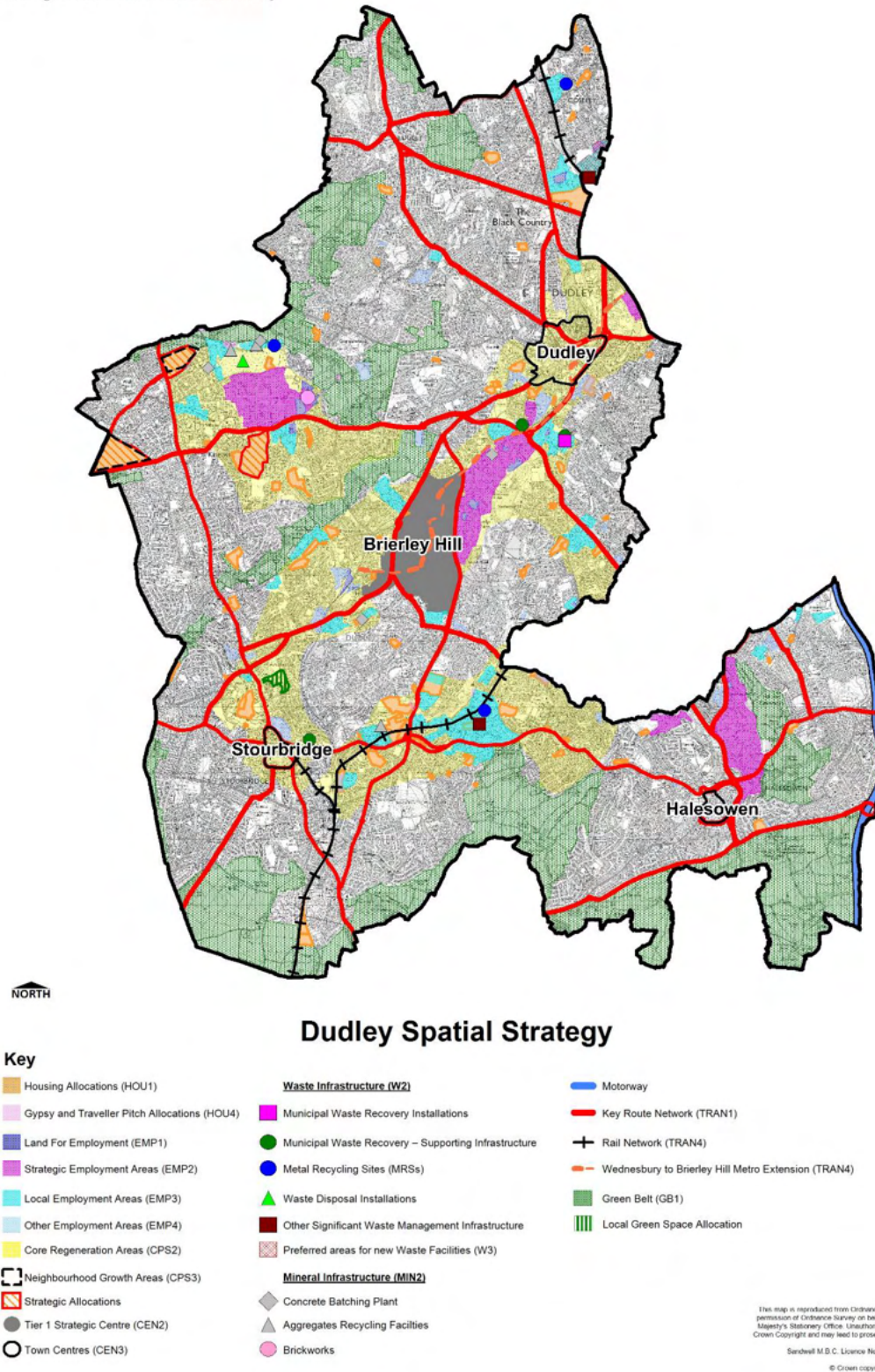
- Education – outstanding local schools, colleges and universities which secure excellent results for their learners;
- Business – a portfolio of quality industrial, retail and commercial premises;
- Tourism – an attractive tourism offer with a rich industrial, historical and geological focus
- Transport- improved public transport system linking Dudley borough to other Black Country strategic centres, the wider region and the national rail network;
- Environment – Dudley will be an affordable and attractive place to live, with a green network of high-quality parks, waterways and nature reserves that are valued by local people and visitors. There will be a strong affinity to local centres, supporting health, wellbeing and prosperity; and
- Community – Dudley will be a place with healthy, resilient, safe communities with high aspirations and the ability to shape their own future. Dudley will have improved health outcomes and higher wellbeing.

A9 The BCP forms an essential part of this strategy, supporting the recovery and growth of the economy, and providing for a continuous supply of new homes to meet the needs of local communities. The BCP will ensure that the borough's network of open spaces will be protected and enhanced to support its natural assets and can continue to provide opportunities to improve health and well-being whilst ensuring that development is located where it can provide convenient access for all sections of the community to work, shopping, health, education, leisure, green space and other facilities.

A10 The BCP supports the delivery of 13,235 new homes and 22ha employment land to 2039, supporting the growth of the borough's population to around 350,000 people by 2040. To plan for this growth, Dudley is prioritising locations that are both sustainable and deliverable in line with the Spatial Strategy set out in Policy CSP1. This growth will be supported by transport investment, focused on the rapid transit network and key road corridors as well as investment in walking and cycling.

Figure 15 - Dudley Spatial Plan

Black Country | **Plan**  
 Planning for the future of the Black Country



A11 Development and investment will be focussed on Brierley Hill Strategic Centre and three Core Regeneration Areas as summarised in Table 13 below.

**Table 13 - Dudley Growth Targets (2020 - 2039)**

Location	Housing (dwellings)	Employment land hectares (ha)
<b>Strategic Centre</b>		
Brierley Hill (Strategic Centre)	3,154 (inc 350 uplift)	0
<b>Core Regeneration Areas</b>		
Central Core Regeneration Area	1,712	7.51
North West Core Regeneration Area	1,145	1.4
Jewellery Line Core Regeneration Area	886	0
<b>Total Growth Network</b>	<b>6,897</b>	<b>8.91</b>
<b>Towns and Neighbourhoods Area</b>		
Dudley Towns and Neighbourhood Areas	2,662	13.09
Kingswinford Neighbourhood Growth Area	860	0
<b>Total Towns and Neighbourhoods Area</b>	<b>3,522</b>	<b>13.09</b>
<b>Allowance for windfall housing sites (outside of the strategic centre)</b>	<b>2,816</b>	<b>0</b>
<b>Total</b>	<b>13,235</b>	<b>22</b>

### Brierley Hill Strategic Centre

A12 Brierley Hill Strategic Centre incorporates both the traditional High Street and the Merry Hill Centre. The traditional Brierley Hill High Street is a separate entity (i.e. excluding

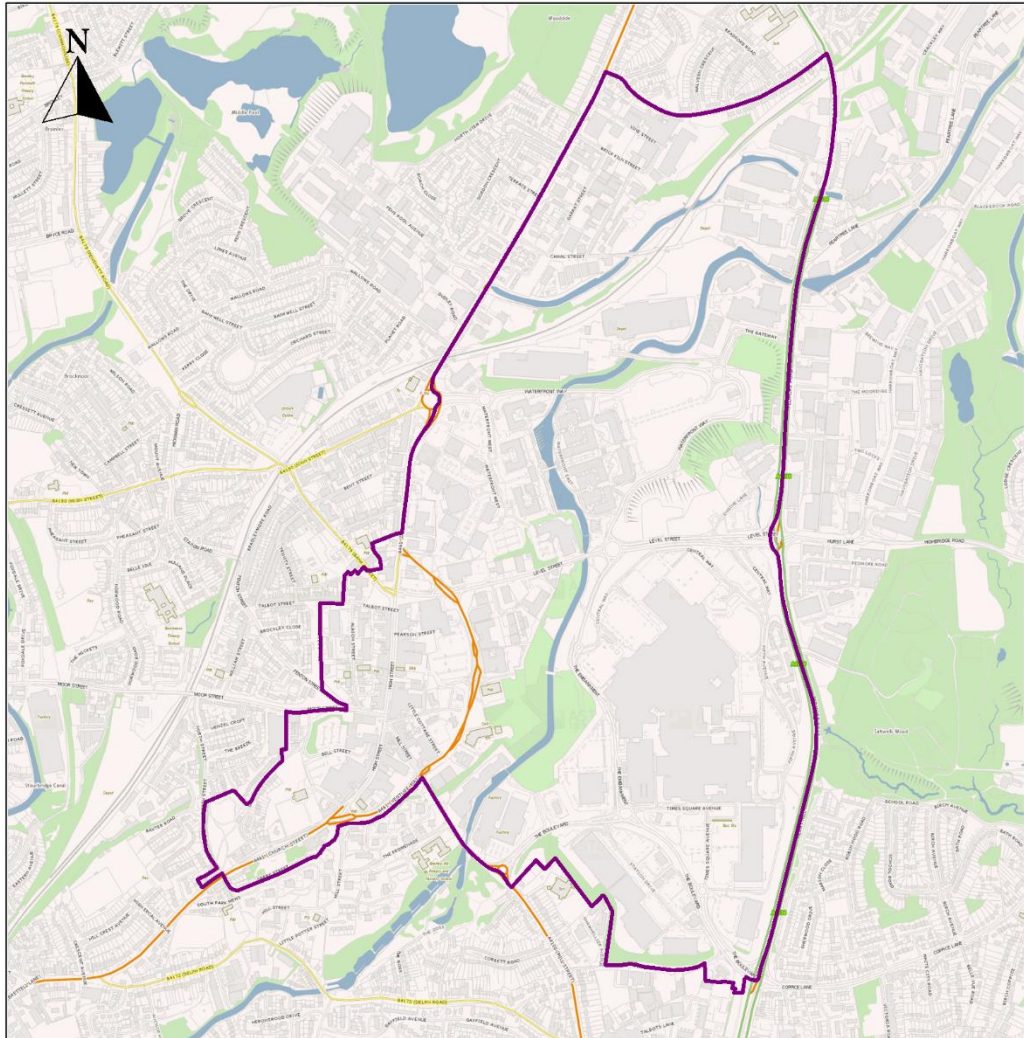
Merry Hill) and represents a retail area that serves its immediate hinterland and local community. The Merry Hill Centre is a key element of the Brierley Hill economic and physical landscape. It represents the single largest quantity of managed floorspace within the Black Country Local Authorities' (BCLA) area and is a regional centre of significance and ranks within the top 100 retail centres nationally (Experian). It has a wide catchment area that encompasses the Black Country and beyond.

- A13 The BCP supports the diversification, repurposing and rejuvenation of the Strategic Centre. Changing shopping patterns and challenges to the high street will be addressed through increased flexibility and facilitating the consolidation of the shopping core (particularly to reduce vacancy rates), complemented by office and leisure-led mixed uses, and supported by maximising residential provision in all locations (including the use of upper floors). The future of the centre, as with most strategic centres across the Black Country, is dependent on ensuring less reliance on retail to generate footfall and to support alternative uses (potentially including mixed uses) that function both during the day and into the evening.
- A14 The Brierley Hill Town Centre Investment Programme, supported by £10 million funding from the Government's Future High Street Fund, will deliver environmental improvements and improved pedestrian access to the High Street/Metro and Merry Hill. There is significant potential to redevelop vacant properties for office and new residential uses, alongside estate renewal opportunities. In addition, Dudley Council secured a further £1.8m of funding for the Brierley Hill High Street Heritage Action Zone (HAZ). It is a Government funded and run by Historic England with the aim of making the high street a more attractive, engaging and vibrant place for people to live, work and spend time. Brierley Hill High Street was one of 68 High Street across England selected to receive a share of the fund. The character and quality of both the cultural and civic function of the strategic centre and the built and natural environment will be improved, helping to make it a sustainable, healthy and attractive place to shop, live, work and visit. This will be achieved through BCP Policies (particularly CSP2, CEN2 and Environmental Transformation Policies).

Figure 16 - Brierley Hill Strategic Centre

Black Country **Plan**  
Planning for the future of the Black Country

Brierley Hill Strategic Centre



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- A15 The Black Country Centres Study advises that the future prosperity of the Brierley Hill Strategic Centre is predicated on the need to reduce its reliance on the retail sector and instead seek alternative mixed uses that generate a daytime and evening economy.
- A16 The key opportunities for Brierley Hill Strategic Centre are:
- a) The diversification of uses within the centre, including the potential for a growth in leisure, restaurants and pubs, education and community facilities provision.
  - b) The identification of sites for a significant increase in new housing.

- c) The programmed Midland Metro route, which runs through the centre with several stops proposed, including a potential interchange at Canal Street, including integrating stations within a network of pathways and cycleways.
  - d) The challenge of climate change and adapting to a low carbon future, including the further greening of the centre and the provision of renewable energy initiatives, including the provision of EV charging points.
  - e) Raising the profile of the High Street and capitalising on the successful Future High Streets (FHS) and Heritage Action Zone (HAZ) funding bids.
  - f) The Enterprise Zone (DY5 EZ), including the new university music faculty at The Waterfront.
  - g) The retention of The Waterfront primarily as an office centre.
  - h) The creation of high-quality public realm and more communal spaces and community focal points.
  - i) Improving the linkages between the Merry Hill Centre and Brierley Hill High Street, and the centre and the adjoining nature reserves.
  - j) Comprehensive 5G broadband coverage.
- A17 Policy CSP2 sets the critical role of the four strategic centres as the key drivers to deliver the overall growth strategy. This is supplemented by Policy CEN2, which defines this role in more detail, providing specific guidance on the range of activities and scale of development that will be appropriate.
- A18 The strategic centre benefits from an existing Area Action Plan (AAP) which was adopted in 2011. The AAP is currently the subject of a review and will be referred to as the Brierley Hill Plan (BHP). It is proposed that the BHP Issues and Options Report, which is due to be consulted upon after the consultation on the draft BCP, will present different options on the extent of the plan area and strategic centre boundaries. These will include an option that this boundary remains the same as those within the AAP. However, this may also mean that, subject to consultation on the BHP, the responses received and further assessment, the boundary of Brierley Hill Strategic Centre will change from that shown in Figure 15, and therefore be revised within later stages of the BCP.
- A19 As stated above the AAP is currently subject to a review, with the review document (BHP) programmed for adoption shortly after the approval of the BCP. At this stage, the existing Brierley Hill AAP will be superseded (in total) by the new BHP, including the existing AAP land use allocations and policies.

A20 Therefore, for the purposes of applying Policies CEN1-6, within Brierley Hill Strategic Centre the following AAP policies are relevant in defining in-centre boundaries, but will be superseded post-BCP adoption within the BHP:

- Retail – Primary Shopping Area (AAP Policies 45 and 46)
- Office – AAP boundary (and AAP Policies 46 and 48)
- Leisure - AAP boundary (and AAP Policy 46)

A21 The housing capacity for the strategic centre outlined in Table 13 is based on the existing AAP allocations and recent evidence including the Black Country Centre's study and the DY5 Enterprise Zone Review by Cushman Wakefield. It includes an estimated uplift as detailed in the Black Country Urban Capacity Review 2021. This capacity will be further tested through the AAP review but provides a sound basis to understand the housing capacity for the Strategic Centre for the purposes of this Plan.

A22 The Brierley Hill AAP also has the following targets for other land uses, carried through from the Black Country Core Strategy: -

- Offices – an additional 220,000 sq. m (gross) of floorspace
- Comparison Retail – an additional 95,000 sq. m (gross) of floorspace

A23 However, current evidence highlights future uncertainty and little capacity to support additional floorspace for these land uses. Subject to further assessment, monitoring and review, this evidence will inform the scope for future land use allocations within the BHP.

### Central Core Regeneration Area

A24 The Central Core Regeneration Area is focussed on A461 Birmingham Road / Stourbridge Road and the Midland Metro Wednesbury to Brierley Hill extension. It is centred on the Wednesbury to Brierley Hill Growth Corridor, recognised as a priority for investment in the WMCA SIDP and the West Midlands Housing Deal.

A25 The area contains the town centres of Dudley (which has a tourism focus of regional and national significance) and Stourbridge and runs adjacent to the Brierley Hill Strategic Centre.

A26 The area has major regeneration and renewal opportunities (inc. Netherton) for new employment and residential development, which will be well-connected by public transport via the new Dudley Interchange and the metro extension, to retail, office and leisure opportunities at Brierley Hill Strategic Centre and DY5 Enterprise Zone.



- A27 The area is well connected to important road, canal and tram infrastructure, that link Dudley with the Black Country, the national rail network and the wider hinterland. Utilising the opportunities presented by the extended Metro line serving Wednesbury to Brierley Hill, proposals are being put forward to enhance rapid public transport connectivity along the Brierley Hill to Stourbridge corridor.
- A28 In and around Dudley town centre a series of public sector-led interventions have been implemented since 2012 and as of 2021, a programme of further investment is on site or planned that will deliver the comprehensive regeneration of the area. This includes the Metro Extension; Dudley Transport Interchange; construction of the Very Light Rail National Innovation Centre (VLRNIC), the Black Country and Marches Institute of Technology (IOTT) and the extension of the Black Country Living Museum. There are further aspirations to deliver a new higher education facility, creating a University Centre and Learning Quarter at Castle Hill, that will stimulate the transformational change of the town centre.
- A29 The Plan supports the role of the Central Core Regeneration Area as a major Growth Corridor and offers the opportunity to enhance the town centres of Dudley and Stourbridge and the corridor between them. The extension of the Metro through Dudley and Brierley Hill and the proposed further extension of a rapid transit system from Brierley Hill to Stourbridge, provide a game changing opportunity for the economic, social and environmental regeneration of the Borough. The location of housing and employment land opportunities along the route of the metro has the potential to facilitate significant housing and employment growth within the catchment of new stations.
- A30 New development will respect and enhance the historic character and local distinctiveness of the area, with investment in environmental infrastructure including the canals, open spaces and wildlife habitats.

### **Jewellery Line Core Regeneration Area**

- A31 The Jewellery Line Core Regeneration Area is focused on Lye which has been identified as a key housing-led regeneration area within the Dudley Borough Development Strategy<sup>106</sup>. In the region of 880 homes have been identified for development primarily on obsolete employment sites adjacent to the district centre, Lye Station and along the river Stour corridor.

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<sup>106</sup> <https://www.dudley.gov.uk/residents/planning/planning-policy/dudley-local-plan/dudley-borough-development-strategy/>

- A32 Opportunities exist to consolidate the area as a location for housing growth through the development of outdated or obsolete areas of industrial land and the exploitation of the excellent main-line rail links. Lye is well-connected to key road and rail networks. Lye Station lies on the Birmingham-Worcester railway line (Jewellery Line), with central Birmingham and future links to HS2 just 25 minutes away. The Wednesbury to Brierley Hill Metro extension, to be completed in 2022, will improve connectivity between Lye and employment opportunities at Brierley Hill, Dudley and the wider sub-region.
- A33 Lye has been promoted as one of the Black Country Garden City locations<sup>107</sup> by the Black Country LEP. The original Garden City movement focused on improving quality of life and society living and functioning within the natural environment.
- A34 The Plan will support the comprehensive development of Lye and its surrounding area as an Urban Garden City, creating an enhanced sense of place by seeking to improve its housing offer, realise the economic potential of the area, enhance the District Centre and local community facilities, whilst at the same time enhancing the Stour Valley and protecting the area's environment and nature conservation value.

### North West Core Regeneration Area

- A35 The North West Core Regeneration Area is focussed on the area of Pensnett. The area is served by Pensnett Trading Estate, one of the largest secure business estates in Europe, and home to 160 businesses, as well as adjacent industrial areas, providing a major employment location for the borough.

The Plan identifies opportunities for new residential communities, including the former Ketley Quarry site (strategic allocation DSA3), providing additional high-quality housing. New housing development will provide additional catchment for Kingswinford District Centre and for Pensnett and Wall Health local centres, helping to sustain their resilience and vitality as local centres. The BCP promotes enhanced connectivity to local facilities via more sustainable transport links (public transport, walking and cycling) and enhanced environmental improvements. Development will protect and enhance the area's wildlife corridor, which runs between the green belt from South Staffordshire into the urban areas of Brierley Hill, Pensnett and Dudley. There are also important ecological links to Fens Pools Local Nature Reserve and its Special Area of Conservation. Opportunities to

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<sup>107</sup> [https://www.blackcountrylep.co.uk/upload/files/GardenCity/bcgc\\_brochure\\_FINAL.pdf](https://www.blackcountrylep.co.uk/upload/files/GardenCity/bcgc_brochure_FINAL.pdf)

contribute to the Wildlife Corridor between Fens Pools SAC and Baggeridge Country Park should be explored as part of future developments in the area.

### **Dudley Towns and Neighbourhoods Area**

- A36 The Plan includes existing Towns and Neighbourhood Areas such as Halesowen, Sedgley, Coseley and Stourbridge. These areas are established residential and employment areas served by a network of district and local centres as defined in Policy CEN1 and CEN5, as well as providing local employment opportunities and community facilities to serve communities outside the strategic centre and Regeneration Growth Areas. The BCP seeks to sustain and enhance these areas by ensuring a mix of good quality residential areas through a constant supply of small-scale development opportunities and potential renewal.
- A37 The Towns and Neighbourhoods Area also includes a new Neighbourhood Growth Area in Kingswinford where two sites, Land south of Holbeache Lane / Wolverhampton Road in Kingswinford and Land at Swindon Road in Wall Heath, will be released from the green belt. This will be covered by a Strategic Allocation and will be the focus of new residential growth. There will be a requirement for development proposed on allocated sites to be of the highest quality and accommodate the correct infrastructure provision in the right places. Housing growth in this part of the borough will be supported by a strengthened local infrastructure, including local highway improvements, and creation of new green spaces of value for residents and wildlife. New housing development will provide additional catchment for Kingswinford District Centre and Wall Heath local centres, helping to sustain their resilience and vitality as local centres. These requirements will be addressed through the production of master plans for the sites in accordance with Policy CPS3 and policies DSA1 and DSA2 below.

### **Green Belt Areas**

- A38 The green belt areas of Dudley form a series of wedges and urban fringe areas and perform many different functions. The green belt areas do contain some rural landscapes, including agricultural land such as around Halesowen and Stourbridge. However, much of the green belt is captured within the urban area and provides a network of natural and formal open spaces, historic parks, such as Leasowes, education buildings, recreational facilities (such as Stourbridge and Halesowen golf courses), and other infrastructure (such as sewage works, sub-stations and cemeteries). Fens Pools SAC forms an important wedge of the green belt in the heart of borough's urban area.

Opportunities to contribute to the wildlife corridor between Fens Pools SAC and Baggeridge Country Park is a priority for improvement and extension.

## Delivering the Strategy

- A39 This strategy will be delivered by:
- a) A review of the adopted Brierley Hill Area Action Plan (AAP), to be known as the Brierley Hill Plan to refresh detailed site allocations within the strategic centre boundary in a comprehensive manner, in accordance with the Vision and strategic priorities set out in Policy CSP2.
  - b) The allocation of sites and implementation of policies in this Plan across the administrative area to accommodate housing and employment development.
  - c) The saving of policies contained in the Dudley Borough Development Strategy and the Dudley, Halesowen and Stourbridge Area Action Plans (AAP) unless specifically replaced by Policies in the Black Country Plan as listed in Appendix A1.
- A40 A number of the Development Allocations replace existing allocations made in adopted Local Plan documents, which formed part of the Dudley Policies Map. Where this is the case, the previous allocation reference and the Local Plan document concerned are listed in Appendix A1. Appendix A2 provides details of all other Local Plan designations in Dudley that have also been replaced or amended through this Plan. Such changes have only been made where this is necessary to deliver development allocations.
- A41 Where town centre policies contain a housing element which have counted towards Dudley's housing provision, but do not form part of the Black Country Plan allocations, these have been listed in Appendix A3.
- A42 Detailed site and designation boundaries can be viewed on the online Policies Map for Dudley.

## Development Allocations

- A43 Outside the strategic centre, Table 14 provides details of all development allocations made through this Plan within Dudley. A number of these allocations are of strategic significance to the delivery of the Plan because of their size, either individually or in combination with adjoining allocations. Each strategic allocation has a separate policy, providing details of the specific constraints and requirements affecting development, which should be read alongside the information for the allocation provided in Table 14.

Table 14 - Dudley Housing Allocations in the Black Country Plan (BCP Policy HOU1)									
BCP Site Ref	Previous local plan allocation (replaced unless stated)	Site name and address	Appropriate uses	Indicative development capacity (net new homes)	Gross Site Area (ha)	Site area (ha) net	Brownfield/ greenfield	Anticipated delivery timescale	Further information
DUH208	Not previously allocated	Land south of Holbeache Lane / Wolverhampton, Kingswinford	housing	330 (40 DPH)	14.8	8.24	greenfield	2030 - 2035 155 homes 2035 – 2039 175 homes	Site removed from green belt. See Policy CSA1 for further details.
DUH211	Not previously allocated	Land at Swindon Road, Wall Heath, Kingswinford (The Triangle Site)	housing	530 (40 DPH)	26	13.30	greenfield	2030 - 2035 280 homes 2035 - 2039 253 homes	Site removed from green belt. See Policy CSA1 for further details.
DUH218	Not previously allocated	Lower Guys Lane, Lower Gornal	housing	25 (35 DPH)	1.0	0.75	greenfield	2030 - 2035 25 homes	Site removed from green belt. See Policy

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									CSA1 for further details.
DUH203	Not previously allocated	Ketley Quarry / Ketley Farm, Dudley Road, Kingswinford	housing	600 (40/45dph)	20.81	13.52	brownfield	2024 – 2029 50 homes 2030 - 2035 250 homes 2035- 2039 300 homes 12 homes – density uplift	See Strategic Allocation Policy xx
DUH206	Not previously allocated	Worcester Lane North, Stourbridge	housing	10 (35 DPH)	0.61	0.61	greenfield	2024 - 2029 10 homes	Site removed from green belt. See Policy CSA1 for further details. SLINC mitigation required.

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									Hedgerow to be protected. Railway to be considered.
DUH207	Not previously allocated	Worcester Lane Central, Stourbridge	housing	45 (35 DPH)	2.29	1.37	greenfield	2024 - 2029 45 homes	Site removed from green belt. See Policy CSA1 for further details. SLINC mitigation required. Hedgerow to be protected. Railway to be considered.

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DUH209	Not previously allocated	Worcester Lane South, Stourbridge	housing	60 (35 DPH)	3.30	3.00	greenfield	2030-35 60 homes	Site removed from green belt. See Policy CSA1 for further details. SLINC mitigation required.
DUH217	Not previously allocated	Grazing Land Wollaston Farm, Wollaston, Stourbridge	housing	90 (35 DPH)	3.77	2.56	greenfield	2024-2029 20 homes 2030-35 70 homes	Site removed from green belt. See Policy CSA1 for further details. Access constraints to be considered.
DUH210	Not previously allocated	Viewfield Crescent, Dudley	housing	24 (30DPH)	1.56	0.83	greenfield	2024-2029 24 homes	Site removed from green belt. See Policy CSA1 for further details.



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									Rights of Way-Along southern Boundary  SLINC mitigation required. Steep incline on site.
DUH222	Not previously allocated	Corbyns Hall Open Space	Housing	15 (15DPH)	1.01	1.01	Greenfield		Access constraints on site
DUH223	DBDS E11B.6	Brockmoor Foundry North	housing	60 (40DPH)	1.9	1.7	brownfield	2035-2039 60 homes	Noise constraints from adjacent industrial works.
DUH220	Not previously allocated	VB Old Wharf	Housing	36 (35DPH)	1.40	1.05	Brownfield		Industrial area

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DUH001	DBDS H11B.1	Cookley Works, Leys Road, Brockmoor, Brierley Hill	housing	70 (45DPH)	2.16	1.62	brownfield	2030 – 2035 70 homes	Access constraints on site.
DUH002	DBDS H11B.16	Land at Old Wharf Road, Stourbridge	housing	230 (55 DPH)	7.02	4.20	brownfield	2024-2029 80 homes 2030 – 2035 100 homes 2035-2039 50 homes	Majority of the site is cleared with main businesses relocated. Net area to allow for supporting infrastructure and open space requirements.
DUH219	DBDS NETH.E1	Marriott Road, Netherton	housing	105 (40 DPH)	3.50	2.6	brownfield	2030-35 88 homes	SLINC mitigation required. Area of high historic townscape

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								2035-2039 17 homes	value and archaeological priority area.
DUH003	DBDS H13.26	West of Engine Lane, north of the railway, Lye	housing	168 (40 DPH)	6.00	4.25	brownfield	2030- 2035 90 homes 2035-2039 78 homes	Sustainable location close to Lye train station – likely to come forward as part of the Lye regeneration project. Net area allows for open space.
DUH004	DBDS H13.29	Long Lane / Malt Mill Lane, Shell Corner	housing	13 (35 DPH)	0.36	0.36	brownfield	2024 – 2029 13 homes	Site adjoins an existing housing commitment.

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DUH005	DBDS H13.4	Belmont Road, Lye	housing	12 (35 DPH)	0.33	0.33	brownfield	2024- 2029 12 homes	Back – land site to the rear of properties
DUH006	DBDS H13.5	Caledonia Sewage Works, Lye	housing	140 dwellings (35 DPH)	6.24	3.97	brownfield	2024- 2029 100 homes 2030-2035 40 homes 18 homes – density uplift	Net area reduced to allow for flood risk areas and SLINC mitigation required.
DUH007	DBDS H13.28	Clinic Drive, Lye	mixed use	10 (15 DPH)	0.91	0.68	brownfield	2024-2029 10 homes	Mixed use site for community uses or supermarket provision with peripheral housing.

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DUH008	DBDS H13.10	116-120 Colley Gate, Cradley	housing	14 (60 DPH)	0.25	0.25	brownfield	2024 – 2029 14 homes	Within Cradley / Windmill Hill Local Centre
DUH009	DBDS H11B.7	Land off Delph Lane, Brierley Hill	housing	45 (35 DPH)	1.28	1.28	brownfield	2030 - 2035 45 homes	Vacant site in a residential area
DUH010	DBDS HO.10	Land off Ruiton Street / Colwall Road, Lower Gornal	housing	19 (40 DPH)	0.46	0.46	brownfield	2024-2029 19 homes	Vacant land allocated in a residential area
DUH058	DBDS NETH.H8	St Peter's Road, Netherton	housing	55 (50 DPH)	1.2	0.89	brownfield	2024-2029 55 homes	Industrial area adjacent to the canal.

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DUH012	DBDS HO.12	Summit Place, Gornal Wood	housing	15 (35 DPH)	0.43	0.43	greenfield	2024-2029 15 homes	Land adjacent to PH in a residential area
DUH013	DBDS H16.11	Land adj. to 49 Highfields Road, Coseley	housing	13 (35 DPH)	0.40	0.40	brownfield	2024-2029 13 homes	Vacant land adjacent to residential premises.
DUH014	DBDS H13.21	Springfield Works, Pearson Street, Lye	housing	10 (40 DPH)	0.35	0.25	brownfield	2024-2029 10 homes	Locally listed building means conversion is preferable. Indicative yield provided - based on 40 DPH (edge of centre).
DUH015	DBDS H11B.24	Land at Plant Street, Mill Street and	housing	43 (45 DPH)	1.29	0.97	brownfield	2024-2029 43 homes	Industrial area with fragmented ownership. Site area

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		Bridge Street, Wordsley							and capacity has been reduced in line with owners' intentions. The site adjoins the canal conservation area and has historic buildings.
DUH016	DBDS H11B.18	Leys Road / Moor Street, Brierley Hill	housing	78 (40 DPH)	2.77	1.95	brownfield	2035 – 2039 78 homes	Industrial premises including a former garage site.
DUH017	DBDS H11B.22	Quantum Works, Enville Street, Stourbridge	housing	14 (40 DPH)	0.36	0.36	brownfield	2024-2029 14 homes	Narrow and restrictive site resulting in access constraints.

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DUH018	DBDS H13.14	East of Balds Lane, Lye	housing	68 (35 DPH)	2.6	1.95	brownfield	2030 – 2035 68 homes	Underused industrial site. Current planning application on the site shows a willing landowner for redevelopment.
DUH019	DBDS H13.23	Rufford Road, Stourbridge	housing	16 (40 DPH)	0.41	0.41	brownfield	2024-2029 16 homes	Capacity and site area reduced in line with owner's intentions.
DUH020	DBDS H13.12	Lyde Green / Cradley Road, Cradley	housing	27 (40 DPH)	0.69	0.69	brownfield	2024-2029 27 homes	Capacity and site area reduced in line with owners' intentions and to allow for a buffer adjacent to the canal,



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									in line with planning policy.
DUH021	DBDS NETH.H13	Land at corner of Saltwells Road and Halesowen Road, Netherton	housing	49 (35 DPH)	1.40	1.40	brownfield	2024-2029 49 homes	Industrial area adjacent to the canal. Land levels likely to reduce capacity.
DUH022	DBDS H13.17	Land off Thorns Road, Lye (North)	housing	105 (40 DPH)	3.42	2.61	brownfield	2024-2029 60 homes 2030-35 45 homes	Site area and capacity reduced in line with landowner consultation exercise.

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DUH023	DBDS H13.16	Land off Engine Lane, (south of railway), Lye	housing	68 (40 DPH)	1.70	1.70	brownfield	2035 – 2039 68 homes	Sustainable location close to Lye Station. Other uses may be considered acceptable if there is a proven need for flexibility, subject to the proposed use being appropriate and non-conflicting with residential uses.
DUH024	DBDS H13.27	East of Engine Lane (south of the railway), Lye	housing	35 (35 DPH)	1.25	0.93	brownfield	2030 – 2035 35 homes	Sustainable location close to Lye Station. Other uses may be considered acceptable if there is a proven

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									need for flexibility, subject to the proposed use being appropriate and non-conflicting with residential uses.
DUH025	DBDS H13.15	Bott Lane / Dudley Road, Lye	housing	43 (35 DPH)	1.25	1.25	brownfield	2035- 2039 43 homes	Sustainable location close to Lye Station. Other uses may be considered acceptable if there is a proven need for flexibility, subject to the proposed use being appropriate and non-

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									conflicting with residential uses.
DUH027	DBDS H11A.21	280 Stourbridge Road (former Henry Boot training centre), Holly Hall, Dudley	housing	22 (80 DPH)	0.28	0.28	brownfield	2024 – 2029 22 homes	Adjacent site has outline planning permission for residential development.
DUH028	DBDS H11B.27	Land opposite Spicer Lodge, Enville Street, Stourbridge	housing	10 (40 DPH)	0.25	0.25	brownfield	2024 – 2029 10 homes	Yield based on an apartment scheme.
DUH029	DBDS H13.31	St Marks House, Brook Street, Lye	housing	12 (40 DPH)	0.29	0.29	brownfield	2024 – 2029 12 homes	Yield based on an apartment scheme.

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DUH030	DBDS H11A.23	Shaw Road / New Road, Dudley	housing	16 (55 DPH)	0.39	0.29	brownfield	2024 - 2029 16 homes	Sustainable location. Original site boundary reduced following landowner engagement. Site is a difficult shape which will reduce capacity.
DUH031	DBDS NETH.H15	The Straits, Lower Gornal	housing	23 (35 DPH)	0.64	0.64	greenfield	2030 - 2035 23 homes	Green space on borough boundary.
DUH032	DBDS H11A.22	The Woodlands, Dixons Green Road	housing	22 (55 DPH)	0.40	0.40	brownfield	2024-2029 22 homes	Site of demolished care home.

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DUH034	DBDS NETH.E1	Industrial land at Marriott Road and Cradley Road	housing	88 (35 DPH)	3.34	2.5	brownfield	2030—2035 88 homes	Industrial area within local employment area.
DUH035	DBDS E13.6	Hays Lane, Stour Vale Road, Lye	housing	58 (50DPH)	1.45	1.09	brownfield	2035 – 2039 58 homes	AHHTV area and heritage asset on site for conversion potential. Any proposed development will need to meet requirement of Policies DEL2 / EMP4 and has potential contamination on site.

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DUH036	DBDS E13.2	Leona Industrial Estate, Nimmings Road, Blackheath	housing	21 (40 DPH)	0.53	0.53	brownfield	2030-2035 21 homes	Subject to DEL 2 / EMP 4.
DUH044	DBDS H13.12	Land adj. rear 84-86 Lyde Green, Halesowen	housing	17 (35 DPH)	0.50	0.50	brownfield	2030 – 2035 17 homes	Mixed use scheme to allow for ground floor retail units.
DUH045	DBDS H13.13	Former factory site, Park Lane, Cradley	housing	80 (40 DPH)	3.6	2.00	brownfield	2024 - 2029 80 homes	Subject to a planning application currently being assessed – residential development.

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DUH046	DBDS H14.4	Former MEB Headquarters, Mucklow Hill Halesowen	housing	60 (40 DPH)	1.50	1.50	brownfield	2030-2035 60 homes	Mixed use development opportunity.
DUH049	DBDS H16.2	Former Mons Hill Campus (Dudley College), Wrens Hill Road, Dudley	housing	30 (50 DPH)	0.81	0.60	brownfield	2024-2029 30 homes	Site is being progressed through pre-application discussions - adjacent residential development.
DUH053	DBDS ES13.3	Timmis Road, Lye	housing	17 (40 DPH)	0.6	0.45	brownfield	2024-2029 17 homes	Planning application on site.



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DUH051	DBDS E11B.5	Northmoor Estate, Brierley Hill	housing	22 (50 DPH)	0.53	0.4	brownfield	2024-2029 22 homes	
DUH057	DBDS H16.9	Land adjacent to Pear Tree Lane, Coseley	housing	38 (50 DPH)	0.99	0.74	greenfield	2024-2029 38 homes	
DUH060	DBDS H13.22	Foredraft Street, Cradley (two sites, A and B)	housing	18 (35 DPH)	0.53	0.53	brownfield	2024-2029 18 homes	Site is subject to a live planning application.
DUH059	DBDS H14.3	Former New Hawne Colliery, Hayseech Road, Halesowen	housing	15 (30 DPH)	0.63	0.63	brownfield	2024-2029 15 homes	Grade II and Grade II* listed buildings on site, therefore sympathetic conversion is required, and any proposals need to be

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									sympathetic to the setting of the designated heritage assets and to the AHHLV and APA
DUH033	DBDS H11B.26	Former Hospital Site, Ridge Hill, Brierley Hill Road, Wordsley	housing	103	3.5	3.5	brownfield	2024-2029 103 homes	Reserved matters approved for 103 units (P19/1777)
DUH061	DBDS H10.4	Former Ibstock Works Brick Ltd. Stallings Lane, Kingswindford	housing	148 (40 DPH)	7.58	4.5	brownfield	2024-2029 148 homes	Outline planning permission P16/1461 P20/0631 – reserved matters for 148 units, currently being assessed.

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DUH011	DBDS H0.17	Bourne Street, Coseley	housing	79 (30DPH)	2.8	2.57	brownfield	2024-2029 79 homes	Former refuse tip. Will require remediation. Outline permission for up to 100 homes (P17/0184). Current application for 79 homes (P20/1306)
DUH026	DBDS H11A.19	Land at Bull Street, Dudley	housing	80 (40DPH)	2.06	2.06	brownfield	2024-2029 80 homes	Reserved matters for 80 units approved in October 2020 (P20/0647).
DUH063	SAAP S9	Bradley Road West, Stourbridge	housing	80 (45 DPH)	0.25	0.25	brownfield	2024-2029 80 homes	Housing site in the Stourbridge AAP

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DUH062	DBDS H16.1	Land at Birmingham New Road, Coseley	housing	472	13.4		brownfield	2024-2029 472 homes	Reserved matters for 472 units (P19/0611). Site area reduced from previous allocation. Part of the site re-allocated to employment use.
DUH066	Not previously allocated	Sandvik Ltd, Manor Way, Halesowen	housing	60 (40 DPH)	1.5	1.5	brownfield	2024-2029 60 homes	Mixed use development opportunity.
DUH205	Not previously allocated	National Works, Hall Street, Dudley	housing	150 (55 DPH)	5.0	2.9	brownfield	2035-2039 150 homes	The site occupies an elevated location with respect to surrounding land uses to the north, east and south. The

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									<p>layout / density design will need to prevent overlooking. Tree retention is a possibility in the south east section of the site adjacent to Bean Road.</p> <p>The whole site is within an Area of High Historic Townscape Value - Kates Hill and Dixons Green Road; mixed historic housing and industry</p>

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DUH050	Not previously allocated	Car park, Oak Court, Dudley	housing	24	0.37	0.37	brownfield	2024-2029 24 homes	
DUH039	Not previously allocated	Land rear of Salcombe Grove, Coseley	housing	44	1.1	0.80	greenfield	2024-2029 44 homes	
DUH054	Not previously allocated	Garage site adjacent Hinbrook Road, Dudley	housing	14	0.29	0.29	brownfield	2024-2029 14 homes	Garage site in centre of residential estate.
DUH052	Not previously allocated	Land rear of 294 - 364 Stourbridge Road, Halesowen	housing	39 (40 DPH)	1.34	1.0	brownfield	2024-2029 39 homes	Narrow access and substantial tree coverage on site.

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DUH055	Not previously allocated	Land at Anchor Hill, Delph Road, Brierley Hill	housing	28 (40 DPH)	0.88	0.66	brownfield	2024-2029 28 homes	Site is being progressed through pre-application discussions.
DUH056	Not previously allocated	Land at Corporation Road and Cavell Road, Dudley	housing	20 (50 DPH)	0.42	0.42	brownfield	2024-2029 20 homes	Site is being progressed through pre-application discussions.
DUH038	Not previously allocated	Land between Heath Road and Copse Road, Netherton	housing	27 (40 DPH)	0.76	0.57	brownfield	2024 – 2029 27 homes	Open space

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DUH040	Not previously allocated	High Street, Wollaston, Stourbridge	housing	14 (45 DPH)	0.40	0.30	brownfield	2024-2029 14 homes	Non-conforming use adjacent to the river.
DUH041	Not previously allocated	Land rear of Two Gates Lane, Cradley	housing	24 (45 DPH)	0.68	0.51	greenfield	2024-2029 24 homes	
DUH042	Not previously allocated	Woodman Inn, 31 Leys Road, Brockmoor	housing	12 (40 DPH)	0.26	0.26	brownfield	2024-2029 24 homes	Former public house with residential to the south and Cookley Wharf industrial estate to the north.
DUH047	Not previously allocated	Land adjacent 32 Whitegates Road, Coseley	housing	10 (40 DPH)	0.25	0.25	brownfield	2024-2029 10 homes	Site is being progressed through



Table 14 - Dudley Housing Allocations in the Black Country Plan (BCP Policy HOU1)									
BCP Site Ref	Previous local plan allocation (replaced unless stated)	Site name and address	Appropriate uses	Indicative development capacity (net new homes)	Gross Site Area (ha)	Site area (ha) net	Brownfield/ greenfield	Anticipated delivery timescale	Further information
									pre-application discussions.
DUH037	Not previously allocated	206 Thorns Road, Quarry Bank	housing	26 (50 DPH)	0.55	0.47	brownfield	2024 – 2029 26 homes	Potential access constraints.
DUH048	Not previously allocated	Hampshire House, 434 High Street, Kingswinford	housing	30 (70 DPH)	0.44	0.44	brownfield	2024-2029 30 homes	Office building and associated parking, close to Kingswinford local centre.
DUH212	Not previously allocated	Lewis Rd, Lye	housing	38 (45 DPH)	4.14	1.4	greenfield	2024-29 38 homes	Tree mitigation works. Mitigation for loss of public open space. Land remediation works following landfill and mining works.

Table 14 - Dudley Housing Allocations in the Black Country Plan (BCP Policy HOU1)									
BCP Site Ref	Previous local plan allocation (replaced unless stated)	Site name and address	Appropriate uses	Indicative development capacity (net new homes)	Gross Site Area (ha)	Site area (ha) net	Brownfield/ greenfield	Anticipated delivery timescale	Further information
DUH204	Not previously allocated	Wellington Road and Dock Lane, Dudley	housing	74 (45 DPH)	2.2	1.65	brownfield	2030- 2035 74 homes 14 homes – density uplift	Edge of centre location, net area reduced to allow for supporting infrastructure and open space requirements.
DUH213	Not previously allocated	Lapwood Avenue, Kingswinford	housing	45 (40 DPH)	1.38	1.38	greenfield	2030 - 2035 45 homes	
DUH214	Not previously allocated	Seymour Road, Wollescote	housing	4 (40DPH)	0.19	0.15	greenfield	2024-2029 4 homes	Site has steep topography.
DUH215	Not previously allocated	Bent Street,	housing	7 (40 DPH)	0.15	0.15	greenfield	2024-2029	

Table 14 - Dudley Housing Allocations in the Black Country Plan (BCP Policy HOU1)									
BCP Site Ref	Previous local plan allocation (replaced unless stated)	Site name and address	Appropriate uses	Indicative development capacity (net new homes)	Gross Site Area (ha)	Site area (ha) net	Brownfield/ greenfield	Anticipated delivery timescale	Further information
		Brierley Hill						7 homes	
DUH216	Not previously allocated	Bryce Road, Pensnett	housing	115 (40 DPH)	4.0	3.0	greenfield	2024- 2029 55 homes 2030 – 2035 70 homes	Residential bounding all sides of the site. Former primary school now demolished to the north east. Allow for 25% open space and infrastructure.
DUH221	Not previously allocated	Standhills Road, Kingswinford South	housing	52 (35DPH)	3.93	1.57	brownfield	2035 – 2039 52 homes	To be included in Masterplan of Ketley Quarry (inc site access). Protected trees and SLINC mitigation required.

Table 14 - Dudley Housing Allocations in the Black Country Plan (BCP Policy HOU1)									
BCP Site Ref	Previous local plan allocation (replaced unless stated)	Site name and address	Appropriate uses	Indicative development capacity (net new homes)	Gross Site Area (ha)	Site area (ha) net	Brownfield/ greenfield	Anticipated delivery timescale	Further information
DUH042	Not previously allocated	Land at Blowers Green Road, Dudley	housing	63 (45 DPH)	1.88	1.41	brownfield	2024 – 2029 63 homes 12 homes – density uplift	Housing redevelopment would remove non-conforming use.
DUH004	H13.29	Long Lane / Malt Mill	housing	13 (35 DPH)	0.36	0.36	brownfield		
DUH043	Not previously allocated	Woodman Inn	housing	12 (46 DPH)	0.26	0.26	brownfield		
DUH065		Church Road	housing	29	0.88	0.66	brownfield		Housing renewal site
DUH064		Baptist End Road	housing	49	1.45	1.09	brownfield		Housing renewal site

Table 15 - Dudley Gypsy and Traveller Pitch Carried Forward Allocations in Black Country Plan (BCP Policy HOU1 / HOU4)									
BCP Site Ref	Previous local plan allocation (replaced unless stated)	Site name and address	Appropriate uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
DUGT01	DBDS – L5	Delph Lane, Brierley Hill	Gypsy and Traveller Pitches	4 pitches	0.12	0.12	N/A	Existing allocation	Established in 1965 and allocated in local plan in 2016. Potential further capacity for an additional two pitches
DUGT02	DBDS – L5	Holbeache Lane, Wall Heath	Gypsy and Traveller Pitches	4 pitches	0.24	0.24	N/A	Existing allocation	Established since 1960 without formal planning permission. Site allocated in Dudley Borough Development Strategy to regularise the site

Table 15 - Dudley Gypsy and Traveller Pitch Carried Forward Allocations in Black Country Plan (BCP Policy HOU1 / HOU4)									
BCP Site Ref	Previous local plan allocation (replaced unless stated)	Site name and address	Appropriate uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
									in planning policy. Potential further capacity for an additional 4 pitches
DUGT03	DBDS – L5	Dudley Road, Lye	Gypsy and Traveller Pitches	6 pitches	0.3	0.3	N/A	Existing allocation	Established in 1953 and allocated in local plan in 2016
DUGT04	DBDS – L5	Smithy Lane, Pensnett	Gypsy and Traveller Pitches	15 pitches	0.45	0.45	N/A	Existing allocation	Established in 1984 allocated in local plan in 2016
DUGT05	DBDS – L5	Oak Lane, Pensnett	Gypsy and Traveller Pitches	22 pitches	1.1	1.1	N/A	Existing allocation	Allocated in Local Plan since 1993. Site established in 1974

Table 15 - Dudley Gypsy and Traveller Pitch Carried Forward Allocations in Black Country Plan (BCP Policy HOU1 / HOU4)									
BCP Site Ref	Previous local plan allocation (replaced unless stated)	Site name and address	Appropriate uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
DUGT10	Not previously allocated	Saltbrook Scrapyard, Salbrook Road, Halesowen	Gypsy and Traveller Pitches	2 pitches	2.92	2.19	N/A	Existing	Site secured planning permission in 2019 and was implemented in 2020. Site allocated in BCP

**Table 16 - Dudley Employment Allocations in Black Country Plan (BCP Policy EMP1)**

<b>BCP Site Ref</b>	<b>Previous local plan allocation (replaced unless stated) or other source</b>	<b>Site name and address</b>	<b>Appropriate uses</b>	<b>Indicative development capacity (employment land floorspace sqm)</b>	<b>Gross site area (ha)</b>	<b>Anticipated delivery timescale</b>	<b>Further information</b>
DUE323	DBDS E16.2	Fountain Lane / Budden Road, Coseley	Mixed Employment Uses B2/B8/E(g)	5,000	1.79	Post 2026	Land adjoining existing industrial unit within Local Employment Area.
DUE326	DBDS E10.2	Gibbons Industrial Park / United Steels, Pensnett	Mixed Employment Uses B2/B8/E(g)	4,500	0.74	2021-26	Vacant land adjoining steelworks within Local Employment Area.
DUE123	DBDS ES10.1	Dandy Bank Road Phases 2 and 3, Pensnett	Mixed Employment Uses B2/B8/E(g)	5,869	4.27	2021-26	Within DY5 EZ  Extension to Pensnett Trading Estate Strategic Employment Area, granted planning permission for three



Table 16 - Dudley Employment Allocations in Black Country Plan (BCP Policy EMP1)							
BCP Site Ref	Previous local plan allocation (replaced unless stated) or other source	Site name and address	Appropriate uses	Indicative development capacity (employment land floorspace sqm)	Gross site area (ha)	Anticipated delivery timescale	Further information
							industrial units in 2020 (P19/1532).
DUE327	DBDS ES10.1/E10.1	Tansey Green Road, Pensnett	Mixed Employment Uses B2/B8/E(g)	7,000	2.33	2021-26	Within DY5 EZ  Land around existing brickworks - possible former surface working of clay and marl and tipping of waste material.
DUE320	DBDS E10.1	Dreadnought Road, Pensnett	Mixed Employment Uses B2/B8/E(g)	3,716	0.99	2021-26	Within DY5 EZ  Part of area around existing brickworks Planning permission granted for industrial unit (mixed

Table 16 - Dudley Employment Allocations in Black Country Plan (BCP Policy EMP1)							
BCP Site Ref	Previous local plan allocation (replaced unless stated) or other source	Site name and address	Appropriate uses	Indicative development capacity (employment land floorspace sqm)	Gross site area (ha)	Anticipated delivery timescale	Further information
							employment uses) in 2019 (P19/0942)
DUE132	DBDS ES11A.3	Hulbert Drive, Blackbrook Valley	Mixed Employment Uses B2/B8/E(g)	8,440	2.04	2021-26	Within DY5 EZ Planning applications for industrial employment uses recently submitted (P20/1527 and P20/1565)
DUE136	DBDS ES11A.4	Narrowboat Way, Blackbrook Valley	Mixed Employment Uses B2/B8/E(g)	5,000	1.48	Post 2026	Within DY5 EZ Adverse ground conditions are required to be remediated

Table 16 - Dudley Employment Allocations in Black Country Plan (BCP Policy EMP1)							
BCP Site Ref	Previous local plan allocation (replaced unless stated) or other source	Site name and address	Appropriate uses	Indicative development capacity (employment land floorspace sqm)	Gross site area (ha)	Anticipated delivery timescale	Further information
DUE137	DBDS ES11A.7	Brewins Way, Blackbrook Valley	Mixed Employment Uses B2/B8/E(g)	1,850	0.75	2021-26	Within DY5 EZ. Planning Permission granted for the erection of an industrial unit to house a metal recycling operation (P19/1426).
DUE147	DBDS NETH.ES9	Cradley Road, Westminster Industrial Estate, Netherton	Mixed Employment Uses B2/B8/E(g)	1,600	0.48	2021-26	Existing industrial units on 2/3 sides.
DUE149	DBDS ES11B.2	Moor Street, Brierley Hill	Mixed Employment Uses B2/B8/E(g)	9,000	2.17	Post 2026	Land alongside and including redundant freight line (former depot).

Table 16 - Dudley Employment Allocations in Black Country Plan (BCP Policy EMP1)							
BCP Site Ref	Previous local plan allocation (replaced unless stated) or other source	Site name and address	Appropriate uses	Indicative development capacity (employment land floorspace sqm)	Gross site area (ha)	Anticipated delivery timescale	Further information
DUE187	DBDS ES14.3	Steelpark Road, Halesowen	Mixed Employment Uses B2/B8/E(g)	2,700	0.40	2021-26	Existing industrial units on 4 sides.
DUE198	DBDS ES13.1	Cakemore Road, Blackheath	Mixed Employment Uses B2/B8/E(g)	5,234	1.18	2021-26	Reserved Matters approved for mixed industrial use - P20/0348
DUE322	DBDS E11A.1	Grazebrook Park, Blackbrook Valley,	Mixed Employment Uses B2/B8/E(g)	1,704	0.47	2021-26	Within DY5 EZ Recent planning application for industrial employment uses submitted – P20/1528

Table 16 - Dudley Employment Allocations in Black Country Plan (BCP Policy EMP1)							
BCP Site Ref	Previous local plan allocation (replaced unless stated) or other source	Site name and address	Appropriate uses	Indicative development capacity (employment land floorspace sqm)	Gross site area (ha)	Anticipated delivery timescale	Further information
DUE321	DBDS H16.1	Bean Road, Coseley	Mixed Employment Uses B2/B8/E(g)	4,000	2.16	Post 2026	Adverse ground conditions to be remediated. Whole site previously allocated for housing. Site area now amended to include employment land allocation on part of site.
DUE135	DBDS ES11A.8	New Road, Netherton	Mixed Employment Uses B2/B8/E(g)	2,800	0.75	2021-26	Within DY5 EZ and adjacent to existing industrial units

## Waste Allocations

### Strategic Waste Management Sites

A44 The existing strategic sites identified on the Waste Key Diagram are the significant waste management facilities operating in the Black Country. They have been identified through a detailed analysis of all known licenced and exempt facilities in each authority area. Under Policy W2 (Waste Sites), the BCA will safeguard all existing strategic and other waste management facilities from inappropriate development, in order to maintain existing levels of waste management capacity and meet Strategic Priority 13, “*To manage waste as a resource and minimise the amount produced and sent to landfill*”.

A45 The strategic waste management sites within Dudley Borough are listed in Table 17:

<b>Table 17 - Strategic Waste Management Sites in Dudley (BCP Policy W2)</b>			
<b>BCP Site Ref/location</b>	<b>Previous Local Plan Ref (2011 Black Country Core Strategy, BCCS)</b>	<b>Site Name and Address</b>	<b>Operational capacity (tonnes per annum, tpa)</b>
			<b>Total Landfill Capacity (tonnes) (end of 2018)</b>
<b>Municipal Waste Recovery Installations</b>			
WS01	WSD6	Dudley Energy from Waste (EfW) facility, Lister Road Depot, Lister Road, Dudley	95,000
<b>Municipal Waste Recovery – supporting infrastructure</b>			
WS04	WSD11 (see DBDS page 20)	Blowers Green Recycling Depot, Blowers Green Road, Dudley	40,000
WS05	n/a	Lister Road Transfer Station, Lister Road Depot, Lister Road, Dudley	23,500

<b>Table 17 - Strategic Waste Management Sites in Dudley (BCP Policy W2)</b>			
<b>BCP Site Ref/location</b>	<b>Previous Local Plan Ref (2011 Black Country Core Strategy, BCCS)</b>	<b>Site Name and Address</b>	<b>Operational capacity (tonnes per annum, tpa)</b>
			<b>Total Landfill Capacity (tonnes) (end of 2018)</b>
WS06	WSD10	Stourbridge Household Waste Recycling Centre (HWRC) off Birmingham Street (A458), Stourbridge	20,000
<b>Waste Disposal Installations</b>			
WS16	WSD5	Himley Quarry Landfill, Oak Lane, Kingswinford	150,000 / 432,000
<b>Significant Metal Recycling Sites (MRS)</b>			
WS21	WSD9	Shakespeare's MRS, Oak Lane, Kingswinford	40,000
WS22	WSD1	Sims MRS Halesowen, James Scott Road, Cradley, Halesowen (formerly E Coley Steel)	35,000
WS23	n/a	Wades of Wednesbury, Webb Street, Coseley	20,000
<b>Other Significant Waste Management Infrastructure</b>			
WS34	n/a	AB Waste Management and Skip Hire (formerly Bloomfield Recycling)	45,000
WS35	n/a	Green World Recycling, Hayes Trading Estate, Folkes Road, Lye	50,000

## Preferred Areas for New Waste Facilities

- A46 A number of employment areas have been identified in the Black Country Waste Study (BCWS) as being most suited to the development of new waste recovery, waste treatment and waste transfer infrastructure.
- A47 Under Policy W3 (Preferred Areas for New Waste Facilities), these areas are considered least likely to give rise to land use conflicts, and in several cases, there is already co-location of existing waste facilities to which new sites would contribute.
- A48 There is only one such area in Dudley Borough, and this is identified on the Waste Key Diagram and listed in Table 18:

**Table 18 - Preferred areas for new waste facilities in Dudley (BCP Policy W3)**

Area Ref	Previous Local Plan Ref (2017 Dudley Borough Development Strategy, DBDS)	Address	Area (hectares)
WPD1	E16.2 (local employment area)	Bloomfield Road / Budden Road, Coseley (note that parts of this area extend into Sandwell Borough)	28.1

## Minerals Allocations

- A49 The Black Country Minerals Study (BCMS, Tables 12.10 and 12.9) lists all known existing mineral sites and mineral infrastructure sites in the Black Country. Existing mineral sites within the Black Country include permitted mineral extraction sites, stockpiles, brick and tile works, and a pot clay factory. Existing Black Country mineral infrastructure sites include secondary / recycled aggregates production, rail-linked aggregates depots, coating plants, ready-mix (RMX) concrete batching plants, manufacture of concrete products, and dry silo mortar (DSM) plants.
- A50 Under Policy MIN2 (Minerals Safeguarding Areas, MSAs), the BCA will safeguard all existing mineral sites and mineral infrastructure sites from inappropriate development – this being necessary in order to retain existing capacity, and thereby helping to make best use of and conserve the Black Country’s finite mineral resources and meet Strategic Priority 14, to manage the Black Country’s mineral resources (Objective - Meeting our resource and infrastructure needs).



A51 The locations of these Black Country mineral sites and mineral infrastructure sites are identified on the Minerals Key Diagram; those sites located within Dudley Borough are listed in the following tables:

**Table 19 - Mineral Sites in Dudley**

BCP Site Ref	Previous Local Plan Ref	Site Name	Location	Use
MSD1	n/a	Dreadnought Brickworks	Dreadnought Road, Pensnett	Operational brickworks

**Table 20 - Mineral infrastructure sites in Dudley (BCP Policy MIN2)**

Site Ref	Previous Local Plan Ref	Site Name	Location	Type
MID1	n/a	Accumix Concrete	Ham Lane, Kingswinford	Concrete Batching Plant
MID2	n/a	Bell Recycling Centre	Oak Lane, Kingswinford	Aggregates Recycling
MID3	n/a	Breedon Dudley (Brierley Hill) Concrete Plant	Off Delph Road, Brierley Hill	Concrete Batching Plant
MID4	n/a	Dudleymix Concrete	Peartree Lane, Netherton	Concrete Batching Plant
MID5	n/a	Oak Lane Aggregates Recycling Site	Oak Lane, Kingswinford	Aggregates Recycling
MID6	n/a	SW Jackson Aggregates	Off Oak Lane, Kingswinford	Concrete Batching Plant

Site Ref	Previous Local Plan Ref	Site Name	Location	Type
MID7	n/a	Regen R8 Limited	Timmis Road, Lye	Aggregates Recycling

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## Policies for Strategic Allocations

### Policy DSA1 Land South of Holbeach Lane /Wolverhampton Road, Kingswinford



- A52 The Land South of Holbeache Lane / Wolverhampton Road Strategic Allocation falls within the Kingswinford Neighbourhood Growth Area and covers BCP Allocation DUH208. It is proposed that the site be removed from the green belt and be allocated to deliver approximately 330 homes at an average net density of 40 dph.
- A53 The estimated phasing of delivery is:
- 2030 - 2035 155 homes
  - 2035 – 2039 175 homes
- A54 There will be a requirement for the development of the site to deliver homes and infrastructure of the highest quality design and functionality, and to accommodate the required infrastructure provision to fully mitigate for the release of this site from the green belt and to deliver maximum benefits to the local environment and community. The key planning requirements for the Holbeache Lane / Wolverhampton Road Strategic Allocation are set out below. Other standard policy requirements, as set out in the BCP and Dudley Local Plan documents and SPDs, will also apply. A masterplan will be prepared to guide the development of the Strategic Allocation. This will provide further detail on the requirements set out in this policy and will provide a spatial framework for development.
- A55 The site is in one ownership and is situated in close proximity to strategic sites and Policy DSA2: Land at Swindon Road, Wall Heath, Kingswinford Strategic Allocation and Policy DSA3: Ketley Quarry Strategic Allocation. The cumulative impact of the sites (and other housing / employment allocations) on local infrastructure provision will need to be considered, in terms of:
- school place impacts;
  - highways impacts;
  - delivery of green belt loss mitigation;
  - delivery of biodiversity net gain;
  - delivery of recreational open space improvement.
- A56 Once the BCP has been adopted, allocations should be developed in accordance with the criteria identified in respect of each site and all general policy requirements, including any necessary developer contributions.

### **School Place Requirements**

- A57 It is currently anticipated that both primary and secondary school place requirements arising from housing developments in the north west of Dudley over the Plan period will be capable of being met through extensions to existing primary and secondary schools. Pedestrian and public

transport improvements to increase accessibility to local primary and secondary schools may be required in accordance with Policy HOU2.

### **Highways Requirements**

- A58 It is essential that a cycling and walking network which includes active travel routes around key sites should form a key part of the site layout providing connections to all nearby local amenities, including local primary schools and local centres. These connections should include pedestrian crossing improvements at the A449 to enable safe crossing of the highway. Details will need to be set out in the master plan.
- A59 It is considered that a vehicular access point could be gained from the existing roundabout (A449 / A491) to the west of the site, subject to junction capacity analysis and wider transport modelling. A potential second access to Oak Lane via an improved Ham Lane could be provided. Highway and junction improvements would be required to Wall Heath and Kingswinford centres, as well as Stalling Lane and A449/ Himley Road. Details will be set out in the masterplan.

### **Green Belt Loss Mitigation Requirements**

- A60 Measures to provide sufficient mitigation for the loss of green belt cannot be confirmed yet; rather this will be set out in the pre-submission document.
- A61 There will be a requirement for all green belt loss mitigation works and any necessary transfer of land ownership to be completed before the substantial completion of development.
- A62 The green belt boundary has been redrawn around the development site. In most cases there is an existing landscaped buffer or road that provides a defensible new green belt boundary. It is recommended that a buffer of landscaped open space is provided along the northern portion of the site, in order to ensure development is appropriately screened from the historically sensitive Holbeache Lane and Holbeache House. Developments should be designed to minimise potential harm to the integrity of remaining green belt areas and to landscape character, as identified in the Black Country Green Belt Study and Black Country Landscape Sensitivity Assessment.

### **Nature Conservation and Net Biodiversity Gain Requirements**

- A63 All existing SINC, SLINC, tree preservation orders, hedgerows, woodland and significant trees both within and adjoining the development sites should be retained, protected and incorporated sympathetically into the design of development. Sufficient buffer areas should be provided at the edge of these habitat areas, particularly mature trees and hedgerows, to allow them to thrive following development (see ENV4).

- A64 It is anticipated that net biodiversity gain requirements for the developments will be met through delivery of the green belt loss mitigation requirements, subject to the minimum 10% requirement identified in the Environment Bill / Act and the requirements of Policy ENV3.

### **Historic Environment Requirements**

- A65 Located adjacent to this allocation, on its northern boundary, is the Grade II\* listed Holbeache House and its curtilage (List Entry Number 1228293). The impact of any proposals on the setting and significance of this designated heritage asset will be a material planning consideration for development. Also, in close proximity to this allocation, on its northern and north-eastern boundary, is the Oak Farm Wedge Area of High Historic Landscape Value (AHHLV 38), a non-designated heritage asset.
- A66 Applicants will therefore be required to support their proposals with a Statement of Heritage Significance (prepared in accordance with Historic England's latest guidance) illustrating that proposals have been formulated with a full appreciation of the requirements of Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and with the policies relating to designated and non-designated heritage assets laid out in the NPPF and local plan.
- A67 The design of the development should not impact on the existing character and appearance of Holbeache Lane, which provides a significant contribution to the setting and significance of Holbeache House and is also one of the positive features that contributes to the Oak Farm Wedge AHHLV.

### **Recreational Open Space Requirements**

- A68 The incorporation of high-quality landscaping across the development should be a significant forethought of the design process. A well landscaped green buffer is required to the north of the site, which should also provide a neighbourhood area for play. In effect this should well separate development completely from the historically sensitive elements to the north.
- A69 Further to this, there should be some offsetting of development to the south of the site where existing dwelling houses are located, and well-used informal pedestrian routes exist. It is understood that a high-pressure gas pipeline runs across the middle of the site, which may require some offsetting of development if it were to be retained.

### **Sustainable Drainage Requirements**

- A70 Naturalised sustainable drainage systems that are sufficient to retain greenfield runoff rates should be provided for the site, in accordance with Policy CC6. An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the master plan is prepared.

### Local Wastewater Treatment Capacity

- A71 This site is served by Roundhill WwTW and it is not anticipated that there are any issues with the site handling additional flow during the Plan period.

### Design principles

- A72 The development of the site will form a new community and neighbourhood on green belt land; all proposals must have distinguishable merit in their design and form. Only high-quality design that is bespoke, unique and specific to the site will be acceptable, in line with the requirements of Policies CSP4 and ENV9 among others. The incorporation of high-quality landscaping across the development should be a significant part of the initial design process. A well-landscaped green buffer is required to the north of the site, which should also provide a neighbourhood area for play. It should also be a continuous green thread, which links in with other treed areas and hedgerows in and around the site to provide a meaningful wildlife corridor. All mature trees and hedgerows should be maintained as this will be vital to mitigate some of the visual impact of developing this green belt site.
- A73 Development should sit behind the existing tree-lined boundary along the A449 and should be outward looking making use of continuous perimeter roads to aid connectivity and permeability. The site as a whole should be highly permeable, avoiding the use of private drives and cul-de-sacs that limit on-foot and cycle connectivity. The layout of development should consider as a priority the amenity of existing residents to the south of the site, specifically those with dwellings that back onto it. Where possible the site layout should also seek to maintain and maximise key views across the development (predominantly south-east to north-west). Although there are no key commutable desire lines across the site, at current it is well-used for leisure by residents. This reinforces the need for a well-connected and permeable site layout as well as for an enhanced element of open space to make up for the loss of the site as whole.
- A74 Due to the sensitive historic location of the site and existing green belt setting, it is considered that apartments would not be acceptable here.

### Nature Conservation and Net Biodiversity Gain Requirements

- A75 The site is currently a large arable field surrounded by species-rich hedgerows – designated as SLINC, with rich ground flora. The site is adjacent to a woodland SLINC and has connectivity to the wider open countryside to the north of the site via arable fields and hedgerows. Mature hedgerows form the boundary of the arable area and the grassland areas of the site. These will need to be retained as part of the development as they support a wide variety of flora, support breeding birds and create a nesting and foraging habitat for many species. They include large stretches of intact, stock-proof hedge, and stretches of defunct, non-stock proof, hedge with

gaps. The hedgerow adjacent to the Wolverhampton Road (A491) has several large, mature trees within it, including Norway maple and aspen. These will need to be retained as part of the development.

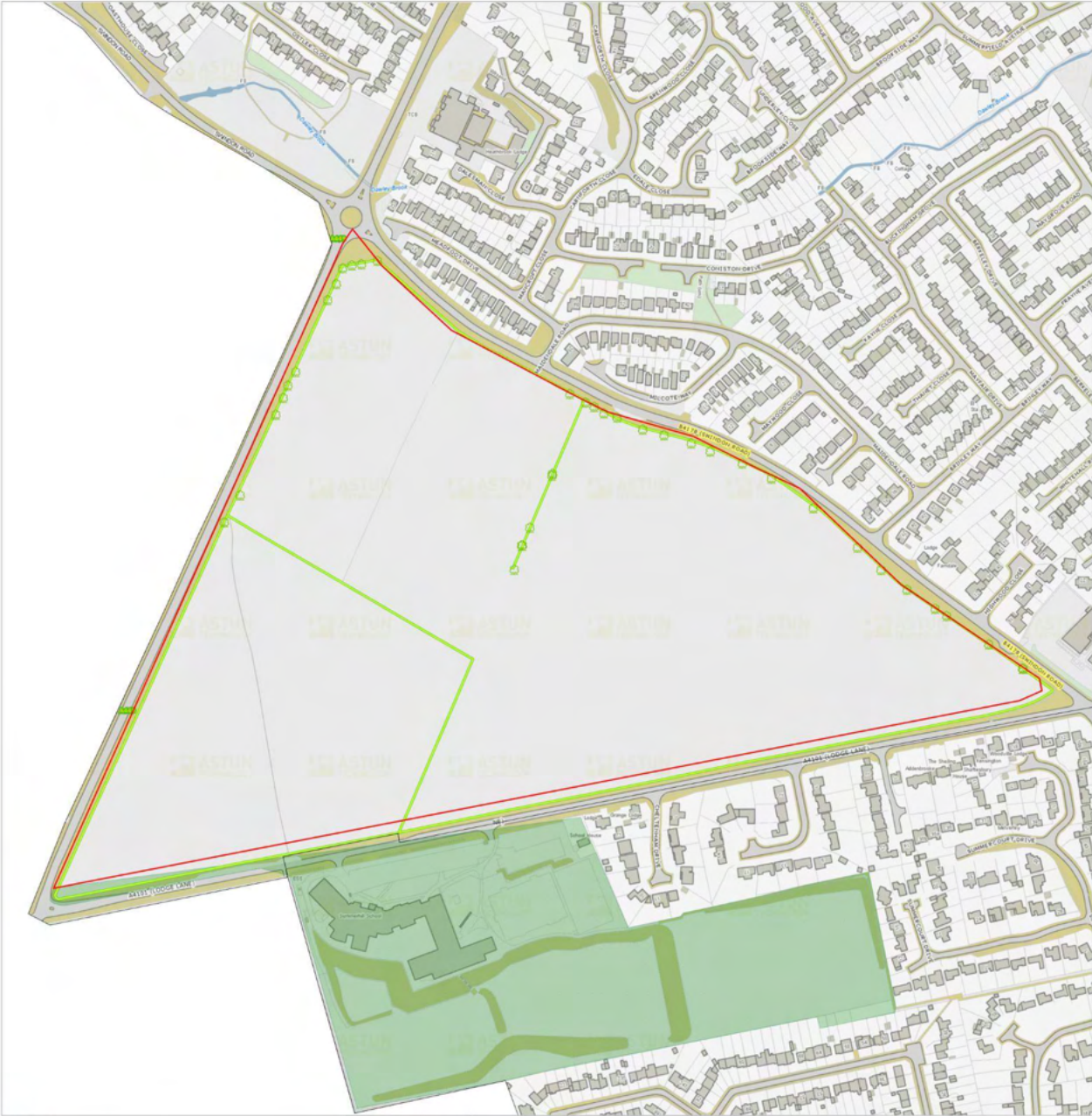
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**Policy DSA2– Land at Swindon Road, Wall Heath, Kingswinford (The Triangle site) Strategic Allocation**

**Black Country Plan**  
 Planning for the future of the Black Country

**STRATEGIC ALLOCATION**



**Key:**

- Strategic Allocation
- Conservation Area
- ▲ Listed Buildings
- Individual Tree Preservation Order (TPO)
- Grouped TPO
- Sites of Importance for Nature Conservation (SINC)
- Sites of Local Importance for Nature Conservation (SLINC)
- Greenway
- Green Belt

<b>Strategic Allocation:</b>	DSA.2
<b>Site Assessment Reference:</b>	SA-0025-DUD
<b>Site Names:</b>	The Triangle
<b>Local Authority:</b>	Dudley
<b>Ward:</b>	Kingswinford North and Wall Heath



A76 Land at Swindon Road, Wall Heath, Kingswinford will be allocated for new residential growth and will form part of the Kingswinford Neighbourhood Growth Area; it includes BCP Allocation DUH211. It is proposed that the site be removed from the green belt and be allocated to deliver approximately 530 homes at an average net density of 40 dph.

A77 The estimated phasing of delivery is:

- 2030 - 2035 280 homes
- 2035- 2039 250 homes

A78 There will be a requirement for the development of the site to deliver homes and infrastructure of the highest quality design and functionality, and to accommodate the required infrastructure provision to fully mitigate for the release of this site from the green belt and to deliver maximum benefits to the local environment and community. There will be a requirement for the development of the site to be of the highest quality and accommodate the correct infrastructure provision in the right places. The key planning requirements for the Swindon Road, Wall Heath Strategic Allocation are set out below. Other standard policy requirements, as set out in the BCP and Dudley Local Plan documents and SPDs, will also apply. A master plan will be prepared to guide the development of the strategic allocation. This will provide further detail on the requirements set out in this Policy and will provide a spatial framework for development.

A79 The site is in one ownership and is situated near strategic sites: Policy DSA1: South of Holbeache Lane / Wolverhampton Road Strategic Allocation and Policy DSA3: Ketley Quarry Strategic Allocation. The cumulative impact of these sites (and other housing / employment allocations) on local infrastructure provision will need to be considered, in terms of:

- school place impacts;
- highways impacts;
- delivery of green belt loss mitigation;
- delivery of biodiversity net gain;
- delivery of recreational open space improvement.

A80 Once the BCP has been adopted, allocations should be developed in accordance with the criteria identified in respect of each site and all general policy requirements, including any necessary developer contributions.

### **School Place Requirements**

A81 It is currently anticipated that both primary and secondary school place requirements arising from housing developments in the north west of Dudley over the Plan period will be capable of being

met through extensions to existing primary and secondary schools. Pedestrian and public transport improvements to increase accessibility to local primary and secondary schools may be required in accordance with Policy HOU2.

- A82 Should it be determined that some form of primary school provision is required as the BCP progresses towards adoption, this may need to be accommodated on the site and land will need to be allocated to accommodate a two-form entry primary school (approximately 2.4ha).

### **Highways Requirements**

- A83 Highway infrastructure is necessary in order for any development to function effectively and to minimise impacts on surrounding road junctions. It is considered that there should be three points of vehicular access, including from Swindon Road to the north and Lodge Lane to the south. The number of access points required, and their precise location should be subject to further detailed transport assessment. Connections should be made through the site, so that pedestrians and vehicles can travel from Swindon Road, through to the A449 or Lodge Lane as they choose. A cycling and walking network which includes active travel routes around key sites should form a key part of the site layout providing connections to all nearby local amenities, including local primary schools and local centres. Details will need to be set out in the master plan.

### **Green Belt Loss Mitigation Requirements**

- A84 Measures to provide sufficient mitigation for the loss of green belt cannot be confirmed yet; rather this will be set out in the pre-submission document.
- A85 There will be a requirement for all green belt loss mitigation works and any necessary transfer of land ownership to be completed before substantial completion of development. Being a green belt site, the retention and provision of high-quality landscaping should be a significant first stage in the design process. Aside from the aforementioned considerations regarding open space, mature trees along the periphery and within the site should be retained, as well as hedgerows within the site where possible.
- A86 The green belt boundary has been redrawn around the development site. In most cases there is an existing landscaped buffer or road that provides a defensible new green belt boundary. A significant level of well-landscaped open space should be retained, providing a landscaped open space buffer along the western side of the site where the impact on views is highest and there are clear constraints to development (notably the north-westernmost and south-westernmost fields, due to their topography and the potential impact of development on visual amenity in this location). Development will be concentrated in the easternmost portion of the site, where impacts on views and the surrounding area would be lowest. It is likely that higher densities could be accommodated here than in locations to the west. Developments should be designed to minimise

potential harm to the integrity of remaining green belt areas and landscape character, as identified in the Black Country Green Belt Study and Black Country Landscape Sensitivity Assessment.

### **Nature Conservation and Net Biodiversity Gain Requirements**

- A87 The site sits on the fringe of the urban area, with links to wider greenspace and open countryside. The site is surrounded by hedgerows that are of high ecological value due to the species that they support. Both the internal and boundary hedgerows contain mature trees, which should be retained as part of the site's features. These current hedgerow lines are growing along pre-existing / old boundaries. The site as a whole assists in the movement and migration of species as well as providing important feeding areas for local and migratory wildlife populations. There is potential for bat roosting sites in the mature hedgerow trees. Bat and bird boxes could be installed on some of the mature trees to provide nesting and roosting opportunities. A mixed semi-natural woodland occurs in the form of a small wooded copse, situated in the west of the site. Opportunities for enhancement and planting around this part of the site should be explored in line with Policy ENV4 - Trees, Woodland and Hedgerows. A management plan for the long-term maintenance of the woodland would also be required.
- A88 It is anticipated that net biodiversity gain requirements for the developments will be met through delivery of the green belt loss mitigation requirements set out above.
- A89 Policy ENV3 - will apply to this site.

### **Historic Environment Requirements**

- A90 Located adjacent to this strategic allocation, on its south-eastern edge is the Grade II listed Summerhill Hotel (List Entry Number 1228678). The impact of any development proposals on the setting and significance of this designated heritage asset will be a material planning consideration. Applicants will therefore be required to support their proposals with a *Statement of Heritage Significance* (prepared in accordance with Historic England's latest guidance) illustrating that proposals have been formulated with a full appreciation of the requirements of Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and with the policies relating to designated heritage assets laid out in the NPPF and local plan.
- A91 Within this allocation there is one site recorded on the Council's Historic Environment Record (HER), HER record 12113, which relates to a medieval book fitting. In view of this and in view of the fact that the allocation still retains the majority of its original field boundaries (as marked on the first edition OS) applicants will be required to support their proposals with a historic environment desk-based assessment, undertaken in accordance with guidance provided by the Chartered Institute for Archaeologists (CIfA).

### **Recreational Open Space Requirements**

A92 Subject to satisfactory delivery of mitigation for the loss of green belt, it is considered that the local area will have good access to existing recreational open space, allotment, play and sports facilities that have the capacity to meet the varied needs of new residents, in line with adopted open space standards. Therefore, no new on-site open space will be required, beyond that necessary to protect existing nature conservation value and provide sufficient natural, sustainable drainage systems. However, it will be necessary to provide quality walking and cycle routes within the developments that provide easy, quick and safe access to nearby open spaces and the countryside.

### **Sustainable Drainage Requirements**

A93 Naturalised sustainable drainage systems that are sufficient to retain greenfield runoff rates should be provided for the site, in accordance with Policy CC6. An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the master plan is prepared.

### **Local Wastewater Treatment Capacity**

A94 This site is served by Roundhill WwTW and it is not anticipated that there are any issues with the site handling additional flow during the Plan period.

### **Design principles**

A95 Due to the tree-lined periphery of the site and its topography, it is considered that development would be best located at the edge of the site, fronting directly onto Swindon Road and Lodge Lane. The chosen layout must be highly permeable and well connected, prioritising pedestrian and cycle users, maximising the feeling of enclosure and responding to human scales. Proposals should avoid the use of private drives and cul-de-sacs, as these hinder good on-foot / cycle connectivity. As such it is likely that proposals brought forward will differ to much of the existing morphology (cul-de-sac) in the surrounding area. As the site will create a new community / neighbourhood on green belt land, proposals must have distinguishable merit in their design and form. Only high-quality design that is bespoke, unique and specific to the site will be acceptable.

A96 Existing desire lines are well-used by local residents for leisure and walking to / from Summerhill School in the south. These should be retained and routes for school commuters diverted as little as possible.

Policy DSA3 - Land at Ketley Quarry, Kingswinford



**Key:**

- Strategic Allocation
- Conservation Area
- ▲ Listed Buildings
- Individual Tree Preservation Order (TPO)
- Grouped TPO
- Sites of Importance for Nature Conservation (SINC)
- Sites of Local Importance for Nature Conservation (SLINC)
- Greenway
- Green Belt

Strategic Allocation:	DSA.3
Site Assessment Reference:	SA-0004-DUD
Site Names:	Ketley Quarry, Dudley Road, Kingswinford
Local Authority:	Dudley
Ward:	Kingswinford South



- A97 Land at Ketley Quarry, Kingswinford will be allocated for new residential growth and will form part of the North West Regeneration Core Area covering BCP Allocations DUH203 and DUH221. The site's gross area is 20.81ha of which 13.52 ha of the site is developable for 600 dwellings based on 40 - 45dph.
- A98 The estimated phasing of delivery is:
- 2024 – 2029 50 homes
  - 2030 - 2035 250 homes
  - 2035 - 2039 300 homes
- A99 There will be a requirement for the development of the site to deliver homes and infrastructure of the highest quality design and functionality, and to accommodate the required infrastructure provision in appropriate locations. The key planning requirements for the Ketley Quarry Strategic Allocation are set out below. Other standard policy requirements, as set out in the BCP and Dudley Local Plan documents and SPDs, will also apply. A master plan will be prepared to guide the development of the strategic allocation. This will provide further detail on the requirements set out in this Policy and will provide a spatial framework for development.
- A100 The Quarry and adjacent sites are in separate ownership and are situated in close proximity to strategic sites identified in Policy DSA1: South of Holbeache Lane / Wolverhampton Road and Policy DSA2: land at Swindon Road, Wall Heath. The cumulative impact of these sites (and other housing / employment allocations) on local infrastructure provision will need to be considered, in terms of:
- school place impacts;
  - highways impacts;
  - delivery of biodiversity net gain;
  - delivery of recreational open space improvements
- A101 Once the BCP has been adopted, allocations should be developed in accordance with the criteria identified in respect of each site and all other relevant general policy requirements, including any necessary developer contributions.

### **School Place Requirements**

- A102 It is currently anticipated that both primary and secondary school place requirements arising from housing developments in the north west of Dudley over the Plan period will be capable of being met through extensions to existing primary and secondary schools. Pedestrian and public

transport improvements to increase accessibility to local primary and secondary schools may be required in accordance with Policy HOU2.

- A103 Should it be determined that some form of primary school provision is required as the BCP progresses towards adoption, this may need to be accommodated on the site and land will need to be allocated to accommodate a two-form entry primary school (approximately 2.4ha).

### **Highways Requirements**

- A104 Highway infrastructure is necessary in order for any development to function effectively and to minimise impacts on surrounding road junctions. It is considered that there should be vehicular access, of Dudley Road with a possible secondary access of Ketley Road, by Ketley Farm. The number of access points required, and their precise location should be subject to further detailed transport assessment. A cycling and walking network which includes active travel routes around key sites should form a key part of the site layout providing connections to all nearby local amenities, including local primary schools and local centres. Details will need to be set out in the master plan.

### **Nature Conservation and Net Biodiversity Gain Requirements**

- A105 There is a statutory designation for features of geological significance (SSSI) at the north of the site and two non-statutory geological designations (SINC) within the site. The SSSI designation is a geological outcrop of the Etruria Formation, created during the Carboniferous Period (359 - 299 million years ago). The wider site is designated as a SLINC. The vast majority of the site is a disused quarry and is made up of bare ground and large mounds of quarry spoil. Parts of the quarry have become vegetated with early successional species and tall ruderal vegetation. The disused Tansy Green branch railway line runs to the east of the site, providing a further link to Fens Pools Nature Reserve to the south. Dawley Brook to the east of the site is designated as a SINC. The site also contains three distinct areas of woodland, with the belt to the east and southwest of the site acting as a boundary feature.
- A106 Bat and bird surveys, including for barn owls, will need to be carried out in the abandoned farmhouse and surrounding buildings. Other surveys such as reptile and badger surveys may also be required.
- A107 Policy ENV3 - Biodiversity Net Gain will apply to this site.

### **Historic Environment Requirements**

- A108 This allocation is the site of the former Ketley Colliery (HER 7963) recorded as being mostly abandoned by the production of the first edition OS in 1884. It also contains the site of Ketley



Quarry (also recorded on the first edition OS), which is one of the 'Geo-sites' located within the Black Country Geopark, (see Policy ENV6)<sup>108</sup>.

- A109 Located in the north-west corner of this allocation, adjacent to the road, is the site of a weighbridge and its associated Weights and Measures building (HER15424). The buildings first appeared on the Fourth Edition OS (1937-1948). Any proposed development should seek to incorporate these heritage assets into any future proposals for this part of the site along with suitable interpretation information.
- A110 Located in the southern part of the allocation is the site of Stourbridge Extension Canal (HER 7385), built during the 1830s and opened in 1840. Proposals for the site should seek to include within it sympathetic ways of revealing the significance of this heritage asset.

### **Recreational Open Space Requirements**

- A111 It will be necessary to provide good-quality walking and cycle routes within the developments, which can provide easy, quick and safe access to nearby open spaces and the countryside.

### **Sustainable Drainage Requirements**

- A112 Naturalised sustainable drainage systems that are sufficient to retain greenfield runoff rates should be provided for the site, in accordance with Policy CC6. An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the master plan is prepared.

### **Local Wastewater Treatment Capacity**

- A113 This site is served by Roundhill WwTW and it is not anticipated that there are any issues with the site handling additional flow during the Plan period.

### **Design principles**

- A114 New development will have a density of no more than 40 - 45dph and will also retain a network of public open space across the site. Any proposed development should create a permeable layout by connecting the surrounding vehicle roads and pedestrian routes with a network of public open space and tree-lined streets. Layouts should incorporate 'back to back garden' housing and avoid the rear or sides of gardens facing the streets and public realm. Existing trees and on-site biodiversity value (according to the outcome of robust surveys) must be safeguarded and incorporated into the proposed layouts. These assets should form part of the publicly accessible open space and should not be located within any private plots, except in exceptional

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<sup>108</sup> For more information, please see <https://blackcountrygeopark.dudley.gov.uk/sites-to-see/ketley-quarry/>

circumstance. Corner plots should be designed to address both aspects e.g. consider and propose a dual building frontage to minimise blank / dead frontages. All public open space should be overlooked by housing.

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## Local Green Space Designations

A115 Local Green Space designation is a way to provide special protection for green areas of particular importance to local communities. The Council has designated an area of green space for special protection, as outlined in the policy table below. The Local Green Space has been put forward by the local community, with a strong evidence base, due to its local importance. The area has been identified on the Dudley Proposals Map.

### Policy DSA4 Corbett Meadow Local Green Space



- A116 The area shown on the Proposals Map is allocated as Corbett Meadow Local Green Space. In line with national policy the site will be protected from inappropriate development, unless there are very special circumstances that outweigh the harm to the site.
- A117 The views of the local community will also need to be taken into account when considering any development proposals on the site.
- A118 Designation of land as Local Green Space is set out in the NPPF, allowing communities to identify and protect green areas of particular importance to them. It has been demonstrated that Corbett Meadow meets the criteria set out in Paragraph 100 of the NPPF (2019). The site of the meadow was purchased by local philanthropist John Corbett in 1892 to provide a hospital and the gardens and public grounds were to be used for the purposes of a public park. The site supports a variety of wildlife and is made up of flower-rich lowland meadow pasture, many wooded areas of veteran age and natural ponds.

### Nature Conservation Alterations and Designations

- A119 Dudley Council will safeguard and enhance designated nature conservation sites, habitats and features through the development process and in accordance with the Black Country Plan, in particular Policy ENV1 and the Dudley Borough Development Strategy Policy S21.
- A120 A number of designations or amendments have been made to Nature Conservation sites which have been adopted by the Council. Details of the sites are shown in Appendix A4. In addition, site and designation boundaries can be viewed on the online Policies Map for Dudley.

## B. Sandwell

### Introduction

- B.1 Sandwell is a metropolitan borough in the Black Country, made up of six towns: Oldbury, Rowley Regis, Smethwick, Tipton, Wednesbury and West Bromwich. With 327,378 residents, Sandwell has the third largest population in the West Midlands Combined Authority area and is the 34th largest local authority in Great Britain. The borough's population is predicted to grow faster than both that of the West Midlands and the national average.
- B.2 Sandwell has many growing and productive businesses and a higher than average proportion of its businesses are small, but residents are not always able to take up opportunities related to those employment and economic activities. Local businesses will often need a highly skilled workforce to be able to grow to meet modern demands; that workforce needs training and support to help deliver and accelerate innovation. Sandwell also has a limited amount of the type of high quality land needed to enable businesses to expand and grow in the borough's industrial core.
- B.3 Creating a clean, attractive and safe living environment in Sandwell is a key priority, as is developing a robust response to climate change in an area with a complex industrial heritage and its associated legacy of land, water and air pollution
- B.4 Although Sandwell has many challenges, it also has a significant number of opportunities. The BCP and Sandwell's own Inclusive Economy Deal will be focusing on the challenges for people, place and business and the opportunities that are available to make a difference.
- B.5 The aim is to deliver a healthier, more successful future for the people of Sandwell – working closely together with residents, businesses and other stakeholders.

### The Strategy

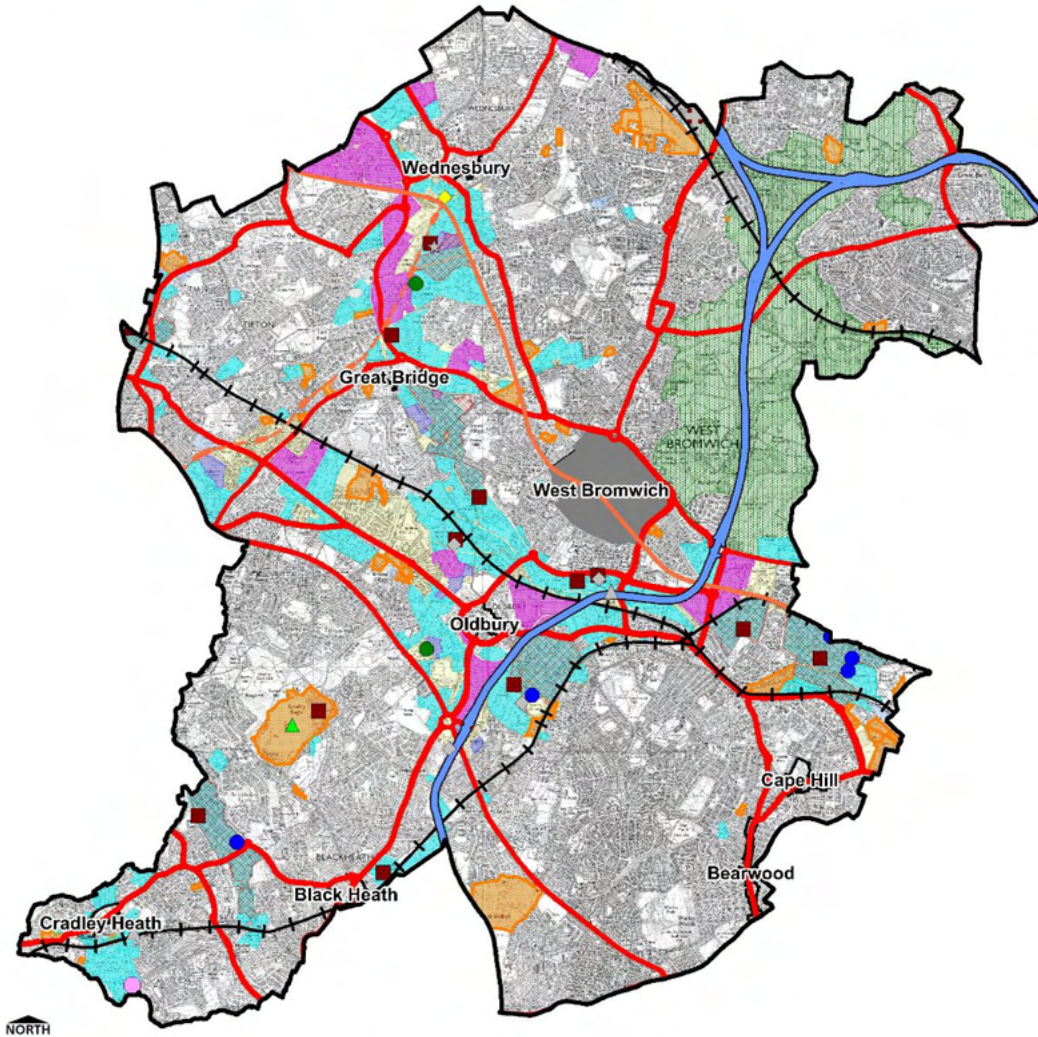
- B.6 The 2030 Vision for Sandwell is:

*'It's where we call home and where we're proud to belong - where we choose to bring up our families, where we feel safe and cared for, enjoying good health, rewarding work, feeling connected and valued in our neighbourhoods and communities, confident in the future, and benefiting fully from a revitalised West Midlands'.*

- B.7 The BCP forms an essential part of this strategy, supporting the re-energising, diversification and re-purposing of the borough, supporting the recovery and growth of our economy, and providing for a continuous supply of new homes to meet the needs of our communities.
- B.8 The BCP will ensure that the borough's network of open spaces will be protected and enhanced to support its natural assets, and continue to provide opportunities to improve health and well-being whilst ensuring at the same time, that development is located where it can provide convenient access for all sections of the community to work, shopping, health, education, leisure, green space and other facilities.
- B.9 This Plan supports the delivery of 9,158 new homes and 126,000 jobs to 2039, supporting the growth of the borough's population and a workforce of 108,000. To plan for this growth, the Council is prioritising locations that are both sustainable and deliverable in line with the Spatial Strategy set out in Policy CSP1.

Figure 17 - Sandwell Spatial Plan

Black Country | **Plan**  
 Planning for the future of the Black Country



### Sandwell Spatial Strategy

**Key**

- |  |   |   |
|--|---|---|
| Housing Allocations (HOU1)                           | Waste Disposal Installations                      | Motorway  |
| Gypsy and Traveller Pitch Allocations (HOU4)         | Other Significant Waste Management Infrastructure | Key Route Network (TRAN1)                           |
| Employment Development Site (EMP1)                   | Hazardous Waste Treatment Infrastructure          | Rail Network (TRAN4)                                |
| Strategic Employment Areas (EMP2)                    | Preferred areas for new Waste Facilities (W3)     | Birmingham to Wolverhampton Metro Line (TRAN4)      |
| Local Employment Areas (EMP3)                        | <b>Mineral Infrastructure (MIN2)</b>              |   |
| Other Employment Areas (EMP4)                        | Rail Linked Aggregates Depot                      | Wednesbury to Brierley Hill Metro Extension (TRAN4) |
| Core Regeneration Areas (CSP2)                       | Aggregates Recycling Facilities                   | Green Belt (G1)                                     |
| Tier 1 Strategic Centres (CEN2)                      | Concrete Batching Plant                           |   |
| Town Centres (CEN2)                                  | Coating Plant                                     |   |
| <b>Waste Infrastructure (W2)</b>                     |   |   |
| Municipal Waste Recovery – Supporting Infrastructure | Concrete Products                                 |   |
| Metal Recycling Sites (MRSs)                         | Brickworks  |   |

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Table 21 - Sandwell Growth targets (net) 2020 - 2039

Location	Housing	Employment Land allocations (ha)
<b>The Growth Network</b>		
Strategic Centre	201 200 (Uplift to be tested) = 401	0
Sandwell Central Core Regeneration Area	2,032	28
<b>Towns and Neighbourhood Areas</b>		
Neighbourhood Growth Areas	N/A	N/A
Other Sites in Towns and Neighbourhood Areas	4,997	0
Small Windfall Housing Sites	1,728	N/A
<b>Total</b>	<b>9,158</b>	<b>28</b>

### West Bromwich Strategic Centre

B.10 West Bromwich Strategic Centre, as designated on the Policies Map and shown on Figure 17 is the third largest centre in the Black Country and It is the focus for a wide range of civic, retail, cultural and leisure functions. The centre is organised around a strong linear high street form. The High Street runs north-west to south-east with a focus on high street retail activity along the pedestrianised Princess Parade / Duchess Parade section, which is enclosed by the West Bromwich Ringway. It is a highly accessible location by a range of public transport options including rail, metro and bus services.

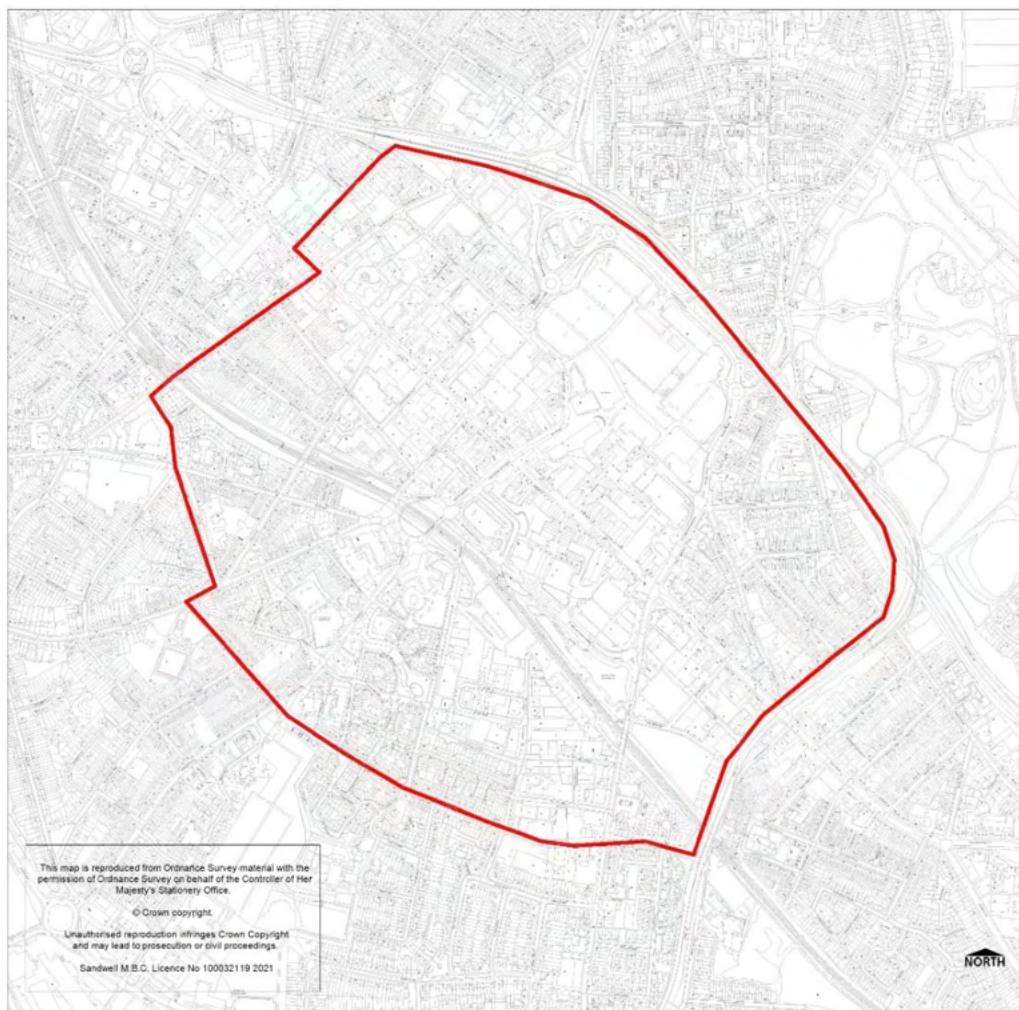
B.11 This Plan supports the diversification, repurposing and rejuvenation of the Strategic Centre, being a focus for a well-balanced mix of commercial, business and service uses. Changing shopping patterns and challenges to the high street will be addressed through increased flexibility and facilitating the consolidation of the shopping core (particularly to reduce vacancy rates), complemented by surrounding



office and leisure-led mixed uses, and supported by maximising residential provision in all locations (including the use of upper floors).

- B.12 The future of the centre, as with most Strategic Centres across the Black Country, is dependent on ensuring less reliance on retail to generate footfall and to generate alternative uses (potentially mixed uses) that function both during the day and into the evening.

**Figure 18 - West Bromwich Strategic Centre**



- B.13 The Strategic Centre benefits from an existing Area Action Plan (AAP) which was adopted in 2011. The AAP will be reviewed following the adoption of the BCP. Until the AAP review is completed, all AAP policies remain relevant for proposals within the BCP boundary of West Bromwich Strategic Centre.

- B.14 Therefore, for the purposes of applying Policies CEN1- CEN6, within West Bromwich Strategic Centre the following AAP policies are relevant in defining in-centre boundaries:
- Retail – Primary Shopping Area (AAP Policies)
  - Conservation Area - AAP boundary (and AAP Policy) WBP8
- B.15 The housing capacity for West Bromwich Strategic Centre set out in Table 21 is based on existing permissions and AAP allocations, but also includes an estimated uplift based on more recent evidence, including the Black Country Centres study and emerging development proposals, as detailed in the Black Country Urban Capacity Review Update 2021. This housing capacity figure will be further tested, in detail, through the AAP review, but provides a sound basis to understand the housing capacity of the City Centre for the purposes of this Plan.

### **West Bromwich Masterplan and Interim Planning Statement (IPS)**

- B.16 Until the review of the AAP and to aid regeneration of the centre and stimulate a Covid -19 recovery, a masterplan and Interim Planning Statement has been commissioned with a final report due mid-summer 2021. It is hoped that the masterplan will act as a catalyst for on-going and new regeneration schemes for West Bromwich – unlocking further investment and opportunities to boost the town’s future economic growth.
- B.17 The masterplan will build on the Towns Investment Plan for West Bromwich, which has already been drawn up by the council in response to the Government’s Towns Fund programme, with the council bidding for £25 million to help reinvigorate the town.
- B.18 The priorities for West Bromwich are to reinvigorate the town centre; unlock land to aid regeneration; support good quality jobs and stimulate Covid-19 recovery by:
- Repurposing vacant premises and sites in the strategic centre to provide community, education, healthcare provision, with additional residential use being a major contributor in attracting investment and promoting vitality of the centre.
  - Seeking office development in sustainable locations within the centre.
  - Creating a Civil and Mechanical Engineering Centre, delivering a range of apprenticeships and training including in groundworks, street works, steel fixing and scaffolding.

- Creating a Digital Den to establish affordable digital services for deprived communities; create pathways to opportunities to education and employment via accredited online training courses; provide careers guidance; and provide children with online educational resources so opportunities for learning are always accessible.
- Regenerating the Town Hall Quarter to establish a fully restored cultural and entertainment offer in the town centre.
- Transforming the town centre further through site assembly and development paving the way for new markets, education facilities and high-quality housing.
- Providing a new green corridor to link the centre to Dartmouth Park and Sandwell Valley.
- Creating cycling and walking routes across the town centre and to Sandwell Valley.

B.19 The Interim Planning Statement will take the land use changes proposed by the masterplan forward to be endorsed by the Council.

B.20 Following adoption of the BCP, the production of a revised Tier 2 Sandwell Plan will follow approximately six months afterwards, to ensure conformity.

B.21 Following adoption of the Sandwell Plan, a formal Area Action Plan (AAP) for West Bromwich Strategic Centre will be produced, incorporating and updating key issues from the masterplan.

### **Sandwell Central Core Growth Area**

B.22 The Sandwell Central Core Regeneration Area covers the main employment areas of the Borough, from Smethwick in the south east to Wednesbury in the north, taking in areas of Oldbury, Tipton and West Bromwich.

B.23 The area provides regeneration and renewal opportunities for new employment and residential development, which will be well-connected by public transport, as well as by the new Metro extension. Through residential allocations within the Growth Area there is capacity for 2,032 new dwellings. The area contains 947 hectares of employment land, which will be safeguarded through the protection and improvement of existing employment areas as set out in Policies EMP1, EMP2 and EMP3.

B.24 The area is well-connected by road and rail, with access to the national motorway network at Junctions 1 and 2 of the M5, and sections of the West Midlands Key

Route Network, linking Sandwell with the rest of the Black Country and the wider West Midlands area. There are three rail lines running through the area; the Stour Valley Line (Birmingham to Wolverhampton), which forms part of the West Coast Main Line; the Birmingham Snow Hill to Worcester line; and the Birmingham to Rugeley line. The area is also well-served by the West Midlands Metro with the existing Birmingham to Wolverhampton line and will benefit from the opening of the Wednesbury to Brierley extension.

- B.25 Further investment in the highway network to support public transport and active travel is planned through the Key Route Network Corridor Investments Plans.

## Delivering the Strategy

- B.26 This strategy will be delivered by:

- An early review of the adopted West Bromwich Area Action Plan (AAP) to refresh detailed site allocations within the Strategic Centre boundary in a comprehensive manner.
- The allocation of sites and implementation of policies in this Plan across the administrative area to accommodate housing and employment development.
- The saving of policies contained in the Sandwell SADDPD and West Bromwich AAP unless specifically replaced by Policies in the Black Country Plan as listed in Appendix B1.

- B.27 Tables 22, 23, 24, 25, 26, 27, 28, and 29 provide details of all development allocations and waste and minerals allocations made through the BCP within Sandwell (outside the West Bromwich Strategic Centre boundary).

- B.28 Several of the allocations replace existing ones identified in adopted local plan documents, which previously formed part of the Sandwell Policies Map. Where this is the case, the previous allocation reference and the Local Plan document concerned are listed. Table 29 and Appendix B1 provides details of other local plan designations in Sandwell that have also been replaced or amended through the BCP. Such changes have only been made where this is necessary to deliver development allocations. All detailed allocation and designation boundaries can be viewed on the online Sandwell Policies Map.

## Other

### Environment and climate change

- B.29 In line with the Council's Climate Change Strategy, a local heat network for West Bromwich is at detailed project development stage. This is part of the strategy towards achieving carbon neutrality for Sandwell Council buildings and operations by 2030 and for the borough as a whole by 2041.
- B.30 Other heat networks are being explored, albeit these are currently at an initial stage. General 'greening' of the centre, via landscaping and other environmental enhancements is proposed, with improved links to Dartmouth Park and Sandwell Valley.
- B.31 As part of the above, the central area will have more meet-and-greet areas to foster non-transactional interactions and drive footfall, thus bolstering a reduced but viable amount of retail and other centre uses.

### **Sandwell Valley**

- B.32 The Council will investigate opportunities for utilising the Sandwell Valley for leisure and tourism through the Cultural Strategy, whilst respecting its green belt status and the other nature conservation allocations it contains.

## Development Allocations

Table 22 - Sandwell Residential Site Allocations (BCP Policy HOU1)									
BCP Site Ref / Location - (Sandwell Central Growth Area (SCGA))	Previous Local Plan Allocation (replaced unless stated)	Site Name and Address	Appropriate Uses	Indicative Development Capacity (net homes)	Gross Site Area (ha) (brownfield /greenfield)	Indicative Net Developable Area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
SAH226	N/A	Land to north of Painswick Close Sub Station	Housing	120	4.3 (G)	To be determined	28		<p>Site removed from the GB. Green Belt mitigation will be required</p> <p>Majority of site is a SLINC (SA006 Land at Yew Tree) mitigation measures will be required</p> <p>See below for more detailed information</p>

**Table 22 - Sandwell Residential Site Allocations (BCP Policy HOU1)**

<b>BCP Site Ref / Location - (Sandwell Central Growth Area (SCGA))</b>	<b>Previous Local Plan Allocation (replaced unless stated)</b>	<b>Site Name and Address</b>	<b>Appropriate Uses</b>	<b>Indicative Development Capacity (net homes)</b>	<b>Gross Site Area (ha) (brownfield /greenfield)</b>	<b>Indicative Net Developable Area (ha)</b>	<b>Net Density (dph)</b>	<b>Anticipated Delivery Timescale</b>	<b>Further Information</b>
<p>The Rushall Canal bounds the site to the east and community open space to the west. The Q3 academy is located to the east of the site over the canal and there are established pedestrian routes to the north of the site and indeed through the middle over the canal via a restricted byway. There is an extensive Electricity Distribution site to the southwest. The greatest asset of this site is its location next to the canal and open space; opportunities to overlook these spaces should be maximised and there is potential to raise the heights of the building in these areas.</p> <p>There are pylons and overhead lines present to the south of the site. The National Grid Design Guide states that '<i>as these guidelines show, where development is proposed on a site crossed by an overhead line there are good operational and amenity reasons - not to do with EMFs (sic. Electro Magnetic Fields) - for not siting built development directly beneath overhead lines</i>'. If this area was left as undeveloped, it would aid in providing mitigation from development for the SLINC on the rest of the site. Not developing this area would also provide a sizeable buffer between the motorway and built form.</p> <p>The current main issue is that there doesn't appear to be a viable access option from an existing adopted highway.</p> <p>All current potential access points cross private driveways to dwellings and hence to open up development opportunities would require the purchase of private properties and demolition to provide access from either Caledonian Close, Delamere Drive and/or Broom Road. For a residential site of this proposed size, two accesses are preferred, for amenity and highways safety issues.</p>									

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<p>If a suitable access could be found then the junction of Greenside Way and Walsall Road would need to be tested for capacity and safety.</p> <p>The area is adjacent to Rushall Canal and hence the need to provide a Flood Risk Assessment and suitable and complimentary sustainable drainage and flood prevention measures must be emphasised. No evidence of existing flooding issues currently exists. The Council would not wish to accept underground attenuation tanks as a solution as this is currently a green field site.</p>									
SAH224	N/A	Land off Tanhouse Avenue, Great Barr	Housing	50	2.49 (G)	1.25	40		<p>Site removed from the GB. GB mitigation will be required.</p> <p>Submitted as a CfS – 40</p> <p>Majority of the site is a SLINC (SA045 – Tanhouse Avenue)</p>



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									<p>so mitigation measures will be required.</p> <p>Small part of the site is a SINC (0.21ha).</p> <p>Part of site is Community Open Space – replacement in wider site which will need to be mitigated</p> <p>See below for more detailed information</p>

**Table 22 - Sandwell Residential Site Allocations (BCP Policy HOU1)**

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The site slopes to the south and rises from east to west, so that the western part of the site is level with the road.

A SINC separates the two sites, which includes an access road to the RSPB reserve running through the middle of it. Houses on either site should face onto this area for reasons of safety and security.

A railway track bounds the site to the south, which separates the site from Sandwell Valley.

There is an access road that serves a social club that bounds the site on the southwest boundary.

A public foul gravity lateral drain runs almost parallel to the railway on the southern boundary. Development here would need to retain a standoff distance from the sewer unless it was diverted.

Within the planning application (DC/17/60630) for flood protection works to the wider area, the Environment Agency were intending to plant trees to the southern boundary of the site as a visual screen. If this has been carried out, it may prevent development on this section; however, there is a sewer / drain in a similar location that requires a standoff from it.

The front of the site has a strong treeline, which should be retained.

Consideration would need to be given in terms of capacity and safety to the junctions of;

Tanhouse Avenue and Hamstead Road; Bowstoke Road and Newton Road; Newton Road and Hamstead Road

**Table 22 - Sandwell Residential Site Allocations (BCP Policy HOU1)**

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<p>Consideration should be given to additional traffic on Tanhouse Avenue and the potential need for additional safety measures, particularly near to Hamstead Junior School and Hamstead Primary School.</p> <p>The current access road to the RSPB Nature centre runs through the middle of the site and needs to be retained.</p> <p>Each parcel of land to either side of the RSPB access road could be served by their own entrance from Tanhouse Avenue, although the distance from other existing junctions would need to meet current Residential Design Guidance Standards.</p> <p>Proposed roads on any new estate must have traffic calming and 20mph zones designed in from the start as an integral part of the overall urban design package, not simply bolted on afterwards.</p> <p>Area is close (adjacent?) to a large River Tame floodplain area, currently subject to new flood defence works and hence the need to provide suitable and complementary sustainable drainage and Flood Prevention measures needs to be emphasised. Liaison with the Environment Agency will be required due to the proximity to the main river.</p> <p>There is evidence of some surface water flooding issues on Tanhouse Road that would need to be considered by Flood Risk Assessment. The Council would not wish to accept underground attenuation tanks as a solution here as currently the area is a greenfield site.</p>									

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SAH225		Charlemont Community Centre	Housing	1	0.05 (B)	To be determined	20		Site removed from the GB. GB mitigation will be required.
									Submitted as a CfS – 263
									Site is surrounded by COS
SAH091	HOC7	Land at Friar Park Road, Wednesbury	Housing	750	26.65 (G) and (B)	Masterplanning will determine the net	28	2024 - 2039	Joint Venture between Sandwell Council and WMCA and have commissioned a

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						development area			<p>Masterplan and remediation strategy for the land. Outline application anticipated to be submitted by end of 2021 with building commencing 2024. Mitigation needed for SLINC (SA004).</p> <p>Community Open Space part of site and will need mitigating.</p>

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									Playing pitches on site and need to be retained or replaced on site
									Capacity is an estimate and will be confirmed following Masterplan work
SAH228		Brandhall Golf Course	Housing	560	37.2 (G)	Masterplanning will determine the net development area	15	2025-2034	Masterplan has been commissioned.
									COS and SLINC (SA097 – Brandhall Golf Course) and

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									Wildlife Corridor on part of site will need to be mitigated.
									Capacity is an estimate and will be confirmed following Masterplan work
SAH081 (SCGA)	H12.8	North Smethwick Canalside	Housing	400	8.77 (B)	8.77	46	2028 - 2036	Actively looking at bringing part of this forward with either WMCA or Towns Fund intervention

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SAH096	H13.3	Forge Lane / Silverthorne Lane	Housing	127	2.82 (B)	2.82	45	2030-2033	Boundary amended to exclude employment area. Land owner has assembled site.
SAH077 (SCGA)	H12.9	Heartlands Furniture, Cranford Street, Smethwick - Phase 2 of Grove Lane MP	Housing	300	2.4 (B)	To be determined by Masterplan work.	125	2028 - 2036	Masterplan due to be completed August 2021. Estimate first phase to commence in 2025, subject to remediation of the land. Capacity will be confirmed



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									following Masterplan work. Rest of the site will follow.
SAH227 (SCGA)		Dudley Road East	Housing	106	2.65 (B)	2.65	40		Employment review and site assessment found site suitable for housing
SAH104 (SCGA)	H12.9	Heath Street Housing Zone Deal - Phase 3 of Grove Lane MP	Housing	30	0.9 (B)	To be determined by Masterplan work.	33	2028-2036	Masterplan due to be completed August 2021. Estimate first phase to commence in 2025, subject to remediation of the

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									land. Capacity will be confirmed following Masterplan work Rest of the site will follow.
SAH102 (SCGA)	H12.9	PJ Commercial - Phase 4 of Grove Land Master Plan	Housing	28	0.8 (B)	To be determined by Masterplan work.	35	2028-2036	Masterplan due to be completed August 2021. Estimate first phase to commence in 2025, subject to remediation of the land. Capacity will be confirmed

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									following Masterplan work. Rest of the site will follow.
SAH085 (SCGA)	H12.9	Grove Lane - Phase 5a of Grove Lane Master Plan	Mixed Use	70	1.85 (B)	To be determined by Masterplan work.	38	2028-2036	Masterplan due to be completed August 2021. Estimate first phase to commence in 2025, subject to remediation of the land. Capacity will be confirmed following Masterplan

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									work Rest of the site will follow.
SAH084	H12.9	Abberley Street, Smethwick - Phase 5b of Grove Lane Masterplan	Mixed Use	200	6.27 (B)	To be determined by Masterplan work.	32	2028-2036	Masterplan due to be completed August 2021. Estimate first phase to commence in 2025, subject to remediation of the land. Capacity will be confirmed following Masterplan work. Rest of the site will follow.

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SAH105 (SCGA)	H12.9	Phase 6 of Grove Lane MP	Mixed Use	40	1.18 (B)	To be determined by Masterplan work.	34	2028-2036	Masterplan due to be completed August 2021. Estimate first phase to commence in 2025, subject to remediation of the land. Rest of the site will follow.
SAH088 (SCGA)	H9.3	Rattlechain Site, Land to the north of Temple Way, Tividale, Oldbury	Housing	322	14.7 (B)	7.24	45	2034-2039	Land owner in discussions to include other land - looking to masterplan the area.

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									SLINC on part of the site (SA037-Johns Lane) mitigation may be required
SAH080	H16.5	Bradleys Lane / High Street	Housing	241	5.6 (B)	5.6	45	2034-2039	Redevelopment with the cooperation of owners looking to relocate.
SAH083 (SCGA)	WBPr36	Swan Lane Former Gas Works	Housing	149	5.4 (B)	4.07	37	2033-2038	Land owner interested in bringing site forward for residential use. Capacity as per

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									application discussions
									May have an impact on SLINC (SA017 – Snowhill to Wolverhampton Railway) and mitigation may be required
SAH087 (SCGA)	H8.1	Land to east of Black Lake, West Bromwich	Housing	110	2.45 (B)	2.45	45	2035-2038	Land owners want to develop for housing
SAH094			Housing	95	2.72 (B)	2.72	35	2036-2039	Land owner advised will continue to

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(SCGA)	Post 2021 Housing Site	Langley Maltings, Western Road, Langly							operate but will look at opportunities to move and redevelop
									Grade II Listed Building
SAH070	H9.9	Land at Horseley Heath, Alexandra Road and Lower Church Lane, Tipton	Housing	86	2.62 (B)	1.9	45	2037-2039	SLINC (SA028 – Alexandra Road) on part of the site.
									Land owner interested in bringing site forward for residential use.



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SAH103	HOC8	The Phoenix Collegiate, Friar Park Road, Wednesbury	Housing	84	4.8 (B)	4.8	18	2025-2026	Planning application - DC/20/63911 - for 84 homes
SAH076 (SCGA)	H9.2	Lower City Road, Oldbury	Housing	64	1.83 (B)	1.83	35	2036-2038	Response from some land owners looking to bring site forward. Does not meet accessibility thresholds in HOU2
SAH089	H9.9	Site surrounding former Post Office and Telephone	Housing	52	1.16 (B)	1.16	45	2033-2035	

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		Exchange, Horseley Heath, Tipton							
SAH093 (SCGA)		Tatbank Road, Oldbury	Housing	52	1.15 (B)	1.15	45	2036-2038	Land owner advised will continue to operate but will look at opportunities to move and redevelop
SAH082	WBPr25	Carters Green / Gun Lane	Housing	49	1.09 (B)	1.09	45	2031-2033	Part of One Public Estate
SAH092	HOC8	Friar Street, Wednesbury	Housing	45	1.01 (B)	1.01	45	2037-2039	Land owner interested in bringing site forward for residential use

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SAH078	WBPr26	John Street	Housing	45	1.01 (B)	1.01	45	2031-2032	Long term plans
SAH073 (SCGA)	H9.6	Wellington Road, Tipton	Housing	40	0.91 (B)	0.91	45	2036-2037	Land owner interested in relocating.
SAH072	H13.9	Elbow Street	Housing	33	0.77 (B)	0.77	45	2029-2030	Land owner advised interested in developing site
SAH086	HOC18	Former Sunlight Laundry, Stanhope Rd, Smethwick	Housing	32	0.73 (B)	0.73	44	2024-2025	Part of Council Housing programme

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SAH098 (SCGA)	H9.3	Temple Way (Rattlechain), Tividale, Oldbury	Housing	32	0.9 (B)	0.9	36	2036-2037	Awaiting discussions with neighbouring land owners. Does not meet accessibility thresholds in HOU2
SAH099 (SCGA)	H9.2	Summerton Road	Housing	32	0.89 (B)	0.89	36	2032-2034	Site boundary amended - land owners operate for next 5-10 years with a view to redevelop. Does not meet accessibility thresholds in HOU2

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SAH074	WBPr17	Trinity Way / High Street	Residential - Mixed Use	53	0.6 (B)	0.6	88	2031-2033	Land owner advised looking to invest in site in next 5-10 years
SAH067	HOC8	Alma Street, Wednesbury	Housing	23	0.52 (B)	0.52	45	2025-2026	Land owner interested in bringing site forward for development for residential use
SAH090 (SCGA)	H9.6	Used Car Sales site on corner of Lower Church Lane, and	Housing	23	0.56 (B)	0.56	41	2036-2037	Long term plans

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		Horseley Heath, Tipton							
SAH069 (SGCA)	H8.8	Beever Road, Great Bridge	Housing	18	1.01 (B)	1.01	18	2024-2025	Part of Council Housing programme. Site constraints
SAH097	H13.4	Cokeland Place / Graingers Lane	Housing	16	0.36 (B)	0.36	45	2030-2031	Land owner interested in bringing site forward for development for residential use
SAH068	HOC13	Hawes Lane, Rowley Regis	Housing	15	0.56 (B)	0.56	27	2024-2025	Part of Council Housing

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									programme. Site constraints
SAH095	H13.1	Macarthur Road	Housing	13	0.3 (B)	0.3	43	2033-2034	Land owner interested in bringing site forward for development for residential use
SAH079	H12.6	West End Avenue	Housing	11	0.32 (B)	0.32	34	2024-2025	Part of Council Housing programme
SAH071	H9.9	Mill Street, Great Bridge	Housing	34	0.86 (B)	0.86	40	2033-2034	Land owner interested in bringing site forward for residential use

<b>Table 22 - Sandwell Residential Site Allocations (BCP Policy HOU1)</b>									
<b>BCP Site Ref / Location - (Sandwell Central Growth Area (SCGA))</b>	<b>Previous Local Plan Allocation (replaced unless stated)</b>	<b>Site Name and Address</b>	<b>Appropriate Uses</b>	<b>Indicative Development Capacity (net homes)</b>	<b>Gross Site Area (ha) (brownfield /greenfield)</b>	<b>Indicative Net Developable Area (ha)</b>	<b>Net Density (dph)</b>	<b>Anticipated Delivery Timescale</b>	<b>Further Information</b>
SAH075 (SCGA)	HOC6	Bank Street (West), Hateley Heath	Housing	43	0.85 (B)	0.85	51	2028-2030	Land owner advised will be looking to develop for housing
SAH100		Edwin Richards Quarry, Portway Road, Rowley Regis	Housing	281	10.1 (B)	10.1	28	2026/2032	Outline expires 2023 - advised they are still looking to develop the site. Capacity as per planning permission  Part of site is Strategic Open Space which cannot be built on.



<b>Table 22 - Sandwell Residential Site Allocations (BCP Policy HOU1)</b>									
<b>BCP Site Ref / Location - (Sandwell Central Growth Area (SCGA))</b>	<b>Previous Local Plan Allocation (replaced unless stated)</b>	<b>Site Name and Address</b>	<b>Appropriate Uses</b>	<b>Indicative Development Capacity (net homes)</b>	<b>Gross Site Area (ha) (brownfield /greenfield)</b>	<b>Indicative Net Developable Area (ha)</b>	<b>Net Density (dph)</b>	<b>Anticipated Delivery Timescale</b>	<b>Further Information</b>
									Part of site is a SLINC (SA070 – Hailstone Quarry) which may require mitigation
SAH100	H12.9	Thandi Coach Station, Alma Street, Smethwick	Housing	58	0.71 (B)	0.71	82	2023-2025	expires 2021 - land owner still showing interest in developing site
SAH229 (SCGA)		Brades Road, Oldbury	Housing	51	1.14 (B)	1.14	45	2032-2033	Submitted as a Call for Site

<b>Table 22 - Sandwell Residential Site Allocations (BCP Policy HOU1)</b>									
<b>BCP Site Ref / Location - (Sandwell Central Growth Area (SCGA))</b>	<b>Previous Local Plan Allocation (replaced unless stated)</b>	<b>Site Name and Address</b>	<b>Appropriate Uses</b>	<b>Indicative Development Capacity (net homes)</b>	<b>Gross Site Area (ha) (brownfield /greenfield)</b>	<b>Indicative Net Developable Area (ha)</b>	<b>Net Density (dph)</b>	<b>Anticipated Delivery Timescale</b>	<b>Further Information</b>
SAH206	H12.4	Kitchener Street, Black Patch Smethwick	Housing	49	1.39 (B)	1.39	35	2030-2035	Identified in Black Patch Interim Planning Statement and Masterplan. Accessibility will need to be addressed.

**Table 23 - Sandwell Gypsy and Traveller Site Allocations**

BCP Site Ref / Location - (Sandwell Central Growth Area (SCGA))	Previous Local Plan Allocation (replaced unless stated)	Address	Appropriate Uses	Gross Site Area	Net Site Area	Indicative Development Capacity	Anticipated Delivery Timescale	Further Information
SAGT28	H16.7	Brierley Lane	Residential	0.73		10 Plots	2030-2031	Extension to caravan site - funding required

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## Employment

- B.34 Under Policy EMP2, 219 hectares of employment land will be allocated as High-Quality Employment Land and will be safeguarded for manufacturing and logistics uses within Use Classes E(g)(ii), E(g)(iii), B2 and B8.
- B.35 Within Sandwell, High-Quality Employment land is concentrated in three main areas. Two of these are around the M5 - adjacent to Junction one in West Bromwich and adjacent to Junction two in Oldbury; both of these fall within Growth Corridor 12. The third area where there is a concentration of High Quality Employment Land is along the Black Country New Road, from Tipton to Wednesbury, which is in Growth Corridor Eight.
- B.36 Under Policy EMP3, a further 890 hectares of employment land will be allocated as Local Quality Employment Land and will be safeguarded for manufacturing and logistics uses within Use Classes E(g)(ii), E(g)(iii), B2 and B8. The main concentrations of Local Quality Employment are concentrated in Growth Corridors Nine, Oldbury to Tipton and Corridor 12, Oldbury, West Bromwich and Smethwick.
- B.37 In addition, there is a further 18 hectares of employment land that is not being allocated; Policy EMP4 will apply to these sites.
- B.38 In addition to the existing occupied employment it is proposed to allocate 23 hectares of vacant land as employment development sites. The proposed employment development sites are set out in Table 24.

Table 24 - Sandwell Employment Development Allocations

BCP Site Ref / Location - (Sandwell Central Growth Area (SCGA))	Previous Local Plan Allocation (replaced unless stated)	Site Name and Address	Appropriate Uses	Indicative Development Capacity (ha employment land)	Gross Site area (ha)	Anticipated Delivery Timescale	Further Information
SAE246	Whiteland	Whitehall Road, Tipton	Employment	5.3	5.3	2039	
SAE176	Housing	Coneygree, Newcomen Drive, Tipton	Employment	6.9	6.9	2030	
SAE329	Employment (Not replaced)	Land adjacent to M5 J2, Oldbury	Employment	1.12	1.12	2030	
SAE200	Employment (Not replaced)	Land adjacent to Asda, Wolverhampton Road Oldbury	Employment	1.6	1.6	2030	
SAE158	Employment/Mixed Use	Severn Trent land off Roway Lane, Oldbury	Employment	3.4	3.4	2030	

BCP Site Ref / Location - (Sandwell Central Growth Area (SCGA))	Previous Local Plan Allocation (replaced unless stated)	Site Name and Address	Appropriate Uses	Indicative Development Capacity (ha employment land)	Gross Site area (ha)	Anticipated Delivery Timescale	Further Information
SAE253	Employment (not replaced)	Rounds Green Road / Shidas Lane, Oldbury	Employment	2.9	2.9	2026	
SAE261	Housing	British Gas, land off Dudley Rd, Oldbury	Employment	1.1	1.1	2039	
SAE258	Housing	Legacy 43, Ryder Street, West Bromwich	Employment	0.9	0.9	2039	
SAE256	Employment (Not replaced)	Site off Bilport Lane, Wednesbury	Employment	5.29	5.29	2039	

### Strategic Waste Sites

B.39 The existing strategic sites, identified on the Waste Diagram and listed in Table 25, are the significant waste management facilities operating in the Black Country. They have been identified through a detailed analysis of all known licenced and exempt facilities in each authority area. Under Policy W2, the four Local Authorities will safeguard all existing strategic and other waste management facilities from inappropriate development, in order to maintain existing levels of waste management capacity and meet Strategic Objective 13.

**Table 25 - Sandwell Strategic Waste Sites**

Site Ref	Site	Authority	Operational Capacity (tpa)
<b>Municipal Waste Recovery – Supporting Infrastructure</b>			
WS07	Eagle Recovery and Transfer Hub	Sandwell	140,000
WS08	Sandwell HWRC (Shidas Lane)	Sandwell	20,000
<b>Waste Disposal Installations (1)</b>			
WS17	Edwin Richards Landfill	Sandwell	250,000
			9,171,000 <sup>109</sup>
<b>Significant Hazardous Waste Treatment Infrastructure</b>			
WS19	Wednesbury Treatment Centre	Sandwell	40,000
<b>Significant Metal Recycling Sites (MRSs)</b>			
WS23	Alutrade	Sandwell	24,000
WS24	Cradley Metal Recycling Centre	Sandwell	165,000
WS25	ELG CSR Depot (Rowley Regis) <sup>[1]</sup>	Sandwell	20,000

<sup>109</sup> Estimated Total Landfill Capacity in tonnes has been calculated from the remaining landfill capacity in cubic metres at the end of 2018, using the following formula: 0.85 tonne = 1 cubic metre, therefore tonnes = cubic metres x 0.85.

Site Ref	Site	Authority	Operational Capacity (tpa)
WS26	EMR Smethwick	Sandwell	60,000
WS27	Sims MRS Smethwick (Rabone Lane)	Sandwell	200,000
WS28	Sims MRS Smethwick (Unit 60 Anne Road)	Sandwell	20,000
<b>Other Significant Waste Management Infrastructure</b>			
WS36	Arrow Recycling	Sandwell	22,000
WS37	Bescot LDC, Bescot Sidings	Sandwell	150,000
WS38	Biffa Tipton WTS	Sandwell	65,000
WS39	Bull Lane Works WTS	Sandwell	200,000
WS40	Edwin Richards Inert Recycling and Soil Treatment Facility	Sandwell	75,000
WS41	Envira Recycling	Sandwell	50,000
WS42	Giffords Recycling	Sandwell	20,000
WS43	Jayplas	Sandwell	70,000
WS44	Metal & Waste Recycling (Cox's Lane)	Sandwell	25,000
WS45	ELG CSR Depot	Sandwell	75,000
WS46	Trinity Street MRF	Sandwell	60,000
WS47	Union Road Inert Waste Recycling Facility	Sandwell	40,000
WS48	Wednesbury Aggregates Recycling Facility	Sandwell	35,000
<a href="#">[1] Operational in 2018 but currently (April 2020) 'mothballed.'</a>			

Sources: Environment Agency: Waste Data Interrogator (WDI) 2007 – 2018, Operational Incinerators, 2018, Public Register, Remaining Landfill Capacity in England as at end of 2018 Version 2.



## Preferred Areas for New Waste Facilities

B.40 A number of employment areas have been identified in the Black Country Waste Study (BCWS) as being most suited to the development of new waste recovery, treatment and transfer infrastructure. In Sandwell, they are the sites contained in table 26. Under Policy W3, these areas are considered least likely to give rise to land use conflicts, and in several cases, there is already co-location of existing waste facilities to which new sites would contribute.

**Table 26 - Sandwell Preferred Areas for new Waste Facilities**

Site Ref	Address	Potentially Suitable Waste Use <sup>[1]</sup>	Area
WPSa1	Cornwall Road and Parkrose Industrial Estates, Soho	Energy from waste treatment, in-vessel composting, anaerobic digestion, transfer, recycling	60.1
WPSa2	Tat Bank, Langley	Energy from waste treatment, in-vessel composting, anaerobic digestion, transfer, recycling	53.1
WPSa3	Charles Street Enterprise Park, Queens Court Trading Estate, Swan Village	Treatment, in-vessel composting, anaerobic digestion, transfer, recycling	42.7
WPSa4	Hill Top and Bilport Lane Industrial Estates, Wednesbury	Treatment, in-vessel composting, anaerobic digestion, transfer, recycling	19.9
WPSa5	Powke Lane and Waterfall Lane Trading Estates, Rowley Regis	Treatment, in-vessel composting, anaerobic digestion, transfer, recycling	46.1
WPSa6	Dartmouth Road	n/a	26.2

<sup>1</sup> As indicated in the Black Country Waste Study, Wood 2020

## Minerals

B.41 The Black Country Minerals Study (BCMS, Tables 12.9 and 12.10) lists all known existing mineral sites and mineral infrastructure sites in the Black Country. Existing

mineral sites within the Black Country include permitted mineral extraction sites, stockpiles, brick and tile works, and a pot clay factory.

- B.42 Existing Black Country mineral infrastructure sites include secondary / recycled aggregates production, rail-linked aggregates depots, coating plants, ready-mix (RMX) concrete batching plants, manufacture of concrete products, and dry silo mortar (DSM) plants.
- B.43 Under Policy MIN2 (Minerals Safeguarding Areas, MSAs), the BCA will safeguard all existing mineral sites and mineral infrastructure sites from inappropriate development – this being necessary in order to retain existing capacity, and thereby helping to make best use of and conserve the Black Country's finite mineral resources and meet Strategic Objective 13.
- B.44 The locations of these Black Country mineral sites and mineral infrastructure sites are identified on the Minerals Key Diagram, and those sites located within Sandwell Borough are listed in the following tables:

**Table 27 - Sandwell Key Mineral Infrastructure**

Site Ref	Site	Location	Type
MIS1	Anytime Concrete	Gerard House, Kelvin Way, West Bromwich	Concrete batching plant
MIS2	Bescot LDC - Rail Ballast Facility	Land at Bescot Sidings, off Sandy Lane, Wednesbury	Rail-related aggregates depot/ Aggregates recycling
MIS3	Breedon Oldbury Concrete Plant	Engine Street, Oldbury	Aggregates recycling
MIS4	Breedon Oldbury Concrete Plant	Cemex House, Wolverhampton Road, Oldbury	Concrete batching plant
MIS5	Former Hanson Site (West Bromwich)	Grice Street, West Bromwich	Aggregates recycling
MIS6	Hanson Ready Mixed Concrete Plant	Roway Lane, Oldbury	Concrete batching plant

Site Ref	Site	Location	Type
MIS7	Wednesbury Asphalt Plant	Smith Road, Wednesbury	Coating plant
MIS8	Cradley Special Brick	Corngreaves Trading Estate, Overend Road, Cradley Heath	Brickworks
MIS9	Oldfields Inert Recycling Facility	Oldfields, Off Corngreaves Road, Cradley Heath	Aggregates recycling

**Table 28 - Sandwell changes to existing Local Plan designations (Waste and Minerals)**

Local Plan Document	Designation / Site Reference	Site Name	Description of Change	Reason for Change
BCCS (also mapped in the DBDS)	MSA (BCCS Policy MIN1)	Mineral Safeguarding Area (covers almost the whole of the Black Country)	Removed	Replaced in the draft BCP by more tightly defined MSAs in Walsall Borough

Table 29 - Sandwell changes to existing housing allocations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Est. Capacity	proposed use
H8.3	2929		Site on corner of New Street, Hill Top, West Bromwich	1.11	allocated as both community open space and housing	propose to delete the housing allocation and retain the community open space allocation.
H9.7	1401	801	Bell Street / Dudley Road, Tipton	0.62	20	employment
H9.6	1448	81	Station Street, Tipton	1.37	43	employment
H13.8	1461	665 80 and 82	Waterfall Lane & 101-126 Station Rd	0.34	8	employment
HOC11	2232	263	United Steels Ltd, Upper Church Lane Tipton	1.58	73	employment
H12.8	2372	121	Rabone Lane, Smethwick	5.98	209	employment
WBPr30	2381		Bus Depot	1.1	68	employment
WBPr31	2384		Oldbury Road	16.8	588	employment
WBPr32	2385		Brandon Way / Albion Road (North)	6.2	248	employment
WBPr33	2386		Brandon Way / Albion Road (South)	1.5	494	employment
WBPr34	2387		Brandon Way / Brandon Close	1	43	employment
WBPr38	2389		Church Lane / Gladstone Street	2.8	111	employment

<b>Table 29 - Sandwell changes to existing housing allocations</b>						
<b>Allocation Ref</b>	<b>Site Ref</b>	<b>Old SAD Ref</b>	<b>Address</b>	<b>Site Area (ha)</b>	<b>Est. Capacity</b>	<b>proposed use</b>
H9.5	2463	150 / 856	Coneygre	7.61	300	employment
H8.5	2906	15	Darlaston Road/ Old Park Road, Kings Hill, Wednesbury	5.2	200	employment
H8.4	2907	34	Holloway Bank, Wednesbury	5.71	149	employment
H8.4	2911	334	Mounts Road, Wednesbury	1.1	39	employment
H8.2	2916	553	Whitehall Industrial Estate, Whitehall Road, Great Bridge	2.51	65	employment
H8.2	2917	555	Land between Whitehall Road and Walsall Canal, Great Bridge	0.75	23	employment
H8.1	2920	634	Land to north and west of Ridgacre Road	1.63	51	employment
H8.5	2921	642	Kings Hill Trading Estate, Darlaston Road, Wednesbury	3.28	86	employment
H8.5	2922	643	Old Park Trading Estate site on Old Park Road, Wednesbury	2.62	68	employment
H8.1	2923	654	Land to the south of Ridgacre Road, West Bromwich	1.11	35	employment
H8.1	2924	657	Church Lane, West Bromwich	0.75	24	employment
H8.4	2925	788	Site off Mount Road Wednesbury	0.49	17	employment
H8.4	2926	791	Corner of Bridge Street and Mounts Road, Wednesbury	3.15	110	employment

<b>Table 29 - Sandwell changes to existing housing allocations</b>						
<b>Allocation Ref</b>	<b>Site Ref</b>	<b>Old SAD Ref</b>	<b>Address</b>	<b>Site Area (ha)</b>	<b>Est. Capacity</b>	<b>proposed use</b>
H8.4	2927	795	Site on corner of Woden Rd South and Bridge St, Wednesbury	1.61	56	employment
H9.1	2935	966	Wellman Robey Ltd, Newfield Road, Oldbury	4.91	129	employment
H9.4	2936	1239	CBF LTD, Wade Building Services, Groveland Road, Oldbury	1.26	40	employment
H9.5	2937	151	Fisher Street / Coneygre Road, Tipton	1.7	60	employment
H9.7	2938	265	Castle Street, Tipton	1.49	47	employment
H9.5	2943	878	Coneygre Road / Burnt Tree, Tipton	1.11	35	employment
H9.1	2944	967	Birmingham Board Co Ltd, Dudley Road East, Oldbury	1	32	employment
H9.1	2945	968	Beswick Paper, Dudley Road, Oldbury	0.96	33	employment
H9.1	2949	1196	British Gas Plc, Land off Dudley Road, Oldbury	1.04	33	employment
H9.4	2950	1240	Land adjacent to Cleton Business Park, Tipton Road, Tipton	0.56	18	employment
H9.4	2951	-	Vaughan Trading Estate	19.92	349	employment
(834)	2953		Sedgley Road West, High Street, Tipton	1.12	39	employment

Table 29 - Sandwell changes to existing housing allocations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Est. Capacity	proposed use
(145)	2955		Unit 1, Groveland Road	0.36	13	employment
(147)	2956		Upper Chapel Street / Brittonia Street / 70 - 74 Dudley Road West	0.63	22	employment
(148)	2957		Dudley Road / 28 Dudley Road West	1.78	62	employment
(149)	2958		Tipton Road, Oldbury	1.76	62	employment
(247)	2960		Diamond Buses, Hallbridge Way, Oldbury	3.13	110	employment
(248)	2963		Groveland Road	1.18	41	employment
(578)	2965		Land between Great Bridge Street and William Street, Tipton	1.92	67	employment
(300)	2966		Alexandra Industrial Estate, Locarno Road / Alexandra Road, Tipton	2.2	77	employment
(911)	2967		Black Country Park, Great Bridge Street, Great Bridge	2.18	76	employment
(375) Post 2021	2969		Dudley Road West, Oldbury	0.46	16	employment
(836)	2971		Hurst Lane / Birmingham Canal / Sedgley Road, West Tipton	2.19	77	employment
(144)	2973		Burnt Tree Industrial Estate, Groveland Road	0.82	29	employment

<b>Table 29 - Sandwell changes to existing housing allocations</b>						
<b>Allocation Ref</b>	<b>Site Ref</b>	<b>Old SAD Ref</b>	<b>Address</b>	<b>Site Area (ha)</b>	<b>Est. Capacity</b>	<b>proposed use</b>
WBPr36	2975		Swan Village Industrial Estate, West Bromwich	0.8	25	employment
H12.6	2990	200	Fitzgerald Lighting Ltd, Rood End Road	1.39	44	employment
H12.7	2994	854	Oldbury Road Industrial Estate	0.57	18	employment
H13.5	3004	259 / 896	Newlyn Road	3.37	103	employment
H13.2	3010	1301	Corngreaves Road	2.8	98	employment
(789)	3013		JAS Industrial Park, Titford Lane, Oldbury	0.93	33	employment
(855)	3014		Oldbury Road, Oldbury	2.89	102	employment
(1130)	3016		230 Oldbury Road	1.48	52	employment
H13.8	3017	284	Sandwell MBC Depot and surrounds, Waterfall Lane, Cradley Heath	1.36	43	employment
3019	3019		Station Road (South), Rowley Regis	0.85	30	employment
H13.8	3020	656	Broadcott and Broadway Industrial Estates	1.49	47	employment
H13.4	3026	268	Station Street / Graingers Lane	1.3	41	employment
H13.4	3027	280	Bridge Trading Estate	0.57	19	employment
H13.5	3032	260	Oldfields	1.64	51	employment



Table 29 - Sandwell changes to existing housing allocations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Est. Capacity	proposed use
H13.6	3034	933	Foxoak Street, Newtown Lane, Providence Street	4.82	168	employment
H13.7	3043	297	Station Road	3.21	84	employment
(724)	3140		Land at Dolton Way, between Factory Road, Bloomfield Road and railway line, Tipton.	2.62	99	employment
H13.5	3142	1302	Spinners End	0.71	25	employment
H16.2	3219	753	Bloomfield Road / Barnfield Road	0.83	26	employment
H16.3	3221	842	Bloomfield Road / Fountain Lane	1.5	53	employment
H13.6	3226	1303	Bank Street, Cradley Heath (west of Kimber Drop Forgings site)	1.3	41	employment
H9.8	3398	302	Alexandra Road / Upper Church Lane / Locarno Road, Tipton	10.43	142	employment
	5129		Portway Road, Wednesbury	10.7	375	employment
	5139		Brymill Industrial Estate, Brown Lion Street, Tipton	1.98	69	employment
	5265		Phase 9, The Parkway, site between Stafford Street, Victoria Street and Potters Lane, Wednesbury	0.94	33	employment
	5450		Barnfield Trading Estate Tipton	2.24	78	employment

Table 29 - Sandwell changes to existing housing allocations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Est. Capacity	proposed use
	5551		Ridgacre Enterprise Park, Ridgacre Road, West Bromwich	0.8	28	employment
	5553		Rimstock Plc, Ridgacre Road, Black Lake, West Bromwich	1.05	37	employment
	5556		Vector Industrial Park, Church Lane, West Bromwich	5.2	182	employment
	5623		Brook Street Business Centre, Brook Street Community Centre, 196- 200 Bloomfield Road.	1.5	53	employment
	5641		Site between Great Western Street and Potters Lane, Wednesbury	1.14	49	employment
	5642		Land between Potters Lane and Stafford Street Wednesbury	0.85	30	employment
	5646		Site on Stafford Street, Wednesbury	1.45	51	employment
	5648		Land at Potters Lane, Wednesbury	0.74	26	employment
	5972		Former Corus Premises, Bloomfield Road, Tipton	0.56	20	employment
	5138		Nicholls Road, Tipton	3.96	139	White land – EMP4
H9.5	354	91	Park Lane West (South Staffs Depot), Tipton	2.95	77	White land – EMP4

Table 29 - Sandwell changes to existing housing allocations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Est. Capacity	proposed use
H9.5	6109	80	Groveland Road, Dudley Port, Tipton	0.11	7	White land
H9.7	265	93	Old Cross Street, Tipton	0.48	14	white land
H9.5	440	89	Orchard Street, Burnt Tree, Tipton	0.28	30	white land
H12.5	585	466	Flash Road / Broadwell Road, Oldbury	0.68	5 (36)	white land
HOC18	841	431	Wilson Road / Sycamore Road Smethwick	1.07	37	white land
H13.6	1436	71	St. Anne's Road, Cradley Heath	1.13	36	white land
WBPr37	1440		John Street North	0.49	18	white land
H8.1	1443	51	Cardigan Close / Sussex Avenue	0.14	5	white land
H12.7	1446	482	Holly Lane, Smethwick	0.53	29	white land
H12.6	1698	614	Land adjacent to 88 Wellesley Road	0.26	9	white land
H12.3	1919	1032	Former Starlight Auto Sales, Wolverhampton Road	0.23	14	white land
H12.10	1997	1037	Tudor Works, 36A Windmill Lane	0.25	24	white land
HOC9	2085	1047	Brunswick Park Trading Estate, Wednesbury	0.36	42	white land
H16.1	2227	756	Factory Road	0.44	35	white land

<b>Table 29 - Sandwell changes to existing housing allocations</b>						
<b>Allocation Ref</b>	<b>Site Ref</b>	<b>Old SAD Ref</b>	<b>Address</b>	<b>Site Area (ha)</b>	<b>Est. Capacity</b>	<b>proposed use</b>
H13.9	2259	1071	Sentine Plastics Ltd, Wrights Lane	0.17	13	white land – EMP4
HOC11	2368	262	Summerhill Primary School, Central Avenue, Tipton	1.09	40	white land
H16.5	2370	303	Bradleys Lane / High Street	0.38	13	white land – EMP4
H12.7	2423	210	Churchill Road, Smethwick	0.5	60	white land
H8.7	2910	269	Leabrook Road / Willingsworth Road, Tipton	0.37	13	white land – EMP4
H8.2	2913	439	Sheepwash Lane / Whitehall Road, Great Bridge	0.08	3	white land
H8.2	2915	550	Land between Tinsley Street and Whitehall Road, Tipton	0.28	10	white land – EMP4
H8.1	2930	804	Pembroke Way, Hateley Heath, West Bromwich	2.3	81	white land
H8.2	2931	1120	Garage on Whitehall Road, Great Bridge, Tipton	0.14	5	white land
H8.2	2932	1121	Old Inn site, Sheepwash Lane, Great Bridge, Tipton	0.04	1	white land
H8.7	2933	45	Bannister Road, Wednesbury	2.22	76	white land
H8.8	2934	154	Site on New Road, Great Bridge inc St Lukes Centre	0.4	14	white land
H9.7	2942	779	Castle Street / High Street, Tipton	0.7	23	white land

Table 29 - Sandwell changes to existing housing allocations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Est. Capacity	proposed use
H9.9	2947	1117	Railway Street, Horseley Heath, Tipton	0.35	12	white land – EMP4
H9.9	2948	1119	Salem Street, Great Bridge, Tipton	0.32	11	white land
(765)	2952		Lower Church Lane, Tipton	0.38	13	white land
(146)	2974		88-90 Dudley Road West	0.37	13	white land
H12.4	2980	109	Clay Lane, Oldbury	0.28	12	white land – EMP4
HOC13	2982	40	Tippity Green, Hawes Lane, Rowley Regis	1.13	40	white land
HOC13	2983	1135	Allsops Hill Rowley Regis	0.38	13	white land
HOC13	2984	1282	Land at Tippity Green, Rowley Regis	4.47	150	white land
H12.1	2987	5	Wolverhampton Road and Anvil Drive, Oldbury	0.31	9	white land – EMP4
H12.10	2997	123	Cape Hill / Durban Road	2.97	94	white land
(205)	2999		South Road / Broomfield, Smethwick	0.27	10	white land
(1129)	3015		104-110 Oldbury Road, Smethwick	0.68	24	white land
H13.4	3029	587	Cradley Road (West)	0.99	33	white land
H13.4	3031	1124	Cradley Road (East)	0.41	12	white land

Table 29 - Sandwell changes to existing housing allocations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Est. Capacity	proposed use
H13.11	3044	613	High Street, Blackheath	0.35	12	white land
HOC3	3048	1014	Land at Newton Road, Great Barr	0.2	16	white land
H16.5	3141	863	Batmanshill Road / Hobart Road	0.25	8	white land
	3223		Summerton Road	0.52	18	white land
H9.2	3224	310	10 - 60 Dudley Road East, Oldbury	2.00	70	white land – EMP4
H13.6	3225	217	Foxoak Street / St Annes Road (Kawasaki Garage)	0.4	14	white land
H12.10	3462	122	Unett Street / Raglan Road	4.6	81	white land
H13.3	3467	586	Chester Road	2.38	10	white land
	5301		Potters Lane / Great Western Street, Wednesbury	0.19	6	white land – EMP4
	5381		Victoria Street / Albert Street, Wednesbury	0.19	7	white land – EMP4
	5643		Site between Dudley Street and Victoria St Wednesbury	1.18	41	white land – EMP4
	6206		West Cross Centre. Oldbury Road / Mallin Street, Smethwick	1.06	37	white land
			Dudley Road East / Brades Road, Oldbury	3.76		white land – EMP4
			Zion Street, Tipton	2.43		white land – EMP4

Table 29 - Sandwell changes to existing housing allocations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Est. Capacity	proposed use
			70-74 Crankhall Lane	1.78		white land – EMP4

DRAFT

## C. Walsall

### Introduction

- C.1 Walsall has an estimated population of 285,500 people<sup>110</sup>, comprised of approximately: -
- 21.7% children between 0-15,
  - 60.7% working-aged between 16-64, and
  - 17.6% 65 years and over.
- C.2 The population has seen a 7.8% increase over the past decade, up from 264,800 in 2009. Most of this increase has been in people aged under 16 and over 65; both groups have seen approximately 12% increases. This is in contrast to a working age population (16-64 years) increase of around 5%. Walsall is expected to see continued and consistent population growth of 7% to an estimated 304,400 people by 2030 and by a further 13% to an estimated 320,400 by 2040.
- C.3 Walsall's economy has an annual output of £4.77 billion and provides around 120,000 jobs. The local economy supports a steadily increasing resident population of over a quarter of a million people, with three in every five people being of working age. However, only two-thirds of working-age residents are in employment, and for those in work, earnings are below the national average while testing economic conditions prevail.<sup>111</sup>
- Walsall town centre is at the heart of the borough, while there are second-tier district centres in Bloxwich, Brownhills, Willenhall, Darlaston and Aldridge. These district centres are supported by smaller centres and settlements across the borough.
- C.4 Walsall can be defined by two main character areas based on its geology, the mineral resources from which drove Walsall's industrial past. The west and central part is a legacy of the Industrial Revolution, a largely urban area rich in coal and limestone and an area that has experienced changing economic prosperity,

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<sup>110</sup>

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland> - ONS Mid-year estimate 2019

<sup>111</sup> [Walsall Insight](#) – Trends and Intelligence (Accessed February 2021)



significant areas of ground contamination and abandoned infrastructure. The east remains largely rural, with open landscapes, agricultural land and woodland, but also with areas of 20<sup>th</sup> century housing and industry, including active quarries and brickworks.

- C.5 Much of the urban area has been regenerated in recent decades, with new homes and industry provided on formerly derelict land. The development opportunities that remain present significant challenges because of the cost of addressing contamination and ground instability. Some former industrial land is also now of value for nature conservation and as open space. The total supply of land that might be available in the urban area to meet future need for homes and jobs is therefore limited. In order to ensure that sufficient new homes and employment remain available, the opportunity to review both open space within the urban area and also land in the Green Belt was taken during the preparation of the BCP.
- C.6 Strategic opportunities for employment are focused on previously-developed sites that have complex ground mitigation requirements, and which already provide the sustainable transport infrastructure required for such uses, together with a small number of greenfield sites on the edge of the urban area that have good highway access, and which relate to existing employment areas. The opportunities for large housing sites are focussed on the edge of existing urban settlements, to ensure sustainable linked neighbourhoods are created.

## The Strategy

- C.7 The vision for Walsall Council is set out in the Corporate Plan. This states that
- " We are led by the communities we serve who help shape the services we provide, and we help those communities to make a positive difference to their own lives through active civic engagement and co-operation [so that] Inequalities are reduced and all potential is maximised."*<sup>112</sup>
- C.8 In the future, Walsall will be a more confident place, with renewed investment in key infrastructure and key centres, greater opportunities for work and leisure and an affordable, accessible housing stock.
- C.9 The Corporate Plan sets out the Council's priorities, which include:

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<sup>112</sup> Walsall's [Corporate Plan](#) (2018-2021)

- Creating an environment where business invests and everyone who wants a job can access one.
- People live a good quality of life and feel that they belong.
- Children thrive emotionally, physically, mentally and feel they are achieving their potential.
- Housing meeting all peoples' needs, is affordable, safe and warm.

C.10 The BCP will help to deliver these priorities through:

- economic growth for all people, communities and business
- Adaptable and diversified urban centres that increasingly support a range of residential, leisure and community uses to support and enhance the retail function.
- housing to meet the needs of everyone in the community, to be concentrated in sustainable areas to ensure that their housing needs are met, that they can integrate with the existing urban area to ensure a strong sense of belonging and cohesion and so that they can contribute to and benefit from existing services and public space;
- new large edge-of-urban residential sites in sustainable locations with good accessibility, supported by access to health and education services, which will include the necessary environmental protection and enhancement measures to address environmental challenges now and into the future;
- strategic and other waste management facilities and identify suitable new facilities to ensure continued economic growth and to ensure waste management is sufficient to protect the needs of communities.

## Delivering the Strategy

C.11 Most development is carried out by the private sector through the delivery of planning permissions. The strategy and the BCP will guide investment decisions through the determination of planning applications and the delivery of financial and other support by the local authority and other public bodies where necessary. As well as the policies and site allocations in the BCP, the strategy is supported by the policies that will be saved in the existing development plan documents:

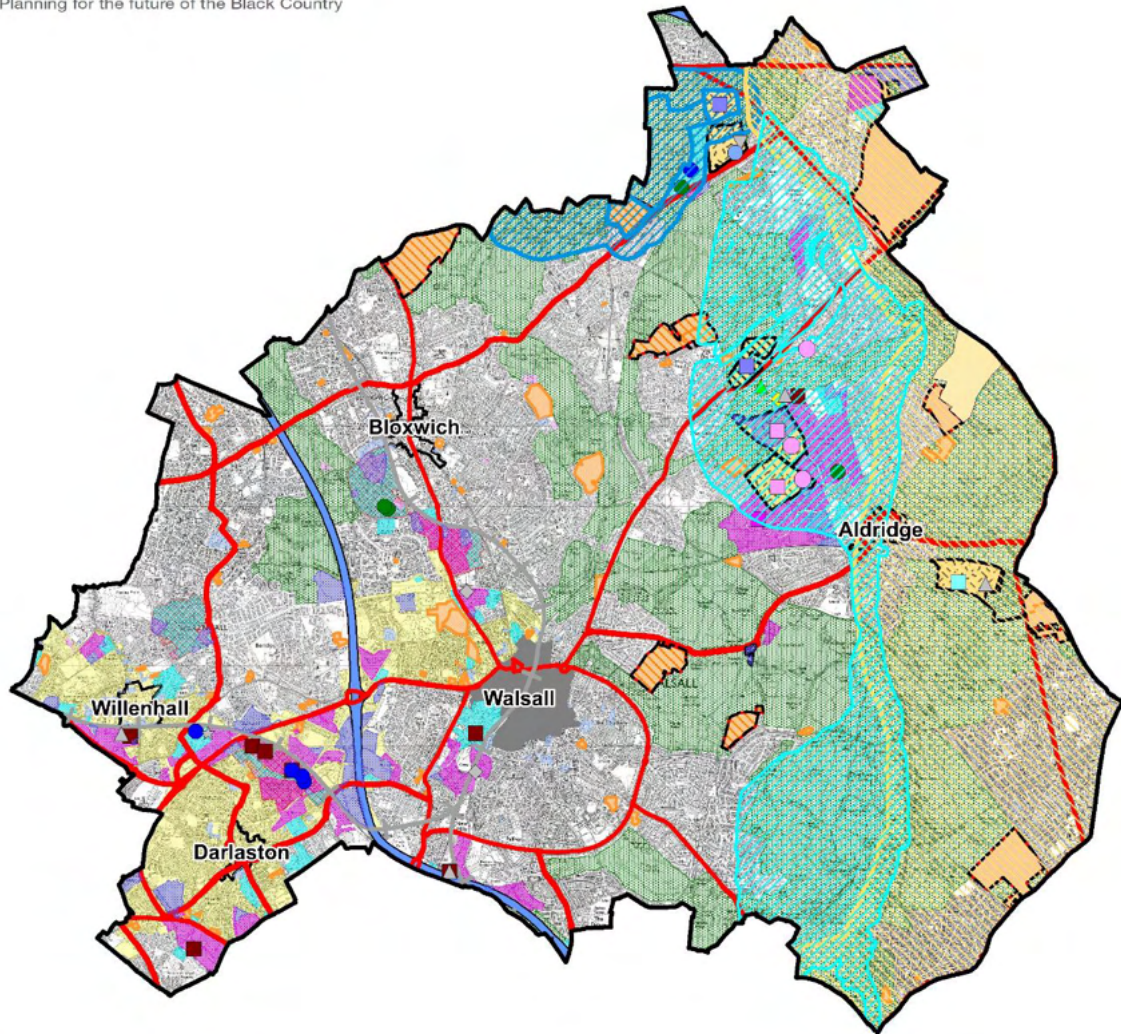
- Walsall Town Centre Area Action Plan (2019)
- Walsall Site Allocations Document (SAD) (2019) most of the allocations in the SAD are 'carried forward' into the BCP and are listed in this chapter)
- "saved" policies of the Walsall Unitary Development Plan (2005)

## Development Allocations

- C.12 The sites listed below and shown on the Policies Map are allocated for the stated uses and are subject to the listed policies. The sites are of three types; land for housing development, land for travellers and land for employment development (industry and warehousing). A small number of these allocations are of strategic significance to the delivery of the Plan because of their size, either individually or in combination with adjoining allocations. Each strategic allocation has a specific Policy applying to it, providing details of the particular constraints and requirements affecting development, which should be read alongside the information for the allocation provided in Table 31.
- C.13 Most existing allocations in Walsall's Site Allocation Document are 'carried forward' into the Plan, except where sites have been developed or in a small number of cases the allocated use is no longer considered to be appropriate. These carried-forward allocations are listed separately for clarity in the tables below but are also subject to the listed policy(ies) in the Plan. In some cases, the precise site boundaries and site reference numbers have changed from those in the SAD. In the adopted version of the Plan, the 'newly allocated' and 'carried forward' sites will be listed together and will have equal status.
- C.14 The policies of the BCP will safeguard various existing land uses and designations. Occupied employment land will be safeguarded by policies EMP2, EMP3 and EMP4. Sites that are safeguarded by these policies are not listed individually below but are shown on the Policies Map. In the case of sites in Walsall, occupied employment land is currently safeguarded by the SAD and most of this land will be carried forward to the BCP, although the categories of some sites (local or strategic quality) will change.
- C.15 The Plan will not allocate sites in Walsall Strategic Centre and this area will remain subject to the Town Centre Area Action Plan. However, some of the targets, in particular for housing, office and retail uses, are based on provision to be made in the Strategic Centre. Details are set out in the chapters for these topics.
- C.16 The sites listed in this appendix can be viewed in detail on the online Policies Map.

Figure 19 - Walsall Spatial Plan

Black Country | **Plan**  
 Planning for the future of the Black Country



NORTH

### Walsall Spatial Strategy

**Key**

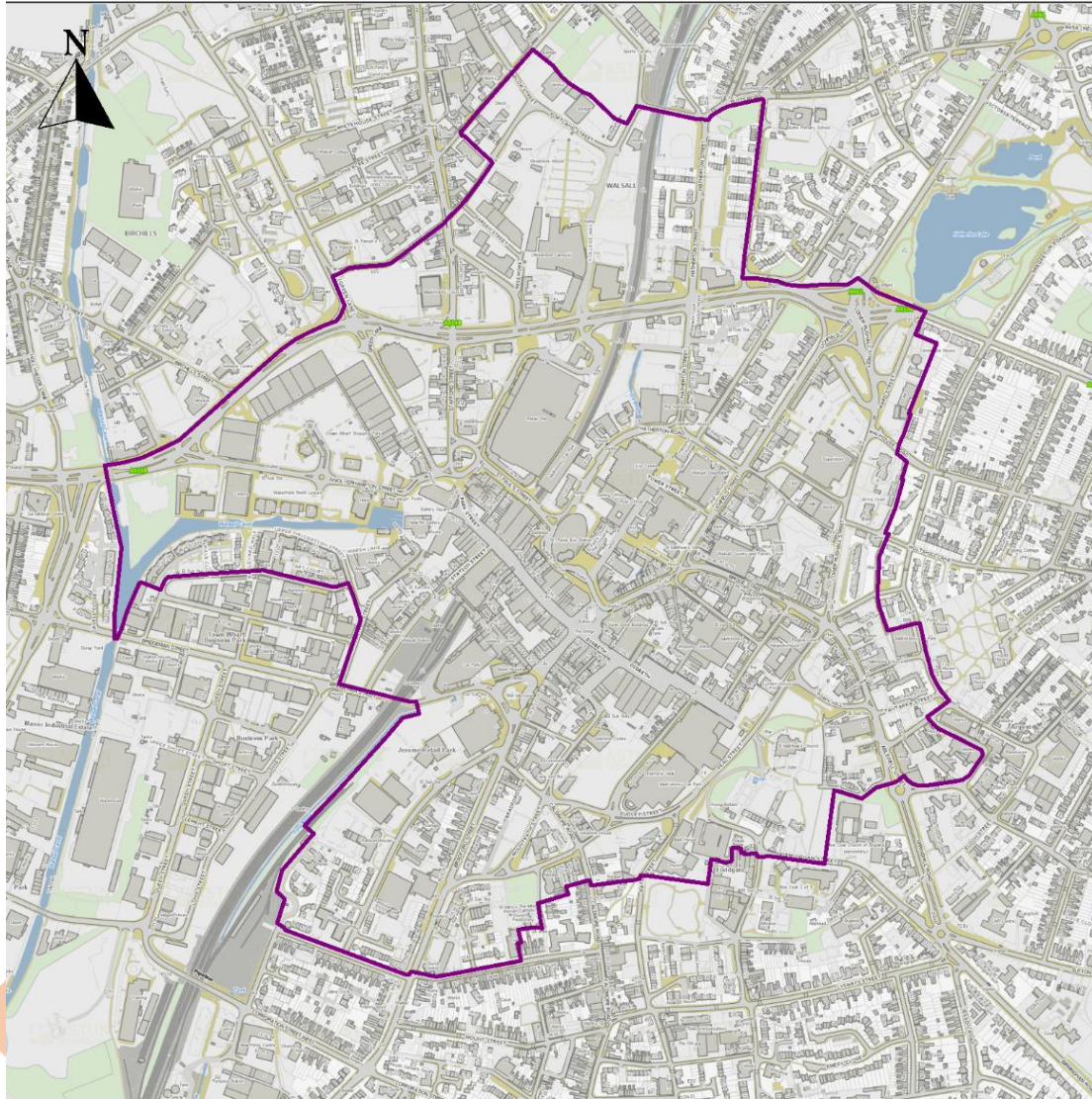
- Housing Allocations (HOU1)
- Gypsy and Traveller Pitch Allocations (HOU4)
- Land For Employment (EMP1)
- Strategic Employment Areas (EMP2)
- Local Employment Areas (EMP3)
- Other Employment Areas (EMP4)
- Core Regeneration Area (CPS2)
- Neighbourhood Growth Area (CPS3)
- Strategic Allocations
- Tier 1 Strategic Centre (CEN2)
- Town Centres (CEN3)
- Waste Infrastructure (W2)**
- Municipal Waste Recovery Installations
- Municipal Waste Recovery – Supporting Infrastructure
- Metal Recycling Sites (MRSs)
- Waste Disposal Installations
- Other Significant Waste Management Infrastructure
- Hazardous Waste Treatment Infrastructure
- Preferred areas for new Waste Facilities (W3)
- Mineral Infrastructure(MIN2)**
- Aggregates Recycling Facilities
- Concrete Batching Plant
- Fireclay Stockpile
- Coating Plant
- Concrete Products
- Dry Silo Mortar Plant
- Pot Clay Factory
- Brickworks
- Active Quarry
- Pre-operational Quarry
- Dormant Quarry
- Mineral Extractions Sites & Mineral Safeguarding Areas (MIN2)**
- Mineral Extraction Site
- Dormant Mineral Extraction Site
- Fire Clay Mineral Safeguarding Area
- Sand and Gravel Mineral Safeguarding Area
- Brick Clay Mineral Safeguarding Area
- Preferred Area for Sand & Gravel (MIN3)
- Motorway
- Key Route Network (TRAN1)
- Rail Network (TRAN4)
- Green Belt (GB1)

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Figure 20 - Walsall strategic centre and AAP boundary

Black Country | **Plan**  
Planning for the future of the Black Country

### Walsall Strategic Centre



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## General Spatial Strategy

C.17 Policy CSP1 describes the development strategy for the Black Country as a whole, with growth and regeneration focussed into the Strategic Centres and Core Regeneration Areas as outlined in policy CSP2. Outside these locations, policy CSP3 states that the quality of the Existing Neighbourhood Areas will be protected and enhanced, and a limited number of Neighbourhood Growth Areas in highly sustainable locations on the edge of the Urban Areas will be delivered. These areas in Walsall are described below.

## Walsall Strategic Centre

C.18 Walsall Strategic Centre is the administrative, commercial and cultural heart of the borough. It is the focus for a wide range of civic, retail, cultural and leisure functions, including being home to the Town Hall and Civic Centre, County and Magistrates Courts, Walsall College, Waterfront, Crown Wharf and the New Art Gallery. The location is highly accessible by public transport, through the provision of increasingly well-integrated rail and bus services. It lies at the centre of the Walsall to Wolverhampton Core Growth Area.

C.19 In the context of this strategy, and the evidence and opportunities outlined above, the priority for Walsall Town Centre for 2039 is to become a diversified, repurposed and rejuvenated strategic centre, providing a focus for a well-balanced mix of commercial, business, service and community uses spanning the daytime and night-time economy. Changing shopping patterns and challenges to the high street will be addressed through increased flexibility, facilitating the consolidation of the shopping core and opening space up to new uses, flexible models of operation and reducing vacancies. This flexibility in the shopping core will be complemented by surrounding office and leisure-led mixed uses, and supported by maximising residential provision in all locations (including the use of upper floors) and with it the services, community functions and educational amenity and accessibility that residents need. The character and quality of the town centre's built and natural environment will be improved to make the town centre a sustainable, healthy and attractive place to shop, live, work and visit.

C.20 The existing strategy for the strategic centre comprises the Unitary Development Plan (2005) and Area Action Plan (AAP) (2019). The UDP, while largely superseded by subsequent Development Plan Documents (including the Black Country Core Strategy and the Walsall Site Allocations Document), still contains

saved policies that apply to the Strategic Centre of Walsall, namely Part 1 5.4 - 5.11, Part 2 5.12 - 5.24, Policy S1, Policy S2, Policy S3, Policy S4 and affects developments outside of centres through saved paragraphs and policies 5.41, Policy S6, Policy S7 as well as other general centres Policies S8 - S17. The AAP identifies several areas for investment and targeted use, including St Matthew's Quarter, Walsall Gigaport, Walsall Waterfront and Park Street Shopping Core, with an associated set of policies and proposals for each one. All AAP policies are relevant to proposals within the BCP boundary of Walsall Strategic Centre.

## District Centre

- C.21 Walsall has five District Centres, Aldridge, Bloxwich, Brownhills, Darlaston and Willenhall, as outlined in BCP Policy CEN1. The district centres serve more localised roles, providing substantial retail, leisure and services to a wide area. Their main role is to meet the needs of their districts for convenience goods, local services and community facilities, although they all have some importance for comparison shopping and in accommodating facilities of Borough-wide importance which cannot be located in Walsall Town Centre.
- C.22 The priority for District Centres in 2039 will be to help drive forward the growth and regeneration of the borough outside of the strategic centre as a hub for their respective district areas, providing an enhanced level of town centres uses and services for residents in the district while strengthening connections to the town centre and the outlying local centres and residential areas on the urban fringe. District Centres will be more adaptable and flexible, accommodating housing provision where possible to improve vibrancy and the health of the centre, and offer the most sustainable areas well served by public transport links and a wide array of uses and services. Darlaston and Willenhall lie within the Walsall to Wolverhampton Core Growth Area: they will serve as centres for targeted investment in infrastructure delivery and employment land to help deliver strengthened links between the Black Country's strategic centres. Aldridge, Bloxwich and Brownhills will serve nearby Neighbourhood Growth Areas.

## Local Centres

- C.23 Walsall has 34 local centres as listed in BCP Policy CEN1. This network of vibrant Local Centres provides particularly for day-to-day convenience shopping and service needs both within the Core Regeneration Areas and Existing Neighbourhood Areas. Within these areas the retention, enhancement and further

development of shops, services and other town centre uses is the key aim, with housing supported where it can complement and not prejudice the main town centre uses. Local centres are important to the vitality of Walsall. These centres generally meet day-today convenience goods needs and are especially useful to the elderly and less mobile. They also provide a focal point for the communities within Walsall and are an important part of the Borough's character.

- C.24 The priority for Local Centres in 2039 is their protection from the loss of provision to the communities that rely on them, ensuring retention of a good level of access to local convenience and comparison retail, services, community facilities and other amenities. Improved connections through the Neighbourhood Growth Areas will ensure communities continue to be sustainable, with a range of services to support residents' local needs.
- C.25 The existing strategy for Local Centres includes the SAD, which outlines policies and allocations for all areas in Walsall outside of the strategic centre and district centres, namely SLC1 and SLC2 which detail plans to strengthen Local Centres.

### **Walsall to Wolverhampton Core Growth Area**

- C.26 The Walsall to Wolverhampton Core Regeneration Area is based around the road, rail and waterway corridor, with the Black Country Route linked to M6 Junction 10, the re-opened railway stations at Darlaston and Willenhall, and the Wyrley and Essington Canal which provides a pedestrian, cycle and leisure route from Birchills, through Walsall Strategic Centre, Phoenix 10 and Darlaston to Moxley. Much regeneration has already taken place in this area, and many new homes and jobs are expected to be delivered in the future at key locations such as Phoenix 10, Bentley Lane, Moxley Tip and in Willenhall Town Centre. The Core Regeneration Area will continue to be the focus of public sector investment to regenerate brownfield sites.

### **Existing Neighbourhood Areas**

- C.27 Outside the strategic centre and growth areas, existing commitments for new homes and employment will continue to be delivered. The neighbourhood areas provide a network of sustainable residential areas, including some new housing sites of medium size, as well as clusters of employment areas, a network of green infrastructure and community facilities, with seamless links to the strategic centres, Core Regeneration Areas and the Green Belt. It is also expected that small scale



housing developments will continue to come forward in the neighbourhood areas as windfalls.

## Neighbourhood Growth Areas

C.28 The existing growth network does not have the capacity to accommodate all our need for new homes and jobs. It is also important to safeguard the character of the existing neighbourhood areas, which are often low to medium density housing with good quality open space. A number of Neighbourhood Growth Areas are therefore proposed in sustainable locations close to the existing urban area that have good access to services. These areas will provide for additional homes and jobs to meet the needs of our residents. They will also provide for new or enhanced services where necessary, and in most cases, developers will be required to enhance biodiversity through the provision of new areas for wildlife and the restoration of existing ones.

## Green Belt

C.29 Policy CSP3 states that a strong Green Belt will continue to be retained to promote urban renaissance and to provide easy access to the countryside for urban residents where the landscape, nature conservation and agricultural land will be protected and enhanced. Walsall contains the bulk of Green Belt land in the Black Country, comprising over one third of the borough. Walsall's Green Belt is mainly agricultural.

## Growth Targets

**Table 30 - Walsall growth targets for housing and employment land allocations**

Location	Housing (net homes)	Employment Land allocations
Neighbourhood Growth Areas	5,418 (to 2039)	36ha
Core Regeneration Area	2,126	88ha
Walsall Strategic Centre	1,168	n/a
Towns and Neighbourhood Areas	3,177	40ha

Location	Housing (net homes)	Employment Land allocations
Windfalls	1,455	n/a
<b>Total</b>	<b>13,344</b>	<b>164ha</b>

C.30 The figures in this table are the numbers that are expected to be capable of delivery during the period of the plan. Proposals that will result in the numbers of homes or employment land exceeding the figures will be supported where they are in accordance with the other policies of the development plan.

Table 31 - Walsall Sites Allocated for Housing by Black Country Plan (policy HOU1)									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative net developable area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
WAH230	GB1	Land on the east side of Chester Road, Aldridge	Neighbourhood Growth Area.	66	5.09	2.55	35	Between 2027-2028	See Strategic Allocation Policy WSA.9.
WAH231	GB1	Land off Sutton Road, Longwood Lane, Walsall	Neighbourhood Growth Area.	202	11.9	7.74	35	Between 2027-2031	See Strategic Allocation Policy WSA.6.
WAH232	GB1	Yieldsfield Farm (sometimes recorded as Yieldfields farm), Stafford Road, Bloxwich	Neighbourhood Growth Area.	978	39.55	37.26	35	600 by 2039	See Strategic Allocation Policy WSA.4.
WAH233	GB1	Middlemore Lane West, Aldridge	Neighbourhood Growth Area.	35	1.35	1.35	35	By 2027	A strategy for landscape and ecology that ensures the retention and / or mitigation for established trees. Footpath improvements along Middlemore Lane to provide safe and secure access routes. On-site provision or funding for

Table 31 - Walsall Sites Allocated for Housing by Black Country Plan (policy HOU1)									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative net developable area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
									off-site arrangements to improve access to a primary school and local health centre.
WAH234	GB1	Land between Queslett Road, Doe Bank Lane and Aldridge Road, Pheasey	Neighbourhood Growth Area.	1426	42.27	42.27	45	960 by 2039	See Strategic Allocation Policy WSA8.
WAH235	GB1	Home Farm, Sandhills, Walsall Wood	Neighbourhood Growth Area.	1417	54	54	35	800 by 2039	See Strategic Allocation Policy WSA1.
WAH236	GB1	Land at Yorks Bridge, Lichfield Road, Pelsall	Neighbourhood Growth Area.	580	21.41	17.21	45	Between 2027-2039	See Strategic Allocation Policy WSA5.
WAH237	GB1	Land north of Stonnall Road, Aldridge	Neighbourhood Growth Area.	363	13.82	13.82	35	Between 2027-2034	See Strategic Allocation Policy WSA3.

Table 31 - Walsall Sites Allocated for Housing by Black Country Plan (policy HOU1)									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative net developable area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
WAH238	GB1	Land at Vicarage Road / Coronation Road, High Heath	Neighbourhood Growth Area.	504	32.11	19.22	35	400 by 2039	See Strategic Allocation Policy WSA.2.
WAH239	GB1	Land north of Northfields Way, Clayhanger, Brownhills	Neighbourhood Growth Area.	46	1.87	1.37	45	By 2027	A satisfactory strategy for enhancement mitigation and compensation for ecology will be required.
WAH240	GB1	Land at Mob Lane, High Heath, Pelsall	Neighbourhood Growth Area.	209	7.99	7.99	35	Between 2027-2031	See Strategic Allocation Policy WSA.2.
WAH241	GB1, ENV7	Former NHS site, land east of Nether Hall Avenue, Great Barr	Neighbourhood Growth Area.	18	1.43	0.71	35	By 2025	Site access must be from Stewards Drive. Landscaping scheme to include details of tree protection and retention. The site is in a MSA and requires prior extraction where practical and

Table 31 - Walsall Sites Allocated for Housing by Black Country Plan (policy HOU1)									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative net developable area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
									environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place.
WAH242	GB1	Calderfields West, Aldridge Road, Walsall	Neighbourhood Growth Area.	592	22.48	18.6	35	442 by 2039	See Strategic Allocation Policy WSA.7.
WAH243	GB1	Cartbridge Lane South Open Space	Neighbourhood Growth Area.	61	1.81	1.81	45	By 2027	The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for superficial sand and gravel, shall take place. On-site provision or

Table 31 - Walsall Sites Allocated for Housing by Black Country Plan (policy HOU1)									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative net developable area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
									funding for off-site arrangements to improve access to a health centre.
WAH244	OS1	Former Reedswood Golf Course	Towns and Neighbourhood Area.	94	5.6	2.8	45	Between 2027-2028	Part of reclaimed former power station. Landscaping scheme to include details of tree protection and retention.
WAH245	OS1	Former Allens Centre and Hilton Road amenity greenspace	Towns and Neighbourhood Area.	23	2.10	0.71	45	By 2025	Redundant open space. Only 0.71 ha of the submitted area to the west is allocated.
WAH246	GB1	Land to the east of Chester Road, north of Pacific Nurseries Hardwick	Neighbourhood Growth Area.	228	8.69	8.69	35	Between 2030-2034	See Strategic Allocation Policy WSA9.

Table 31 - Walsall Sites Allocated for Housing by Black Country Plan (policy HOU1)									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative net developable area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
WAH247	GB1	Sandfield Farm, Lichfield Road, Brownhills	Neighbourhood Growth Area.	33	1.27	1.27	35	By 2027	High quality design to provide for single storey accommodation is required. The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. On-site provision or funding for off-site arrangements to improve access to a primary school and local health centre.



Table 31 - Walsall Sites Allocated for Housing by Black Country Plan (policy HOU1)									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative net developable area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
WAH248	GB1	Land to the northeast of Shire Oak, Lichfield Road	Neighbourhood Growth Area.	10	0.37	0.37	35	By 2027	The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place. Development of the site must be in conjunction with Sandfield Farm development to ensure sustainability.
WAH249	GB1	Land to the southwest of Shire Oak, Lichfield Road	Neighbourhood Growth Area.	8	0.32	0.32	35	By 2027	The site is in a MSA and requires prior extraction where practical and environmentally feasible.

Table 31 - Walsall Sites Allocated for Housing by Black Country Plan (policy HOU1)									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative net developable area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
									Where practical and environmentally feasible prior extraction for bedrock, sand and gravel will take place. Development of the site must be in conjunction with Sandfield Farm development to ensure sustainability.
WAH250	GB1	Star Service Station, Queslett Road East	Neighbourhood Growth Area.	53	0.27	0.27	45	By 2022	Former Green Belt site with planning permission for flats.
WAH251	GB1	212 Barns Farm, Barns Lane	Neighbourhood Growth Area.	112	4.26	4.26	45	Between 2027-2029	A satisfactory strategy for enhancement mitigation and or compensation for ecology which takes account of the adjacent

Table 31 - Walsall Sites Allocated for Housing by Black Country Plan (policy HOU1)									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative net developable area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
									SLINC. Investigation and remediation of contaminated land. The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for superficial sand and gravel, brick clay shall take place. Mitigation including consideration of acceptable layout to ensure no significant amenity impacts from the operation of Atlas Quarry. On-site provision or

Table 31 - Walsall Sites Allocated for Housing by Black Country Plan (policy HOU1)									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative net developable area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
									funding for off-site arrangements to improve access to a health centre.
WAH252	GB1	The Three Crowns, Sutton Road	Towns and Neighbourhood Area.	7	0.7	0.7	35	By 2022	Brownfield site in green belt with existing planning permission. A satisfactory strategy for enhancement mitigation and or compensation for ecology.
WAH253	GB1	South of Stonnall Road	Neighbourhood Growth Area.	38	5.07	4.45	35	Between 2032-2033	Investigation and remediation of contaminated land. Footpaths required to serve the development and provision for a controlled / uncontrolled pedestrian crossing on

Table 31 - Walsall Sites Allocated for Housing by Black Country Plan (policy HOU1)									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative net developable area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
									Stonnall Road. The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. On-site provision or funding for off-site arrangements to improve access to a primary school and local health centre.
WAH254	GB1	Pacific Nurseries, Chester Road, Walsall	Neighbourhood Growth Area.	121	4.65	2.09	35	Between 2029-2031	Investigation and remediation of contaminated land.

Table 31 - Walsall Sites Allocated for Housing by Black Country Plan (policy HOU1)									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative net developable area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
									Established trees worthy of protection shall be retained and could reduce the developable area. The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place. . On-site provision or funding for off-site arrangements to improve access to primary school,

Table 31 - Walsall Sites Allocated for Housing by Black Country Plan (policy HOU1)									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative net developable area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
									secondary school and local health centre.
WAH255	GB1	Rear of 91 Wood Lane, Streetly	Neighbourhood Growth Area.	49	2.33	1.7	35	By 2026	Established trees worthy of protection shall be retained and could reduce the developable area. The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place. On-site provision or funding for off-site arrangements to

Table 31 - Walsall Sites Allocated for Housing by Black Country Plan (policy HOU1)									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative net developable area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
									improve access to a primary school.
WAH256	GB1	Land to the rear of 114-130 Green Lane, Shelfield	Neighbourhood Growth Area.	37	1.91	1.41	35	By 2026	Landscaping scheme to include details of tree protection and retention. The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for superficial sand and gravel, shall take place.



Table 32 - Walsall Sites Allocated for Housing 'Carried Forward' from Site Allocation Document									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative Net Developable Area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
WAH001	HC1	New Road (former car showroom), Willenhall		9	0.27			by 2026	Residential development to north and south. Site may be affected by underground power cable: see National Grid / Western Power comments
WAH002	HC1	Field Street (Gilberts' Club), Willenhall		26	0.77			by 2026	Potential to enlarge UDP allocated site to include all or part of this area as part of Willenhall district centre development
WAH003	HC1	Kendrick Place and Castle View Road, Moxley		25	0.73			by 2026	Surplus Walsall Council land. Boundary amended and capacity revised to exclude area with planning permission
WAH005	HC1	Goscote Lane Copper Works, Goscote		263	8.76			by 2026	Large site in housing renewal area. Reclamation work is underway. SAD allocation is for 395 but

Table 32 - Walsall Sites Allocated for Housing 'Carried Forward' from Site Allocation Document									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative Net Developable Area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
									capacity reduced to match latest planning application
WAH006	HC1	Bentley Road North (corner of King Charles Avenue), Bentley		23	0.34			by 2026	Cleared former social housing site. Potential to develop with similar site immediately to north.
WAH007	HC1	Joynson Street (site of former Kings Hill JMI School), Darlaston		17	0.49			by 2026	Surplus Walsall Council property. Planning permission for nursing home but suitable for conventional dwellings if this is not implemented. Add lapsed pp area to west
WAH008	HC1	Adjoining 15 Joynson Street, Darlaston		5	0.08			by 2026	Lapsed planning permission. Site too small to allocate by itself but lies adjacent to much larger housing sites

<b>Table 32 - Walsall Sites Allocated for Housing 'Carried Forward' from Site Allocation Document</b>									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative Net Developable Area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
WAH009	HC1	Riding Way, Short Heath		14	0.40			by 2026	Part is surplus Council property. Inaccessible and little used open space
WAH010	HC1	Hatherton Liberal Club, North Street, Walsall		6	0.18			by 2026	Need to consider potential for housing in conjunction with adjoining sites
WAH011	HC1	Mill Street, (former scrap yard), Walsall		12	0.34			by 2026	Need to consider potential for housing in conjunction with adjoining sites
WAH012	HC1	Watling Street (land north of Kings Deer Road), Brownhills		15	0.21			by 2026	Vacant site adjacent to recently completed housing development.
WAH013	HC1	Poplar Avenue (east), Bentley		23	0.63			by 2026	

Table 32 - Walsall Sites Allocated for Housing 'Carried Forward' from Site Allocation Document									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative Net Developable Area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
WAH014	HC1	Noose Crescent (former Lakeside School), Willenhall		59	1.71			by 2026	Surplus school site owned by Walsall Council
WAH015	HC1	Rear of 16 High Road, Lane Head, Willenhall		29	0.84			by 2026	Garage and open storage area. Site lies in residential area. Housing recently completed on former church site to north-east. Site enlarged to include former site 348
WAH016	HC1	30 to 32 Hollyhedge Lane (east side), Walsall		33	0.29			by 2026	
WAH017	HC1	28 Hollyhedge Lane (east side) (), Walsall		24	0.21			by 2026	

<b>Table 32 - Walsall Sites Allocated for Housing 'Carried Forward' from Site Allocation Document</b>									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative Net Developable Area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
WAH018	HC1	former Bradford Coal Wharf, Hollyhedge Lane (east side) , Walsall		52	0.45			by 2026	
WAH019	HC1	Orange Tree, 20 Wolverhampton Road, Walsall		4	0.03			by 2026	Estimated dwelling capacity based on numbers proposed in planning application 07/0196/FL/W7 divided pro-rata across application site. Suitability for residential subject to air quality being acceptable
WAH020	HC1	Former Metal Casements, Birch Street, Walsall		95	2.71			by 2026	Developability depends on treatment of limestone workings
WAH021	HC1	Hollyhedge Lane (west side), Walsall		14	0.39			by 2026	

<b>Table 32 - Walsall Sites Allocated for Housing 'Carried Forward' from Site Allocation Document</b>									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative Net Developable Area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
WAH022	HC1	Walsall Iron and Steel, Wolverhampton Road, Walsall		67	0.48			by 2026	Potential to develop in conjunction with adjoining former Harvestime
WAH023	HC1	Festival Avenue (end of street), Darlaston		10	0.31			by 2026	Surplus open space.
WAH024	HC1	Festival Avenue, Darlaston		24	0.68			by 2026	Surplus Open Space. Formerly playing field for now demolished school.
WAH025	HC1	Woodwards Road (former garage and vehicle storage yard), Walsall		24	0.37			by 2026	
WAH026	HC1	New Invention Methodist Church, Lichfield Road, New Invention		14	0.42			by 2026	Former church in residential area.

<b>Table 32 - Walsall Sites Allocated for Housing 'Carried Forward' from Site Allocation Document</b>									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative Net Developable Area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
WAH027	HC1	Allen's Centre, Hilton Road, New Invention		22	0.64			by 2026	Surplus council property. Allocation relates to building footprint only, not adjacent open space
WAH028	HC1	Essington Lodge, Essington Road, New Invention		23	0.66			by 2026	Potential surplus Walsall Council property
WAH030	HC1	60, Walsall Road, Willenhall, Walsall		24	0.39			by 2026	Lapsed planning permission for residential development. In use as car parking for adjacent temple
WAH031	HC1	1 and 2 Fletchers Lane, Willenhall		2	0.05			by 2026	allocate for housing in conjunction with adjoining sites
WAH032	HC1	3 Fletchers Lane, Willenhall		3	0.06			by 2026	Lapsed planning permission. Allocate for housing with adjoining sites

<b>Table 32 - Walsall Sites Allocated for Housing 'Carried Forward' from Site Allocation Document</b>									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative Net Developable Area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
WAH033	HC1	ASK Motors, 664 Bloxwich Road, Walsall		20	0.15			by 2026	Lapsed planning permission. Site currently in use for car sales but lies in predominantly residential area
WAH034	HC1	British Lion Works, Forest Lane, Walsall		16	0.23			by 2026	capacity reduced in line with latest permission
WAH035	HC1	British Lion Works, Forest Lane, Walsall		3	0.07			by 2026	Residual area covered by SAD housing allocation. Estimated capacity based on 40dph
WAH036	HC1	Eagle Public House, Creswell Crescent, Bloxwich		17	0.12			by 2026	Lapsed planning permission for apartments. Adjacent to rail station and frequent bus service so suitable for high density residential development despite adjacent development only comprising houses



<b>Table 32 - Walsall Sites Allocated for Housing 'Carried Forward' from Site Allocation Document</b>									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative Net Developable Area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
WAH040	HC1	Former Works Site c/o Cemetery Road, Villiers Street, Willenhall		14	0.16			by 2026	potential for development in conjunction with adjacent sites and as part of Willenhall district centre
WAH043	HC1	Howdles Lane / Castle Street, Brownhills		40	1.19			by 2026	Site boundary amended from UDP allocation to match boundary with Gladstone House and exclude access to Howdles Lane garages
WAH044	HC1	Gladstone House, 45 Castle Street, Brownhills		6	0.18			by 2026	Too small to allocate in SAD by itself, but add to adjoining UDP allocation site (HO168a)
WAH045	HC1	Land adjacent Bentley Green, Bentley Road North, Walsall		144	0.78			by 2026	
WAH046	HC1	Land at Churchill Road and Kent Road, to the rear of 2-14 Kent Road		26	0.92			by 2026	Site boundary and housing capacity based on outline planning

Table 32 - Walsall Sites Allocated for Housing 'Carried Forward' from Site Allocation Document									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative Net Developable Area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
		and 201-205 Churchill Road, Bentley, Walsall							permission. Part of site is within SLINC. Sewer beneath part of site
WAH048	HC1	Bentley Moor Club, Bentley Drive, Walsall		10	0.27			by 2026	lapsed planning permission but site remains clear and available
WAH049	HC1	Lichfield Road, Little Bloxwich		10	0.29			by 2026	Part of UDP allocation has been developed. Remainder of site is currently in use as community transport base
WAH050	HC1	Petrol Station, 274 - 276 Lichfield Road, Willenhall		21	0.51			by 2026	Lapsed planning permission. Site remains in use as petrol station but surrounding area is residential, so this would be preferred alternative use
WAH051	HC1	Rear of Pinson Road, Willenhall		15	0.40			by 2026	Potential to enlarge site to include land to east and north as part of

Table 32 - Walsall Sites Allocated for Housing 'Carried Forward' from Site Allocation Document									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative Net Developable Area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
									Willenhall district centre development
WAH053	HC1	Former Petrol Station corner of Bentley Mill Way, Wolverhampton Road West, Walsall		21	0.10			by 2026	Lapsed planning permission. Potential to be added to adjoining former Pickfords Site IN91.4 but housing in conjunction with Lane Arms PH site more feasible
WAH054	HC1	Former Lane Arms Public House, corner of Bentley Road North, Wolverhampton Road West, Walsall		12	0.24			by 2026	
WAH055	HC1	Between 114 and 120 and 122a and 127 Watling Street/ Roman Close, Brownhills		10	0.29			by 2026	Surplus Walsall Council land.

<b>Table 32 - Walsall Sites Allocated for Housing 'Carried Forward' from Site Allocation Document</b>									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative Net Developable Area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
WAH056	HC1	Cricket Close allotments and tennis courts, Walsall		42	1.22			by 2026	
WAH057	HC1	Former Royal Navy Club, 120 Elmore Green Road, Bloxwich		10	0.10			by 2026	lapsed permission but site remains vacant and available
WAH058	HC1	Gordon House (TA Centre), Sutton Road, Walsall		22	0.63			by 2026	Potential surplus Government property
WAH059	HC1	Narrow Lane House and Neighbourhood Office Site, Narrow Lane, Walsall		14	0.48			by 2026	Surplus Walsall Council property. Boundary revised 29-03-18 following completion of junction improvement

<b>Table 32 - Walsall Sites Allocated for Housing 'Carried Forward' from Site Allocation Document</b>									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative Net Developable Area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
WAH060	HC1	Pleck Working Men's Club, Pleck Road, Walsall		11	0.24			by 2026	Lapsed planning permission. Site has been cleared and in use for temporary car parking
WAH061	HC1	Royal British Legion Club, Broad Lane Gardens, Bloxwich		25	0.71			by 2026	Surplus Walsall Council property
WAH063	HC1	Former Warreners Arms, High Street, Brownhills		58	0.36			by 2026	Capacity based on planning application but this has been withdrawn
WAH065	HC1	Birway Garage, Newhall Street, Willenhall		28	0.33			by 2026	allowed on appeal 6/1/15
WAH066	HC1	Willenhall Coachcraft, 348 Wolverhampton Road West, Willenhall		33	0.62			by 2026	Long established car sales use at front of site but remainder is vacant

<b>Table 32 - Walsall Sites Allocated for Housing 'Carried Forward' from Site Allocation Document</b>									
Site Ref	Policy in Previous Local Plan	Site Name and Address	Growth Area	Indicative Housing Capacity	Gross Site area (ha)	Indicative Net Developable Area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
WAH067	HC1	Rowley View, Moxley (former nursery and open space)		15	0.43			by 2026	Former Rowley View Nursery
WAH068	HC1	Rowley View, Moxley (Former Highgate Arms)		11	0.17			by 2026	Former Highgate Arms Pub.
WAH069	HC1	Gorway Road		25	1.65			by 2026	Future of site needs to be considered in conjunction with remainder of Wolverhampton University site. Still potential for housing, but impact on woodland needs to be addressed

Table 33 - Walsall Sites Allocated for Permanent Gypsy and Traveller Sites by Black Country Plan

Policies	Site Ref	Policy in Previous Local Plan	Site Name and Address	Appropriate Uses	Indicative Development Capacity (housing and employment land)	Site area (ha)	Anticipated Delivery Timescale	Further Information
HOU4	WAGT019	GB1	56 Cartbridge Lane	Travellers	4 pitches	0.27ha	Immediate	Existing occupied site in Green Belt with temporary planning permission that lapsed in 2016
HOU4	WAGT020	GB1	34-38 Gould Firm Lane	Travellers	4 pitches	0.20ha	Immediate	Existing occupied site in Green Belt with personal permission

Table 34 - Walsall Sites allocated for permanent Gypsy and Traveller sites carried forward from Site Allocation Document

Policies	Site Ref	Policy in Previous Local Plan	Site Name and Address	Appropriate Uses	Indicative Development Capacity (housing and employment land)	Site area (ha)	Anticipated Delivery Timescale	Further Information
HOU4	WAGT001	HC4, GB1	Willenhall Lane Caravan Site, Willenhall Lane, Bloxwich (Former Community Room)	Travellers	2 pitches	n/a	2024	Additional pitches on existing local authority site through redevelopment of former community room
HOU4	WAGT002	HC4	Rear of 48 - 72 Foster Street, Blakenall	Travellers	3 pitches	n/a	2024	Existing allocation

Policies	Site Ref	Policy in Previous Local Plan	Site Name and Address	Appropriate Uses	Indicative Development Capacity (housing and employment land)	Site area (ha)	Anticipated Delivery Timescale	Further Information
HOU4	WAGT003	HC4	Dolphin Close (Goscote Site C), Goscote	Travellers	10 pitches	n/a	2024	Existing allocation on local authority owned land

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<b>Table 35 - Walsall Existing Traveller Sites Safeguarded for Current Use and Carried Forward from Site Allocation Document</b>								
<b>Policies</b>	<b>Site Ref</b>	<b>Policy in Previous Local Plan</b>	<b>Site Name and Address</b>	<b>Appropriate Uses</b>	<b>Indicative Development Capacity (housing and employment land)</b>	<b>Site area (ha)</b>	<b>Anticipated Delivery Timescale</b>	<b>Further Information</b>
HOU4	WAGT018	HC4, GB1	Willenhall Lane Caravan Site, Willenhall Lane, Bloxwich	Travellers	19 pitches			
HOU4	WAGT005	HC4	Haywoods, Noose Lane, Willenhall	Travellers	1 pitch			
HOU4	WAGT004	HC4	Trentham Cottage, Noose Lane, Willenhall	Travellers	11 pitches			
HOU4	WAGT006	HC4	47A Guild Avenue, Bloxwich	Travellers	1 pitch			
HOU4	WAGT007	HC4, GB1	Railswood Nursery, Railswood Drive, Pelsall	Travellers	1 pitch			
HOU4	WAGT016	HC4	Adjacent 1 Croft Street, Willenhall	Travellers	1 pitch			

Table 35 - Walsall Existing Traveller Sites Safeguarded for Current Use and Carried Forward from Site Allocation Document								
Policies	Site Ref	Policy in Previous Local Plan	Site Name and Address	Appropriate Uses	Indicative Development Capacity (housing and employment land)	Site area (ha)	Anticipated Delivery Timescale	Further Information
HOU4	WAGT012	HC4, GB1	Bridge Farm, Goscote Lane, Bloxwich	Showpeople	12 plots			
HOU4	WAGT011	HC4, GB1	Oak Tree Farm, Goscote Lane, Bloxwich	Showpeople	9 plots			
HOU4	WAGT010	HC4, GB1	Goscote Lane (Storage Yard), Bloxwich	Showpeople	0 (storage area)			
HOU4	WAGT009	HC4, GB1	Showmen's Guild Site, Goscote Lane, Bloxwich	Showpeople	20 plots			
HOU4	WAGT013	HC4, GB1	East of Goscote Lane (Strawberry Fields), Bloxwich	Showpeople	1 plot			
HOU4	WAGT014	HC4	Lindon Road, Brownhills	Showpeople	1 plot			
HOU4	WAGT017	HC4	Toberland, Reaymer Close, Walsall	Showpeople	14 plots			

**Table 35 - Walsall Existing Traveller Sites Safeguarded for Current Use and Carried Forward from Site Allocation Document**

Policies	Site Ref	Policy in Previous Local Plan	Site Name and Address	Appropriate Uses	Indicative Development Capacity (housing and employment land)	Site area (ha)	Anticipated Delivery Timescale	Further Information
HOU4	WAGT015	HC4	Charlie Swann, 110 Lindon Road, Brownhills	Showpeople	9 plots			

**Table 36 - Walsall Sites Allocated for Employment by Black Country Plan (policy EMP1)**

BCP Site Ref	Policy in previous local plan	Site Name and Address	Indicative development capacity (ha employment land)	Gross site area (ha)	Anticipated delivery timescale	Further Information
WAE409	GB1	237 Watling Street, Brownhills	5.92	5.92	By 2039	Neighbourhood Growth Area
WAE404	GB1	Lynx / Beatwaste Site, Bentley Lane	11.22	11.2	By 2039	Former landfill site in green belt. Investigation and remediation of contaminated land.
WAE410	GB1	Johnsons Farm and Meadow Farm	8.41	8.41	By 2039	Neighbourhood Growth Area. Footpaths are required to serve the development along Lichfield Road and Hanney Hay Road. The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical

BCP Site Ref	Policy in previous local plan	Site Name and Address	Indicative development capacity (ha employment land)	Gross site area (ha)	Anticipated delivery timescale	Further Information
						and environmentally feasible prior extraction for bedrock sand and gravel, shall take place.
WAE411	GB1	Land to the south east of Longwood Bridge	1.3	1.3	By 2039	Neighbourhood Growth Area adjacent to Aldridge Airport industrial area. Established trees worthy of protection shall be retained and could reduce the developable area.
WAE412	GB1	Sandown Quarry, Stubbers Green Road, Aldridge	20.85	20.85	By 2039	<p>Currently active quarry that will need to be infilled and stabilised before development.</p> <p>Landscaping scheme required in the interests of local amenities and ecology. The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for superficial sand and gravel, brick clay shall take place.</p>

Table 37 - Walsall Sites Allocated for Employment 'Carried Forward' from Site Allocation Document						
BCP Site Ref	Policy in Previous Local Plan (replaced unless stated)	Site Name and Address	Indicative Development Capacity (ha employment land)	Gross Site area (ha)	Anticipated Delivery Timescale	Further Information
WAE002	IND3	Pelsall Road / Bullows Road, Brownhills		1.51		
WAE005	IND2	North of Maybrook / Clayhanger Road, Brownhills		1.79		
WAE004	IND3	Former scrapyard, north of Joberns Tip, Coppice Lane, Walsall Wood		1.91		
WAE007	IND3	Longleat Road, Walsall Wood (south of Focus Car Park)		0.19		
WAE009	IND3	Land corner of Northgate / Longleat Road, Aldridge		0.62		
WAE010	IND2	Adjacent Shaylors, Anchor Industrial Park, Wharf Approach, Aldridge		0.95		
WAE012	IND2	Former Aldridge Rail Sidings, Middlemore Lane, Aldridge		2.16		
WAE014	IND2	Former Jack Allen Site, South of Middlemore Lane, Aldridge		1.87		
WAE021	IND2	McKechnie Brass, Middlemore Lane, Aldridge		6.34		

Table 37 - Walsall Sites Allocated for Employment 'Carried Forward' from Site Allocation Document						
BCP Site Ref	Policy in Previous Local Plan (replaced unless stated)	Site Name and Address	Indicative Development Capacity (ha employment land)	Gross Site area (ha)	Anticipated Delivery Timescale	Further Information
WAE017	IND3	Focus 10 (adjacent former Trident Alloys), Willenhall Lane, Bloxwich		5.92		
WAE024	IND3	Fryers Road, Bloxwich		3.82		
WAE018	IND3	Rear of Biasi House, opposite Mary Elliot School, Leamore Lane		0.55		
WAE027	IND2	Former Calor Gas Site fronting Green Lane, Walsall		1.01		
WAE041	IND2	North of Newfield Close, Walsall		2.19		
WAE032	IND3	Former scrap yard, Alma Street, Walsall		0.51		
WAE052	IND2	Walsall Enterprise Park West, Regal Drive, Pleck		0.79		
WAE056	IND2	Adjacent to Middletons, Bescot Crescent		0.43		
WAE058	IND2	Reedswood Way		4.02		

Table 37 - Walsall Sites Allocated for Employment 'Carried Forward' from Site Allocation Document						
BCP Site Ref	Policy in Previous Local Plan (replaced unless stated)	Site Name and Address	Indicative Development Capacity (ha employment land)	Gross Site area (ha)	Anticipated Delivery Timescale	Further Information
WAE063	IND2	Tempus 10 North (land east of KFC, Tempus Drive)		1.76		
WAE064	IND2	Tempus 10 South (land south of Village Hotel, Tempus Drive)		1.64		
WAE068	IND3	Land between St. Annes Road, Monmer Lane and Sharesacre Street, Willenhall		2.57		
WAE065	IND3	Adjacent Rainbow Business Park, Stringes Lane, Willenhall		0.45		
WAE069	IND3	Former Ductile, Charles Street, Willenhall		2.59		
WAE070	IND2	Aspray (Former George Carter Pressings), Park Road, Willenhall		1.24		
WAE076	IND3	Land rear of Guardian Lock and 47 Wednesfield Road, Willenhall		0.39		
WAE071	IND3	North of Watery Lane, Willenhall		0.63		

Table 37 - Walsall Sites Allocated for Employment 'Carried Forward' from Site Allocation Document						
BCP Site Ref	Policy in Previous Local Plan (replaced unless stated)	Site Name and Address	Indicative Development Capacity (ha employment land)	Gross Site area (ha)	Anticipated Delivery Timescale	Further Information
WAE072	IND3	Rear of Assa Abloy, School Street, Willenhall		2.24		
WAE076	IND2	Rear of 18 Rose Hill, Willenhall		0.3		
WAE078	IND2	North of Westacre, Willenhall		0.64		
WAE084	IND2	Central Point, Willenhall Road, Darlaston		1.67		
WAE093	IND2	Access 10 Business Park, land adjacent Unit 401, Bentley Road South		1.03		
WAE099	IND2	Heath Road / Kendricks Road, Darlaston		0.41		
WAE103	IND3	Former IMI south of canal, Darlaston Road, Pleck (Phoenix 10 Site A - Part)		0.84		
WAE104	IND2	Former IMI Works, Pleck (Phoenix 10 Site A - part)		9.45		
WAE106	IND2	North of IMI, Pleck (Phoenix 10 Site B)		4.09		



Table 37 - Walsall Sites Allocated for Employment 'Carried Forward' from Site Allocation Document						
BCP Site Ref	Policy in Previous Local Plan (replaced unless stated)	Site Name and Address	Indicative Development Capacity (ha employment land)	Gross Site area (ha)	Anticipated Delivery Timescale	Further Information
WAE105	IND2	Rear of Globe Pub, Darlaston Road, Walsall		2.89		
WAE109	IND2	Box Pool Site, Darlaston Road, Walsall		1.67		
WAE110	IND2	James Bridge Gasholders Site, Darlaston Road, Walsall		8.22		
WAE118	IND2	Rear of Woods Bank Trading Estate, Woden Road West, Darlaston		1.2		
WAE120	IND2	Moxley Junction, Moxley		0.48		
WAE122	IND5	Former Moxley Tip, Moxley Road		10.38		
WAE205	IND2	Bentley Mill Way East (Phoenix 10 Site C)		2.4		
WAE315	IND5	Casino and Cinema, Bentley Mill Way		4.58		
WAE317	IND5	Millers Close, Bentley Mill Way		0.82		
WAE328	IND3	Leamore Lane (south side - former Dealeys Castings)		2.54		

Table 37 - Walsall Sites Allocated for Employment 'Carried Forward' from Site Allocation Document						
BCP Site Ref	Policy in Previous Local Plan (replaced unless stated)	Site Name and Address	Indicative Development Capacity (ha employment land)	Gross Site area (ha)	Anticipated Delivery Timescale	Further Information
WAE333	IND5	Willenhall Sewage Works		8.9		
WAE341	IND5	Hughes Road, Moxley		4.37		

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## Strategic Allocations

- C.31 The following strategic allocations are large sites that are significant in size and that have specific development considerations. Decisions on planning applications for these sites should be made in accordance with the specific policy requirements listed in this document.
- C.32 For each site where the allocation includes housing, an indicative site capacity is provided. The precise number of homes to be developed will be determined through the planning application process.

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## Aldridge North & Walsall Wood

### Policy WSA1 (Walsall Strategic Allocation) – Home Farm, Sandhills, Walsall Wood

**Black Country Plan**  
Planning for the future of the Black Country

STRATEGIC ALLOCATION



**Key:**

Strategic Allocation	Environmental Agency (EA) Flood Zone 2
Conservation Area	EA Flood Zone 3
Listed Buildings	JBA Indicative Flood Zone 2
Individual Tree Preservation Order (TPO)	JBA Indicative Flood Zone 3a
Grouped TPO	JBA Indicative Flood Zone 3b
Sites of Importance for Nature Conservation (SINC)	
Sites of Local Importance for Nature Conservation (SLINC)	
Greenway	
Green Belt	

<b>Strategic Allocation:</b>	WSA.1
<b>Site Assessment Reference:</b>	SA-0022-WAL
<b>Site Names:</b>	Home Farm, Sandhills, Walsall Wood, Walsall, West Midlands
<b>Local Authority:</b>	Walsall
<b>Ward:</b>	Aldridge North and Walsall Wood



## General introduction

- C.33 Home Farm is located on the northern boundary of Walsall with Lichfield. The northwest boundary is defined by the Wyrley and Essington Canal, with housing beyond and industrial uses to the far northwest corner. The northeast boundary follows the boundary to Lichfield District with more land in agricultural use beyond. The southwest boundary meets the rear garden boundaries to houses on Chester Road. The southeast boundary meets the Lichfield Road with houses on the opposite side.
- C.34 The developable area is 54 hectares.
- C.35 The estimated capacity of the site is 1435 houses.
- C.36 Mixed tenure housing is suitable on the site, with higher densities of at least 35dph and affordable housing provision.

## Design principles:

- Deliver appropriate local facilities to support the new residents and to enhance the sustainability of the existing area, including a new primary school and local health centre.
- Investigation and detailed proposals for remediation of contaminated land.
- A transport strategy that includes:
  - unconnected access to and from the site along Chester Road and Lichfield Road;
  - necessary capacity mitigation and improvements to the junction at Lichfield Road and Chester Road;
  - provides a new traffic light junction between Lindon Road and Chester Road; and
  - provides opportunities for bus routes to serve the development.
- Enhanced provision for pedestrians and cyclists, including enhanced connectivity with the district centre.
- Develop a site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.

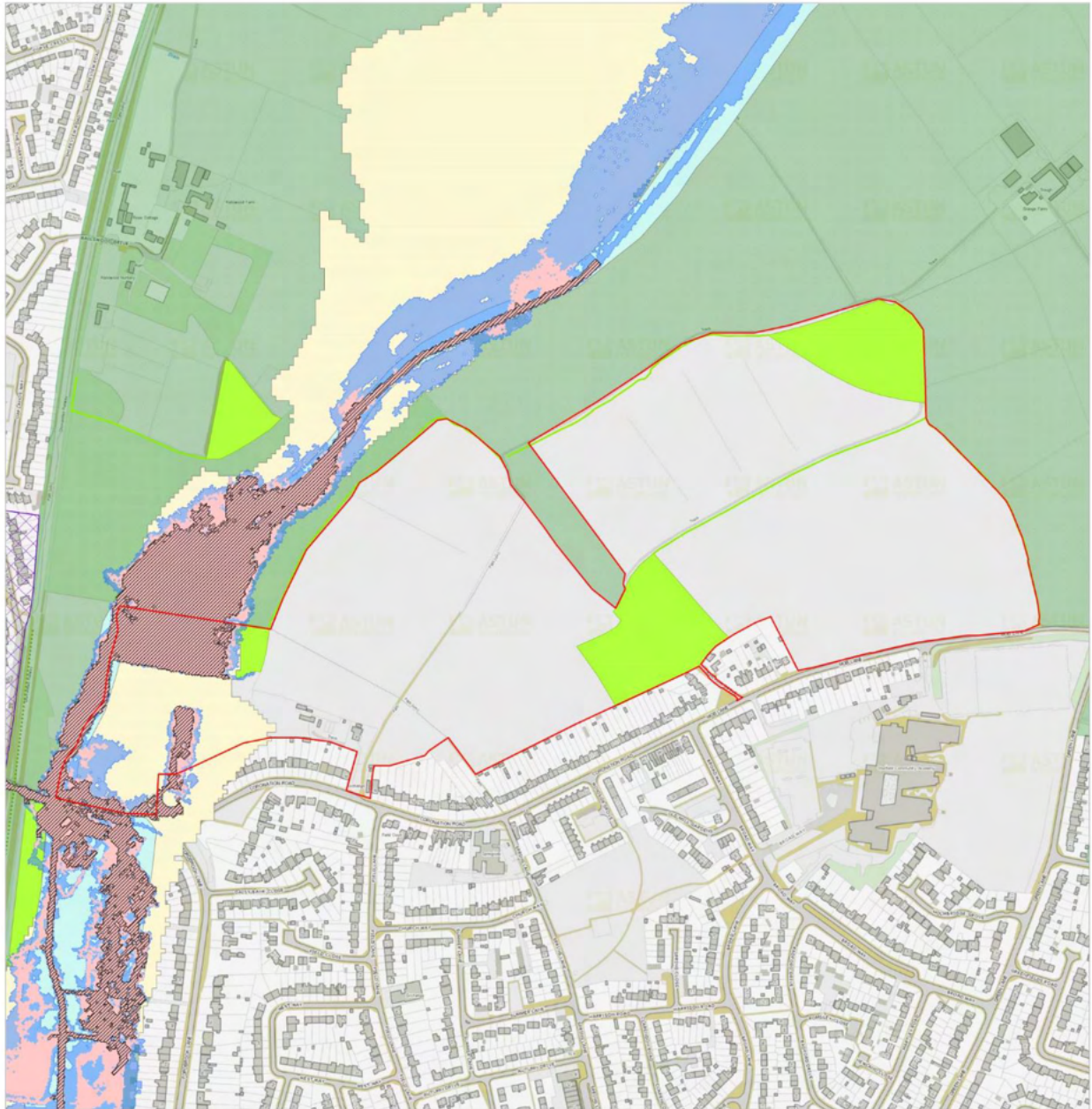
- A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character or on protected animal species
- The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.

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**Policy WSA2 – Land at Vicarage Road and Coronation Road, High Heath and land at Mob Lane, Pelsall**

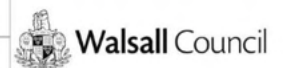


**STRATEGIC ALLOCATION**



Strategic Allocation	Environmental Agency (EA) Flood Zone 2
Conservation Area	EA Flood Zone 3
Listed Buildings	JBA Indicative Flood Zone 2
Individual Tree Preservation Order (TPO)	JBA Indicative Flood Zone 3a
Grouped TPO	JBA Indicative Flood Zone 3b
Sites of Importance for Nature Conservation (SINC)	
Sites of Local Importance for Nature Conservation (SLINC)	
Greenway	
Green Belt	

<b>Strategic Allocation:</b>	<b>WSA.2</b>
<b>Site Assessment Reference:</b>	SA-0056-WAL & SA-0048-WAL
<b>Site Names:</b>	Land at Mob Lane, Pelsall, Walsall, West Midlands
<b>Local Authority:</b>	Walsall
<b>Ward:</b>	Aldridge North and Walsall Wood



## General introduction

- C.37 Land at Vicarage Road and Coronation Road and land at Mob Lane is located along the northern urban edge of High Heath. To the north are fields with Pelsall and Clayhanger urban areas beyond, to the east fields and a sewage works, to the south is proposed allocation WSA3, High Heath and an area of housing that is characterised by predominantly traditional semi-detached houses, and to the west is Pelsall and a former railway line.
- C.38 The developable site area is 30.19ha.
- C.39 The estimated capacity of the site is 713 houses.
- C.40 Mixed tenure housing is suitable with higher densities of at least 35dph and affordable housing provision.

## Design principles:

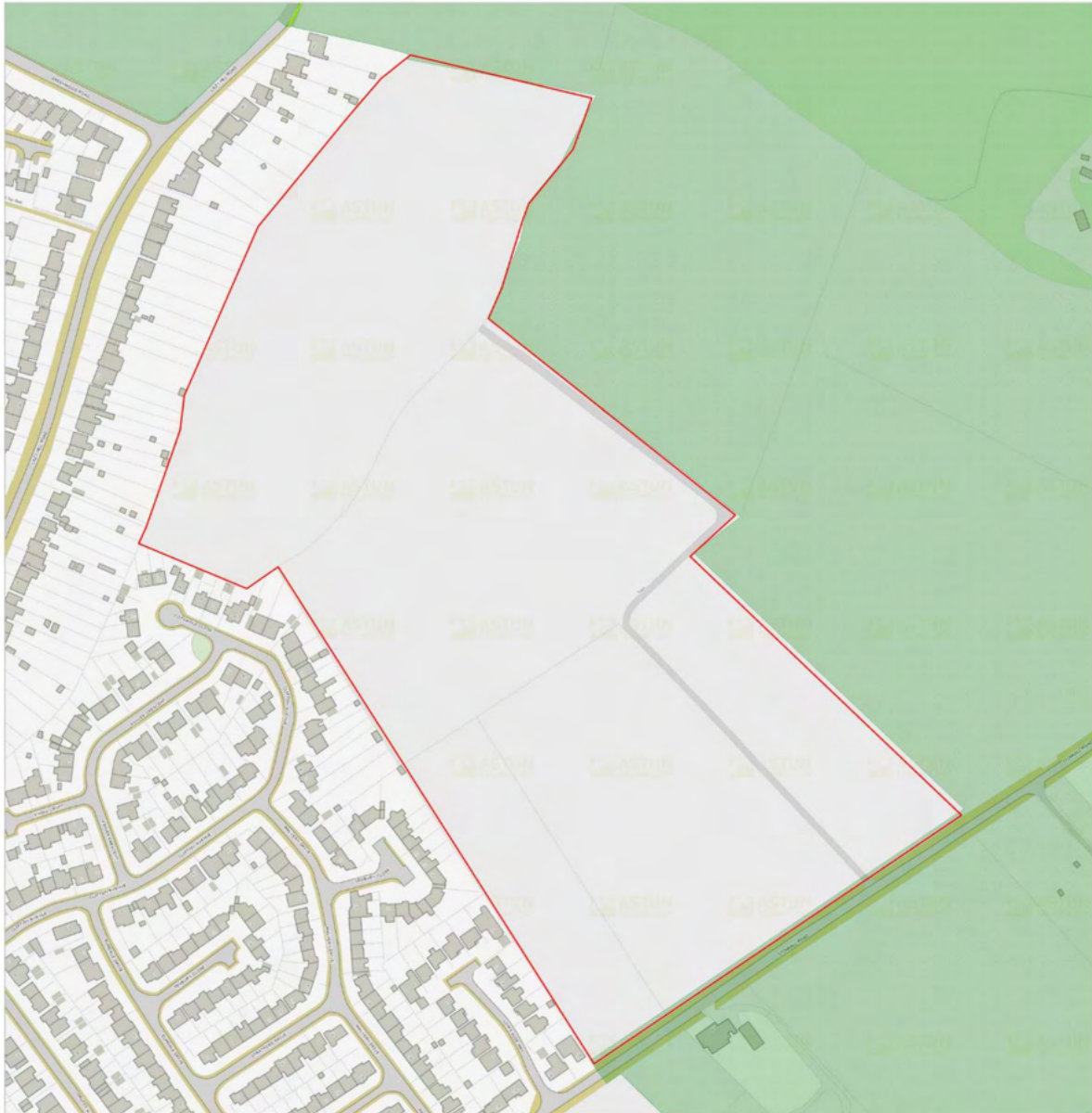
- Deliver appropriate local facilities to support the new residents and to enhance the sustainability of the existing area, including a new primary school and local health centre.
- Investigation of and detailed proposals for the remediation of contaminated land.
- A transport strategy that includes improvements to Mob Lane and Green Lane.
- A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and that is designed to deliver landscape, biodiversity and amenity benefits.
- A strategy for landscape and habitat creation that provides enhancement, retention and / or mitigation for established trees and hedges, to ensure there are no significant adverse impacts on visual amenity and character or on protected animal species.
- The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.



Policy WSA3 – Land north of Stonnall Road, Aldridge



STRATEGIC ALLOCATION



**Key:**

Strategic Allocation	Environmental Agency (EA) Flood Zone 2
Conservation Area	EA Flood Zone 3
Listed Buildings	JBA Indicative Flood Zone 2
Individual Tree Preservation Order (TPO)	JBA Indicative Flood Zone 3a
Grouped TPO	JBA Indicative Flood Zone 3b
Sites of Importance for Nature Conservation (SINC)	
Sites of Local Importance for Nature Conservation (SLINC)	
Greenway	
Green Belt	

<b>Strategic Allocation:</b>	WSA.3
<b>Site Assessment Reference:</b>	SA-0034-WAL
<b>Site Names:</b>	Land North of Stonnall Road, Aldridge, Walsall
<b>Local Authority:</b>	Walsall
<b>Ward:</b>	Aldridge North and Walsall Wood



## General introduction

- C.41 Land north of Stonnall Road is located along the eastern urban edge of Aldridge. To the north are houses; to the east agricultural fields; to the south is proposed allocation WAH253 and agriculture beyond; and to the west are houses. The predominant character of houses here are a mix of detached bungalows and houses, modern but traditionally styled.
- C.42 The estimated capacity of the site is 13.82ha.
- C.43 The site is proposed to be allocated for 363 houses.
- C.44 Mixed tenure housing is suitable, with higher densities of at least 35dph and affordable housing provision.

## Design principles:

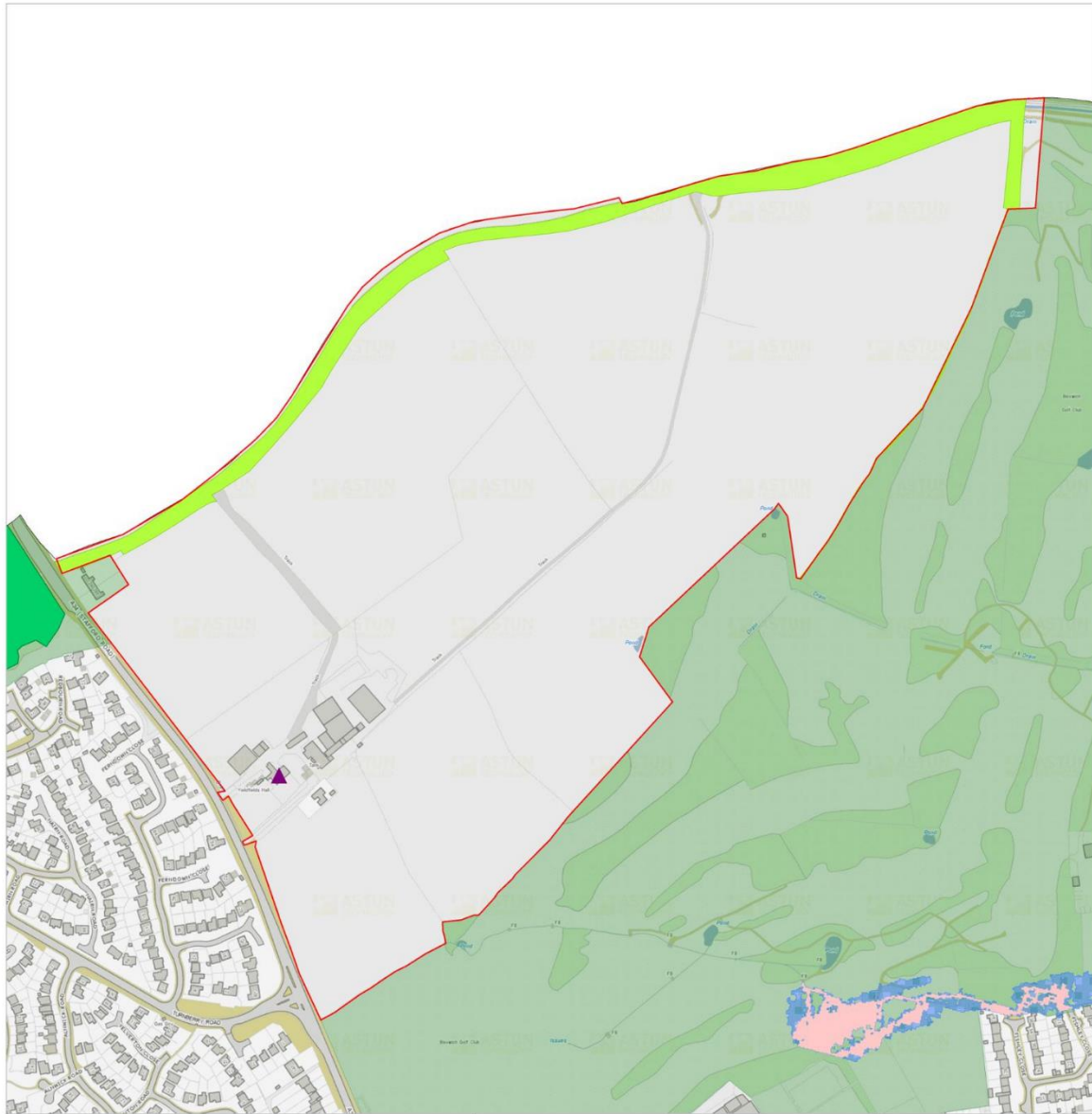
- Improvements to local facilities, to support residents and to enhance the sustainability of the existing area, in particular improved capacity at the primary school and local health centre.
- Investigation of and detailed proposals for remediation of contaminated land.
- A transport strategy that includes widening to Stonnall Road for the extent of the site allocation and improves pedestrian access.
- Develop a site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.
- Develop a strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character or on protected animal species.
- The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.

## Bloxwich East

### Policy WSA4 – Yieldsfield Farm (sometimes recorded as Yieldfields farm), Stafford Road, Bloxwich

**Black Country Plan**  
 Planning for the future of the Black Country

STRATEGIC ALLOCATION



**Key:**

Strategic Allocation	Environmental Agency (EA) Flood Zone 2
Conservation Area	EA Flood Zone 3
Listed Buildings	JBA Indicative Flood Zone 2
Individual Tree Preservation Order (TPO)	JBA Indicative Flood Zone 3a
Grouped TPO	JBA Indicative Flood Zone 3b
Sites of Importance for Nature Conservation (SINC)	
Sites of Local Importance for Nature Conservation (SLINC)	
Greenway	
Green Belt	

<b>Strategic Allocation:</b>	WSA.4
<b>Site Assessment Reference:</b>	SA-0014-WAL
<b>Site Names:</b>	Land at Yieldsfield Farm, Stafford Road, North of Bloxwichll
<b>Local Authority:</b>	Walsall/ South Staffs
<b>Ward:</b>	Bloxwich East



## General introduction

- C.45 Yieldsfield Farm is located along the northern urban edge of Bloxwich. To the north are fields with Newtown and Landywood beyond in South Staffordshire District. To the east lie fields and to the south is Bloxwich Golf Course. To the west is the Turnberry housing estate, composed of predominantly modern, traditionally styled detached houses. Within this site is Yieldsfield Hall, a Grade II listed building.
- C.46 The developable site area is 26ha.
- C.47 The estimated capacity of the site is 978 houses.
- C.48 Mixed tenure housing is suitable on the site with higher densities of at least 35dph and affordable housing provision.

## Design principles:

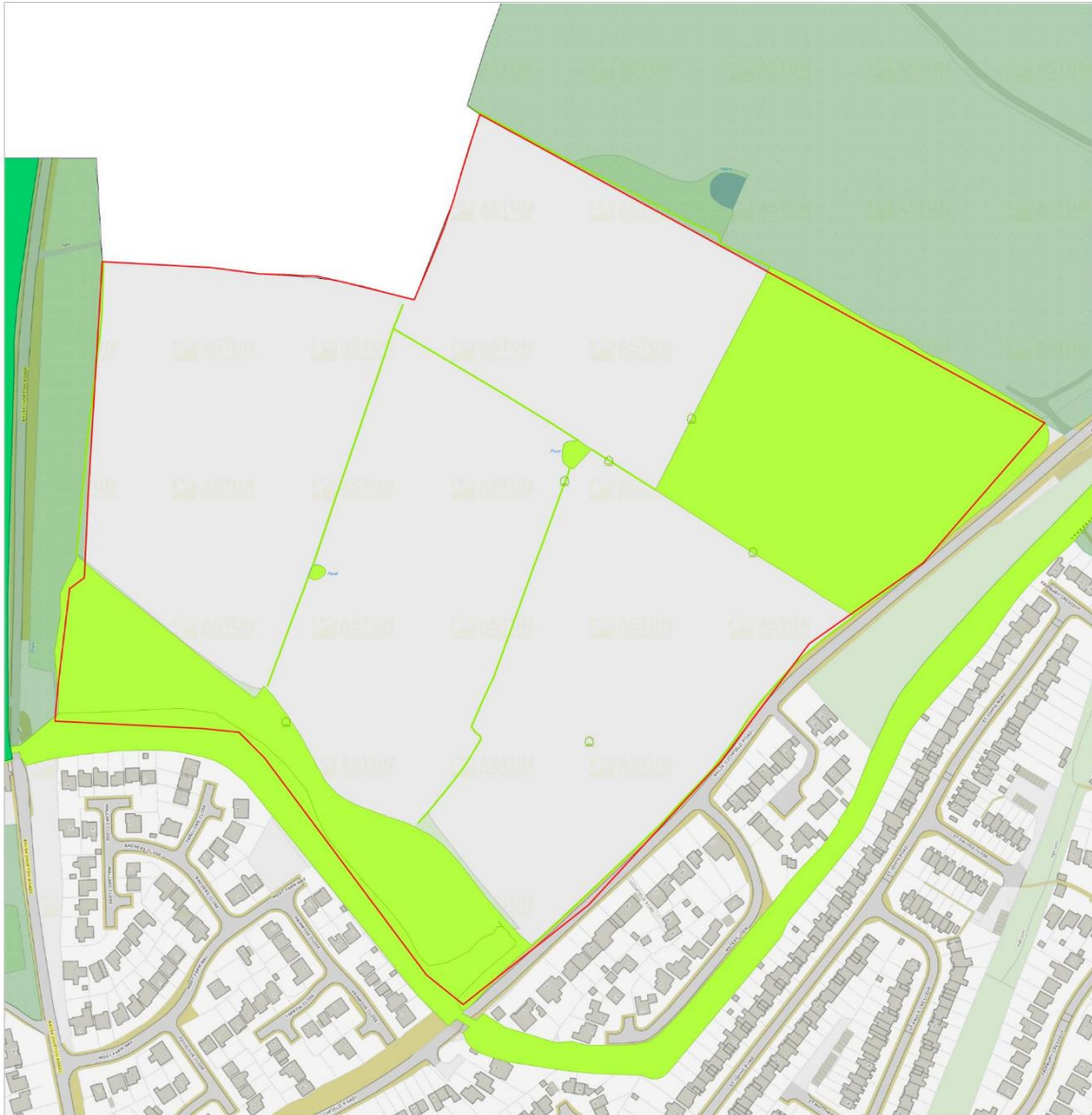
- High quality, sensitive design and layout that conserves and enhances the setting and significance of Yieldsfield Hall, a Grade II listed building; this must be informed by a detailed heritage character assessment for the proposal.
- Delivery of appropriate local facilities to support residents and to enhance the sustainability of the existing area, including a new primary, school and local health centre.
- Contribution to improvements for secondary school provision in North Bloxwich.
- Investigation and detailed proposals for remediation of contaminated land.
- A transport strategy that includes new crossing points on the A34 and a new vehicular junction to serve the development.
- A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.
- A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character, in particular that might be experienced from the north and west, and to ensure there is no significant adverse impact on protected animal species.

# Pelsall

## Policy WSA5 – Land at Yorks Bridge, Lichfield Road, Pelsall

**Black Country | Plan**  
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STRATEGIC ALLOCATION



<b>Key:</b> Strategic Allocation Conservation Area Listed Buildings Individual Tree Preservation Order (TPO) Grouped TPO Sites of Importance for Nature Conservation (SINC) Sites of Local Importance for Nature Conservation (SLINC) Greenway Green Belt Environmental Agency (EA) Flood Zone 2 EA Flood Zone 3 JBA Indicative Flood Zone 2 JBA Indicative Flood Zone 3a JBA Indicative Flood Zone 3b	<b>Strategic Allocation:</b>	WSA.5
	<b>Site Assessment Reference:</b>	SA-0030-WAL
	<b>Site Names:</b>	Land at Yorks Bridge, Lichfield Road, Pelsall, Walsall
	<b>Local Authority:</b>	Walsall/ South Staffs
	<b>Ward:</b>	Pelsall



## General introduction

- C.49 Yorks Bridge is located on the northern urban edge of Pelsall, along the border with Cannock Chase District. To the north are fields with Norton Canes the nearest urban area beyond in Cannock. To the east lie fields; to the south and west is residential development, predominantly modern, traditionally-styled detached houses. The site contains ten protected trees and a SLINC to the east.
- C.50 The developable site area is 13.47ha.
- C.51 The estimated capacity of the site is 580 houses.
- C.52 Mixed tenure housing is suitable with higher densities of at least 35dph and affordable housing provision.

## Design principles:

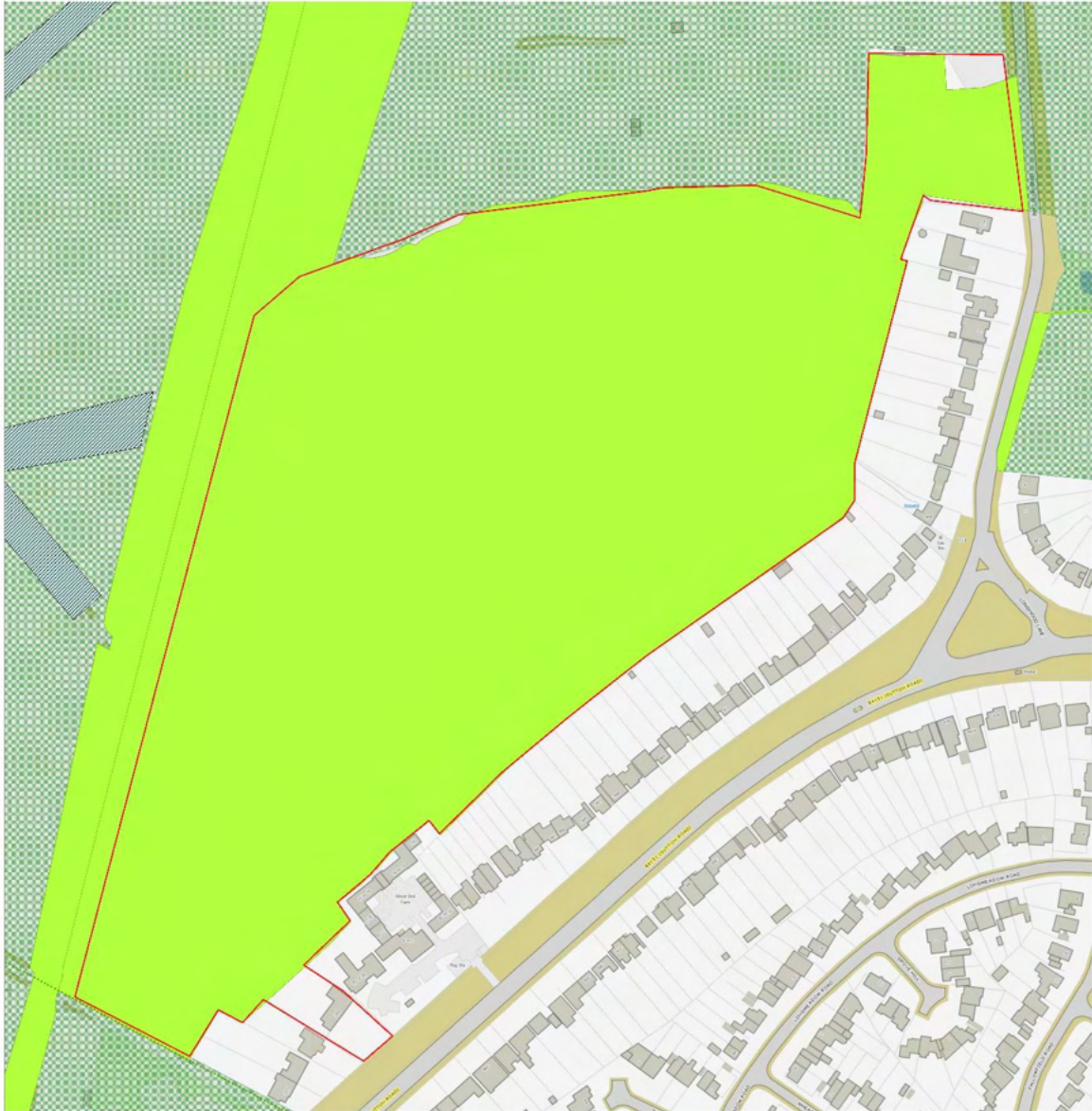
- Delivery of appropriate local facilities to support residents and to enhance the sustainability of the existing area, including a new primary school and local health centre.
- Investigation and detailed proposals for the remediation of contaminated land.
- A transport strategy that includes the widening of Lichfield Road to allow for a ghost turn into the site, and which includes necessary capacity mitigation and improvements to the junction at Lichfield Road, Wolverhampton Road, Lime Lane and Walsall Road.
- A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits whilst protecting existing SLINC designated areas.
- A strategy for landscape and habitat creation, which provides enhancement, retention and mitigation for protected and established trees and hedges, to ensure there is no significant adverse impact on ecology, biodiversity, visual amenity and character and protected animal species.

## Pheasey Park Farm

### Policy WSA6 – Land off Sutton Road, Longwood Lane, Walsall

**Black Country Plan**  
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STRATEGIC ALLOCATION



**Key:**

Strategic Allocation	Environmental Agency (EA) Flood Zone 2
Conservation Area	EA Flood Zone 3
Listed Buildings	JBA Indicative Flood Zone 2
Individual Tree Preservation Order (TPO)	JBA Indicative Flood Zone 3a
Grouped TPO	JBA Indicative Flood Zone 3b
Sites of Importance for Nature Conservation (SINC)	
Sites of Local Importance for Nature Conservation (SLINC)	
Greenway	
Green Belt	

<b>Strategic Allocation:</b>	WSA.6
<b>Site Assessment Reference:</b>	SA-0012-WAL
<b>Site Names:</b>	Land off Sutton Road, Longwood Lane, Walsall
<b>Local Authority:</b>	Walsall
<b>Ward:</b>	Pheasey Park Farm



## General introduction

- C.53 Land off Sutton Road, Longwood Lane is located along the very northern part of Pheasey Park Farm. To the north are fields, to the east and south are houses and to the west is the canal with Arboretum Park beyond it. The character of the immediate area is defined by predominantly traditionally-styled detached houses. The site has recently been designated a SLINC.
- C.54 The developable site area is 7.74ha.
- C.55 The estimated capacity of the site is 202 houses.
- C.56 Mixed tenure housing is suitable in this location, with higher densities of at least 35dph and affordable housing provision.

## Design principles:

- Improvements to local facilities, to support residents and to enhance the sustainability of the existing area, in particular improved capacity at the primary school and local health centre.
- Investigation of and detailed proposals for the remediation of contaminated land.
- A transport strategy that includes single access onto Sutton Road, and which ensures that the transport impacts of the development are appropriately managed and mitigated.
- Enhanced provision for pedestrians and cyclists, including enhanced connectivity with cycle route CR012.
- A site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and that are designed to deliver landscape, biodiversity and amenity benefits, which also takes full account of existing watercourses.
- A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for existing SLINC features and established trees, to ensure there is no significant adverse impact on ecology, biodiversity, visual amenity and character or on protected animal species.

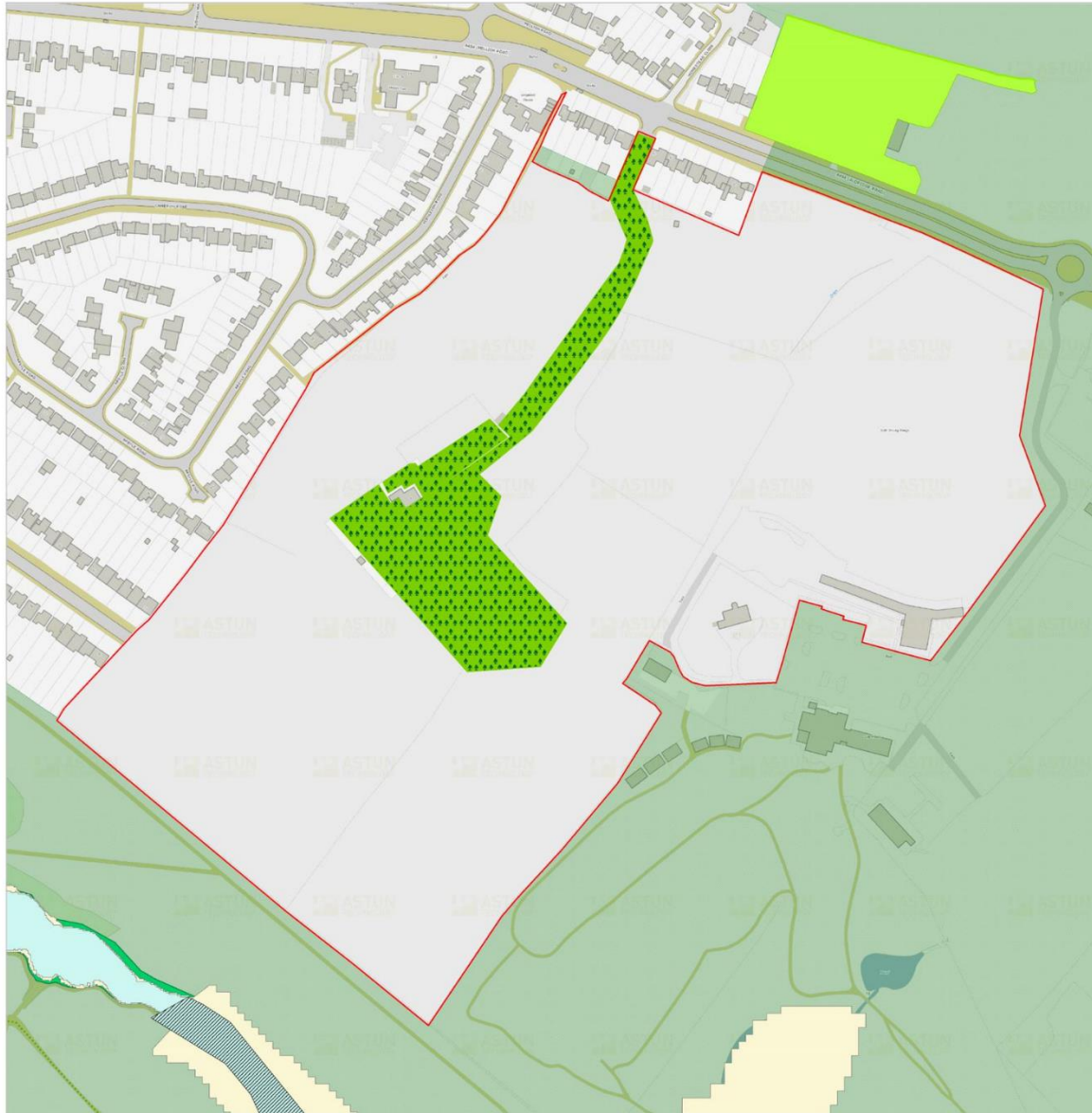


## St Matthews

### Policy WSA7 – Calderfields West, Land at Aldridge Road, Walsall

**Black Country Plan**  
Planning for the future of the Black Country

STRATEGIC ALLOCATION



**Key:**

Strategic Allocation	Environmental Agency (EA) Flood Zone 2
Conservation Area	EA Flood Zone 3
Listed Buildings	JBA Indicative Flood Zone 2
Individual Tree Preservation Order (TPO)	JBA Indicative Flood Zone 3a
Grouped TPO	JBA Indicative Flood Zone 3b
Sites of Importance for Nature Conservation (SINC)	
Sites of Local Importance for Nature Conservation (SLINC)	
Greenway	
Green Belt	

<b>Strategic Allocation:</b>	WSA.7
<b>Site Assessment Reference:</b>	SA-0078-WAL
<b>Site Names:</b>	Calderfields West, Aldridge Road, Walsall - Land at Aldridge Road
<b>Local Authority:</b>	Walsall
<b>Ward:</b>	St. Matthews



## General introduction

- C.57 The site at Calderfields West, on land at Aldridge Lane, is located along the eastern urban edge of St. Mathews. To the north are fields, to the east is Calderfields Golf Club, to the south is the Arboretum and to the west are houses. The character of the area is a mix of traditional and modern styled detached houses. Within the developable site area is Calderfields Farm, which provides seven existing barn conversion properties with gated access from Aldridge Road.
- C.58 The developable site area is 18.6ha.
- C.59 The estimated capacity of the site is 592 houses.
- C.60 Mixed tenure housing is suitable with higher densities of at least 35dph and affordable housing provision.

## Design principles:

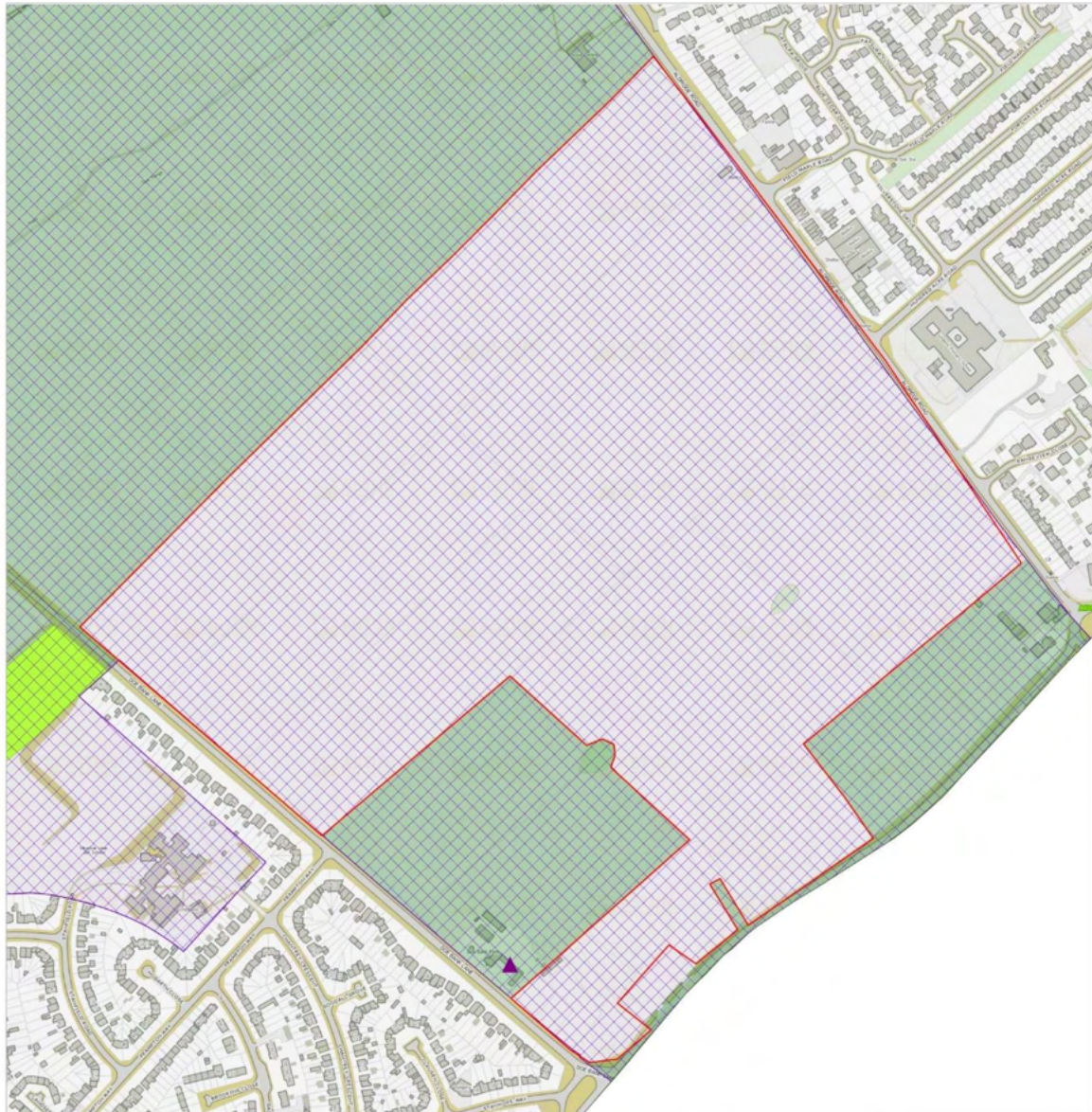
- Deliver appropriate local facilities to support the new residents and to enhance the sustainability of the existing area, including a new primary school and local health centre.
- Investigation and detailed proposals for the remediation of contaminated land.
- A transport strategy that ensure that the transport impacts of the development are appropriately managed and mitigated.
- Enhanced provision for pedestrians and cyclists, including enhanced connectivity with the town centre.
- A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.
- A strategy for landscape and habitat creation, in particular along the southern boundary to the Arboretum, providing new tree planting to ensure there is no significant adverse impact on the visual amenity and character of the Arboretum, nor on protected animal species.

## Streetly

### Policy WSA8 – Land between Queslett Road, Doe Bank Lane and Aldridge Road, Pheasey



#### STRATEGIC ALLOCATION



**Key:**

Strategic Allocation	Environmental Agency (EA) Flood Zone 2
Conservation Area	EA Flood Zone 3
Listed Buildings	JBA Indicative Flood Zone 2
Individual Tree Preservation Order (TPO)	JBA Indicative Flood Zone 3a
Grouped TPO	JBA Indicative Flood Zone 3b
Sites of Importance for Nature Conservation (SINC)	
Sites of Local Importance for Nature Conservation (SLINC)	
Greenway	
Green Belt	

<b>Strategic Allocation:</b>	WSA.8
<b>Site Assessment Reference:</b>	SA-0017-WAL
<b>Site Names:</b>	(Former Columba Park) Land at Queslett Road/Aldridge Road.
<b>Local Authority:</b>	Walsall
<b>Ward:</b>	Streetly



## General introduction

- C.61 Land between Queslett Road, Doe Bank Lane and Aldridge Road is made up of fields between the Pheasey Estate and Streetly. To the north are agricultural fields, to the east, south and west lies housing. The site surrounds Doe Bank Lane Farmhouse and farm buildings to the west, which are Grade II listed.
- C.62 The developable site area is 42.27ha.
- C.63 The estimated capacity of the site is 1426 houses.
- C.64 Mixed tenure housing is suitable with higher densities of at least 35dph and affordable housing provision.

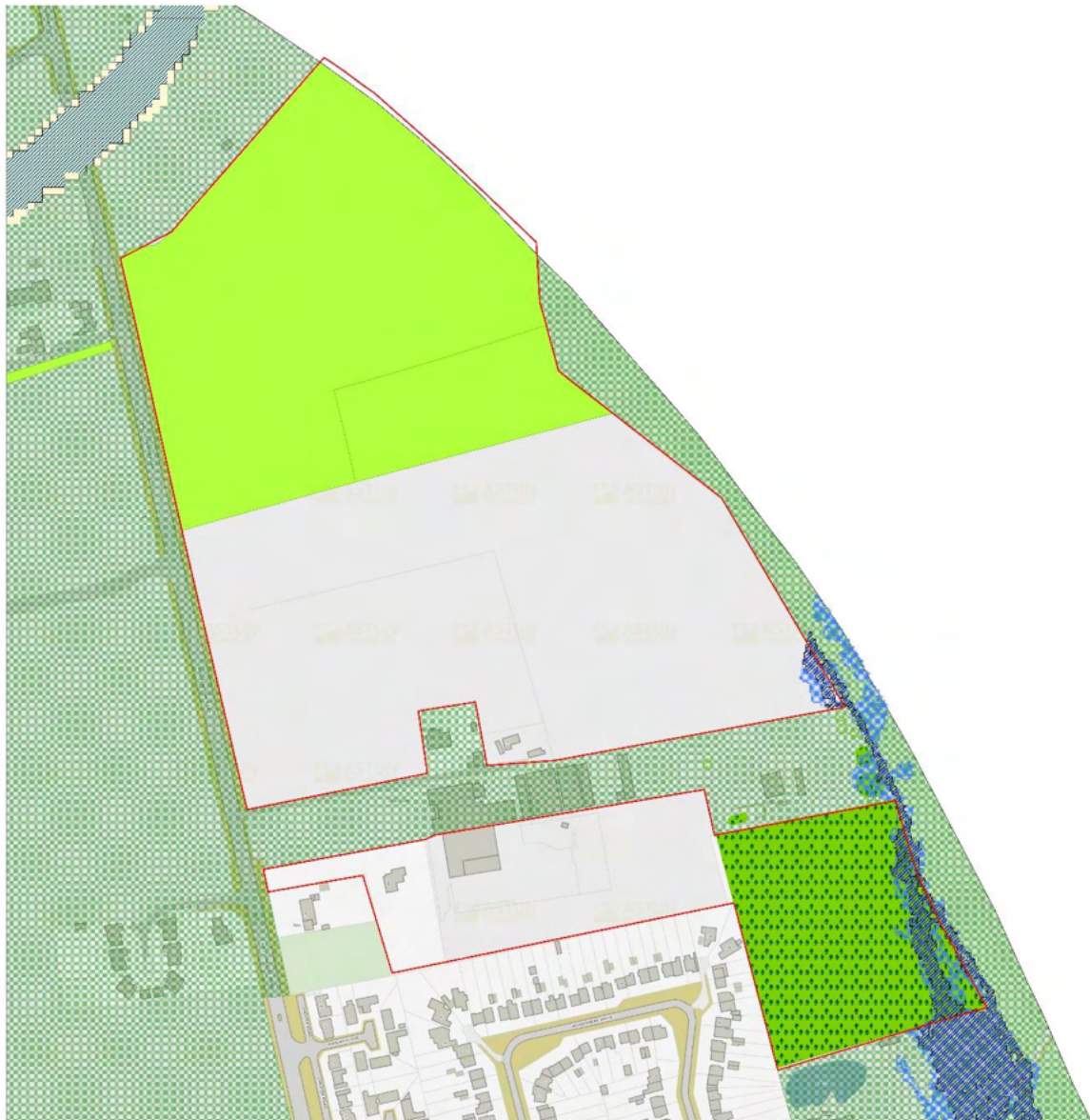
## Design principles:

- High quality, sensitive design and layout that conserves and enhances the setting and significance of Doe Bank Lane Farmhouse and farm buildings, which are Grade II listed buildings; this must be informed by a detailed heritage character assessment undertaken for the proposal.
- Deliver appropriate local facilities to support the new residents and to enhance the sustainability of the existing area, including a new primary school and local health centre..
- Investigation and detailed proposals for remediation of contaminated land.
- A transport strategy that ensures that the transport impacts of the development are appropriately managed and mitigated.
- A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and designed to deliver landscape, biodiversity and amenity benefits.
- A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character, nor on protected animal species.
- The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.

**Policy WSA9 – Land to the east of Chester Road, north of Pacific Nurseries, Hardwick**



**STRATEGIC ALLOCATION**



<b>Key:</b> Strategic Allocation Conservation Area Listed Buildings Individual Tree Preservation Order (TPO) Grouped TPO Sites of Importance for Nature Conservation (SINC) Sites of Local Importance for Nature Conservation (SLINC) Greenway Green Belt Environmental Agency (EA) Flood Zone 2 EA Flood Zone 3 JBA Indicative Flood Zone 2 JBA Indicative Flood Zone 3a JBA Indicative Flood Zone 3b	<b>Strategic Allocation:</b>	<b>WSA.9</b>
	Site Assessment Reference:	SA-0006-WAL, SA-0187-WAL, SA-0312-WAL
	Site Names:	Land to the East of Chester Road, North of Pacific Nurseries, Hardwick, Walsall, WS9 0PH
	Local Authority:	Walsall
	Ward:	Streetly



**General introduction**

C.65 Land to the east of Chester Road (WAH230), north of Pacific Nurseries (WAH246) and Pacific Nurseries (WAH254) are a cluster of three sites, currently used for a mix 562

of agriculture, horse grazing and a garden centre; to the east is a railway line with a golf course beyond it; to the south lies the urban edge of Streetly; and to the west are agricultural fields.

- C.66 The developable site area is 13.33ha.
- C.67 The estimated capacity of the site is 415 houses.
- C.68 Mixed tenure housing is suitable with higher densities of at least 35dph and affordable housing provision.

### Design principles:

- Deliver appropriate local facilities to support the new residents and to enhance the sustainability of the existing area, including a new primary school and local health centre.
- Investigation and detailed proposals for remediation of contaminated land.
- A transport strategy that ensures the transport impacts of the development are appropriately managed and mitigated.
- Enhanced provision for pedestrians and cyclists, including enhanced connectivity with the local centre.
- A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and that is designed to deliver landscape, biodiversity and amenity benefits.
- A strategy for landscape and habitat creation which provides enhancement, retention and mitigation for established trees, to ensure there is no significant adverse impact on visual amenity and character nor on protected animal species.
- The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.

## Waste

### Strategic Waste Management Sites

- C.69 The existing strategic sites identified on the Waste Key Diagram are the significant waste management facilities operating in the Black Country. They have been identified through a detailed analysis of all known licenced and exempt facilities in each authority area.
- C.70 Under Policy W2 (Waste Sites), the BCA will safeguard all existing strategic and other waste management facilities from inappropriate development, in order to maintain existing levels of waste management capacity and meet Strategic Priority 13.
- C.71 The strategic waste management sites within Walsall Borough are listed in the following table:

<b>Table 38 - Strategic Waste Management Sites in Walsall</b>			
<b>BCP Site Ref</b>	<b>Walsall SAD Site Ref</b>	<b>Site Name and Address</b>	<b>Operational Capacity (tpa)</b>
			<b>Total Landfill Capacity (tonnes)<sup>113</sup></b>
<b>Municipal Waste Recovery Installations</b>			
<b>WS02</b>	WS9	Aldridge MRF (Biffa) <sup>114</sup> , Westgate Aldridge	150,000
<b>Municipal Waste Recovery – Supporting Infrastructure</b>			
<b>WS09</b>	WS8	Fryers Road WTS, Bloxwich	100,000
<b>WS10</b>	WS8	Fryers Road HWRC, Bloxwich	12,000

<sup>113</sup> Estimated Total Landfill Capacity in tonnes has been calculated from the remaining landfill capacity in cubic metres at the end of 2018, using the following formula: 0.85 tonne = 1 cubic metre, therefore tonnes = cubic metres x 0.85.

<sup>114</sup> Formerly operated by Greenstar MRF

<b>Table 38 - Strategic Waste Management Sites in Walsall</b>			
<b>BCP Site Ref</b>	<b>Walsall SAD Site Ref</b>	<b>Site Name and Address</b>	<b>Operational Capacity (tpa)</b>
			<b>Total Landfill Capacity (tonnes)<sup>113</sup></b>
<b>WS11</b>	WS14	Merchants Way HWRC, Aldridge	10,000
<b>WS12</b>	WS19	Walsall Council Environmental Depot, Brownhills	2,700
<b>Waste Disposal Installations</b>			
<b>WS18</b>	WS10	Highfields South Landfill, Walsall Wood	130,000
			<b>928,000</b>
<b>Significant Hazardous Waste Treatment Infrastructure</b>			
<b>WS20</b>	WS6	Empire Treatment Works, Aldridge	100,000
<b>Significant Metal Recycling Sites (MRSs)</b>			
<b>WS29</b>	W17	Chas B Pugh, Heath Road, Darlaston	18,000
<b>WS30</b>	W21	ELG Haniel Metals, Heath Road, Darlaston	30,000
<b>WS31</b>	WS05	EMR Darlaston, Bentley Road South	260,000
<b>WS32</b>	W62	Scanmetals (UK) Ltd, Bilston Lane, Willenhall	56,000
<b>WS33</b>	W77	Tandom Metallurgical, Apex Road, Brownhills	25,000
<b>Other Significant Waste Management Infrastructure</b>			



<b>Table 38 - Strategic Waste Management Sites in Walsall</b>			
<b>BCP Site Ref</b>	<b>Walsall SAD Site Ref</b>	<b>Site Name and Address</b>	<b>Operational Capacity (tpa)</b>
			<b>Total Landfill Capacity (tonnes)<sup>113</sup></b>
<b>WS49</b>	WS17	Bescot Triangle South, Bescot Road	50,000
<b>WS50</b>	WS03	Credential Environmental, Parkway North, Western Way	40,000
<b>WS51</b>	W76	D S Smith Birmingham Depot, Rose Hill Industrial Estate, Willenhall	20,000
<b>WS52</b>	WS01	D E O'Reilly Waste Management <sup>115</sup> , Coppice Lane, Aldridge	40,000
<b>WS53</b>	WS05	EMR Darlaston (Fridge Recycling Plant), Bentley Mill Lane, Darlaston	40,000
<b>WS54</b>	WS04	Ecobat Logistics <sup>116</sup> , Crescent Works Industrial Estate, Willenhall Road	25,000
<b>WS55</b>	WS11	Veolia Darlaston, Holland Industrial Park, Bentley Road South	30,000
<b>WS56</b>	W16	Central Waste Oil Collections, Premier Business Park, Queen Street	35,000

Sources: Environment Agency: Waste Data Interrogator (WDI) 2007 – 2018, Operational Incinerators, 2018, Public Register, Remaining Landfill Capacity in England as at end of 2018 Version 2.

<sup>115</sup> Formerly Interserve MRF.

<sup>116</sup> Formerly t/a G & P Batteries, re-branded by parent company in 2018.

## Preferred Areas for New Waste Facilities

- C.72 A number of employment areas have been identified in the Black Country Waste Study (BCWS) as being most suited to the development of new waste recovery, waste treatment and waste transfer infrastructure.
- C.73 Under Policy W3 (Preferred Areas for New Waste Facilities), these areas are considered least likely to give rise to land use conflicts, and in several cases, there is already co-location of existing waste facilities to which new sites would contribute.
- C.74 There are three such areas in Walsall Borough that are identified on the Waste Key Diagram and listed in the following table:

**Table 39 - Walsall Preferred Areas for New Waste Facilities**

BCP Site Ref	Walsall SAD Site Ref	Site name and address	Area (Ha)
WPwa1	IN18.1 IN27	Leamore and Newfield Close Industrial Estates, Bloxwich	80.4
WPwa2	IN88 IN95 IN96	Holland Industrial Park / Heath Road and Environs, Darlaston	52.4
WPwa3	IN67 IN68	Ashmore Lake Industrial Estate, Willenhall	40

## Minerals

- C.75 The Black Country Minerals Study (BCMS, Tables 12.10 and 12.9) lists all known existing mineral sites and mineral infrastructure sites in the Black Country.
- C.76 Existing mineral sites within the Black Country include permitted mineral extraction sites, stockpiles, brick and tile works, and a pot clay factory.
- C.77 Existing Black Country mineral infrastructure sites include secondary / recycled aggregates production, rail linked aggregates depots, coating plants, ready-mix (RMX) concrete batching plants, manufacture of concrete products, and dry silo mortar (DSM) plants.

- C.78 Under Policy MIN2 (Minerals Safeguarding Areas, MSAs), the BCA will safeguard all existing mineral sites and mineral infrastructure sites from inappropriate development – this being necessary in order to retain existing capacity, and thereby helping to make best use of and conserve the Black Country's finite mineral resources and meet Strategic Priority 14.
- C.79 The locations of these Black Country mineral sites and mineral infrastructure sites are identified on the Minerals Key Diagram, and those sites located within Walsall Borough are listed in the following tables:

**Table 40 - Walsall Mineral Sites**

<b>BCP Site Ref</b>	<b>Walsall SAD Site Ref</b>	<b>Site Name and Address</b>	<b>Type</b>
MSwa1	MB1	Aldridge Brickworks, Brick Yard Road, Aldridge	Brickworks
MSwa2	MB2	Atlas Brickworks, Stubbers Green Road, Aldridge	Brickworks
MSwa3	MP2	Atlas Quarry, 175 Stubbers Green Road, Walsall	Brick Clay
MSwa4	MP3	Birch Coppice, Pelsall Rd, Walsall	Coal and Fireclay
MSwa5	MP4	Branton Hill Quarry and extension, Branton Hill Lane, Walsall	Sand
MSwa6	MXA2	Highfields North, Walsall Road, Walsall	Brick Clay (dormant permitted minerals site)
MSwa7	MP9	Land at Brownhills Common, Chester Road North, Brownhills	Coal and Fireclay (dormant permitted minerals site)
MSwa8	MP5	Sandown Brickworks, Stubbers Green Road, Aldridge	Brickworks

BCP Site Ref	Walsall SAD Site Ref	Site Name and Address	Type
MSwa9	MB3	Sandown Quarry, Stubbers Green Road, Aldridge	Brick Clay
MSwa10	MP7	Swan Works, Swan Works, Pelsall Road	Manufacture and supply of pot clay blends

Table 41 - Walsall Mineral Infrastructure Sites

BCP Site Ref	Walsall SAD Site Ref	Site Name and Address	Type
MIwa1	MI4	Bescot Triangle South, Off Bescot Road, Walsall	Aggregates recycling
MIwa2	MI2	Branton Hill CLEUD Relocation Site, Branton Hill Lane, Walsall	Aggregates recycling
MIwa3	MI3	Breedon Walsall Cement and Aggregates Depot, Fairground Way, Walsall	Rail-linked aggregates depot
MIwa4	MI3	Breedon Concrete Plant, Fairground Way, Walsall	Concrete batching plant
MIwa5	MI5	Express Asphalt, Downs Road, Darlaston	Coating plant
MIwa6	MI16	G & B G Morris, Willenhall Industrial Estate, off Eastacre, Willenhall	Secondary aggregates processing
MIwa7	MI17	Interserve Site Services, Brickyard Road, Walsall	Aggregates recycling
MIwa8	MI18	Concrete Walsall, Fenchurch Close, Walsall	Tarmac / concrete batching plant

## D. City of Wolverhampton

### Introduction

- D.1 Wolverhampton is the City of the Black Country, forming the gateway between the West Midlands conurbation and the countryside of Staffordshire and Shropshire. The City has excellent transport connectivity with the sub-region and the rest of the UK. It is well- served by the M54 and M6 motorways and benefits from good public transport links through the Metro, cross-country railway links and in its role as a hub of the sub-regional bus network.
- D.2 Wolverhampton is a young, vibrant and diverse City with a population of 263,357 people in 2019. The City covers an area of 69.4sq km and includes the City Centre and the town centres of Bilston and Wednesfield. While the City has the smallest population of the four Black Country local authorities, it is the second most densely-populated, the administrative boundary being very tightly drawn around the urban area. The northern, western and south-western fringes of the City lie within the West Midlands Green Belt, which also extends into the urban area in a series of green 'corridors'.
- D.3 There were 103,000 jobs in the City in 2019, concentrated in the City Centre, and a series of employment areas that are home to a wide range of manufacturing and logistics businesses. The City economy has traditional strengths in high-value manufacturing and construction and is also developing clusters in other key sectors while retaining a strong focus on investing in skills. Wolverhampton is home to the University of Wolverhampton, who are investing £100m into the Springfield super-campus – an international centre for urban innovation - and the City of Wolverhampton College and its Science, Technology, Engineering and Mathematics (STEM) orientated academies.
- D.4 The City grew initially as a market town, specialising in the wool trade. In the industrial revolution it became a major centre for coal mining, lock-making and subsequently the manufacture of cars and motorcycles. This has created a rich legacy of historic buildings and attractive parks and open spaces. It has a strong sporting, cultural and leisure offer, and is home to Wolverhampton Wanderers Football Club, the Grand Theatre and nationally important Civic Halls concert venue.
- D.5 Covid-19 hit the city hard from the earliest and during subsequent waves of the pandemic, exacerbating existing social and economic challenges including lower-than-average earnings, relatively high levels of unemployment and a need to enhance the skills base of the local workforce. But the City is bold and ambitious city and wants to move forward, plan for recovery and 'level up' prosperity for the benefit of the community.

## The Strategy

D.6 In the context of the issues and opportunities outlined above, the 2030 Vision for Wolverhampton is for:

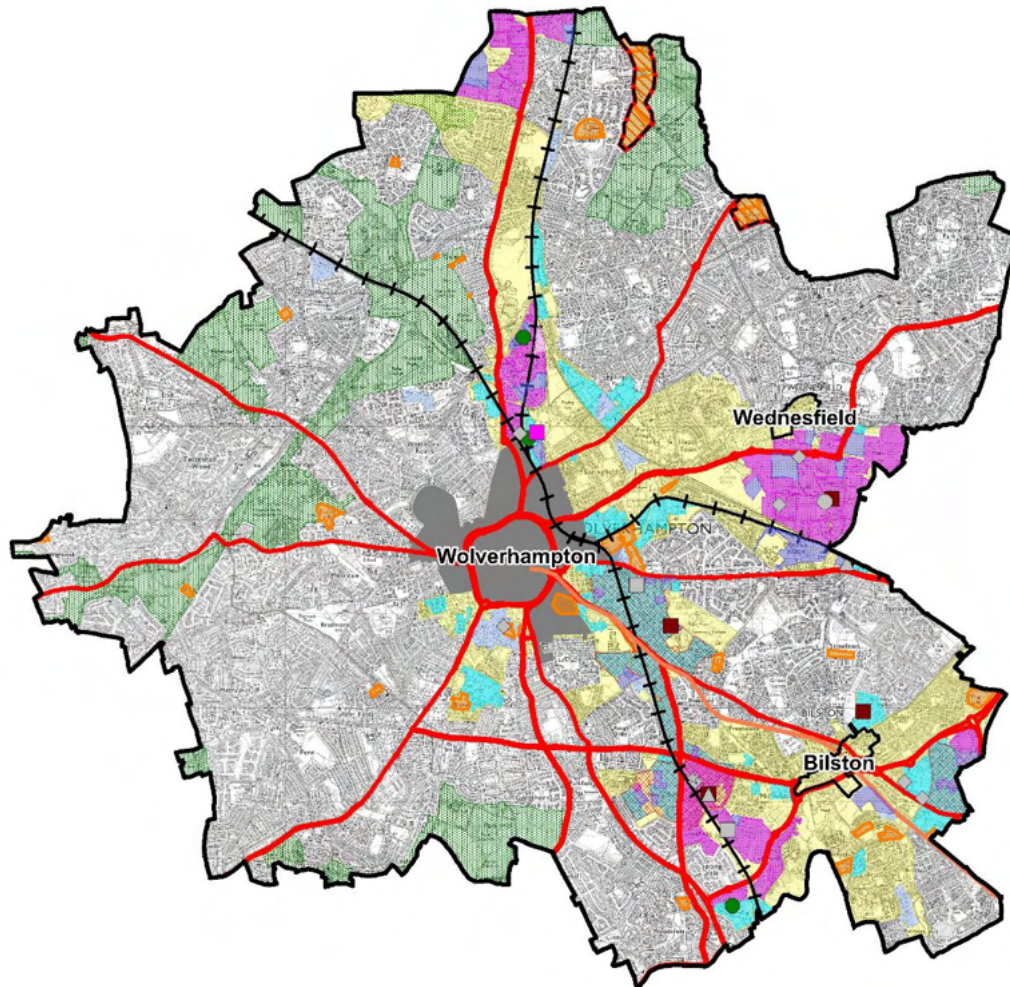
*‘a place where people come from far and wide to work, shop, study and enjoy our vibrant city. It will be transformed while still retaining all of those attributes that give our city its unique identity. A healthy, thriving and sustainable international ‘smart city’ – renowned for its booming economy and skilled workforce, rich diversity and a commitment to fairness and equality that ensures everyone has the chance to benefit from success.’*

D.7 This Plan forms an essential part of this strategy, supporting the re-energising, diversification and re-purposing of the City Centre, supporting the recovery and growth of the economy, and providing for a continuous supply of new homes to meet the needs of local and wider communities. At the same time, the Plan will protect key environmental assets – the green belt, the network of high quality green and blue spaces, and the local character and heritage.

D.8 This Plan supports the delivery of 12,100 new homes and 65ha of employment land to 2039, supporting the growth of the City’s population to around 290,000 people and a workforce of 180,000. To plan for this growth, locations that are both sustainable and deliverable have been prioritised in line with the Spatial Strategy set out in Policy CSP1. This growth will be supported by transport investment, focused on enhancing the rail and rapid transit network and the key road corridors and investment in walking and cycling. Development will help to green the City, by increasing tree cover and providing biodiversity net gain and will help to deliver priority environmental improvements to ensure residents have easy access to a range of healthy recreation opportunities. These priorities will include those set out in the emerging Black Country Nature Recovery Network Strategy, Wolverhampton Open Space and Playing Pitch Strategies, and include opportunities to improve the canal network and restore the Bradley Arm Canal Link (as set out in BCAAP Policy BC7).

Figure 21 - City of Wolverhampton Spatial Plan

Black Country | **Plan**  
 Planning for the future of the Black Country



### Wolverhampton Spatial Strategy

**Key**

- |   |  |  |
|---|--|--|
| <ul style="list-style-type: none"> <li> Housing Allocations (HOU1)</li> <li> Gypsy and Traveller Pitch Allocations (HOU4)</li> <li> Land For Employment (EMP1)</li> <li> Strategic Employment Areas (EMP2)</li> <li> Local Employment Areas (EMP3)</li> <li> Other Employment Areas (EMP4)</li> <li> Core Regeneration Areas (CPS2)</li> <li> Neighbourhood Growth Areas (CPS3)</li> <li> Strategic Allocations</li> <li> Tier 1 Strategic Centre (CEN2)</li> <li> Town Centres (CEN3)</li> </ul> | <p><b>Waste Infrastructure (W2)</b></p> <ul style="list-style-type: none"> <li> Municipal Waste Recovery Installations</li> <li> Municipal Waste Recovery – Supporting Infrastructure</li> <li> Waste Disposal Installations</li> <li> Other Significant Waste Management Infrastructure</li> <li> Preferred areas for new Waste Facilities (W3)</li> </ul> <p><b>Mineral Infrastructure (MIN2)</b></p> <ul style="list-style-type: none"> <li> Concrete Batching Plant</li> <li> Aggregates Recycling Facilities</li> <li> Coating Plant</li> <li> Dry Silo Mortar Plant</li> </ul> | <ul style="list-style-type: none"> <li> Motorway</li> <li> Key Route Network (TRAN1)</li> <li> Rail Network (TRAN4)</li> <li> Exiting West Midland Metro (TRAN4)</li> <li> Green Belt (GB1)</li> </ul> |
|---|--|--|

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D.9 Development and investment will be focussed on Wolverhampton City Centre and three Core Regeneration Areas as summarised in Table 42.

**Table 42 - Wolverhampton Housing and Employment Growth Network**

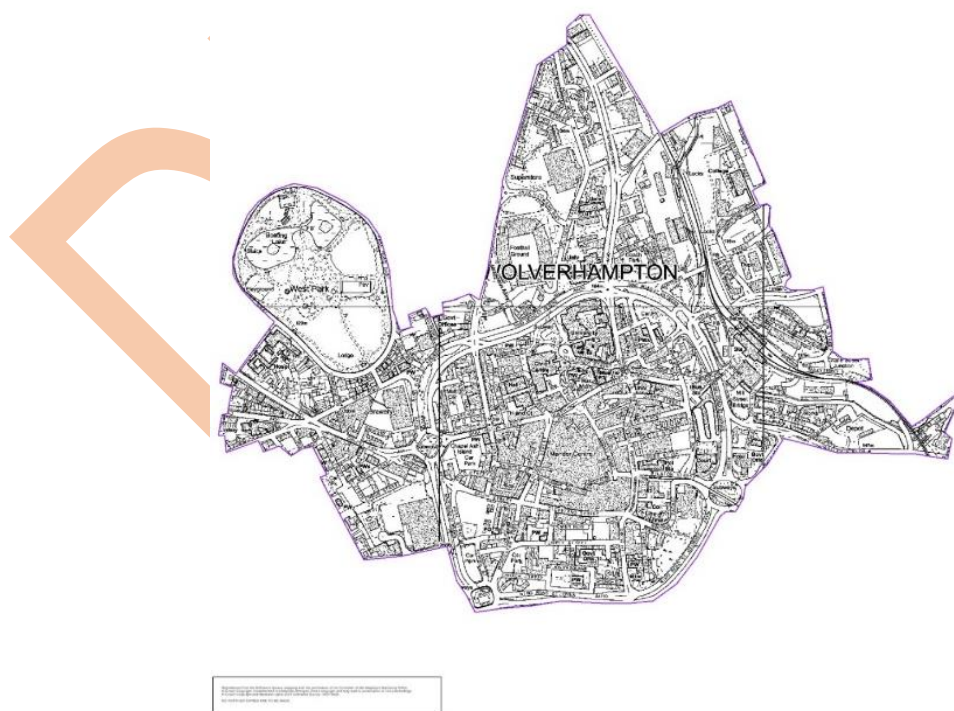
Location	Housing (net homes)	Employment Land allocations (ha)
<b>Growth Network</b>		
Wolverhampton City Centre (Wolverhampton Strategic Centre)	4838 (Sites = 3276; Windfalls = 812; Uplift = 750)	0.0
Stafford Road Core Regeneration Area	395	16.8
Wednesfield Core Regeneration Area	627	26.3
Bilston Core Regeneration Area	2285	22.9
<b>Total Growth Network</b>	<b>8,145</b>	<b>66.0</b>
<b>Towns and Neighbourhoods Area</b>		
Bushbury Neighbourhood Growth Area	532	0.0
Fallings Park Neighbourhood Growth Area	303	0.0
Other Sites in Wolverhampton Towns and Neighbourhoods Area	1468	0.0
<b>Total Towns and Neighbourhoods Area</b>	<b>2,303</b>	<b>0.0</b>
Small Windfall Housing Sites (outside Wolverhampton City Centre)	1652	0.0
<b>Wolverhampton Total</b>	<b>12,100</b>	<b>65.0</b>



## Wolverhampton City Centre

D.10 **Wolverhampton City Centre**, as designated on the Policies Map and shown on Figure 21 is the administrative, commercial and cultural heart of the City and in its role as the City of the Black Country. It is the focus for a wide range of civic, retail, cultural and leisure functions. It is a location that is highly accessible by a range of public transport options, including rail, Metro and bus services. The BCP supports the diversification, repurposing and rejuvenation of the City centre, promoting a well-balanced mix of commercial, business and service uses. Changing shopping patterns and other challenges to the traditional high street will be addressed through increased flexibility and by facilitating the consolidation of the shopping core (particularly to reduce vacancy rates), complemented by surrounding office and leisure-led mixed uses, and supported by maximising residential provision in all locations (including the use of upper floors). The character and quality of both the cultural and civic function of the City centre and the built and natural environment will be improved, helping to make the City centre a sustainable, healthy and attractive place to shop, live, work and visit. This will be achieved through BCP policies (particularly CSP2, CEN2 and Environmental Transformation policies), City centre regeneration projects and through more detailed policies in the City Centre Area Action Plan (AAP)

**Figure 22 - Wolverhampton Strategic Centre Boundary**



D.11 The Black Country Centres Study advises that the future prosperity of the City centre is predicated on attracting additional footfall. This can be achieved through new residential

development, the repurposing of existing vacant space to create and attract interest in, and qualitative improvements to, the leisure offer and associated services. The provision of Grade A offices to focus employment in the centre will also contribute to generating additional footfall. This will build on the strategy of the City Centre AAP, which looked to consolidate the role of the shopping core and encourage complementary activities such as leisure, office and residential uses; and the need for planning 'flexibility' to capture future investment. Regeneration of the City Centre is being delivered through various funding mechanisms and regeneration schemes. For example, the Future High Streets Fund is a £15.7million scheme providing major works that focus on 15ha covering the Victoria Street, Bell Street, Cleveland Street, Fold Street and public realm around the Civic Halls area of the City Centre. This will involve new investment in public realm and events space, helping to boost the evening economy and unlock a wider package of investment, maximising the creation of new jobs, delivery of new homes, a hotel, event zone and green public space improvements.

- D.12 The key opportunities for Wolverhampton City Centre are:
- a) building on the current wave of development activity - there are several major investment and regeneration opportunities underway (2021) within the City centre, including the Interchange Commercial Area, Canalside, Westside Development Area and the Civic Halls;
  - b) providing high density uses that would aid in increasing footfall; and
  - c) patronage of the centre's facilities;
  - d) exploring the potential to attract more visitors in the afternoon and evening;
  - e) increasing a more family-oriented evening economy;
  - f) continuing to improve on the perception of the centre as a safe place;
  - g) exploring the opportunities to increase cycling?
  - h) maximising the opportunity for rapid 5g rollout.
- D.13 Policy CSP2 sets out the critical role of the four Strategic Centres as the key drivers to deliver the overall growth Strategy. This is supplemented by Policy CEN2, which defines this role in more detail, providing specific guidance on the range of activities and scale of development that will be appropriate.
- D.14 The City centre benefits from an existing Area Action Plan, adopted in 2016. The AAP identifies a number of character areas, with an associated set of policies and proposals with

indicative development capacity figures for each one. The early review of this AAP is a priority for the Council and will commence in 2023. Until the AAP review is completed, all AAP policies remain relevant for proposals within the BCP boundary of Wolverhampton Strategic Centre. The Blakenhall and Graiseley<sup>117</sup> and All Saints<sup>118</sup> (Character Areas of the AAP are outside the BCP Wolverhampton Strategic Centre boundary and were consequently 'in scope' as potential locations for BCP site allocations). Therefore, AAP allocations within these areas have been replaced by allocations in the BCP, as detailed in Appendix 15D.

D.15 For the purposes of Policies CEN1- CEN6, within Wolverhampton Strategic Centre the following are relevant in-centre boundaries (see also Appendix 16):

- a) Retail - Primary Shopping Area (AAP Policy CC1(a) and CA1 – Shopping Core)
- b) Office - Wolverhampton City Centre AAP boundary (AAP Policy CC2)
- c) Leisure - Wolverhampton Ring Road (AAP Policy CC3)

D.16 The housing capacity for Wolverhampton City Centre set out in Table 46 is based on existing permissions and AAP allocations, but also includes an estimated uplift based on more recent evidence, including the Black Country Centres study and emerging development proposals, as detailed in the Black Country Urban Capacity Review Update 2021. This housing capacity figure will be further tested in detail through the AAP review, but provides a sound basis to understand the housing capacity of the City centre for the purposes of the BCP.

### **Stafford Road Core Regeneration Area (SRCRA)**

D.17 The Stafford Road Core Regeneration Area is focussed on the A449 Stafford Road and is one of the main gateways into the Black Country. It contains important road, canal and rail infrastructure that links the City with Staffordshire, Shropshire, Telford and northwest England.

D.18 The BCP supports the role of this area as one of the premier employment locations in the Black Country, building on the success of the adjacent i54 Business Park in South Staffordshire, by safeguarding jobs in existing Strategic and Local Employment areas, complemented by sites to accommodate new high-quality development in Fordhouses and Wolverhampton Science Park. There are also more limited opportunities for residential

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<sup>117</sup> Policy CA10

<sup>118</sup> Policy CA11

development. The Plan also promotes enhancements to public transport, walking, cycling and highway networks, particularly along the A449, to maintain sustainable travel patterns and secure private sector investment. Development will respect and enhance the historic character and local distinctiveness of the area, with investment in environmental infrastructure including the canals, open spaces and wildlife habitats.

### **Wednesfield Core Regeneration Area (WCRA)**

- D.19 The Wednesfield Core Regeneration Area is centred on the Walsall to Wolverhampton Growth Corridor, recognised as a priority for investment in the WMCA SIDP and the West Midlands Housing Deal. The area contains a range of facilities, including New Cross Hospital, Wednesfield Town Centre, the Bentley Bridge retail centre and the Wednesfield employment area. It is subject to a number of existing regeneration projects including housing renewal and new housing at the Heath Town Estate, Wednesfield Town Centre enhancements and the A454 Eastern Gateway enhancement programme. It is also a key transport corridor linking the City with Walsall and the M6 motorway, served by the A454 Wolverhampton to Walsall dual carriageway and the Walsall to Wolverhampton railway line.
- D.20 The BCP supports the protection and enhancement of the Wednesfield employment area by identifying a number of sites for development and safeguarding existing business premises from redevelopment to non-employment uses. The BCP also promotes enhanced connectivity both through and into the area to better meet the needs of businesses and local people. Key projects include the improvements to the A454 and access to New Cross Hospital.

### **Bilston Core Regeneration Area (BCRA)**

- D.21 The Bilston Core Regeneration Area acts as a gateway linking Wolverhampton to the heart of the Black Country and Birmingham by rail, Metro, road and canal. At the centre of the Core Regeneration Area is the largest concentration of industrial land in the City, providing thousands of jobs and reflecting the area's industrial heritage. This industrial core, fringed by housing, is anchored by Wolverhampton City Centre in the north and Bilston town centre in the south. Bilston town centre acts as a significant focus for the local community, offering a range of shopping, leisure and community facilities.
- D.22 The BCP supports the protection and enhancement of the employment function of the area by identifying new development opportunities and encouraging the refurbishment and enhancement of existing premises. The BCP also identifies opportunities for residential development on poor-quality surplus industrial land clustered around the City centre and

Bilston town centre, building on the success of flagship partnership-led regeneration schemes currently on-site including Bilston Urban Village, Steelhouse Lane and Ward Street. The BCP promotes enhanced connectivity and high-quality networks of open space focussed on the canal and Metro corridor to serve new communities, with significant environmental projects underway at Ward Street and Bilston Urban Village, and further improvements planned for East Park and the Bradley Canal Arm Link.

### **Wolverhampton Towns and Neighbourhoods Area (WTNA)**

- D.23 The Towns and Neighbourhoods Area of the City includes Tettenhall and Penn to the west, Bushbury, Wednesfield and Ashmore Park to the north and Ettinghshall to the south. This is where the majority of residents live, and is served by areas of open space, health and education facilities and a network of district and local centres as defined in Policy CEN1 and CEN5. There are also a small number of employment areas subject to Policy EMP4, providing a valuable source of jobs for local people.
- D.24 The BCP seeks to sustain and enhance the Towns and Neighbourhoods Area by ensuring that residents have good access to jobs, shopping, health, recreation, open space and other facilities to meet day-to-day community needs. The Towns and Neighbourhoods Area will provide for enhanced housing choice through the bringing forward of a constant supply of development opportunities.
- D.25 The Towns and Neighbourhoods Area also includes two new Neighbourhood Growth Areas: Bushbury (BNGA) and Fallings Park (FPNGA), located in the north east of the City. Each of these Neighbourhood Growth Areas covers a Strategic Allocation, for which there is a separate Policy to guide master planning work (see Policies CSA1 and CSA2 below). Housing growth in this part of the City will be supported by strengthened local infrastructure, including local highway improvements, provision for a new primary school (should this be required) and creation of new green space of value for residents and wildlife. Where there are cross-boundary issues arising from the emerging South Staffordshire Local Plan, infrastructure investment will be coordinated with South Staffordshire Council and Staffordshire County Council.

### **Green Belt Areas**

- D.26 The green belt areas of Wolverhampton form a series of wedges and urban fringe areas and perform many different functions. The green belt areas do contain some rural landscapes, including agricultural land and rural settlements such as Penn Village. However, much of the Wolverhampton green belt is urban in character and provides a

network of natural and formal open space, education buildings, recreational facilities (such as Aldersley Leisure Village, Dunstall Park Racecourse and golf courses), and other infrastructure (such as sewage works, sub-stations and cemeteries). The Smestow Valley Local Nature Reserve, which follows the routes of the canal network, disused railway and Smestow Brook running north-south through the western part of the City, is a particularly important wedge of green belt of high value for wildlife and people, and a priority for improvement and extension. Northcote Farm Country Park is another key community facility located in the green belt, which is a priority for improvement – this will be significantly supported through delivery of the Bushbury Strategic Allocation CSA1 (see below).

## Delivering the Strategy

D.27 This strategy will be delivered by:

- a) The allocation of sites and implementation of policies in the BCP across the administrative area to accommodate housing and employment development;
- b) The saving of policies and designations contained in existing Local Plan documents unless specifically replaced by Policies in the Black Country Plan as listed in Tables 43 - 48 and Appendix 15D;
- c) An early review of the adopted Wolverhampton City Centre Area Action Plan to refresh detailed site allocations within the Wolverhampton Strategic Centre boundary in a comprehensive manner, in accordance with the Vision and Strategic priorities

D.28 Tables 43 - 48 provide details of all development allocations and waste and minerals allocations made through the BCP within Wolverhampton (outside the Wolverhampton Strategic Centre boundary). These allocations are shown on Figure 21. A small number of development allocations are considered to be of strategic significance to delivery of the BCP because of their size, in combination with adjoining allocations. These have been grouped together to form two Strategic Allocations, each of which has a separate policy, providing details of the specific constraints and requirements affecting development. This policy should be read alongside the information for each allocation provided in Tables 43-48.

D.29 A number of the allocations replace existing allocations made in adopted Local Plan documents, which formed part of the Wolverhampton Policies Map. Where this is the case, the previous allocation reference and the Local Plan document concerned are listed. Appendix 15D provides details of all other Local Plan designations in Wolverhampton which have also been replaced or amended through this Plan. Such changes have only been

made where this is necessary to deliver Development Allocations. All detailed allocation and designation boundaries can be viewed on the online Wolverhampton Policies Map.

DRAFT

## Development Allocations

Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
BCP site ref / location	Previous Local Plan allocation (replaced unless stated)	Site name and address	Appropriate Uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
WOH183 WCRA	HNP – H6 (not replaced)	Former G & P Batteries, Grove Street, Heath Town	Housing	56	0.79 (B)	0.79	71	By 2025	Development has outline planning permission
WOH186 WCRA	BCAAP – H1	East of Qualcast Road, Wolverhampton	Housing	101	2.40 (B)	2.00	51	By 2029	Development has outline planning permission.
WOH192 BCRA	CCAAP – 10d (part)	Dudley Road / Bell Place, Blakenhall	Housing	100	0.68 (B)	0.68	147	By 2025	Development has full planning permission for housing and offices. Remaining part of 10d is not now developable.



Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
BCP site ref / location	Previous Local Plan allocation (replaced unless stated)	Site name and address	Appropriate Uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
WOH182 BCRA	CCAAP – 11a	Former Royal Hospital, Royal Hospital Development Area, All Saints	Housing	192	5.13 (B)	4.11	47	By 2029	Development has outline / full planning permission
WOH187 WCRA	BCAAP – H1 (part)	West of Qualcast Road, Wolverhampton	Housing	119	3.40 (B)	3.00	40	2029-34	Occupied employment land. Majority of site suitable for 40 dph subject to minor improvements to access to health services. Any development should be designed to mitigate noise and vibration

Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
BCP site ref / location	Previous Local Plan allocation (replaced unless stated)	Site name and address	Appropriate Uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
									effects arising from neighbouring land uses.
WOH188 WCRA	BCAAP – H1 (part)	West of Colliery Road, Wolverhampton	Housing and Employment	90	2.94 (B)	2.00	45	2034-49	Occupied employment land. 75% of site suitable for housing at 45 dph and 25% suitable for employment uses. Any development should be designed to mitigate noise and vibration effects arising from neighbouring land uses. Remaining part of H1 is not now developable.

Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
BCP site ref / location	Previous Local Plan allocation (replaced unless stated)	Site name and address	Appropriate Uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
WOH189 BCRA	BCAAP – H2	Delta Trading Estate, Bilston Road, Wolverhampton	Housing	80	2.00 (B)	2.00	40	2034-39	Occupied employment land. Site suitable for 40 dph subject to access improvements. The Bilston Corridor Canals Conservation Area Appraisal and Management Proposals sets out principles for development on this site.
WOH190 BCRA	BCAAP – H6	Greenway Road, Bradley, Wolverhampton	Housing	180	4.00 (B)	4.00	45	2029-34: 80 2034-39: 100	Occupied employment land. Site suitable for 45 dph subject to access improvements.

Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
BCP site ref / location	Previous Local Plan allocation (replaced unless stated)	Site name and address	Appropriate Uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
WOH191 BCRA	BCAAP – MU2	South of Oxford Street, Bilston	Housing	20	0.63 (B)	0.45	45	2034-39	Occupied employment land. Site suitable for 45 dph subject to access improvements. Any development should be designed to mitigate noise effects arising from neighbouring land uses.
WOH185 BCRA	BCAAP – HOS1 BCAAP Recreational Open Space (not to be replaced)	Alexander Metals Open Space, Darlaston Lane / Wrenbury Drive, The Lunt	Housing and Open Space	70	4.08 (G)	1.75	40	2029-34	A development of around 70 new homes on 2 ha of open space to the east of Wrenbury Drive and along the northern edge of Bailey's Pool (exact extent to be

Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
BCP site ref / location	Previous Local Plan allocation (replaced unless stated)	Site name and address	Appropriate Uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
									determined). Subject to mitigation for loss of open space through creation of a 4 ha area of Neighbourhood Park to serve the local area on the remaining Alexander Metals Open Space. The details of the Neighbourhood Park creation works are to be determined in consultation with the local community and should include any necessary improvements

Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
BCP site ref / location	Previous Local Plan allocation (replaced unless stated)	Site name and address	Appropriate Uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
									to paths around Bailey's Pool, to facilitate fishing and deal with drainage issues. Links via the Black Country Route path/cycleway to Dingle Wood and a multi-use games area to the south to be maintained. Housing should front onto Bailey's Pool, making the pool safer to use, and the development should be designed and constructed so as to

Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
BCP site ref / location	Previous Local Plan allocation (replaced unless stated)	Site name and address	Appropriate Uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
									minimise amenity impacts on existing residents of Wrenbury Drive, including noise, traffic safety and parking. The site is a former landfill and the existing mound will need to be flattened and material removed to provide a developable area. There are records of great-crested newts on lower-lying parts of the site behind Wrenbury Drive, therefore an

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									ecological survey should be carried out and retention of these areas or mitigation may be required.
WOH195 BCRA	BCAAP – B3	Land at Hall Street / The Orchard, Bilston Town Centre	Housing and Commercial	21	0.12 (B)	0.12	175	2034-39	Site located within Bilston Town Centre therefore suitable for net density of over 100 dph.
WOH193 / WOH194 BCRA	CCAAP – 10g	Former St Luke's Junior School, Goldthorn	Housing	89	2.21 (B/G)	2.21	40	By 2029	Part is former school buildings and part is former school playing fields. Compensation for loss of these playing



Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
BCP site ref / location	Previous Local Plan allocation (replaced unless stated)	Site name and address	Appropriate Uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
		Road, Wolverhampton							fields has already been provided at new St Luke's School site. Capacity may be constrained by highways access. Work is underway to re-assess the capacity of this site which will be reflected in the Publication Plan.
WOH199 WTNA	Not allocated	Former Northicote Secondary School, Northwood	Housing	178	4.94 (B/G)	4.94	36	By 2024	Part is former school buildings and part is former school playing fields. Full planning application (19/01269/FUL) under

Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
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		Park Road, Wolverhampton							consideration as of March 2021.
WOH196 BCRA	Not allocated	Dobbs Street, Wolverhampton	Housing	266	0.96 (B)	0.96	277	By 2029	Former banqueting suite and industrial units acquired by WMCA in 2020 for high density residential.
WOH198 WTNA	Not allocated	Former Beckminster House, Beckminster Road, Wolverhampton	Housing	15	0.86 (B)	0.25	60	By 2029	Grade II Listed Building in grounds with potential for conversion / refurbishment to provide approx. 15 flats.

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WOH184 WTNA	Not allocated	Former Rookery Lodge, Woodcross Lane, Wolverhampton	Housing	16	1.04 (B)	0.25	64	2029-34	Permission granted 2012 for care village including self-contained accommodation. Not brought forward due to viability / mineshafts. External funding being sought.
WOH200 WTNA	Not allocated	Former Nelson Mandela House, Whitburn Close, Wolverhampton	Housing	20	0.6 (B)	0.6	33	By 2024	

Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
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WOH201 WTNA	Not allocated	Former Stowheath Day / Childrens Centres, Stowheath Lane, Wolverhampton	Housing	45	1.13 (B)	1.13	40	By 2029	Site suitable for 40 dph..
WOH202 WTNA	Not allocated	Land to rear of former Stowheath Day Centre, Stowheath Lane, Wolverhampton	Housing	16	0.39 (G)	0.39	40	By 2029	Site suitable for 40 dph.

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WOH197 BCRA	Not allocated	Former Pipe Hall, The Orchard, Bilston	Housing	20	0.13 (B)	0.13	154	By 2024	Listed building purchased by WMCA in 2020 for residential development and suitable for conversion to create up to 20 flats.
WOH272 BCRA	Not allocated	Lane Street / Highfields Road, Bradley	Housing	72	1.79 (B)	1.79	40	2029-34	Occupied employment land submitted through BCP 'call for sites'. Site suitable for 40 dph, subject to a design which: protects the operation of employment land to the east; retains the locally listed

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									Highfield Works building; respects the setting of this building and the Bilston Canal Corridor Conservation Area within which it falls; and respects the Area of High Historic Townscape Value designation covering the whole site. Recreational open space needs of new residents to be met through off-site improvements to local open space.

Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
BCP site ref / location	Previous Local Plan allocation (replaced unless stated)	Site name and address	Appropriate Uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
WOH274 WTNA	BCAAP Recreational Open Space (not to be replaced)	Moseley Road Open Space (part), Langdale Drive, Bilston	Housing	85	1.89 (G)	1.89	45	By 2029	Part of recreational open space suitable for 45 dph, subject to improvements to local open space sufficient to offset loss and meet needs of new residents.
WOH259 BNGA	Not allocated	North of Moseley Road, Bushbury	Housing	78	2.01 (G)	1.95	40	By 2034 (see CSA1 for est. phasing)	Site removed from green belt. See Policy CSA1 for further details.
WOH258 BNGA	Not allocated	South of Moseley Road, Bushbury	Housing	124	4.26 (G)	3.10	40	By 2034 (see CSA1)	Site removed from green belt. See Policy CSA1 for further details.

Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
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								for est. phasing)	
WOH257 BNGA	Not allocated	Northcote Lane, Bushbury	Housing	182	7.44 (G)	4.56	40	By 2034 (see CSA1 for est. phasing)	Site removed from green belt. See Policy CSA1 for further details.
WOH260 BNGA	Not allocated	Land at Bushbury Lane / Legs Lane, Bushbury	Housing and Primary School	148	7.30 (G)	3.70	40	By 2034 (see CSA1 for est. phasing)	Site removed from green belt. See Policy CSA1 for further details
WOH263 FPNGA	Not allocated	Land North of Grassy Lane, Fallings Park	Housing	80	2.70 (G)	2.00	40	By 2034 (see CSA2 for est. phasing)	Site removed from green belt. See Policy CSA2 for further details.



Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
BCP site ref / location	Previous Local Plan allocation (replaced unless stated)	Site name and address	Appropriate Uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
WOH264 FPNGA	Not allocated	Land at Grassy Lane, Fallings Park	Housing	95	2.38 (G)	2.38	40	By 2034 (see CSA2 for est. phasing)	Site removed from green belt. See Policy CSA2 for further details.
WOH262 FPNGA	WUDP Recreational Open Space (not to be replaced)	Open space at Grassy Lane, Fallings Park	Housing and Recreational Open Space	88	3.20 (G)	2.20	40	By 2034 (see CSA2 for est. phasing)	Site removed from green belt. See Policy CSA2 for further details.
WOH271 FPNGA	Not allocated	Land east of Wood Hayes Road, Wolverhampton	Housing	40	2.04 (G)	1.60	25	By 2034 (see CSA2 for est. phasing)	Site removed from green belt. See Policy CSA2 for further details.

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WOH266 WTNA	Not allocated	City of Wolverhampton College / Activity Centre, Paget Road, Compton Park	Housing	140	3.52 (B)	3.52	40	By 2029	Site removed from green belt. The new green belt boundary will continue to follow the edge of built development. Mitigation for green belt loss to be provided through accessibility, biodiversity and environmental quality improvements to nearby Smestow Valley Local Nature Reserve. Site suitable for 40 dph, in accordance with local character, subject to relocation of the College

Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
BCP site ref / location	Previous Local Plan allocation (replaced unless stated)	Site name and address	Appropriate Uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
									and Activity Centre to appropriate sites and splitting highways access between Paget Road and Compton Park to limit impact on Paget Road capacity. Recreational open space needs of new residents to be met through off-site improvements to local open space. .
WOH261 WTNA	Not allocated	Oxley Park Golf Club land adjacent to 139 Oxley Moor	Housing	3	0.13 (G)	0.13	Na	By 2029	Site removed from green belt. The new green belt boundary will continue to follow the edge of Oxley

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BCP site ref / location	Previous Local Plan allocation (replaced unless stated)	Site name and address	Appropriate Uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
		Road, Wolverhampton							Park Golf Course. The whole of Oxley Park Golf Course, including this site, is designated as a SLINC. Mitigation for green belt and SLINC loss to be provided through accessibility, biodiversity and environmental quality improvements to Oxley Park Golf Course. Capacity determined in accordance with local character and presence

Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
BCP site ref / location	Previous Local Plan allocation (replaced unless stated)	Site name and address	Appropriate Uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
									of trees which may require retention.
WOH268 WTNA	Not allocated	Oxley Park Golf Club land adjacent to 1A Ribbesford Road, Wolverhampton	Housing	3	0.06 (B)	0.06	Na	By 2029	As for C33.
WOH269 WTNA	Not allocated	Oxley Park Golf Club land adjacent to 21 Oxley Links Road	Housing	3	0.14 (G)	0.14	Na	By 2029	As for C33.

Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
BCP site ref / location	Previous Local Plan allocation (replaced unless stated)	Site name and address	Appropriate Uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
WOH270 WTNA	Not allocated	Oxley Park Golf Club land adjacent to 10 Oxley Links Road	Housing	4	0.23 (G)	0.23	Na	By 2029	As for C33.
WOH267 WTNA	Not allocated	South Staffordshire Golf Course land at Codsall Road, Wolverhampton	Housing	8	0.85 (G)	0.40	20	By 2029	Site removed from green belt. The new green belt boundary will continue to follow the edge of South Staffordshire Golf Course. Mitigation for green belt loss to be provided through accessibility, biodiversity and environmental

Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
BCP site ref / location	Previous Local Plan allocation (replaced unless stated)	Site name and address	Appropriate Uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
									quality improvements to South Staffordshire Golf Course. Mature trees cover half of the site, reducing the net developable area. Adjoining housing is of very low density with large rear gardens and new development should reflect this open character and ribbon development with a net density of no more than 20 dph. Subject to reconfiguration of golf

Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
BCP site ref / location	Previous Local Plan allocation (replaced unless stated)	Site name and address	Appropriate Uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
									course to replace hole lost to development and retain high standard of South Staffordshire Golf Course as defined in current Playing Pitch evidence.
WOH265 WTNA	Not allocated	Land West of Perton Road, Wightwick	Housing	4	0.60 (G)	0.60	Na	By 2029	Site removed from green belt. Mitigation for green belt loss to be provided through accessibility, biodiversity and environmental quality improvements to nearby Smestow Valley Local Nature Reserve. Track



Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
BCP site ref / location	Previous Local Plan allocation (replaced unless stated)	Site name and address	Appropriate Uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
									to the north west, which runs along the Wolverhampton / South Staffs District boundary, is capable of providing a defensible new green belt boundary.
WOH274 WTNA	Not allocated	Former Wolverhampton Environment Centre (WEC), Westacre Crescent, Finchfield	Housing	14	0.83 (B)	0.45	31	By 2029	Previously developed site removed from green belt. Outline permission previously granted on site for 14 houses. Mitigation for green belt loss to be provided through 10 years maintenance funding for

Table 43 - Wolverhampton Housing Allocations in Black Country Plan									
BCP site ref / location	Previous Local Plan allocation (replaced unless stated)	Site name and address	Appropriate Uses	Indicative development capacity (net homes)	Gross site area (ha) (brownfield /greenfield)	Indicative net developable area (ha)	Net density (dph)	Anticipated delivery timescale	Further information
									former WEC grounds, which are to be incorporated into the adjoining Smestow Valley Local Nature Reserve. .

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Table 44 - Wolverhampton Gypsy and Traveller Pitch Allocations in Black Country Plan

BCP Site Ref / Location	Previous Local Plan Allocation (replaced unless stated)	Site Name and Address	Appropriate Uses	Indicative Development Capacity (net homes)	Gross Site Area (ha) (Brownfield /Greenfield)	Indicative Net Developable Area (ha)	Net Density (dph)	Anticipated Delivery Timescale	Further Information
WOGT06 SRCRA	SRCAAP – HP5	Former Bushbury Reservoir, Showell Road, Wolverhampton	Gypsy and Traveller Pitches	12	2.42 (G)	0.30	40	By 2029	Subject to compensation for loss of SLINC value.

Table 45 - Wolverhampton Employment Allocations in Black Country Plan – Policy EMP1							
BCP Site Ref / Location	Previous Local Plan Allocation (replaced unless stated)	Site Name and Address	Appropriate Uses	Indicative Development Capacity (ha employment land)	Gross Site area (ha)	Anticipated Delivery Timescale	Further Information
WOE684 SRCRA	SRCAAP EDO 2	Rear of IMI Marstons, Wobaston Road	Employment	7.2	7.2	By 2039	High quality design adjacent to canal.
WOE731 WCRA	Not allocated	Pantheon Park (former Prime 10, Bentley Bridge)	Employment	7.2	7.2	By 2029	
WOE737 BCRA	BCAAP MU3	Bilston Urban Village	Employment	6.0	6.0	By 2029	
WOE703 WCRA	BCAAP Recreational Open Space (not to be replaced)	Dean Road / Neachells Lane	Employment	8.0	8.0	By 2029	Part of larger Neachells Lane Open Space. Subject to mitigation for loss of open space and SLINC / nature conservation value.

Table 45 - Wolverhampton Employment Allocations in Black Country Plan – Policy EMP1							
BCP Site Ref / Location	Previous Local Plan Allocation (replaced unless stated)	Site Name and Address	Appropriate Uses	Indicative Development Capacity (ha employment land)	Gross Site area (ha)	Anticipated Delivery Timescale	Further Information
							Capacity may be constrained by highways access onto Neachells Lane. Further assessment work is underway which will be reflected in the Publication Plan.
WOE618 WCRA	Not allocated	Tata Steel, Wednesfield	Employment	4.3	4.3	By 2034	
WOE735 BCRA	BCAAP EDO 13	South of Citadel Junction, Bilston	Employment	3.2	3.2	By 2039	Subject to remediation and mitigation for loss of nature conservation value.

Table 45 - Wolverhampton Employment Allocations in Black Country Plan – Policy EMP1

BCP Site Ref / Location	Previous Local Plan Allocation (replaced unless stated)	Site Name and Address	Appropriate Uses	Indicative Development Capacity (ha employment land)	Gross Site area (ha)	Anticipated Delivery Timescale	Further Information
WOE723 SRCRA	SRCAAP EDO 10	Gas Holder site, Wolverhampton Science Park	Employment	2.6	2.6	By 2029	
WOE732 WCRA	Not allocated	Bowmans Harbour, Wednesfield	Employment	2.6	2.6	By 2029	
WOE662 BCRA	Not allocated	Former MEB site, Major Street / Dixon Street	Employment	2.5	2.5	By 2039	
WOE681 SRCRA	SRCAAP EDO 14	Cross Street North / Crown Street	Employment	2.1	2.1	By 2039	High quality design adjacent to canal. Specific guidance in Wolverhampton Locks Conservation Area. Appraisal to be

Table 45 - Wolverhampton Employment Allocations in Black Country Plan – Policy EMP1

BCP Site Ref / Location	Previous Local Plan Allocation (replaced unless stated)	Site Name and Address	Appropriate Uses	Indicative Development Capacity (ha employment land)	Gross Site area (ha)	Anticipated Delivery Timescale	Further Information
							Incorporated into design and layout of site.
WOE755 BCRA	BCAAP EDO 8	Rolls Royce Playing Field, Spring Road	Employment	1.8	1.8	By 2039	Subject to compensation for loss of playing field / bowling green.
WOE725 SRCRA	SRCAAP EDO 4	Wolverhampton Business Park	Employment	1.8	1.8	By 2034	Existing commitment (includes Class E Office use)
WOE698 WCRA	Not allocated	Phoenix Road	Employment	1.8	1.8	By 2039	
WOE757 BCRA	BCAAP EDO 1	Inverclyde Drive	Employment	1.4	1.4	By 2034	

Table 45 - Wolverhampton Employment Allocations in Black Country Plan – Policy EMP1

BCP Site Ref / Location	Previous Local Plan Allocation (replaced unless stated)	Site Name and Address	Appropriate Uses	Indicative Development Capacity (ha employment land)	Gross Site area (ha)	Anticipated Delivery Timescale	Further Information
WOE753 BCRA	BCAAP EDO 12	Rear of Dale Street (Vulcan Road)	Employment	1.4	1.4	By 2034	
WOE729 WCRA	Not allocated	Bentley Bridge Business Park, Well Lane	Employment	1.2	1.2	By 2029	
WOE694 WCRA	Not allocated	Land behind Keyline Builders Merchants Limited, Neachells Lane / Noose Lane	Employment	1.2	1.2	By 2034	
WOE756 BCRA	BCAAP EDO 5	Purbrook Road	Employment	0.9	0.9	By 2034	Subject to protecting and improving the environment along Willenhall Road in line with Bilston Corridor AAP Policy BC2.



Table 45 - Wolverhampton Employment Allocations in Black Country Plan – Policy EMP1

BCP Site Ref / Location	Previous Local Plan Allocation (replaced unless stated)	Site Name and Address	Appropriate Uses	Indicative Development Capacity (ha employment land)	Gross Site area (ha)	Anticipated Delivery Timescale	Further Information
WOE759 BCRA	BCAAP EDO 6	Powerhouse, Commercial Road	Employment	0.9	0.9	By 2039	
WOE763 BCRA	Not allocated	Dale St, adjacent Debs Diner	Employment	0.9	0.9	By 2039	
WOE727 SRCRA	SRCAAP EDO 12	Mammoth Drive, Wolverhampton Science Park	Employment	0.8	0.8	By 2034	
WOE690 SRCRA	SRCAAP EDO 18	Shaw Road	Employment	0.8	0.8	By 2034	
WOE758 SRCRA	Not allocated	Former Strykers, Bushbury Lane	Employment	0.8	0.8	By 2029	
WOE658 BCRA	Not allocated	Millfields Road, Ettingshall	Employment	0.7	0.7	By 2039	

Table 45 - Wolverhampton Employment Allocations in Black Country Plan – Policy EMP1

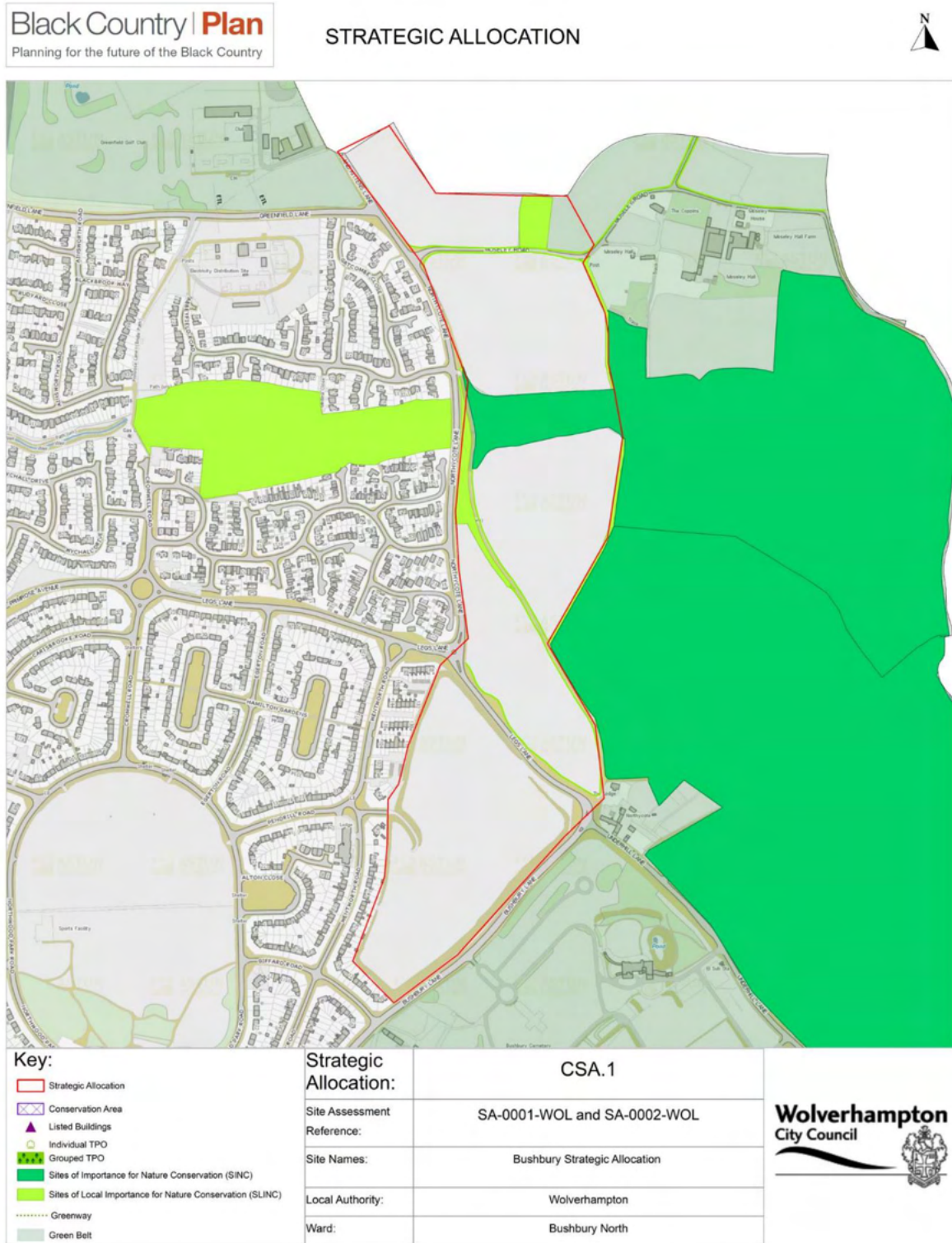
BCP Site Ref / Location	Previous Local Plan Allocation (replaced unless stated)	Site Name and Address	Appropriate Uses	Indicative Development Capacity (ha employment land)	Gross Site area (ha)	Anticipated Delivery Timescale	Further Information
WOE726 SRCRA	SRCAAP EDO 11	Stratosphere Site, Wolverhampton Science Park	Employment	0.7	0.7	By 2034	High quality design adjacent to canal. Specific guidance in Wolverhampton Locks Conservation Area Appraisal to be Incorporated into design and layout of Site.
WOE760 BCRA	BCAAP EDO 9	Rear of Spring Road	Employment	0.7	0.7	By 2039	
WOE734 BCRA	BCAAP EDO 11	Springvale Avenue	Employment	0.7	0.7	By 2039	
WOE754 BCRA	BCAAP EDO 4	Hickman Avenue	Employment	0.7	0.7	By 2039	Subject to protecting and improving the environment

Table 45 - Wolverhampton Employment Allocations in Black Country Plan – Policy EMP1

BCP Site Ref / Location	Previous Local Plan Allocation (replaced unless stated)	Site Name and Address	Appropriate Uses	Indicative Development Capacity (ha employment land)	Gross Site area (ha)	Anticipated Delivery Timescale	Further Information
							along Willenhall Road in line with Bilston Corridor AAP Policy BC2.
WOE761 BCRA	BCAAP EDO 2	Chillington Fields	Employment	0.6	0.6	By 2039	Subject to protecting and improving the environment along Willenhall Road in line with Bilston Corridor AAP Policy BC2.
WOE762 BCRA	BCAAP EDO 3	St Matthews Street	Employment	0.5	0.5	By 2039	

## Policies for Strategic Allocations

### Policy CSA1 – Bushbury Strategic Allocation



D.30 The Bushbury Strategic Allocation falls within the Bushbury Neighbourhood Growth Area and covers BCP Housing Allocations WOH257, WOH258, WOH259 and 617

WHO260. These sites have been removed from the green belt and allocated to deliver 532 homes in total, at an average net density of 40 dph, together with sufficient space to provide a two-form entry primary school.

The estimated phasing of delivery is:

- By 2029: 348 homes and primary school (if necessary)
- 2029-34: 184 homes

D.31 The sites are currently in two separate ownerships; however, they require an integrated and comprehensive approach to development because they are adjacent to each other and have joint infrastructure needs, in terms of:

- school place impacts;
- highways impacts;
- delivery of mitigation for green belt loss ;
- delivery of biodiversity net gain;
- delivery of improvements to recreational open space

D.32 The potential new primary school could also serve the needs of the Fallings Park Strategic Allocation (see Policy CSA2).

D.33 The key planning requirements for the Bushbury Strategic Allocation are set out below. Other standard policy requirements, as set out in the BCP and Wolverhampton Local Plan documents and SPDs, will also apply. A masterplan will be prepared to guide comprehensive development of the Bushbury Strategic Allocation. This will provide further detail on the requirements set out in this Policy and will provide a spatial framework for developments.

### School Place Requirements

D.34 Current pupil yield estimates from housing developments indicate that additional primary school places may be required to serve the Bushbury Neighbourhood Growth Area and other planned housing developments in the north east of Wolverhampton. Therefore, 2.3ha of Site WOH260 has been set aside for a potential primary school. If this site is not ultimately required for provision of a primary school, it will be brought forward for additional housing. In this event, improvements to increase accessibility to nearby primary schools may be required in accordance with Policy HOU2.

- D.35 It is currently anticipated that secondary school place requirements arising from housing developments in the north east of Wolverhampton over the plan period will be capable of being accommodated in existing secondary schools and / or the potential provision of a new secondary school within Wolverhampton. Public transport improvements to increase accessibility to secondary schools may be required in accordance with Policy HOU2.

### Highways Requirements

- D.36 To avoid adverse impacts on the wider road network, improvements to highway junctions along the Northycote Lane / Legs Lane / Bushbury Lane route will be required. Part of Moseley Road will also need to be upgraded to provide access to Sites WOH258 and WOH259, which will need to be brought forward together. Details will be set out in the masterplan.

### Green Belt Loss Mitigation Requirements

- D.37 The following measures will together form sufficient mitigation for the loss of green belt at Sites WOH257, WOH258, WOH259 and WOH260:
- a. accessibility, biodiversity and environmental quality improvements to Northycote Farm Country Park, which falls within the green belt and is owned and managed by City of Wolverhampton Council;
  - b. accessibility, biodiversity and environmental quality improvements to 10.4ha of land designated as the Northycote Farm Country Park Extension Area, which is currently in the control of the owner of Sites WOH257, WOH258 and WOH259. This area falls within the green belt and is a designated SINC, which is currently not accessible to the public. The area will be subject to sensitive improvements, opened up for public access and maintained in perpetuity as an extension to the existing Northycote Farm Country Park.
- D.38 There will be a requirement for all green belt loss mitigation works and any necessary transfer of land ownership to be completed before substantial completion of development at sites WOH257, WOH258, WOH259 and WOH260.
- D.39 The green belt boundary has been redrawn around the development sites to exclude them from it. In most cases there is an existing landscaped buffer or road that will provide a defensible new green belt boundary. However, the northern boundary of Site WOH259 abuts agricultural land in South Staffordshire. To provide a defensible

new green belt boundary in this location, it is important to ensure that the design of development on the site incorporates a significant landscaped buffer along this northern boundary.

- D.40 Developments should be designed to minimise potential harm to the integrity of remaining green belt areas and landscape character, as identified in the Black Country Green Belt Study and Black Country Landscape Sensitivity Assessment.

### **Nature Conservation and Net Biodiversity Gain Requirements**

- D.41 All existing SINCs, SLINCs, tree preservation orders, hedgerows, woodland and significant trees, both within and adjoining the development sites, should be retained, protected and incorporated sympathetically into the design of development (see Policy ENV4). Sufficient buffer zones should be provided at the edge of these habitat areas, particularly where there are mature trees and hedgerows, to allow them to thrive following development.
- D.42 It is anticipated that biodiversity net gain requirements for the developments will be met through delivery of the green belt loss mitigation requirements set out above, and subject to the minimum 10% requirement identified in the Environment Bill / Act and the requirements of Policy ENV3.

### **Historic Environment Requirements**

- D.43 The design of developments should respect the existence of historic environment designations in areas to the north, east and south of the sites, specifically: Moseley Old Hall (National Trust); Northcote Farm Grade II Listed Building; Moseley Mill and Fishponds Area of High Historic Landscape Value; Moseley Court Bushbury Designed Landscape of High Historic Value; Moseley Historic Rural Settlement Area of High Historic Townscape Value and Bushbury Hill Conservation Area.

### **Recreational Open Space Requirements**

- D.44 Subject to satisfactory delivery of the green belt loss mitigation requirements set out above, it is judged that the local area will have good access to existing recreational open space, allotments and play and sports facilities that have the capacity to meet the varied needs of residents, in line with adopted open space standards. Therefore, no new on-site open space will be required, beyond that necessary to protect existing nature conservation value and to provide sufficient natural, sustainable drainage systems. However, it will be necessary to provide quality walking and cycle routes within the developments, which provide easy, quick and

safe access to nearby open spaces and the countryside, and incorporate existing rights of way, including the existing footpath / cycleway track currently dividing the two parts of Site WOH257.

### **Sustainable Drainage Requirements**

- D.45 Naturalised sustainable drainage systems that are sufficient to retain greenfield runoff rates should be provided separately for each site, in accordance with Policy CC5. An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the masterplan is prepared.

### **Local Wastewater Treatment Capacity**

- D.46 The Black Country Water Cycle Study concludes that there is limited headroom / capacity at the Coven Heath wastewater treatment works serving the area. Severn Trent have identified this constraint and have indicated that they will be able to deliver the upgrades required to local wastewater treatment capacity in a timely manner to support the delivery of developments within Bushbury Neighbourhood Growth Area, and also other developments in the north of Wolverhampton and parts of South Staffordshire, over the Plan period.



Policy CSA2 – Fallings Park Strategic Allocation



STRATEGIC ALLOCATION



**Key:**

- Strategic Allocation
- Conservation Area
- ▲ Listed Buildings
- ★ Recreational Open Space
- Individual Tree Preservation Order (TPO)
- Grouped TPO
- Sites of Importance for Nature Conservation (SINC)
- Sites of Local Importance for Nature Conservation (SLINCs)
- Greenway
- Green Belt

Strategic Allocation:	CSA.2
Site Assessment Reference:	SA-0010-WOL, SA-0015-WOL and SA-0030-WOL
Site Names:	Fallings Park Strategic Allocation
Local Authority:	Wolverhampton
Ward:	Fallings Park



D.47 The Fallings Park Strategic Allocation lies within the Fallings Park Neighbourhood Growth Area and covers BCP Housing Allocations WOH262, WOH263, WOH264 and WOH271. These sites have been removed from the green belt and allocated to deliver 303 homes in total together with a central area of high-quality recreational

open space, including play facilities, on Site WOH262, to serve existing and new residents. The sites are suitable for an average density of 40 dph, with the exception of Site WOH271. Due to the linear shape of this site, the rural character of the local area and the need to create a defensible green belt boundary, a development of no more than 25 dph is appropriate.

D.48 The estimated phasing of delivery is:

- By 2029: 200 homes and recreational open space
- 2029-34: 103 homes

D.49 The sites are currently in four separate ownerships; however they require an integrated and comprehensive approach to development because they are adjacent to each other and have joint infrastructure needs, in terms of:

- a) school place impacts;
- b) highways impacts;
- c) delivery of green belt loss mitigation;
- d) delivery of biodiversity net gain;
- e) delivery of recreational open space

D.50 The potential new primary school on the Bushbury Strategic Allocation could also serve the needs of the Fallings Park Strategic Allocation (see Policy CSA1 above).

D.51 The key planning requirements for the Fallings Park Strategic Allocation are set out below. Other standard policy requirements, as set out in the BCP and Wolverhampton Local Plan documents and SPDs, will also apply. A masterplan will be prepared to guide the comprehensive development of the Fallings Park Strategic Allocation. This will offer further detail on the requirements set out in this Policy and will also provide a spatial framework for developments.

### School Place Requirements

D.52 Current pupil yield estimates from housing developments indicate that additional primary school places may be required to serve the Fallings Park Neighbourhood Growth Area and other housing developments over the plan period in the north east of Wolverhampton. Therefore, 2.3ha of Site WOH260 has been set aside for a potential primary school.

- D.53 It is currently anticipated that secondary school place requirements arising from housing developments in the north east of Wolverhampton over the plan period will be capable of being accommodated in existing secondary schools and / or the potential provision of a new secondary school within Wolverhampton.

### Highways Requirements

- D.54 To avoid adverse impacts on the wider road network, major improvements will be required to Grassy Lane, Wood Hayes Road, the Grassy Lane \ Wood Hayes Road junction and the Wood Hayes Road \ Wood End Road signal-controlled junction. Development would also contribute towards increasing congestion on Cannock Road, which has been identified as a pinch point requiring medium term investment.
- D.55 Therefore, major improvements along the routes of Cannock Road and Wood Hayes Road are likely to be required. Details will be set out in the masterplan.

### Green Belt Loss Mitigation Requirements

- D.56 Mitigation for the loss of green belt at Sites WOH262, WOH263, WOH264 and WOH271 will be provided through accessibility, biodiversity and environmental quality improvements to the significant areas of recreational open space located in the nearby Bushbury Hill area, which fall within the green belt and are owned and managed by City of Wolverhampton Council. These cover: Tennyson Road Neighbourhood Park; Bushbury Hill Amenity Area; and Sandy Lane Allotments.
- D.57 There will be a requirement for all green belt loss mitigation works and any necessary transfer of land ownership to be completed before substantial completion of development at sites WOH262, WOH263, WOH264 and WOH271.
- D.58 The green belt boundary has been redrawn around the development sites to exclude them and to align with the administrative boundary between Wolverhampton and South Staffordshire. To the north and east this lies along a culvert / brook and hedgerows and through agricultural fields. To provide a defensible new green belt boundary in this location, it is important that the design of development incorporates significant landscaped buffers, which will also enhance the nature conservation value of existing habitats.
- D.59 Developments should be designed to minimise potential harm to the integrity of remaining green belt areas and landscape character, as identified in the Black Country Green Belt Study and Black Country Landscape Sensitivity Assessment.

## Nature Conservation and Net Biodiversity Gain Requirements

- D.60 All existing hedgerows, woodland and significant trees both within and adjoining the development sites should be retained, protected and incorporated sympathetically into the design of development (see Policy ENV4). Sufficient buffer areas should be provided at the edge of these habitat areas, particularly where mature trees and hedgerows exist, to allow them to thrive following development.
- D.61 It is anticipated that biodiversity net gain requirements for the developments will be met on-site or through the green belt mitigation measures set out above, and subject to the minimum 10% requirement identified in the Environment Bill / Act and the requirements of Policy ENV3.

## Recreational Open Space Requirements

- D.62 1ha of recreational open space, including play facilities, will be provided on Site WOH262 to deliver a park to serve residents. Following this provision, the local area will benefit from good access to recreational open space, allotments, play and sports facilities that together have the capacity to meet the varied needs of residents, in line with adopted open space standards. No additional new on-site open space is likely to be required, beyond that necessary to protect existing nature conservation value and provide sufficient natural, sustainable drainage systems. However, it will be necessary to provide quality walking and cycle routes within the developments that provide easy, quick and safe access to nearby open spaces and the countryside, and which also incorporate existing rights of way.

## Sustainable Drainage Requirements

- D.63 Naturalised sustainable drainage systems that are sufficient to retain greenfield runoff rates should be provided in accordance with Policy CC5. Allowances for the space necessary to accommodate these systems, and a culvert standoff zone, have been made when defining the indicative net developable area. These allowances may be adjusted when the masterplan is prepared.

## Local Wastewater Treatment Capacity

- D.64 The Black Country Water Cycle Study concludes that there is limited headroom / capacity at the Coven Heath wastewater treatment works that serve this area. Severn Trent have identified this constraint and have indicated that they are able to deliver the upgrades required to local wastewater treatment capacity in a timely

manner to support the delivery of developments within the Fallings Park Neighbourhood Growth Area, and also other developments in the north of Wolverhampton and parts of South Staffordshire, over the Plan period.

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## Waste Allocations

### Strategic Waste Management Sites

D.65 The existing strategic sites identified on the Waste Key Diagram are the significant waste management facilities operating in the Black Country. They have been identified through a detailed analysis of all known licenced and exempt facilities in each authority's area. Under Policy W2: Waste Sites, the BCA will safeguard existing strategic and other waste management facilities from inappropriate development, to maintain existing levels of waste management capacity. The strategic waste management sites within Wolverhampton are listed in Table 50:

**Table 46 - Wolverhampton Strategic Waste Management Sites (BCP Policy W2)**

BCP Site Ref / Location	Previous Local Plan Ref (replaced unless stated)	Site Name and Address	Operational Capacity (tonnes per annum)
<b>Municipal Waste Recovery - installations</b>			
WS03 SRCRA	SRCAAP – SW1	Wolverhampton Energy from Waste (EfW), Crown Street	115,000
<b>Municipal Waste Recovery - Supporting Infrastructure</b>			
WS13 SRCRA	SRCAAP – SW2	Crown Street Recycling Transfer Station	20,000
WS14 BCRA	BCAAP – BC2 (1)	Anchor Lane Household Waste Recycling Centre (HWRC)	10,000
WS15 SRCRA	SRCAAP – SW3	Shaw Road Household Waste Recycling Centre (HWRC)	10,000
<b>Other Significant Waste Management Infrastructure</b>			
WS57 BCRA	Not Allocated	Ettingshall Inert Waste Recycling Facility, Millfields Road	100,000

BCP Site Ref / Location	Previous Local Plan Ref (replaced unless stated)	Site Name and Address	Operational Capacity (tonnes per annum)
WS58 BCRA	Not Allocated	Neachells Lane WTS (SUEZ Recycling and Recovery UK Ltd)	25,000
WS59 BCRA	Not Allocated	JMP Wilcox & Company, Road, Beldray Road, Bilston	45,000
WS60 BCRA	BCAAP – BC2 (6)	Purbrook WTS (S.B. Waste Management & Recycling Ltd), Purbrook Road	25,000

Sources: Environment Agency: Waste Data Interrogator (WDI) 2007 – 2018, Operational Incinerators, 2018, Public Register, Remaining Landfill Capacity in England as at end of 2018 Version 2

### Preferred Areas for New Waste Facilities

D.66 A number of employment areas have been identified in the Black Country Waste Study (BCWS) as being suited to the development of new waste recovery, waste treatment and waste transfer infrastructure. Under Policy W3: Preferred Areas for New Waste Facilities, these areas are considered to be the least likely locations to give rise to land use conflicts; in several cases, there is already co-location of existing waste facilities to which new sites would contribute. There are three such areas within Wolverhampton, and these are identified on the Waste Key Diagram and listed in Table 51:

**Table 47 - Wolverhampton Preferred Areas for New Waste Facilities (BCP Policy W3)**

BCP Site Ref / Location	Site Name and Address	Potentially suitable waste uses <sup>119</sup>	Area (hectares)
WPWo1 BCRA	Wolverhampton / Ettingshall Corridor (North)  The area west of the railway line is under pressure from non-employment uses / proximity to housing, however, proposals will be dealt with on a case by case basis.	Energy from Waste  Treatment  In-vessel composting	88.5

<sup>119</sup> As indicated at 5.10 of the Black Country Waste Study, Wood 2020

BCP Site Ref / Location	Site Name and Address	Potentially suitable waste uses <sup>119</sup>	Area (hectares)
	The area to the east of the railway line is less threatened and should therefore be the focus for additional waste uses.	Anaerobic digestion Transfer Recycling	
WPWo2 BCRA	<p>Wolverhampton / Ettingshall Corridor (South)</p> <p>The area is under pressure from housing proposals with significant areas of interest to the north eastern and western boundaries.</p> <p>The area to the east of the railway line is less threatened, and should therefore be the focus for additional waste uses.</p>	Energy from Waste Treatment In-vessel composting Anaerobic digestion Transfer Recycling	74.5
WPWo3 BCRA	Dale Street, Loxdale, Bilston	Treatment In-vessel composting Anaerobic digestion Transfer Recycling	20.6



## Minerals Allocations

- D.67 The Black Country Minerals Study (BCMS, Tables 12.10 and 12.9) lists all known existing mineral sites and mineral infrastructure sites in the Black Country. Existing mineral sites within the Black Country include permitted mineral extraction sites, stockpiles, brick and tile works, and a pot clay factory. There are no existing mineral sites in Wolverhampton.
- D.68 Existing Black Country mineral infrastructure sites include secondary / recycled aggregates production, rail-linked aggregates depots, coating plants, ready-mix (RMX) concrete batching plants, manufacture of concrete products, and dry silo mortar (DSM) plants.
- D.69 Under Policy MIN2: Minerals Safeguarding Areas, the BCA will safeguard all existing mineral sites and mineral infrastructure sites from inappropriate development; this is considered necessary in order to retain existing capacity, thus helping to make the best use of and conserve the Black Country's finite mineral resources.
- D.70 The locations of Black Country mineral sites and mineral infrastructure sites are identified on the Minerals Key Diagram, and those sites located within Wolverhampton are listed in Table 52:

**Table 48 - Wolverhampton Mineral Infrastructure Sites (BCP Policy MIN2)**

BCP Site Ref / Location	Previous Local Plan Ref (replaced unless stated)	Site Name	Address	Type
MIWo1 WCRA	Not Allocated	Aggregate Industries (Wolverhampton)	Manfield Road, Wolverhampton	Concrete batching plant
MIWo2 BCRA	Not Allocated	Britannia Onsite Concrete	Oxford Street/ Vulcan Road, Bilston	Concrete batching plant
MIWo3 BCRA	Not Allocated	CPI Mortars (Wolverhampton)	Springvale Industrial Estate, Springvale Avenue, Bilston	Dry silo mortar plant

BCP Site Ref / Location	Previous Local Plan Ref (replaced unless stated)	Site Name	Address	Type
MIWo4 WCRA	Not Allocated	Dismantling & Engineering Services	Noose Lane, Willenhall	Aggregates recycling
MIWo5 BCRA	BCAAP – BC2 (5)	Ettingshall Asphalt Plant	Spring Road, Wolverhampton,	Coating plant
MIWo6 BCRA	BCAAP – BC2 (5)	Ettingshall Recycling Facility	Millfields Road, Ettingshall	Aggregates recycling
MIWo7 BCRA	Not Allocated	G L Ready Mix Concrete	Unit 1a, Thomas Street, Blakenhall	Concrete batching plant
MIWo8 BCRA	Not Allocated	Hanson Ready Mix, Concrete (Wolverhampton)	Neachells Lane, Wednesfield	Concrete batching plant
MIWo9 WCRA	Not Allocated	Landywood Concrete Products Ltd	Neachells Lane, Wednesfield	Concrete batching plant
MIWo10 WCRA	Not Allocated	Neachells Lane Transfer Station	Consolidation House, Neachells Lane, Willenhall	Specialist facility for manufacture of concrete blocks from recovered street sweepings
MIWo11 BCRA	Not Allocated	Premier Mortars (Wolverhampton)	Chillington Works Industrial Estate, Cross Street, Eastfield	Dry silo mortar plant
MIWo12 BCRA	Not Allocated	S S Concrete	Price Street, Bilston	Concrete batching plant

BCP Site Ref / Location	Previous Local Plan Ref (replaced unless stated)	Site Name	Address	Type
MIWo13 BCRA	BCAAP – BC2 (5)	Tarmac Concrete Ettingshall	Millfields Road, Ettingshall	Concrete batching plant

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## 14 Delivery, Monitoring, and Implementation

### BCP Monitoring and Review

- 14.1 The BCA are committed to ensuring robust monitoring of the implementation of the BCP. The aim is to ensure that the plan is delivered successfully, efficiently and working in partnership with stakeholders.
- 14.2 Monitoring indicators have been included within each chapter of the BCP to measure the implementation of policies. The indicators will identify trigger points at which it may be appropriate to address any emerging issues.
- 14.3 The purpose of the monitoring indicators are to:
- Assess the performance of the plan in delivering the spatial vision and objectives.
  - Identify the need to amend policies or supplementary planning documents.
  - Demonstrate the plan is deliverable in the plan period.
- 14.4 The BCP has been prepared to be flexible over the plan period and adjust to changes where they arise. These changes may include changes to national policy and guidance, demographic changes and variable economic conditions. There also may be circumstances or unexpected external factors that means certain policies become less effective or out of date. Monitoring the plan is essential in identifying any issues and devising appropriate actions. Such actions might include adjusting the implementation of the policies or undertake a partial or early review of the BCP.
- 14.5 The BCLAs, in line with national policy, will review the policies in the Plan to assess whether they need updating at least once every five years and the policies will be updated as necessary.

## 15 Appendix – changes to Local Plans

### A - Dudley

Appendix A1 - Dudley Local Plan Policies to be superseded by the Black Country Plan		
Local Plan document	Superseded Policy	Replacement Policy / wording
Dudley Borough Development Strategy	Policy S26 - Residential Canal Moorings	Policy ENV 7 Canals of the Black Country
Dudley Borough Development Strategy	Policy S25 – Canals	Policy ENV 7 Canals of the Black Country (in part)
Dudley Borough Development Strategy	Policy S20: The Borough's Geology	Policy ENV6: Geodiversity and the Black Country UNESCO Global Geopark (in part)
Dudley Borough Development Strategy	Policy S23: Green Belt	Policy GB1: The Black Country Green Belt (in part)
Dudley Borough Development Strategy	Policy S2: Planning for a Healthy Borough	Policy HWI: Health and Wellbeing (in part)

<b>Appendix A1 - Dudley Local Plan Policies to be superseded by the Black Country Plan</b>		
<b>Local Plan document</b>	<b>Superseded Policy</b>	<b>Replacement Policy / wording</b>
Dudley Borough Development Strategy	Policy D9 – Hot Food Takeaways	Policy HW1: Health and Wellbeing (in part)
Dudley Borough Development Strategy	Policy S2: Planning for a Healthy Borough	Policy HW3: Health Impact Assessments (HIAs) (in part)
Dudley Borough Development Strategy	Policy S2: Planning for a Healthy Borough	Policy HW2: Health Infrastructure (in part)
Dudley Borough Development Strategy	Policy S3: Renewable Energy	Policy CC7: Renewable and Low Carbon Energy and BREEAM Standards (in part)
Dudley Borough Development Strategy	Policy S4: Flood Risk	Policy CC5: Flood Risk (in part)
Dudley Borough Development Strategy	Policy S5: Minimising Flood Risk and Sustainable Drainage Systems (SuDS)	Policy CC6 - Sustainable drainage and surface water management (SuDS)
Dudley Borough Development Strategy	Air Pollution	Will need to be in accordance with CC4 – Air Quality

<b>Appendix A1 - Dudley Local Plan Policies to be superseded by the Black Country Plan</b>		
<b>Local Plan document</b>	<b>Superseded Policy</b>	<b>Replacement Policy / wording</b>
Dudley Borough Development Strategy	Policy S19: Dudley Borough's Green Network	Designations updated in accordance with Black Country Plan Proposals Map
Dudley Borough Development Strategy	The Borough's Green Infrastructure	All policies will need to reflect updated BCP Policies ENV8, ENV3, CC5 and CC3
Dudley Borough Development Strategy	Policy S22: Mature Trees, Woodland and Ancient Woodland	Policy ENV4 – Provision, retention and protection of trees, woodlands and hedgerows
Dudley Borough Development Strategy	Policy S27: River Stour and its Tributaries	Policy CC5: Flood Risk (in part) as replacement to BCCS ENV5
Dudley Borough Development Strategy	Policy S28 – Sports Facilities and Stadiums	Policy ENV8: Open Space, Sport and Recreation (STRATEGIC) replaces to BCCS ENV6: Open Space, Sport and Recreation
Dudley Borough Development Strategy	Policy S29 – Public Open Space	Policy ENV8: Open Space, Sport and Recreation (STRATEGIC) replaces to BCCS ENV6: Open Space, Sport and Recreation

<b>Appendix A1 - Dudley Local Plan Policies to be superseded by the Black Country Plan</b>		
<b>Local Plan document</b>	<b>Superseded Policy</b>	<b>Replacement Policy / wording</b>
Dudley Borough Development Strategy	Policy L1: Housing Development, extensions and alterations to existing dwellings	Policy HOU 6: Houses in Multiple Occupation (in part
Dudley Borough Development Strategy	Policy L3: Provision of Affordable Housing in New Developments	BCP Policy HOU3: Delivering Affordable, Wheelchair Accessible and Self Build / Custom Build Housing
Dudley Borough Development Strategy	Policy L6: Strategic High-Quality Employment Areas	BCP Policy EMP2: Strategic Employment Areas
Dudley Borough Development Strategy	Policy L7: Local Quality Employment Areas	BCP Policy EMP3: Local Employment Areas BCP Policy EMP4: Other Employment Sites
Dudley Borough Development Strategy	Policy L8 – Protecting the Viability and Integrity of Industrial and Business Uses	Policy EMP 4: Other Employment Sites
Stourbridge Area Action Plan	Policy 1 – Urban Design	Policy ENV9: Design Quality
Stourbridge Area Action Plan	Policy 9 – Hot Food Takeaways (A5 Uses	Policy HWI: Health and Wellbeing



<b>Appendix A1 - Dudley Local Plan Policies to be superseded by the Black Country Plan</b>		
<b>Local Plan document</b>	<b>Superseded Policy</b>	<b>Replacement Policy / wording</b>
Stourbridge Area Action Plan	Policy 10 – Housing Mix and Tenure	Policy HOU2: Housing Density, Type and Accessibility
Stourbridge Area Action Plan	Policy 12 – New Housing near to Business uses	Policy HOU2: Housing Density, Type and Accessibility (in part)
Stourbridge Area Action Plan	Policy 15 – Nature Conservation	Policy ENV1: Nature Conservation
Stourbridge Area Action Plan	Policy 19 – Sustainable Urban Drainage Systems and Flood Risk	Policy CC5: Flood Risk (in part) and Policy CC6 - Sustainable drainage and surface water management (SuDS)
Brierley Hill Area Action Plan	Policy 46: Edge of Centre and Out of Centre Development	BCP Policy CEN6: Edge of Centre and Out of Centre Development BCP Policy CEN2: Tier One: Strategic Centres
Brierley Hill Area Action Plan	Policy 48: Offices	BCP Policy CEN2: Tier One: Strategic Centres – <i>in part as reference within Policy 48 to the BCCS</i>

Appendix A1 - Dudley Local Plan Policies to be superseded by the Black Country Plan		
Local Plan document	Superseded Policy	Replacement Policy / wording
Brierley Hill Area Action Plan	Policy 49: Living in Brierley Hill Town Centre	BCP Policy HOU3: Delivering Affordable, Wheelchair Accessible and Self Build / Custom Build Housing – in part - as reference within Policy 49 to the BCCS and the Affordable Housing SPD
Brierley Hill Area Action Plan	Policy 66: Phasing of Comparison Retail Allocations	BCP Policy CEN2: Tier One: Strategic Centres <i>Comment as AAP Policy 66 hooks out to BCCS CEN3</i>
Halesowen Area Action Plan (HAAP)	HAAP Policy 1 'Retail Floorspace' includes that retail proposals in the primary shopping area (PSA) will be supported subject to them satisfying relevant parts of BCCS Policies CEN2 'Hierarchy of Centres' and CEN4 'Regeneration of Town Centres'	Replace 'BCCS Policy CEN2 Hierarchy of Centres' with ' <i>BCP Policy CEN1 The Black Country Centres</i> '; Replace 'BCCS Policy CEN4 Regeneration of Town Centres' with ' <i>BCP Policy CEN3 Tier Two Centres</i> '.
HAAP	HAAP Para 4.9 (as supporting text to Policy 4 'Land Uses outside Halesowen's Primary Shopping Area') states the need to encourage town centre uses outside the PSA in accordance with BCCS Policy CEN4 and restricting A1 shops.	Replace 'BCCS Policy CEN4 Regeneration of Town Centres' with ' <i>BCP Policy CEN3 Tier Two Centres</i> '.

Appendix A1 - Dudley Local Plan Policies to be superseded by the Black Country Plan		
Local Plan document	Superseded Policy	Replacement Policy / wording
HAAP	HAAP Para 4.12 (as supporting text to Policy 6 'Proposed Development and the River Stour') makes reference to BCCS Policy ENV5 'Flood Risk, Sustainable Drainage Systems and Urban Heat Island'.	Replace 'BCCS Policy ENV5 Flood Risk, Sustainable Drainage Systems and Urban Heat Island' with ' <i>BCP Policy CC5 Flood Risk</i> ' and Policy CC6 - Sustainable drainage and surface water management (SuDS)
HAAP	H AAP Para 5.5 (as supporting text to Policy 8 'Development Opportunity Site 1: Pool Road Car Park') makes reference to BCCS Policy ENV5.	Replace 'BCCS Policy ENV5' with ' <i>BCP Policy CC5 Flood Risk</i> ' and Policy CC6 - Sustainable drainage and surface water management (SuDS)
HAAP	HAAP Para 5.10 (as supporting text to Policy 9 'Development Opportunity Site 2: Trinity Point and High Street Car Park') makes reference to BCCS Policy ENV5.	Replace 'BCCS Policy ENV5' with ' <i>BCP Policy CC5 Flood Risk</i> ' and Policy CC6 - Sustainable drainage and surface water management (SuDS)
HAAP	HAAP Para 5.15 (as supporting text to Policy 10 'Development Opportunity Site 3: Link House and Pioneer House') makes reference to BCCS Policy ENV5.	Replace 'BCCS Policy ENV5' with ' <i>BCP Policy CC5 Flood Risk</i> ' and Policy CC6 - Sustainable drainage and surface water management (SuDS)

Appendix A1 - Dudley Local Plan Policies to be superseded by the Black Country Plan		
Local Plan document	Superseded Policy	Replacement Policy / wording
HAAP	HAAP Para 5.18 (as supporting text to Policy 11 'Development Opportunity Site 4: Little Cornbow') makes reference to BCCS Policy ENV5.	Replace 'BCCS Policy ENV5' with ' <i>BCP Policy CC5 Flood Risk</i> ' and Policy CC6 - Sustainable drainage and surface water management (SuDS)
HAAP	HAAP Para 5.21 (as supporting text to Policy 12 'Development Opportunity Site 5: Fountain House') makes reference to BCCS Policy ENV5.	Replace 'BCCS Policy ENV5' with ' <i>BCP Policy CC5 Flood Risk</i> '. And Policy CC6 - Sustainable drainage and surface water management (SuDS)
HAAP	HAAP Para 7.2 as introductory text to the Nature Conservation Chapter makes reference to BCCS Policies CSP3 'Environmental Infrastructure' and ENV1 'Nature Conservation'.	<p>Re BCCS Policy CSP3: There does not appear to be a direct BCP policy replacement for this.</p> <p>Including given the context of this HAAP paragraph, it is sufficient that Para 7.2 be amended to remove the reference to BCCS Policy CSP3 (the reference to ENV1 being sufficient).</p> <p>Amend HAAP Para 7.2 from: 'This complements the Black Country Core Strategy which plans for...'</p> <p>to '<i>This complements the Black Country Plan which plans for...</i>'</p>

Appendix A1 - Dudley Local Plan Policies to be superseded by the Black Country Plan		
Local Plan document	Superseded Policy	Replacement Policy / wording
		Re Policy ENV1 - <u>No change required</u> – remains as (BCP) Policy ENV1 'Nature Conservation'
HAAP	HAAP Para 7.13 under the subheading 'Protecting Key Nature Conservation Sites and Corridors' makes reference to BCCS Policy ENV1 'Nature Conservation'.	Amend HAAP Para 7.13 from: ' <i>...are protected through Core Strategy Policy ENV1...</i> ' to ' <i>...are protected through Black Country Plan Policy ENV1...</i> ' Re Policy ENV1 - <u>No change required</u> – remains as (BCP) Policy ENV1 'Nature Conservation'
HAAP	HAAP Para 8.5 as introductory text to the Historic Environment Chapter under the subheading 'Halesowen Urban Historic Landscape Characterisation study (UHLC)' makes reference to BCCS Policy ENV2 'Historic Character and Local Distinctiveness'.	Replace 'BCCS Policy ENV2 Historic Character and Local Distinctiveness' with ' <i>BCP Policy ENV5 Historic Character and Local Distinctiveness of the Black Country</i> '.
HAAP	HAAP Para 9.8 as supporting text to Policy 27 'Walking and Cycling' makes reference to BCCS Policy TRAN4 ' <i>Creating Coherent Networks for Cycling and for Walking</i> '.	Replace BCCS Policy TRAN4 'Priorities for the Development of the Transport Network' with BCP Policy TRAN5 ' <i>Creating Coherent Networks for Cycling and for Walking</i> '.

Appendix A1 - Dudley Local Plan Policies to be superseded by the Black Country Plan		
Local Plan document	Superseded Policy	Replacement Policy / wording
HAAP	HAAP Para 9.10 as supporting text to Policy 28 'Car Parking' makes reference to BCCS Policy CEN8 'Car Parking in Centres'.	Where development is being proposed, BCP Policy TRAN7 'Parking Management' provides guidance on maximum parking standards.
HAAP	HAAP Para 11.3 in the Delivery Chapter refers to BCCS Policy DEL1 'Infrastructure Provision'	Amend HAAP Para 11.3 from: '...in particular Core Strategy Policy DEL1...' to ' <i>...in particular Black Country Plan Policy DEL1...</i> ' Re Policy DEL1 - <u>No change required</u> – remains as (BCP) Policy DEL1 'Infrastructure Provision'
HAAP	HAAP Policies Map Key in terms of Sites of Local Importance for Nature Conservation (SLINCs) refers to BCCS Policy ENV1 'Nature Conservation'.	Amend the Key's text under SLINC from 'Black Country Core Strategy Policy ENV1...' To ' <i>Black Country Plan Policy ENV1...</i> ' Re Policy ENV1 - <u>No change required</u> – remains as (BCP) Policy ENV1 'Nature Conservation'

Appendix A1 - Dudley Local Plan Policies to be superseded by the Black Country Plan		
Local Plan document	Superseded Policy	Replacement Policy / wording
HAAP	HAAP Policies Map Key in terms of Scheduled Ancient Monuments refers to BCCS Policy ENV2 'Historic Character and Local Distinctiveness'.	Replace 'BCCS Policy ENV2 Historic Character and Local Distinctiveness' with ' <i>Black Country Plan Policy ENV5 Historic Character and Local Distinctiveness of the Black Country</i> '.
Dudley Area Action Plan (DAAP)	Policy 7 – Development Opportunity Site 1 – in the section regarding Acceptable range of land uses refers to CEN4 'Regeneration of Town Centres' in terms of convenience retail floor space	DAAP states 'A1 shops ... and a contribution to the requirement for convenience retail floor space identified by BCCS Policy CEN4  However, BCP Policies do not identify an amount of convenience retail floor space.  BCP Policy CEN3 covers Tier-Two Centres.
DAAP	Policy 8 – Development Opportunity Site 2 – in the section regarding Acceptable range of land uses refers to CEN4 'Regeneration of Town Centres' in terms of convenience retail floor space	DAAP states 'A1 shops ... and a contribution to the requirement for convenience retail floor space identified by BCCS Policy CEN4  However, BCP Policies do not identify an amount of convenience retail floor space.  BCP Policy CEN3 covers Tier-Two Centres.

Appendix A1 - Dudley Local Plan Policies to be superseded by the Black Country Plan		
Local Plan document	Superseded Policy	Replacement Policy / wording
DAAP	Paragraph 6.32 in Housing Opportunities section refers to Policy HOU1 'Delivering Sustainable Housing Growth' (also to vision for regeneration corridor 11a)	Replace Policy HOU1 in the Black Country Core Strategy with <i>Policy HOU1 in the Black Country Plan</i> . Re Policy HOU1 - <u>No change required</u> – remains as (BCP) Policy HOU1 'Delivering Sustainable Housing Growth'
DAAP	Para. 6.36 in Housing allocations within the AAP section refers to HOU3 'Affordable Housing'	Replace: Core Strategy Policy HOU3: Affordable Housing With <i>Black Country Plan Policy HOU3: Delivering Affordable, Wheelchair Accessible and Self Build/Custom Build Housing</i> .
DAAP	Para. 7.5 in Dudley's Primary Shopping Area Section refers to CEN4 'Regeneration of Town Centres' in terms of identified need for retail floor space	BCP Policies do not identify an amount of convenience retail floor space for Dudley Town Centre. BCP Policy CEN3 covers Tier-Two Centres.
DAAP	Policy 15 'Retail Floorspace' (due to reference to CEN4)	In part BCP Policies do not identify an amount of convenience retail floor space for Dudley Town Centre. Replace: Core Strategy Policy CEN4 'Regeneration of Town Centres'



Appendix A1 - Dudley Local Plan Policies to be superseded by the Black Country Plan		
Local Plan document	Superseded Policy	Replacement Policy / wording
		With: <i>Black Country Plan Policy CEN3 'Tier Town Centres'</i>
DAAP	Para7.9 and 7.11 in Beyond Dudley's Primary Shopping Area section refers to CEN4 'Regeneration of Town Centres'	<p>Para.7.9 states: "<i>The Black Country Core Strategy Policy CEN4 specifically acknowledges that Dudley town centre has a particular function as a heritage and leisure focus for regeneration</i>" No BCP policy includes this</p> <p>Para 7.11 Replace: The Black Country Core Strategy Policy CEN4 'Regeneration of Town Centres'</p> <p>With: <i>The Black Country Plan Policy CEN1 'The Black Country Centres'</i></p>
DAAP	Policy 17 'Land Uses outside Dudley Primary Shopping Area' in part reference to CEN4	
DAAP	Para. 8.1 in housing Section refers to Policy CSP1 'The Growth Network', HOU1 'Delivering Sustainable Housing Growth', HOU2 'Housing Density, Type and Accessibility'	<p>Replace (Policy CPS1) with: <i>(Policy CSP2)</i></p> <p>Amend Policies HOU1 and HOU2 of the Black Country Core Strategy to <i>HOU1 and HOU2 of the Black Country Plan</i></p>

Appendix A1 - Dudley Local Plan Policies to be superseded by the Black Country Plan		
Local Plan document	Superseded Policy	Replacement Policy / wording
DAAP	Policy 18 'Housing Within the Dudley Area Action Plan Boundary in part	Replace: Housing policies within the Black Country Core Strategy (including policy HOU3 'Affordable Housing')  With: <i>Housing policies within the Black country Plan (Including Policy HOU3 'Delivering Affordable, Wheelchair accessible and self-build / custom build housing')</i>
DAAP	Para.11.9 under Dudley Urban Historic Landscape Characterisation Study section refers to Policy ENV2 'Historic Character and Local Distinctiveness'	Replace: Core strategy Policy ENV2 'Historic Character and Local Distinctiveness'  With: <i>Black Country Plan Policy ENV5 'Historic Character and Local Distinctiveness of the Black Country'</i>
DAAP	Para. 13.30 in Nature Conservation supporting text refers to Policy ENV1 'Nature Conservation	Amend HAAP Para 7.13 from: ' <i>...are protected through Core Strategy Policy ENV1...</i> '  to ' <i>...are protected through Black Country Plan Policy ENV1...</i> '  Re Policy ENV1 - <u>No change required</u> – remains as (BCP) Policy ENV1 'Nature Conservation'

Appendix A1 - Dudley Local Plan Policies to be superseded by the Black Country Plan		
Local Plan document	Superseded Policy	Replacement Policy / wording
DAAP	Paragraph 14.4 in Planning Obligations section refers to Policy DEL1	Policy DEL1 - <u>No change required</u> – remains as (BCP) Policy DEL1 'Infrastructure Provision'

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Appendix A2 – Changes to existing local plan designations				
Local Plan Document	Designation / Site Reference	Site Name	Description of Change	Reason for Change
		StandHills Open Space	Removed.	Site allocated for housing subject to off-site mitigation for loss of open space.
		Blowers Green Road Open Space	Removed.	Site allocated for housing subject to off-site mitigation for loss of open space.
2017 Dudley Borough Development Strategy (DBDS)	H10.7	Corbys Hall Lane	Removed.	Site previously allocated for housing but removed due to landowner engagement exercise
DBDS	H11A.12	Old Dock, Dudley	Removed	Site previously allocated for housing but removed due to landowner engagement exercise
DBDS	H11B.12	Platts Road, Amblecote	Removed	Site previously allocated for housing but removed due to landowner engagement exercise
DBDS	H11B.19	Land south of Brettel Lane, Brierley Hill	Removed	Site previously allocated for housing but removed due to landowner engagement exercise

<b>Appendix A2 – Changes to existing local plan designations</b>				
<b>Local Plan Document</b>	<b>Designation / Site Reference</b>	<b>Site Name</b>	<b>Description of Change</b>	<b>Reason for Change</b>
DBDS	H11B.20	Former Brick Works, North of Brettell Lane	Removed	Site previously allocated for housing but removed due to landowner engagement exercise
DBDS	H11B.21	North Street Industrial Estate	Removed	Site previously allocated for housing but removed due to landowner engagement exercise
DBDS	UG.H1	Deepdale Lane, Upper Gornal	Removed	Site previously allocated for housing but removed due to landowner engagement exercise
DBDS	H11A.23	Shaw Road, Dudley	Removed	Site previously allocated for housing but removed due to landowner engagement exercise
DBDS	H11B.11	Land south of King William Street, Amblecote	Removed	Site previously allocated for housing but removed due to landowner engagement exercise
DBDS	H14.5	Land off Lodgefield Road, Halesowen	Removed	Site previously allocated for housing but removed due to landowner engagement exercise

Appendix A2 – Changes to existing local plan designations				
Local Plan Document	Designation / Site Reference	Site Name	Description of Change	Reason for Change
DBDS	NETH.H15	South of Northfield Road, Netherton	Removed	Site previously allocated for housing but removed due to landowner engagement exercise
DBDS	H11A.24	Prospect Row	Removed	Site previously allocated for housing but removed due to landowner engagement exercise
DBDS		Griff Chains, Quarry Road, Netherton	Removed	Site previously allocated for housing but removed due to landowner engagement exercise
2011 Black Country Core Strategy (BCCS)  (also mapped in the DBDS)	WP4 (BCCS Policy WM3)	Oak Farm Clay Pit and Environs – proposed landfill site	Removed	Site became operational, has fully completed waste disposal to landfill operations, and is now closed
BCCS	WSD2	Envirotreast, Kingswinford	Removed	
BCCS	WSD3	Biffa, The Foxyards	Removed	

Appendix A2 – Changes to existing local plan designations				
Local Plan Document	Designation / Site Reference	Site Name	Description of Change	Reason for Change
BCCS	WSD4	G & M Industrial Services Ltd	Removed	The waste facility has either closed or no longer qualifies as a strategic waste management site as defined by the BCP (supporting text to Policy W2)
BCCS	WSD7	Midlands Recycling Hub, Lye	Removed	
BCCS	WSD8	Mucklow Hill Transfer Station	Removed	
DBDS	WSD12 (see DBDS page 20)	Oak Farm Clay Pit landfill site	Removed	Completed waste disposal to landfill operations, and is now closed
BCCS	N/A (See BCCS Policy WM3 – Table 17)	Satellite depot / bulking facility (for Dudley MBC)	Removed	Delivered and remains operational as Blowers Green depot, Dudley (as DBDS ref WSD11 – see DBDS page 20)
BCCS	MSA (BCCS Policy MIN1)	Mineral Safeguarding Area (covers almost the	Removed	Replaced in the draft BCP by more tightly defined MSAs in Walsall

<b>Appendix A2 – Changes to existing local plan designations</b>				
<b>Local Plan Document</b>	<b>Designation / Site Reference</b>	<b>Site Name</b>	<b>Description of Change</b>	<b>Reason for Change</b>
(also mapped in the DBDS)		whole of the Black Country)		
BCCS (also mapped in the DBDS)	MA3 (BCCS Policy MIN3)	Himley / Oak Farm - Area of Search for Etruria Marl	Removed	No viable minerals remaining and relating extraction sites closed
BCCS (also mapped in the DBDS)	MA4 (BCCS Policy MIN3)	Ketley - Area of Search for Etruria Marl	Removed	No viable minerals remaining and relating extraction site closed
BCCS (also mapped in the DBDS)	MI4 (BCCS Policy MIN1)	Tansey Green Mineral-Related Infrastructure (potential rail freight to serve brickworks)	Removed	Stourbridge Works (brickworks) closed and redeveloped for housing; Dreadnought Works (brick and tile works) dependent on imported clay from a South Staffordshire extraction site without rail access
DBDS	ES10.1 (in part)	Dandy Bank Ph 1	Removed	Site built out



<b>Appendix A2 – Changes to existing local plan designations</b>				
<b>Local Plan Document</b>	<b>Designation / Site Reference</b>	<b>Site Name</b>	<b>Description of Change</b>	<b>Reason for Change</b>
DBDS	ES11A (in part)	Castlegate Way	Removed	Site built out
DBDS	ES11A.5	Midtherm New Road	Removed	Site built out
DBDS	ES13.2	Station Rd	Removed	Site built out
DBDS	ES13.3 —	Timmis Rd –	Removed	Lost to housing
DBDS	ES13.5	Folkes Rd	Removed	Site built out
DBDS	ES14.1	Heywood Forge, Mucklow Hill	Removed	Site built out
DBDS	H16.2	Land off Darkhouse Lane, Coseley	Removed	Site built out
DBDS	H16.2	Land to the East of Gibbons Lane	Removed	Site built out

<b>Appendix A2 – Changes to existing local plan designations</b>				
<b>Local Plan Document</b>	<b>Designation / Site Reference</b>	<b>Site Name</b>	<b>Description of Change</b>	<b>Reason for Change</b>
DBDS	H10.2	Dudley Guest Hospital Site	Removed	Site built out
DBDS	H11A.1	Middlepark Road, Russells Hall	Removed	Site built out
DBDS	H11A.4	Land South of Cakemore Road, Blackheath	Removed	Site built out
DBDS	H13.1	Attwood Street, Lye	Removed	Site built out
DBDS	H13.2	Former Holt Farm Primary School, Holt Road	Removed	Site built out
DBDS	H13.6	Stewarts Road	Removed	Site built out
DBDS	H13.20	Land off Homer Hill Road, Cradley	Removed	Site built out

Appendix A2 – Changes to existing local plan designations				
Local Plan Document	Designation / Site Reference	Site Name	Description of Change	Reason for Change
DBDS	H13.30	Land off Quarry Road, Mushroom Green	Removed	Site built out
DBDS	HO.15	Rose Hill, Quarry Bank	Removed	Site built out
DBDS	HO.14	Mons Hill, Wrens Hill Road, Dudley	Removed	Site built out
DBDS	H16.6	Davies Avenue, Coseley	Removed	Site built out
DBDS	H16.12	Mount Pleasant Street, Coselet	Removed	Site built out
DBDS	H16.13	Saltwells Road	Removed	Site built out
DBDS	Neth. H14	Turley Street, Woodsetton	Removed	Site built out

<b>Appendix A2 – Changes to existing local plan designations</b>				
<b>Local Plan Document</b>	<b>Designation / Site Reference</b>	<b>Site Name</b>	<b>Description of Change</b>	<b>Reason for Change</b>
DBDS	HO.9	Holloway Street, Lower Gornal	Removed	Site built out
DBDS	HO.19	Hockley Lane, Netherton	Removed	Site built out
DBDS	H11B.24	Plant Street/ Mill Street/ Bridge Street, Wordsley	To be removed	Site currently under construction and will be built out by BCP adoption date
DBDS	H10.6	Tansey Green Rd/ Stallings Lane	To be removed	Site currently under construction and will be built out by BCP adoption date
DBDS	H11b.6	Stourbridge College, Longlands Campus	To be removed	Site currently under construction and will be built out by BCP adoption date
DBDS	HO.23	The Portway, Kingswinford	To be removed	Site currently under construction and will be built out by BCP adoption date

<b>Appendix A3 – Dudley AAP policies with a housing allocation</b>			
<b>Tier Two Plan</b>	<b>Reference</b>	<b>Site</b>	<b>Residential Yield (dwellings)</b>
<b>Dudley AAP</b>	OS1	King Street /Flood Street	80 - increased to 200 density uplift
	OS2	Trindle Road	40
	OS3	Tower Street	40
	OS4	Trident Centre	60
	OS5	Upper High Street	40 increased to 98 density uplift
	OS6	Appleyard Site	40
	OS6	Abberley Street	10
	OS7	Castle Hill	35
<b>Halesowen AAP</b>	OS1	Pool Road	C3 Residential and B1

<b>Appendix A3 – Dudley AAP policies with a housing allocation</b>			
<b>Tier Two Plan</b>	<b>Reference</b>	<b>Site</b>	<b>Residential Yield (dwellings)</b>
	OS2	Trinity Point	B1 offices
	OS3	Link House	C3 – 20
	OS4	Little Cornbow	C3- 43
	OS5	Fountain House	C3 – 30
<b>Stourbridge AAP</b>			
	OS2	Market Street	C3
	OS3	Angel Passage	C3
	OS6	North of Birmingham Rd	C3 - 26
	OS7	Mill Race Lane	C3/B1b/c, B2 and B8
	OS8	Mill Race Lane	C3/B1b/c, B2 and B8

Appendix A3 – Dudley AAP policies with a housing allocation			
Tier Two Plan	Reference	Site	Residential Yield (dwellings)
	OS9	Bradley Road	80
	OS11	Lowndes Road	C3/B1b/c, B2 and B8
	Policy 20	Stourbridge Wharf	C3

Appendix A4 – Alteration to nature conservation designations in Dudley	
Site Name	Status
<ul style="list-style-type: none"> <li>• Watery Lane SLINC and SINC (Wordsley);</li> <li>• Coopers Wood and Lyeclouse meadow SINC (Land South of Manor Way)</li> </ul>	No Change
<ul style="list-style-type: none"> <li>• Roundhill, Holbeache Land SLINC (Kingswinford);</li> <li>• Ashwood Haye Fields SLINC (Kingswinford);</li> </ul>	Designation as new SLINCs

Appendix A4 – Alteration to nature conservation designations in Dudley	
Site Name	Status
<ul style="list-style-type: none"> <li>• Racecourse Lane SLINC (Norton);</li> <li>• Manor Abbey Farm SLINC; formed from the Brickyard and Manor Abbey Hedgerows (Land south of Manor Way (Halesowen));</li> <li>• Raddens Pastures SLINC; covering Raddens Pastures (Land South of Manor Way (Halesowen));</li> <li>• Lyeclose Farm SLINC; covering Lyeclose Farm (Land South of Manor Way (Halesowen)); and;</li> <li>• Illey Hall Farm SLINC; covering Illey Hall Farm (Land South of Manor Way (Halesowen))</li> </ul>	
<ul style="list-style-type: none"> <li>• St Mary's Abbey Remains SINC; covering St Mary's Abbey Remains and Manor Way Tip.</li> </ul>	Designation of a new SINC



Appendix A4 – Alteration to nature conservation designations in Dudley	
Site Name	Status
<ul style="list-style-type: none"> <li>Amalgamate the Tributary of Illey Brook SINC, Lyeclouse Lane Wood SINC, Illey Hall Farm SLINC and Illey Brook SLINC into a single designated site;</li> <li>Kitwell Brook Valley SINC (Land South of Manor Way (Halesowen).</li> <li>Extension to the SINC Boundary around the existing Tributary of Illey Brook SINC.</li> </ul> <p>Extend the boundaries of existing Sites of Local Importance for Nature Conservation (SLINC) designations</p> <ul style="list-style-type: none"> <li>Ketley Quarry (Kingswinford)</li> <li>Coopers Bank north of Coopers Bank Road (Gornal)</li> <li>Coopers Bank south of Coopers Bank Road (Gornal)</li> </ul> <p>Extend the existing Sites of Importance for Nature Conservation (SINC) designation:</p>	<p>Amalgamation and /or extension of boundaries</p>

Appendix A4 – Alteration to nature conservation designations in Dudley	
Site Name	Status
<ul style="list-style-type: none"> <li>Hurst Hill Wood (Sedgley)</li> </ul> <p>Amalgamation of the Coombeswood SLINC and Coombeswood North and South SINC into a single designated site;</p> <p>Coombeswood Site of Importance for Nature Conservation (SINC) minor reductions to the SINC Boundary.</p> <p>Amalgamation of the Tansey Green SLINC, Tansey Green East SLINC, Huntmill Farm SLINC, Coopers Bank East SLINC, Tansey Green claypit ashbeds SINC and the western block of Russell’s Hall SLINC into a single designated site; the existing Barrow Hill and Coopers Bank (SINC) Site of Importance for Nature Conservation</p>	
<ul style="list-style-type: none"> <li>Brick Kiln Lane SINC (Gornal);</li> <li>Conference Wood and Gornal Sewage Works SLINC (Gornal)</li> </ul>	Revised Sites of Local Importance for Nature Conservation (SLINC) and Sites of Importance for Nature Conservation (SINC) boundary designations

Appendix A4 – Alteration to nature conservation designations in Dudley	
Site Name	Status
<ul style="list-style-type: none"> <li>Revised Sites of Local Importance for Nature Conservation (SLINC) boundary designation at: Turls Hill (Sedgley) Swanbrook Valley (Sedgley) – including reduction of boundary</li> </ul>	
<ul style="list-style-type: none"> <li>Caslon Wood SLINC (Cradley and Wollescote)</li> </ul>	Boundary adjustment to an existing SLINC and the inclusion of several hedgerows within the SLINC Designations
<ul style="list-style-type: none"> <li>Minor reduction to the existing boundaries of the following designated Sites of Local Importance for Nature Conservation (SLINC); Moden Hill East (Viewfield Crescent) (Gornal)</li> </ul>	Reduction to boundary

## B - Sandwell

### The impact of the Black Country Plan on existing Sandwell Local Plan Documents

The following Local Plan documents are currently in force in Sandwell:

BCCS	Black Country Core Strategy (2011)
SADDPD	Sandwell Site Allocation and Delivery DPD (2012)
WBAAP	West Bromwich Area Action Plan (2026)
TAAP	Tipton Area Action Plan (2008)
SAAP	Smethwick Area Action Plan (2008)

The Black Country Core Strategy will be wholly replaced by the Black Country Plan (BCP) upon adoption. At this point the BCP, saved parts of SADDPD and WBAAP will make up the Sandwell Local Plan. Some of the policies, supporting paragraphs and Policies Map designations of the Sandwell Local Plan will be replaced or otherwise amended when the BCP is adopted. Appendix B1 lists policies and supporting paragraphs of the Sandwell Local Plan which will be replaced upon adoption of the BCP. Appendix B2 below lists the resulting amendments to the Sandwell Policies Map. As the BCP does not allocate sites in the Strategic Centres, only certain policies, supporting paragraphs and designations within the WBAAP are affected by adoption of the BCP.

As part of this process, the Green Belt boundary has also been adjusted slightly in a small number of locations to address minor inconsistencies between the boundaries that were previously established and the physical situation that exists “on the ground”.

Appendix B1 - Sandwell changes to current Tier 2 local plans				
Local Plan Document	Policy ref / paragraph	Policy / Site Name	Replacement Black Country Policy	Description of Change
Tipton AAP	All policies and proposals		BCP	Tipton AAP Superseded
SADDPD	Green Belt Boundary	Various locations	BCP	Amendments – To release sites for development and to address inconsistencies between the boundaries previously established and the physical situation today
SADDPD	SAD H1	Housing allocations	HOU1 - Delivering Sustainable Housing Growth	SAD H1 - Policy superseded
SADDPD	SAD EOS2	Green belt	GB1 – The Black Country Green Belt GB2 - Safeguarded Land GB3 - Extensions and Replacement Buildings in the Green Belt	SAD EOS2 - Policy superseded
SADDPD	SAD EOS5	Environmental infrastructure	Across various - CC1 - CC6	SAD EOS5 – Policy Superseded
SADDPD	SAD EOS10	Design quality and environmental standards	ENV9 - Design Quality	SAD EOS10 – Policy Superseded

Appendix B2 - Changes to Existing Local Plan Designations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Estimated capacity	proposed use
H9.7	1401	801	Bell Street / Dudley Road, Tipton	0.62	20	employment
H9.6	1448	81	Station Street, Tipton	1.37	43	employment
H13.8	1461	665 80 & 82	Waterfall Lane and 101-126 Station Road	0.34	8	employment
HOC11	2232	263	United Steels Ltd, Upper Church Lane Tipton	1.58	73	employment
H12.8	2372	121	Rabone Lane, Smethwick	5.98	209	employment
WBPr30	2381		Bus Depot	1.1	68	employment
WBPr31	2384		Oldbury Road	16.8	588	employment
WBPr32	2385		Brandon Way / Albion Road (North)	6.2	248	employment
WBPr33	2386		Brandon Way / Albion Road (South)	1.5	494	employment
WBPr34	2387		Brandon Way / Brandon Close	1	43	employment
WBPr38	2389		Church Lane / Gladstone Street	2.8	111	employment

<b>Appendix B2 - Changes to Existing Local Plan Designations</b>						
<b>Allocation Ref</b>	<b>Site Ref</b>	<b>Old SAD Ref</b>	<b>Address</b>	<b>Site Area (ha)</b>	<b>Estimated capacity</b>	<b>proposed use</b>
H9.5	2463	150 / 856	Coneygree	7.61	300	employment
H8.5	2906	15	Darlaston Road/ Old Park Road, Kings Hill, Wednesbury	5.2	200	employment
H8.4	2907	34	Holloway Bank, Wednesbury	5.71	149	employment
H8.4	2911	334	Mounts Road, Wednesbury	1.1	39	employment
H8.2	2916	553	Whitehall Industrial Estate, Whitehall Road, Great Bridge	2.51	65	employment
H8.2	2917	555	Land between Whitehall Road and Walsall Canal, Great Bridge	0.75	23	employment
H8.1	2920	634	Land to north and west of Ridgacre Road	1.63	51	employment
H8.5	2921	642	Kings Hill Trading Estate, Darlaston Road, Wednesbury	3.28	86	employment
H8.5	2922	643	Old Park Trading Estate site on Old Park Road, Wednesbury	2.62	68	employment
H8.1	2923	654	Land to the south of Ridgacre Road, West Bromwich	1.11	35	employment
H8.1	2924	657	Church Lane, West Bromwich	0.75	24	employment
H8.4	2925	788	Site off Mount Road Wednesbury	0.49	17	employment

<b>Appendix B2 - Changes to Existing Local Plan Designations</b>						
<b>Allocation Ref</b>	<b>Site Ref</b>	<b>Old SAD Ref</b>	<b>Address</b>	<b>Site Area (ha)</b>	<b>Estimated capacity</b>	<b>proposed use</b>
H8.4	2926	791	Corner of Bridge Street and Mounts Road, Wednesbury	3.15	110	employment
H8.4	2927	795	Site on corner of Woden Rd South and Bridge St, Wednesbury	1.61	56	employment
H9.1	2935	966	Wellman Robey Ltd, Newfield Road, Oldbury	4.91	129	employment
H9.4	2936	1239	CBF LTD, Wade Building Services, Groveland Road, Oldbury	1.26	40	employment
H9.5	2937	151	Fisher Street / Coneygree Road, Tipton	1.7	60	employment
H9.7	2938	265	Castle Street, Tipton	1.49	47	employment
H9.5	2943	878	Coneygre Road / Burnt Tree, Tipton	1.11	35	employment
H9.1	2944	967	Birmingham Board Co Ltd, Dudley Road East, Oldbury	1	32	employment
H9.1	2945	968	Beswick Paper, Dudley Road, Oldbury	0.96	33	employment
H9.1	2949	1196	British Gas Plc, land off Dudley Road, Oldbury	1.04	33	employment
H9.4	2950	1240	Land adjacent to Cleton Business Park, Tipton Road, Tipton	0.56	18	employment
H9.4	2951	-	Vaughan Trading Estate	19.92	349	employment



Appendix B2 - Changes to Existing Local Plan Designations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Estimated capacity	proposed use
(834)	2953		Sedgley Road West, High Street, Tipton	1.12	39	employment
(145)	2955		Unit 1, Groveland Road	0.36	13	employment
(147)	2956		Upper Chapel Street / Britannia Street / 70 - 74 Dudley Road West	0.63	22	employment
(148)	2957		Dudley Road / 28 Dudley Road West	1.78	62	employment
(149)	2958		Tipton Road, Oldbury	1.76	62	employment
(247)	2960		Diamond Buses, Hallbridge Way, Oldbury	3.13	110	employment
(248)	2963		Groveland Road	1.18	41	employment
(578)	2965		Land between Great Bridge Street and William Street, Tipton	1.92	67	employment
(300)	2966		Alexandra Industrial Estate, Locarno Road / Alexandra Road, Tipton	2.2	77	employment
(911)	2967		Black Country Park, Great Bridge Street, Great Bridge	2.18	76	employment
(375) Post 2021	2969		Dudley Road West, Oldbury	0.46	16	employment

Appendix B2 - Changes to Existing Local Plan Designations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Estimated capacity	proposed use
(836)	2971		Hurst Lane / Birmingham Canal / Sedgley Road, West Tipton	2.19	77	employment
(144)	2973		Burnt Tree Industrial Estate, Groveland Road	0.82	29	employment
WBPr36	2975		Swan Village Industrial Estate, West Bromwich	0.8	25	employment
H12.6	2990	200	Fitzgerald Lighting LTD, Rood End Road	1.39	44	employment
H12.7	2994	854	Oldbury Road Industrial Estate	0.57	18	employment
H13.5	3004	259 / 896	Newlyn Road	3.37	103	employment
H13.2	3010	1301	Corngreaves Road	2.8	98	employment
(789)	3013		JAS Industrial Park, Titford Lane, Oldbury	0.93	33	employment
(855)	3014		Oldbury Road, Oldbury	2.89	102	employment
(1130)	3016		230 Oldbury Road	1.48	52	employment
H13.8	3017	284	Sandwell MBC Depot and surrounds, Waterfall Lane, Cradley Heath	1.36	43	employment
3019	3019		Station Road (South), Rowley Regis	0.85	30	employment

Appendix B2 - Changes to Existing Local Plan Designations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Estimated capacity	proposed use
H13.8	3020	656	Broadcott and Broadway Industrial Estates	1.49	47	employment
H13.4	3026	268	Station Street / Graingers Lane	1.3	41	employment
H13.4	3027	280	Bridge Trading Estate	0.57	19	employment
H13.5	3032	260	Oldfield Trading Estate, Oldfields, Cradley Heath	1.64	51	employment
H13.6	3034	933	Foxoak Street, Newtown Lane, Providence Street	4.82	168	employment
H13.7	3043	297	Station Road	3.21	84	employment
(724)	3140		Land at Dolton Way, between Factory Road, Bloomfield Road and railway line, Tipton.	2.62	99	employment
H13.5	3142	1302	Spinners End	0.71	25	employment
H16.2	3219	753	Bloomfield Road / Barnfield Road	0.83	26	employment
H16.3	3221	842	Bloomfield Road / Fountain Lane	1.5	53	employment
H13.6	3226	1303	Bank Street, Cradley Heath (west of Kimber Drop Forgings site)	1.3	41	employment

Appendix B2 - Changes to Existing Local Plan Designations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Estimated capacity	proposed use
H9.8	3398	302	Alexandra Road / Upper Church Lane / Locarno Road, Tipton	10.43	142	employment
	5129		Portway Road, Wednesbury	10.7	375	employment
	5139		Brymill Industrial Estate, Brown Lion Street, Tipton	1.98	69	employment
	5265		Phase 9, The Parkway, site between Stafford Street, Victoria Street and Potters Lane, Wednesbury	0.94	33	employment
	5450		Barnfield Trading Estate Tipton	2.24	78	employment
	5551		Ridgacre Enterprise Park, Ridgacre Road, West Bromwich	0.8	28	employment
	5553		Rimstock Plc, Ridgacre Road, Black Lake, West Bromwich	1.05	37	employment
	5556		Vector Industrial Park, Church Lane, West Bromwich	5.2	182	employment
	5623		Brook Street Business Centre, Brook Street Community Centre, 196-200 Bloomfield Road.	1.5	53	employment
	5641		Site between Great Western Street and Potters Lane, Wednesbury	1.14	49	employment
	5642		Land between Potters Lane and Stafford Street, Wednesbury	0.85	30	employment

Appendix B2 - Changes to Existing Local Plan Designations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Estimated capacity	proposed use
	5646		Site on Stafford Street, Wednesbury	1.45	51	employment
	5648		Land at Potters Lane, Wednesbury	0.74	26	employment
	5972		Former Corus Premises, Bloomfield Road, Tipton	0.56	20	employment
H9.5	6109	80	Groveland Road, Dudley Port, Tipton	0.11	7	white land
H9.7	265	93	Old Cross Street, Tipton	0.48	14	white land
	5138		Nicholls Road, Tipton	3.96	139	White land - EMP4
H9.5	354	91	Park Lane West (South Staffs Depot), Tipton	2.95	77	White land - EMP4
H9.5	440	89	Orchard Street, Burnt Tree, Tipton	0.28	30	white land
H12.5	585	466	Flash Road / Broadwell Road, Oldbury	0.68	5 (36)	white land
HOC18	841	431	Wilson Road / Sycamore Road Smethwick	1.07	37	white land
H13.6	1436	71	St. Anne's Road, Cradley Heath	1.13	36	white land

Appendix B2 - Changes to Existing Local Plan Designations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Estimated capacity	proposed use
WBPr37	1440		John Street North	0.49	18	white land
H8.1	1443	51	Cardigan Close / Sussex Avenue	0.14	5	white land
H12.7	1446	482	Holly Lane, Smethwick	0.53	29	white land
H12.6	1698	614	Land adjacent to 88 Wellesley Road	0.26	9	white land
H12.3	1919	1032	Former Starlight Auto Sales, Wolverhampton Road	0.23	14	white land
H12.10	1997	1037	Tudor Works, 36A Windmill Lane	0.25	24	white land
HOC9	2085	1047	Brunswick Park Trading Estate, Wednesbury	0.36	42	white land
H16.1	2227	756	Factory Road	0.44	35	white land
H13.9	2259	1071	Sentine Plastics Ltd, Wrights Lane	0.17	13	white land – EMP4
HOC11	2368	262	Summerhill Primary School, Central Avenue, Tipton	1.09	40	white land
H16.5	2370	303	Bradleys Lane / High Street	0.38	13	white land – EMP4

Appendix B2 - Changes to Existing Local Plan Designations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Estimated capacity	proposed use
H12.7	2423	210	Churchill Road, Smethwick	0.5	60	white land
H8.7	2910	269	Leabrook Road / Willingsworth Road, Tipton	0.37	13	white land – EMP4
H8.2	2913	439	Sheepwash Lane / Whitehall Road, Great Bridge	0.08	3	white land
H8.2	2915	550	Land between Tinsley St and Whitehall Road, Tipton	0.28	10	white land – EMP4
H8.1	2930	804	Pembroke Way, Hateley Heath, West Bromwich	2.3	81	white land
H8.2	2931	1120	Garage on Whitehall Road, Great Bridge, Tipton	0.14	5	white land
H8.2	2932	1121	Old Inn site, Sheepwash Lane, Great Bridge, Tipton	0.04	1	white land
H8.7	2933	45	Bannister Road, Wednesbury	2.22	76	white land
H8.8	2934	154	Site on New Road, Great Bridge including St Lukes Centre	0.4	14	white land
H9.7	2942	779	Castle Street / High Street, Tipton	0.7	23	white land

Appendix B2 - Changes to Existing Local Plan Designations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Estimated capacity	proposed use
H9.9	2947	1117	Railway Street, Horseley Heath, Tipton	0.35	12	white land – EMP4
H9.9	2948	1119	Salem Street, Great Bridge, Tipton	0.32	11	white land
(765)	2952		Lower Church Lane, Tipton	0.38	13	white land
(146)	2974		88-90 Dudley Road West	0.37	13	white land
H12.4	2980	109	Clay Lane, Oldbury	0.28	12	white land – EMP4
HOC13	2982	40	Tippity Green, Hawes Lane, Rowley Regis	1.13	40	white land
HOC13	2983	1135	Allsops Hill, Rowley Regis	0.38	13	white land
HOC13	2984	1282	Land at Tippity Green, Rowley Regis	4.47	150	white land
H12.1	2987	5	Wolverhampton Road and Anvil Drive, Oldbury	0.31	9	white land - EMP4
H12.10	2997	123	Cape Hill / Durban Road	2.97	94	white land



Appendix B2 - Changes to Existing Local Plan Designations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Estimated capacity	proposed use
(205)	2999		South Road / Broomfield, Smethwick	0.27	10	white land
(1129)	3015		104-110 Oldbury Road, Smethwick	0.68	24	white land
H13.4	3029	587	Cradley Road (West)	0.99	33	white land
H13.4	3031	1124	Cradley Road (East)	0.41	12	white land
H13.11	3044	613	High Street, Blackheath	0.35	12	white land
HOC3	3048	1014	Land at Newton Road, Great Barr	0.2	16	white land
H16.5	3141	863	Batmanshill Road / Hobart Road	0.25	8	white land
	3223		Summertown Road	0.52	18	white land – EMP4
H9.2	3224	310	10 - 60 Dudley Road East, Oldbury	2.00	70	white land – EMP4
H13.6	3225	217	Foxoak Street / St Annes Road (Kawasaki Garage)	0.4	14	white land
H12.10	3462	122	Unett Street / Raglan Road	4.6	81	white land

Appendix B2 - Changes to Existing Local Plan Designations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Estimated capacity	proposed use
H13.3	3467	586	Chester Road	2.38	10	white land
	5301		Potters Lane / Great Western Street, Wednesbury	0.19	6	white land – EMP4
	5381		Victoria Street / Albert Street, Wednesbury	0.19	7	white land – EMP4
	5643		Site between Dudley Street and Victoria Street, Wednesbury	1.18	41	white land – EMP4
	6206		West Cross Centre. Oldbury Road / Mallin Street, Smethwick	1.06	37	white land
			Dudley Road East / Brades Road, Oldbury	3.76		white land – EMP4
			Zion Street, Tipton	2.43		white land – EMP4
			70-74 Crankhall Lane	1.78		white land – EMP4

Appendix B2 - Changes to Existing Local Plan Designations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Estimated capacity	proposed use
H8.3	2929		Site on corner of New Street, Hill Top, West Bromwich	1.11		Allocated as both community open space and housing H8.3 – propose to delete the housing allocation and retain the community open space allocation

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## C - Walsall

## Walsall Local Plan Policies to be superseded by the Black Country Plan

## Appendix C1

Walsall Unitary Development Plan 2005	
Superseded Policy	Replacement Policy
GP3	DEL1
ENV9 (a)	ENV1
ENV16	ENV4
ENV18	ENV4
ENV23	ENV1, ENV2, ENV3, ENV4
Fig 3.2	ENV1, ENV3, ENV4
ENV24	ENV1, ENV3, ENV4
JP5	EMP2
JP7	EMP3 and EMP4
5.9 – 5.11	CSP2 and CEN11
S2	CEN1, CEN2, CEN3, CEN4, CSP2 and Walsall LPA Chapter
S3 (b)	CEN1, CEN6
S4 (a), (b), (c), (e), (f), (g), 5.31, 5.32, 5.34, 5.35, 5.36.	CEN1, CEN2, CEN3, CSP4, ENV9
S6 (a), (b)	CEN4, CEN5, CEN6
S7 (a) II, IV, V, VI, VII, VIII, (b), (c), (d), (e)	CEN5, CEN6
H4	HOU3
H7	HOU6
T2 (a)	TRAN1
T3	TRAN, TRAN4
T4 (f)	TRAN3

<b>Walsall Unitary Development Plan 2005</b>	
<b>Superseded Policy</b>	<b>Replacement Policy</b>
T5	TRAN2
T6	TRAN6, TRAN8
T7 (a), (c), (d)	TRAN7
T8	TRAN5
T9	TRAN5
T11	TRAN5
Part II 9.12-9.14, 9.16-- 9.18	MIN1, MIN2, MIN3, MIN4
All remaining 'saved' policies are to be carried forward	

<b>Walsall Town Centre Area Action Plan 2019</b>
All policies to be carried forward

<b>Appendix C2 - Walsall Site Allocation Document 2019</b>		
<b>Policy</b>	<b>Site Reference</b>	<b>Reference in BCP</b>
RC1	n/a	Replaced by spatial strategy and policies CSP1 to CSP4. The regeneration Corridors will be replaced by the Core Growth Areas
HC1	All sites except where development is now complete or under construction	Walsall Site Allocations Chapter carries forward housing allocations in SAD
HC3	n/a	Replaced by policy HOU3
HC4	All sites except as below	Walsall Site Allocations Chapter carries forward allocations in SAD except as below
HC4	New Showpeople Site GT45 96 and 100 Lindon Road, Brownhills	Not carried forward. No evidence of demand despite site being marketed

<b>Appendix C2 - Walsall Site Allocation Document 2019</b>		
<b>Policy</b>	<b>Site Reference</b>	<b>Reference in BCP</b>
HC4	New Showpeople Site HO11 Somerford Place (former Dorsetts Scrapyard), Willenhall	Not carried forward. No evidence of demand or deliverability
HC4	New Showpeople Site HO61 Canalside Close, Goscote	No evidence of demand or deliverability
IND1	All sites subject to note below	Replaced by Policy EMP2 subject to note below
IND2	All sites subject to note below	Replaced by Policy EMP2 subject to note below
IND3	All sites subject to note below	Replaced by Policy EMP3 subject to note below
IND4	All sites subject to note below	Replaced by Policy EMP4 subject to note below
IND5	All sites subject to note below	Replaced by Policy EMP1 subject to note below
IND1 to IND5	The detailed boundaries and categorisations of most occupied and vacant existing and potential employment land has been changed as a result of the assessment of land by the BEAR and EDNA studies. BCP policy EMP1 also proposes the allocations of a number of new employment sites that are not referred to in the SAD.	

#### **Walsall Local Centre Designations**

Existing SAD policies to be retained.

#### **Walsall Open Space Designations**

Existing SAD policies to be retained.

<b>Appendix C3 – Changes to Walsall’s existing Travelling Showpeople allocations</b>				
<b>Local Plan Document</b>	<b>Designation / Site Reference</b>	<b>Site Name</b>	<b>Description of Change</b>	<b>Reason for Change</b>
Walsall Site Allocation Document	New Showpeople Sites / GT45	96 and 100 Lindon Road, Brownhills	Removed.	No evidence of need despite site being marketed
Walsall Site Allocation Document	New Showpeople Sites / HO11	Somerford Place (former Dorsetts Scrapyard), Willenhall	Removed	No evidence of need
Walsall Site Allocation Document	New Showpeople Sites / HO61	Canalside Close, Goscote	Removed	No evidence of need

Appendix C4 - Changes to Walsall's Existing Local Plan Designations (Waste & Minerals)						
Local Plan Document	Site Ref	Site	Location	Type	Change	Reason
Site Allocations Document (SAD)	WP3 MP7	Sandown Quarry	Stubbers Green Road, Aldridge	Quarry waste	Removal of potential waste site and permitted mineral site (brick clay extraction)	Closed. Proposed BCP allocation for employment use.
Black Country Core Strategy (BCCS)	WP6					
SAD	MP8	Vigo Utopia	Coppice Lane, Walsall Wood	Landfill (non-hazardous)	Removal of Permitted Mineral Site	Decommissioned former clay extraction site has now been restored as an area of open space.
BCCS	MI1	Former Bace Groundworks	Coppice Lane, Aldridge	Aggregates Recycling	Removal of Minerals Infrastructure Site	Closed in 2012, now occupied by a haulage contractor.
SAD	MI1					
BCCS	WSWa2			Landfill (inert)		Closed.



Appendix C4 - Changes to Walsall's Existing Local Plan Designations (Waste & Minerals)						
Local Plan Document	Site Ref	Site	Location	Type	Change	Reason
SAD	WS2	Branton Hill Landfill Site	Branton Hill Quarry, off Chester Road, Aldridge		Removal of Existing Waste Disposal Site	
BCCS	WSWa7	Metal & Waste Recycling	Bull Lane, Moxley	Recycling	Removal of Existing Waste Disposal Site	Closed.
SAD	WS8					
BCCS	WSWa13	Jute Works	Bridgeman Street, Pleck	Metal & Waste Recycling	Removal of Existing Waste Disposal Site	Closed.
SAD	WS13					
BCCS	WSWa15	Vigo / Utopia Treatment Plants	Coppice Lane, Walsall Wood	Landfill leachate treatment, Landfill gas plant	Removal of Strategic Waste Site	Former landfill (Closed). The landfill gas plant and leachate treatment plant to the south of the former landfill are still operational but
SAD	WS15					

Appendix C4 - Changes to Walsall's Existing Local Plan Designations (Waste & Minerals)						
Local Plan Document	Site Ref	Site	Location	Type	Change	Reason
						are contracted so as to be considered non-strategic.
SAD	MP6	Highfields South	Coppice Lane, Walsall Wood	Clay Extraction	Removal of Permitted Mineral Site	Clay extraction ceased at Highfields South in 2013, remains allocated for non-hazardous waste landfill. Operational, expected to close by 2025
BCCS	MIN1	MSA on BCCS Proposals Map	Covers most of the Black Country	Mineral Safeguarding Area	Removed / Replaced	Replaced in the draft BCP by more tightly defined and individual MSAs in Walsall Borough.

## D – City of Wolverhampton

### The impact of the Black Country Plan on existing Wolverhampton Local Plan Documents and Neighbourhood Plans

The following Local Plan documents and Neighbourhood Plans are currently in force in Wolverhampton:

BCCS	Black Country Core Strategy (2011)
WUDP	Saved parts of the Wolverhampton Unitary Development Plan (2006)
BCAAP	Bilston Corridor Area Action Plan (2014)
SRCAAP	Stafford Road Corridor Area Action Plan (2014)
CCAAP	Wolverhampton City Centre Area Action Plan (2016)
HNP	Heathfield Park Neighbourhood Plan (2014)
TNP	Tettenhall Neighbourhood Plan (2014)

The Black Country Core Strategy will be wholly replaced by the Black Country Plan (BCP) upon adoption. At this point the BCP, BCAAP, SRCAAP, CCAAP and saved parts of the WUDP will make up the Wolverhampton Local Plan. Some of the policies, supporting paragraphs and Policies Map designations of the Wolverhampton Local Plan will be replaced or otherwise amended when the Black Country Plan (BCP) is adopted. Tables 43 - 48 and the tables below list the resulting amendments to the Wolverhampton Policies Map. Appendix D2 lists policies and supporting paragraphs of the Wolverhampton Local Plan which will be replaced upon adoption of the BCP.

The CCAAP covers the Wolverhampton Strategic Centre (as defined in the BCP) and the Blakenhall & Graiseley and All Saints Quarters located to the south of the City Centre. As the BCP does not allocate sites in the Strategic Centres, only certain policies, supporting paragraphs and designations within the CCAAP are affected by adoption of the BCP.

Neighbourhood Plan policies and proposals cannot be replaced by a Local Plan document. However, for clarity, Appendix D3 lists allocations in the Heathfield Park Neighbourhood Plan, which have not been carried forward into the BCP. As the Neighbourhood Plan Forums for the HNP and TNP have now lapsed, the BCP is not required to set separate housing targets for the areas covered by these Neighbourhood Plans.

<b>Appendix D1: Wolverhampton Policies Map amendments that will result from the adoption of the BCP</b>				
<b>Local Plan Document</b>	<b>Designation / Site Reference</b>	<b>Site Name</b>	<b>Description of Change</b>	<b>Reason for Change</b>
WUDP	Housing allocation / H9	Goldthorn Hill Pumping Station and Allotments	Removed	Site no longer developable for housing.
WUDP	Green Belt boundary	Various locations (see Table 43)	Amendments	To release sites for development through the Black Country Plan.
SRCAAP	Housing allocation / HP3	Showell Road / Bushbury Lane	Removed	Site no longer developable for housing.
SRCAAP	Housing allocation / HP6	Bus Depot, Park Lane	Removed	Site no longer developable for housing.
SRCAAP	Housing allocation / HP7	Bluebird Industrial Estate and site to rear, Park Lane	Removed	Site no longer developable for housing.

<b>Appendix D1: Wolverhampton Policies Map amendments that will result from the adoption of the BCP</b>				
<b>Local Plan Document</b>	<b>Designation / Site Reference</b>	<b>Site Name</b>	<b>Description of Change</b>	<b>Reason for Change</b>
SRCAAP	Housing allocation / HP8	Assa Abloy building and former petrol station, Cannock Road	Removed	Site no longer developable for housing.
BCAAP	Housing allocation / H3	Dixon Street	Removed	Site no longer developable for housing.
BCAAP	Housing allocation / H4	Reliance Trading Estate	Removed	Site no longer developable for housing.
BCAAP	Housing allocation / H5	Wolverhampton Street / Shale Street	Removed	Site no longer developable for housing.
CCAAP	Housing allocation / 10a	Tower and Fort Works, Blakenhall & Graiseley Character Area	Removed	Site built-out
CCAAP	Housing allocation / 10b	Former Sunbeam Factory, Blakenhall & Graiseley Character Area	Removed	Site built out

<b>Appendix D1: Wolverhampton Policies Map amendments that will result from the adoption of the BCP</b>				
<b>Local Plan Document</b>	<b>Designation / Site Reference</b>	<b>Site Name</b>	<b>Description of Change</b>	<b>Reason for Change</b>
CCAAP	Housing allocation / 10c	Ablow Street, Blakenhall Character Area	Removed	Site no longer developable for housing.
CCAAP	Housing allocation / 10e	Land north of Graiseley Hill, Blakenhall & Graiseley Character Area	Removed	Site no longer available for development.
CCAAP	Housing allocation / 10f	Former Metal Castings Site, Blakenhall & Graiseley Character Area	Removed	Site no longer available for development.
CCAAP	Housing allocation / 10h	Moorfield Road, Blakenhall & Graiseley Character Area	Removed	Site no longer developable for housing.
SRCAAP / BCAAP / CCAAP	High Quality Employment Areas (HQEA) / Potential High-Quality Employment Areas (PHQ) / Local Quality Employment Areas	Various	Removed	Replaced by Policy EMP1- EMP4 employment designations in Black Country Plan

<b>Appendix D1: Wolverhampton Policies Map amendments that will result from the adoption of the BCP</b>				
<b>Local Plan Document</b>	<b>Designation / Site Reference</b>	<b>Site Name</b>	<b>Description of Change</b>	<b>Reason for Change</b>
	(LQEA) / Employment Development Opportunities (EDO) / Employment Investment Areas (EIA)			

**Appendix D2: Wolverhampton Local Plan Document Policy changes that will result from the adoption of the BCP**

<b>Local Plan Document</b>	<b>Policy / paragraph</b>	<b>Replacement BCP Policy</b>
SRCAAP	Policy SRC1 – Delivering High Quality and Local Employment Opportunities Paragraphs 2.3 – 2.10	EMP1 - EMP4
SRCAAP	Policy SRC4 – Delivering Sustainable Levels of Housing Paragraphs 2.20 – 2.26	HOU1
BCAAP	Policy BC1 – Delivering Sustainable Levels of Housing	HOU1

Local Plan Document	Policy / paragraph	Replacement BCP Policy
	Paragraphs 2.3 – 2.13	
BCAAP	Policy BC2 – Delivering High Quality and Local Employment Opportunities (excluding final two paragraphs relating to Hickman Avenue and Willenhall Road) Paragraphs 2.14 – 2.21	EMP1 – EMP4
CCAAP	Policy CC4 – Providing Sufficient Employment Land Paragraphs 3.1.14 – 3.1.17	EMP1 – EMP4
CCAAP	Policy CC7 – Delivering a Sustainable Mix of Housing (part (a) housing targets only)	HOU1

#### Appendix D3: Wolverhampton Neighbourhood Plan allocations not carried forward into the BCP

Neighbourhood Plan	Designation / Site Reference	Site Name	Reason for allocation not being carried forward into BCP
HNP	Housing allocation H3	Culwell Industrial Estate	Site no longer developable for housing.



Neighbourhood Plan	Designation / Site Reference	Site Name	Reason for allocation not being carried forward into BCP
HNP	Mixed employment / housing allocation E4 / H4	RDP Electronics Ltd, Grove Street	Site no longer developable for housing.
HNP	Housing allocation H7	New Cross Hospital, Wolverhampton Road	Site no longer developable for housing.

## 16 Appendix – Centres

### Centres – definitions of appropriate uses and relevant boundaries for applying BCP Centres Policies CEN1 - CEN6

#### 1. Appropriate Uses

For the purposes of determining planning applications, and policies and proposals in future Local Development Plans, related to BCP Centres Chapter Policies CEN1 - CEN6, “appropriate uses” include business, commercial, service and community uses and comprise:

A. **Centre Uses** - those uses and “sui generis” designations that should be directed to defined centres in the first instance, are subject to requirements set out in national guidance (such as the sequential test and impact assessments) and local policy (particularly BCP Policies CEN1 - CEN6, such as the floorspace thresholds for undertaking the impact assessments set out in national guidance, and Local Development Plan Policies, such as frontage policies) defined as currently including:

- i) *Main Town Centre Uses* contained in the latest national policy guidance (currently defined in NPPF Annex 2), including

#### **Commercial, Business and Service uses:**

- a. Display or retail sale of goods, other than hot food (retail development, including warehouse clubs and factory outlet centres)
- b. Sale of food and drink for consumption (mostly) on the premises (including restaurants and wine bars and public houses, drinking establishments, and drinking establishments with expanded food provision,
- c. Indoor sport, recreation or fitness (not involving motorised vehicles or firearms) and other leisure and entertainment uses such as drive-through restaurants, cinemas, nightclubs, casinos, indoor bowling centres, dance halls, concert halls (venues for live music performance) and bingo halls,
- d. Offices to carry out any operational or administrative functions

#### **Local Community, Non-residential Institutions and Learning uses:**

- e. Display of works of art (otherwise than for sale or hire) (including galleries)
- f. Museums

- g. Included within i above: Shops (mostly) selling essential goods, including food, where the shop's premises do not exceed 280 square metres and there is no other such facility within 1000 metres;

and uses:

- h. arts, culture and tourism development (including theatres and concert halls, hotels and conference facilities).

- ii) *Additional Uses* not specifically cited in i. above, but can either be implied in i. above, are cited elsewhere in latest national guidance such as the PPG, or are highly compatible with the uses/ types of uses set out in i, including:

**Commercial, Business and Service uses:**

- i. Provision of Financial services,
- j. Professional services (other than health or medical services)

**Local Community, Non-residential Institutions and Learning uses:**

- k. Public libraries or public reading rooms
- l. Exhibition halls
- m. Indoor or outdoor swimming pools or skating rinks

and uses:

- n. Launderettes
- o. Betting offices/shops
- p. Pay day loan shops
- q. Hot food takeaways (for the sale of hot food where consumption of that food is mostly undertaken off the premises)
- r. Beauty Salons and nail bars
- s. Other uses where they fall outside the defined limits of any other use class.

- B. **Complementary Uses:** those uses and "sui generis" designations that are well placed to be provided in centres, and where proposals for such uses to serve centres will be supported including:

- iii) *Social Infrastructure:* Good quality facilities that have a significant bearing on the quality of life and health and well-being of a community, by encouraging social

interaction, promoting learning and providing support services to those living, working and visiting an area, including:

**Commercial, Business and Service Uses:**

- a. Other appropriate services in a commercial, business or service locality
- b. Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)
- c. Creche, day nursery or day centre (not including a residential use)

**Local Community, Non-residential Institutions and Learning uses:**

- d. Provision of education
- e. Public halls
- f. Public worship or religious instruction (or in connection with such use)
- g. Law courts
- h. Halls or meeting places for the principal use of the local community
- i. Sports stadia and other outdoor entertainment venues

and:

- j. residential uses which contribute to ensuring the vitality and viability centres.

If national guidance changes in the future, relevant centres policies (particularly BCP policies CEN1 - CEN6 and Local Plan Documents, such as relating to frontage policy), will still apply to those uses identified that should be directed to centres in the first instance.

**2. Definitions of in-centre, edge-of-centre and out-of-centre locations**

Table 53 below sets out the specific locations that are defined as in, edge or out-of-centre for various uses by each LPA that are set out in relevant Local Development Plans, to assist with applying relevant policies and national tests highlighted in BCP Policy CEN1 Table 7 and set out in policies CEN2 - CEN6. The Local Development Plan sources are cited below the table. These definitions and boundaries reflect current national guidance and Local Development Plans may make adjustments to them in the future, informed by the prevailing guidance and evidence. The locations are defined as follows:

- a. **In-centre** locations for appropriate uses are those defined in Local Development Plans, such as primary shopping areas and centre boundaries and are subject to Policies CEN2 - CEN4).

- b. **Edge-of-centre** locations for tier-one and tier-two centres are those locations defined by national guidance, currently within 300m of in-centre locations. For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the centre but within 500 metres of a public transport interchange. As emphasised in current national guidance, taking account of local circumstances locations immediately adjoining the boundaries of Tier-Three Centres are defined as edge-of-centre.
- c. **Out-of-centre** locations are those locations not in or on the edge of a centre. Proposals in edge and out-of-centre locations need to meet the requirements of Policies CEN5 and CEN6.

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**Table 49 - Definitions of in-, edge- and out-of-centre locations (BCP Policies CEN1– CEN6)**

LPA	Type	In-centre			Edge-of-centre			Out-of-Centre	
		Tier-One: Strategic Centres	Tier-Two Centres	Tier-Three Centres	Tier-One: Strategic Centres	Tier-Two Centres	Tier-Three Centres	Tier-One: Strategic Centres and Tier-Two Centres	Tier-Three Centres
Dudley	Retail	AAP PSA Boundary	AAP PSA Boundary	Local Plan Policies	300m of the Primary shopping area	300m of the primary shopping area	Immediately adjoining the boundary	Outwith edge-of-centre locations	Not immediately adjoining Centre boundary
	Leisure	AAP boundary map	APP boundary map (Development Blocks)		300m of the Town Centre Boundary	300m of the Town Centre Boundary			
	Office	AAP boundary map	APP boundary map						

LPA	Type	In-centre			Edge-of-centre			Out-of-Centre	
		Tier-One: Strategic Centres	Tier-Two Centres	Tier-Three Centres	Tier-One: Strategic Centres	Tier-Two Centres	Tier-Three Centres	Tier-One: Strategic Centres and Tier-Two Centres	Tier-Three Centres
		(Development Block)							
Sandwell	Retail	PSA	PSA or Centre Boundary if Oldbury	Centre Boundary	Within 300m of relevant boundary	Within 300m of relevant boundary	Immediately adjoining centre boundary		
	Leisure	Town Centre Core				Immediately adjoining centre boundary			
	Office								
Walsall	Retail	AAP PSA boundary	UDP PSA boundary	Local Plan Policies Map	Outwith AAP PSA boundary	Outwith / not adjoining or unlinked	Immediately adjoining to or within 100m of		

LPA	Type	In-centre			Edge-of-centre			Out-of-Centre	
		Tier-One: Strategic Centres	Tier-Two Centres	Tier-Three Centres	Tier-One: Strategic Centres	Tier-Two Centres	Tier-Three Centres	Tier-One: Strategic Centres and Tier-Two Centres	Tier-Three Centres
				SLC1 Local Centre Boundary	(within 100m) to UDP PSA	Local Plan Policies Map SLC1 Local Centre Boundary			
	Leisure	AAP inset to Local Plan Policies Map boundary	UDP inset map boundary		Outwith or not adjoining APP boundary, or within AAP but outwith PSA and poorly related to it	Within UDP inset area but not related to PSA or transport, or not adjoining, related to or 100m within UDP Inset			
	Office								



LPA	Type	In-centre			Edge-of-centre			Out-of-Centre	
		Tier-One: Strategic Centres	Tier-Two Centres	Tier-Three Centres	Tier-One: Strategic Centres	Tier-Two Centres	Tier-Three Centres	Tier-One: Strategic Centres and Tier-Two Centres	Tier-Three Centres
						map boundary			
Wolverhampton	Retail	AAP PSA boundary	UDP PSA boundary	Centre boundary	Within 300m of relevant boundary	Immediately adjoining centre boundary			
	Leisure	AAP City Centre Ring Road	UDP Centre boundary						
	Office	AAP boundary							

**Sources** - The relevant boundaries set out in Table 53 above are informed by relevant Local Plan Documents of the BCA

## 17 Appendix – Black Country Plan Housing Trajectory

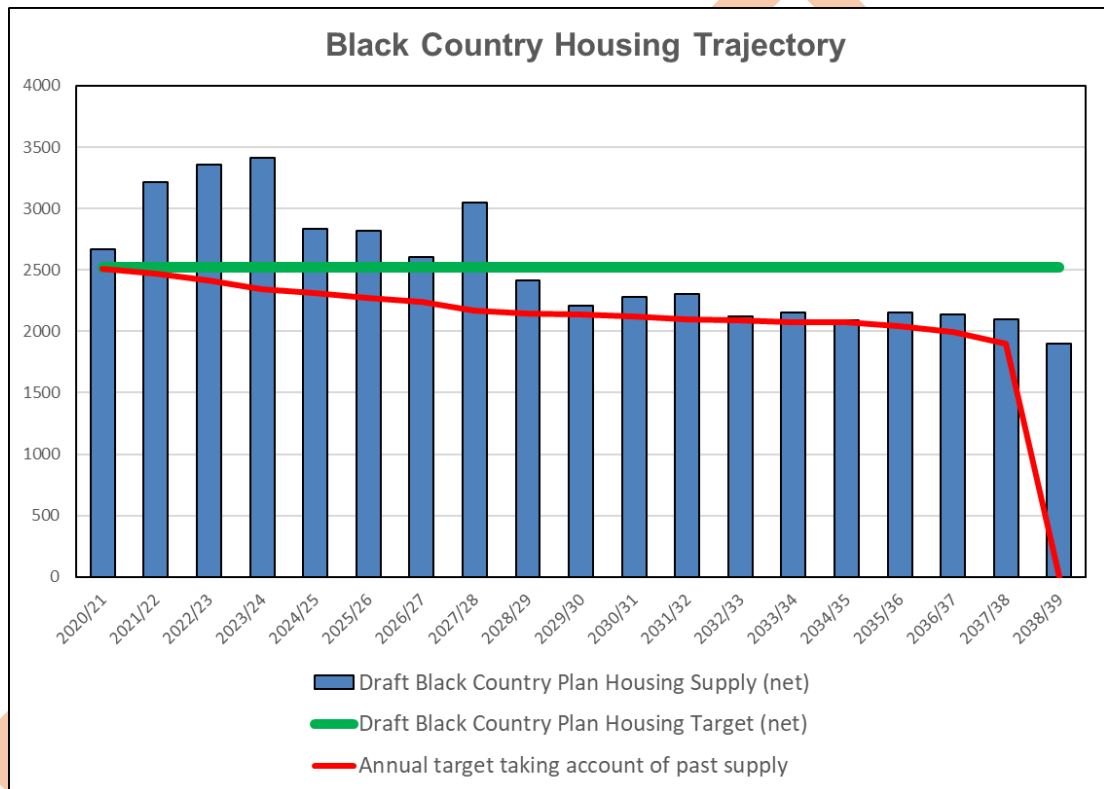
### 1) Draft Black Country Plan Housing Supply

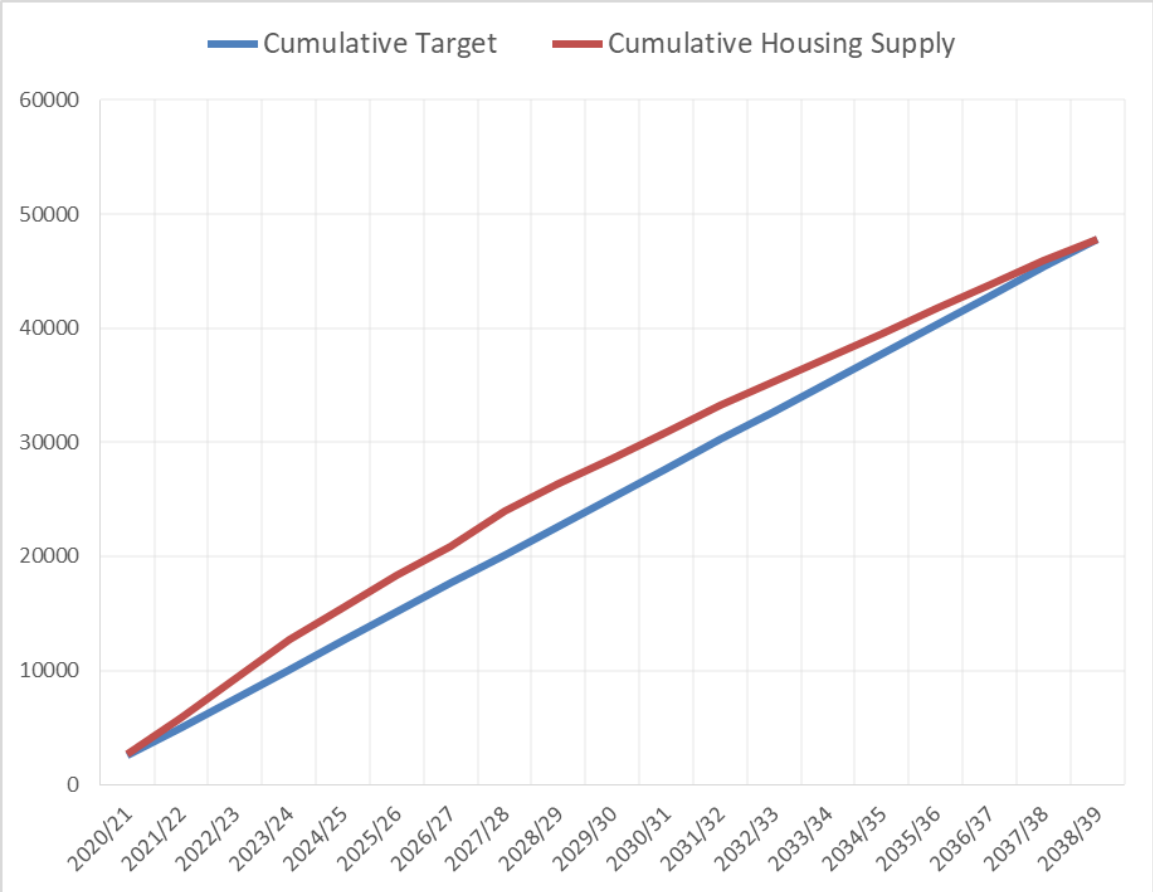
Projected Completions (net homes)	Dudley	Sandwell	Walsall	Wolverhampton	Black Country
2020/21	730	619	146	1177	2672
2021/22	730	346	996	1141	3213
2022/23	730	513	1094	1019	3356
2023/24	907	620	935	949	3411
2024/25	912	606	928	392	2838
2025/26	659	607	874	681	2821
2026/27	668	443	919	572	2602
2027/28	685	377	1418	572	3052
2028/29	679	436	728	573	2416
2029/30	682	444	562	522	2210
2030/31	677	498	627	477	2279
2031/32	649	544	637	477	2307
2032/33	638	442	567	477	2124
2033/34	676	418	585	478	2157
2034/35	695	409	520	468	2092
2035/36	674	492	457	531	2154
2036/37	637	514	457	531	2139
2037/38	635	474	457	531	2097
2038/39	572	356	437	532	1897
<b>Total</b>	<b>13235</b>	<b>9158</b>	<b>13344</b>	<b>12100</b>	<b>47837</b>

## 2) Black Country Housing Trajectory

Year	Draft Black Country Plan Housing Supply (net)	Draft Black Country Plan Housing Target (net)	Cumulative Housing Supply	Cumulative Target	Annual target taking account of past supply	Variation from Cumulative Target
2020/21	2672	2518	2672	2518	2509	-154
2021/22	3213	2518	5885	5036	2468	-850
2022/23	3356	2518	9242	7553	2412	-1688
2023/24	3411	2518	12653	10071	2346	-2582
2024/25	2838	2518	15491	12589	2310	-2902
2025/26	2821	2518	18312	15107	2271	-3206
2026/27	2602	2518	20914	17624	2244	-3290
2027/28	3052	2518	23965	20142	2170	-3823
2028/29	2416	2518	26381	22660	2146	-3721
2029/30	2210	2518	28591	25178	2139	-3413
2030/31	2279	2518	30870	27695	2121	-3174
2031/32	2307	2518	33176	30213	2094	-2963
2032/33	2124	2518	35300	32731	2090	-2569
2033/34	2157	2518	37457	35249	2076	-2208
2034/35	2092	2518	39549	37766	2072	-1782
2035/36	2154	2518	41703	40284	2045	-1419
2036/37	2139	2518	43842	42802	1998	-1040

Year	Draft Black Country Plan Housing Supply (net)	Draft Black Country Plan Housing Target (net)	Cumulative Housing Supply	Cumulative Target	Annual target taking account of past supply	Variation from Cumulative Target
2037/38	2097	2518	45939	45320	1898	-620
2038/39	1897	2518	47837	47837	1	1



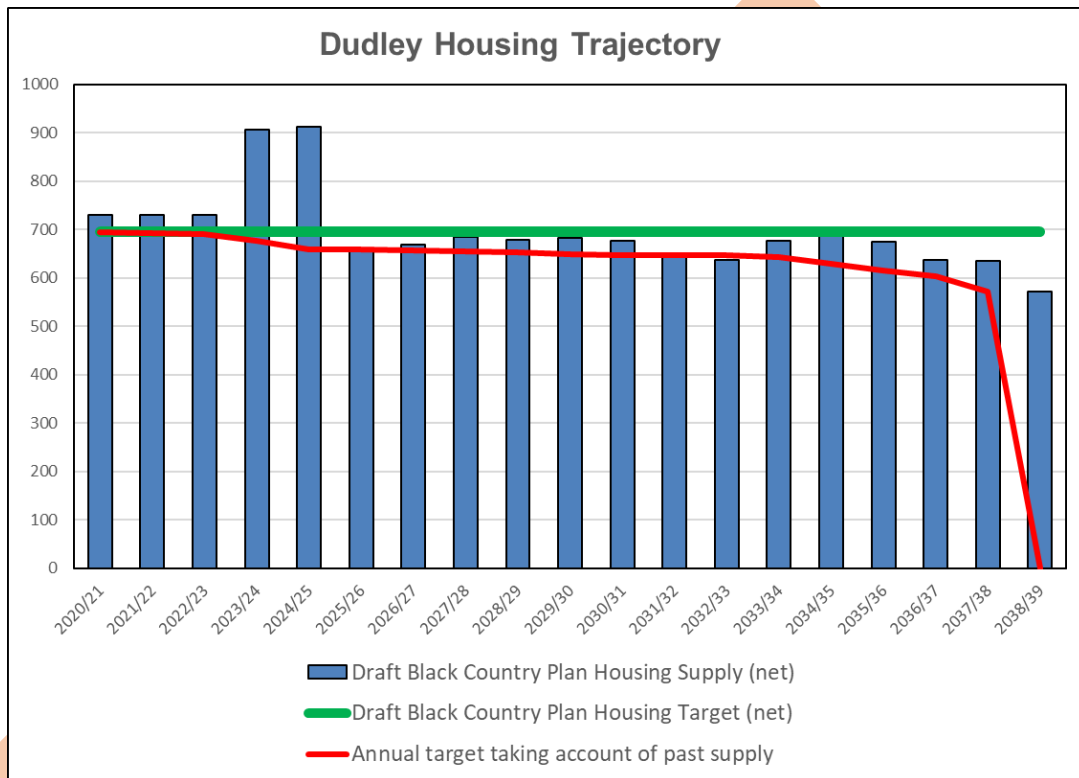


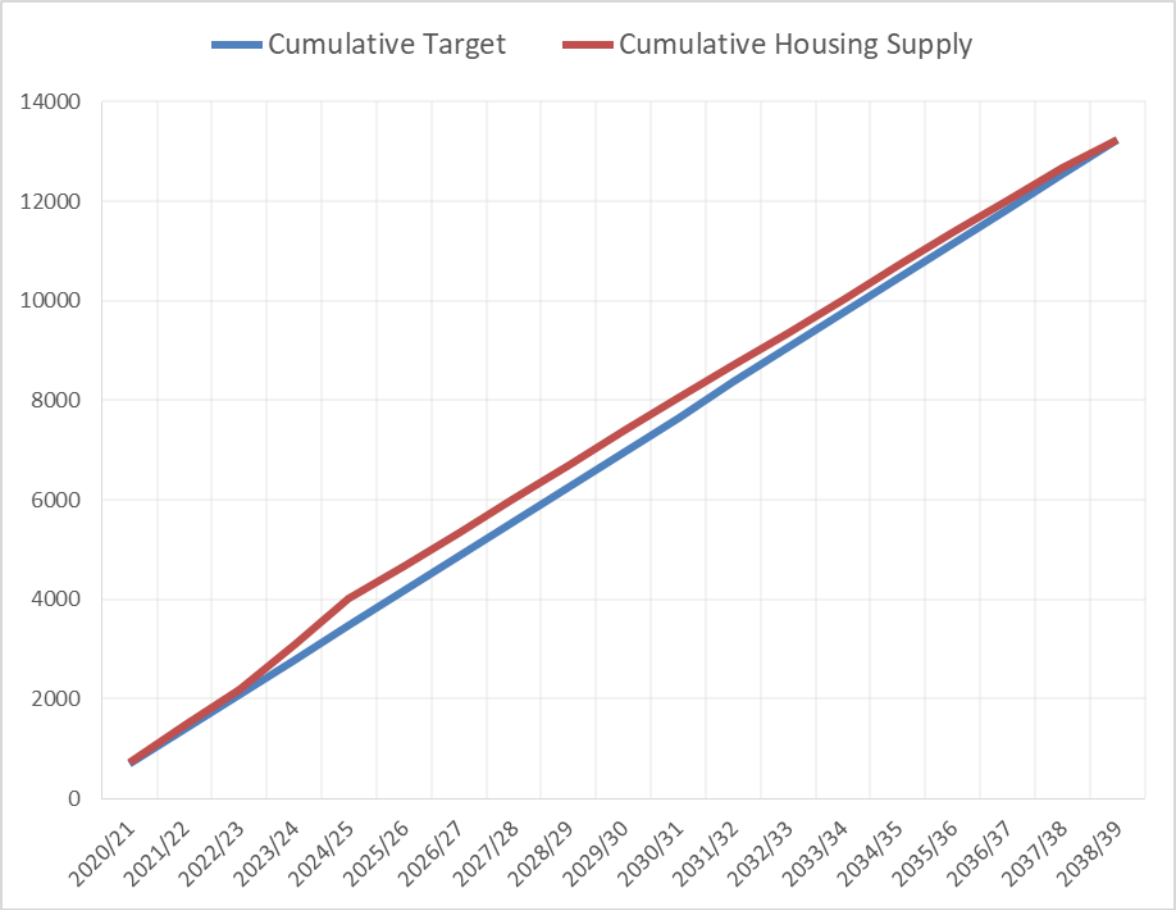
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## 3) Dudley Housing Trajectory

Year	Draft Black Country Plan Housing Supply (net)	Draft Black Country Plan Housing Target (net)	Cumulative Housing Supply	Cumulative Target	Annual target taking account of past supply	Variation from Cumulative Target
2020/21	730	697	730	697	695	-33
2021/22	730	697	1460	1393	693	-67
2022/23	730	697	2190	2090	690	-100
2023/24	907	697	3097	2786	676	-311
2024/25	912	697	4009	3483	659	-526
2025/26	659	697	4668	4180	659	-488
2026/27	668	697	5336	4876	658	-460
2027/28	685	697	6021	5573	656	-448
2028/29	679	697	6700	6269	654	-431
2029/30	682	697	7382	6966	650	-416
2030/31	677	697	8059	7663	647	-396
2031/32	649	697	8708	8359	647	-349
2032/33	638	697	9346	9056	648	-290
2033/34	676	697	10022	9752	643	-270
2034/35	695	697	10717	10449	630	-268
2035/36	674	697	11391	11146	615	-245
2036/37	637	697	12028	11842	604	-186
2037/38	635	697	12663	12539	572	-124

Year	Draft Black Country Plan Housing Supply (net)	Draft Black Country Plan Housing Target (net)	Cumulative Housing Supply	Cumulative Target	Annual target taking account of past supply	Variation from Cumulative Target
2038/39	572	697	13235	13235	0	0





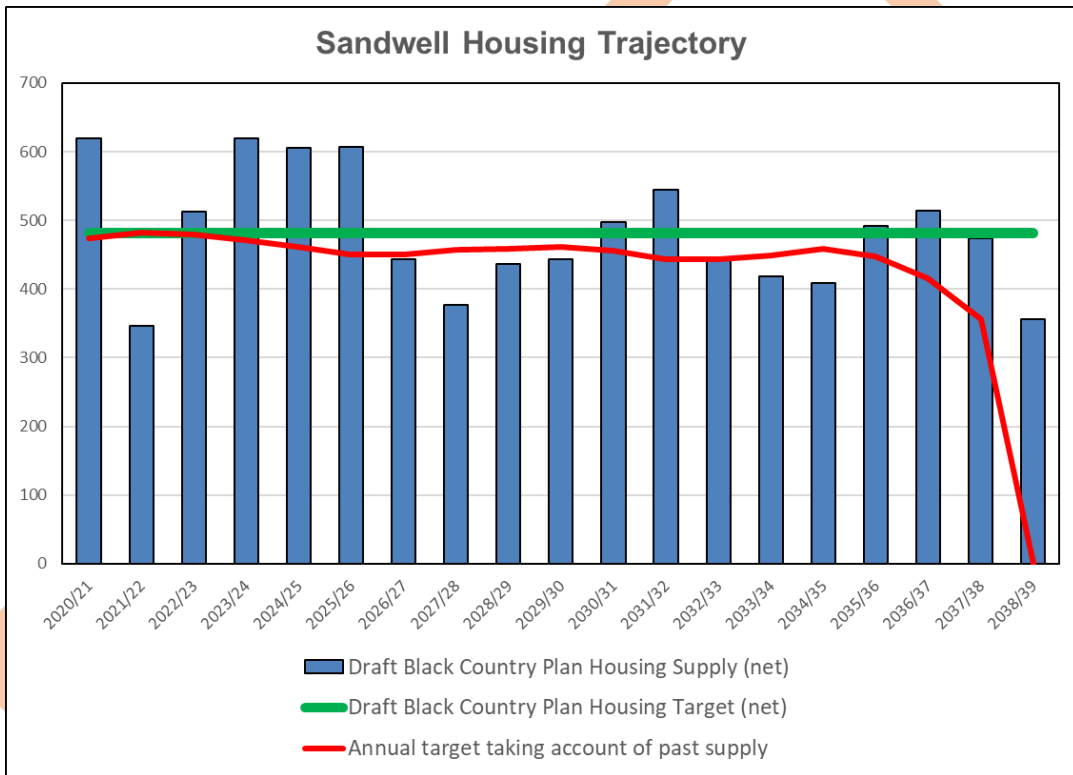
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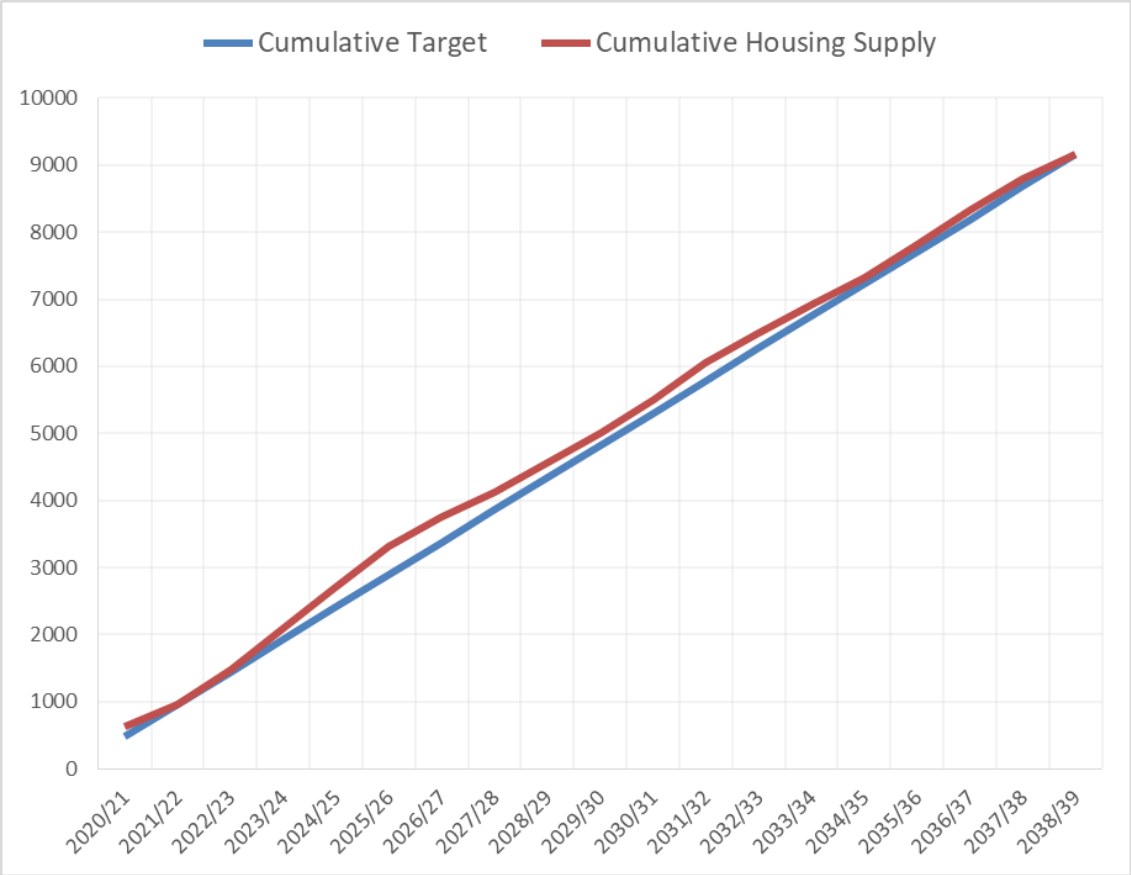


## 4) Sandwell Housing Trajectory

Year	Draft Black Country Plan Housing Supply (net)	Draft Black Country Plan Housing Target (net)	Cumulative Housing Supply	Cumulative Target	Annual target taking account of past supply	Variation from Cumulative Target
2020/21	619	482	619	482	474	-137
2021/22	346	482	965	964	482	-1
2022/23	513	482	1478	1446	480	-32
2023/24	620	482	2098	1928	471	-170
2024/25	606	482	2704	2410	461	-294
2025/26	607	482	3311	2892	450	-419
2026/27	443	482	3754	3374	450	-380
2027/28	377	482	4131	3856	457	-275
2028/29	436	482	4567	4338	459	-229
2029/30	444	482	5011	4820	461	-191
2030/31	498	482	5509	5302	456	-207
2031/32	544	482	6053	5784	444	-269
2032/33	442	482	6495	6266	444	-229
2033/34	418	482	6913	6748	449	-165
2034/35	409	482	7322	7230	459	-92
2035/36	492	482	7814	7712	448	-102
2036/37	514	482	8328	8194	415	-134

Year	Draft Black Country Plan Housing Supply (net)	Draft Black Country Plan Housing Target (net)	Cumulative Housing Supply	Cumulative Target	Annual target taking account of past supply	Variation from Cumulative Target
2037/38	474	482	8802	8676	356	-126
2038/39	356	482	9158	9158	0	0



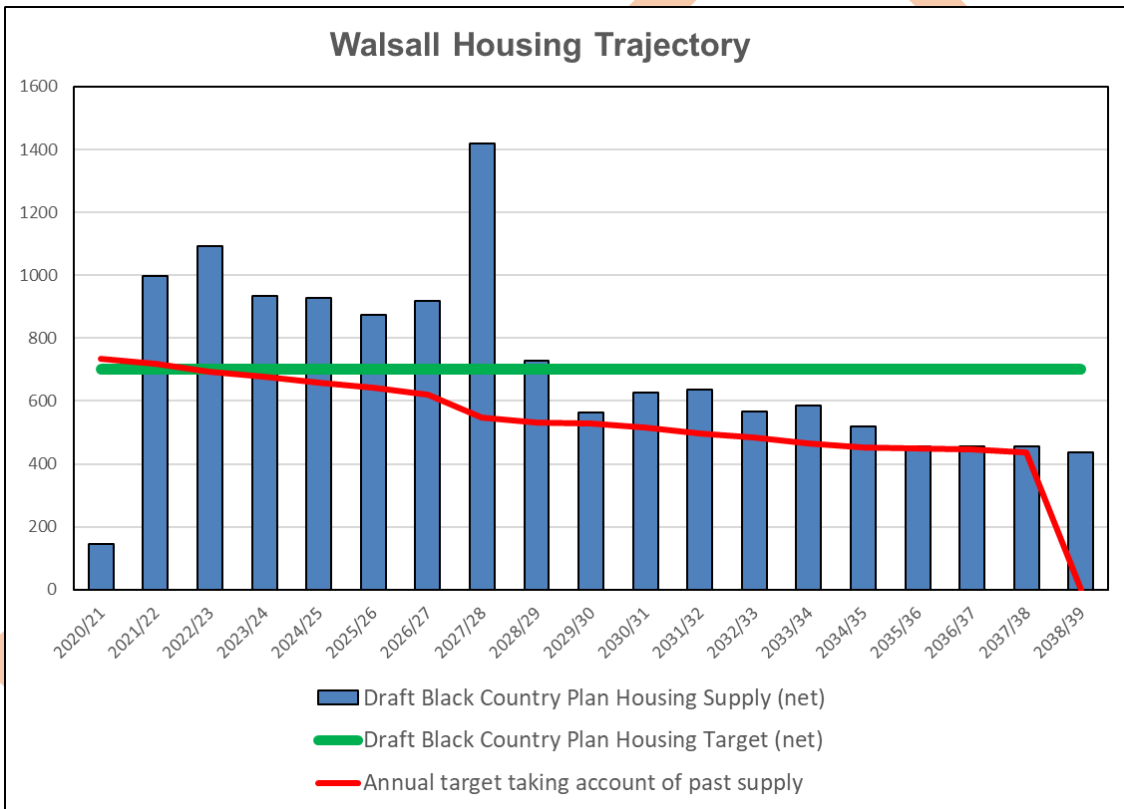


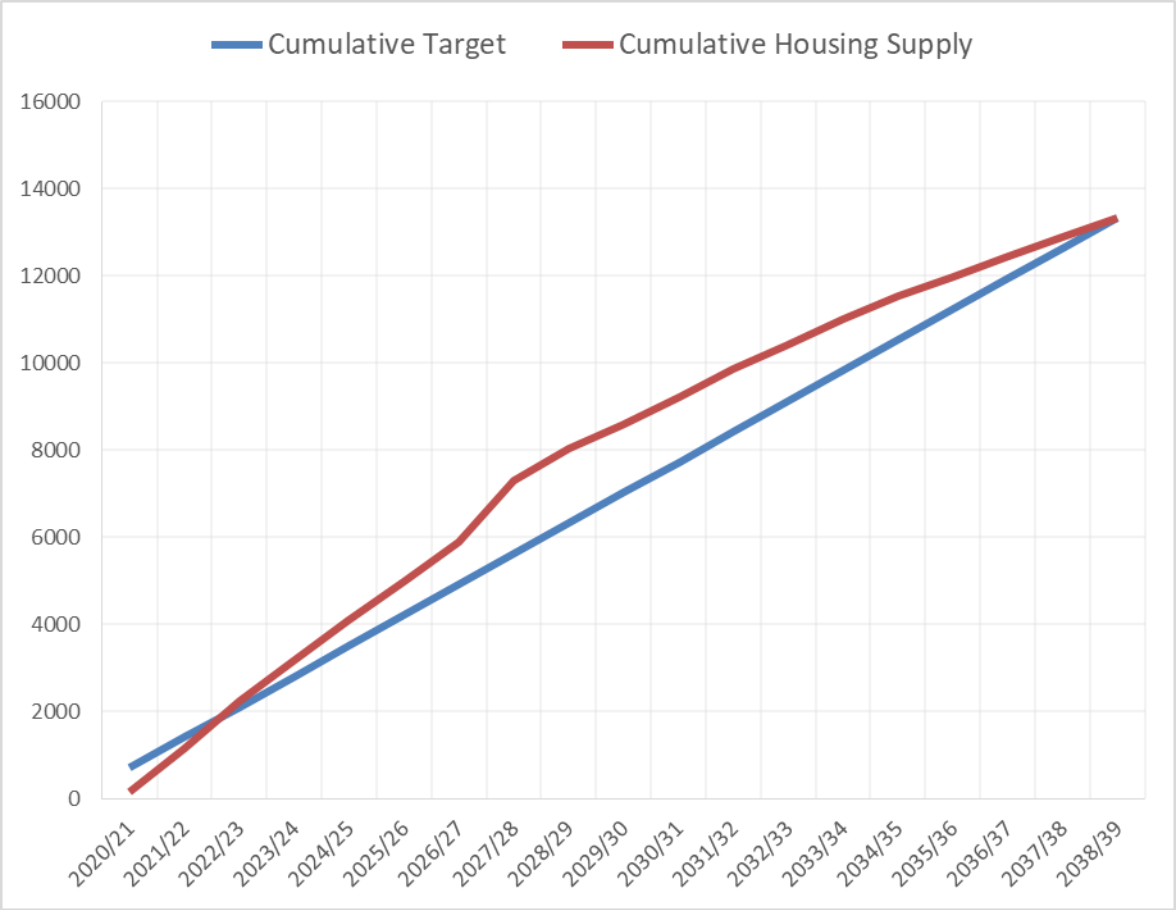
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## 5) Walsall Housing Trajectory

Year	Draft Black Country Plan Housing Supply (net)	Draft Black Country Plan Housing Target (net)	Cumulative Housing Supply	Cumulative Target	Annual target taking account of past supply	Variation from Cumulative Target
2020/21	146	702	146	702	733	556
2021/22	996	702	1142	1405	718	263
2022/23	1094	702	2236	2107	694	-129
2023/24	935	702	3171	2809	678	-362
2024/25	928	702	4099	3512	660	-588
2025/26	874	702	4973	4214	644	-759
2026/27	919	702	5892	4916	621	-976
2027/28	1418	702	7310	5618.4	549	-1692
2028/29	728	702	8038	6321	531	-1717
2029/30	562	702	8600	7023	527	-1577
2030/31	627	702	9227	7725	515	-1502
2031/32	637	702	9864	8428	497	-1436
2032/33	567	702	10431	9130	485	-1301
2033/34	585	702	11016	9832	466	-1184
2034/35	520	702	11536	10535	452	-1002
2035/36	457	702	11993	11237	450	-756
2036/37	457	702	12450	11939	447	-511

Year	Draft Black Country Plan Housing Supply (net)	Draft Black Country Plan Housing Target (net)	Cumulative Housing Supply	Cumulative Target	Annual target taking account of past supply	Variation from Cumulative Target
2037/38	457	702	12907	12641	437	-266
2038/39	437	702	13344	13344	0	0

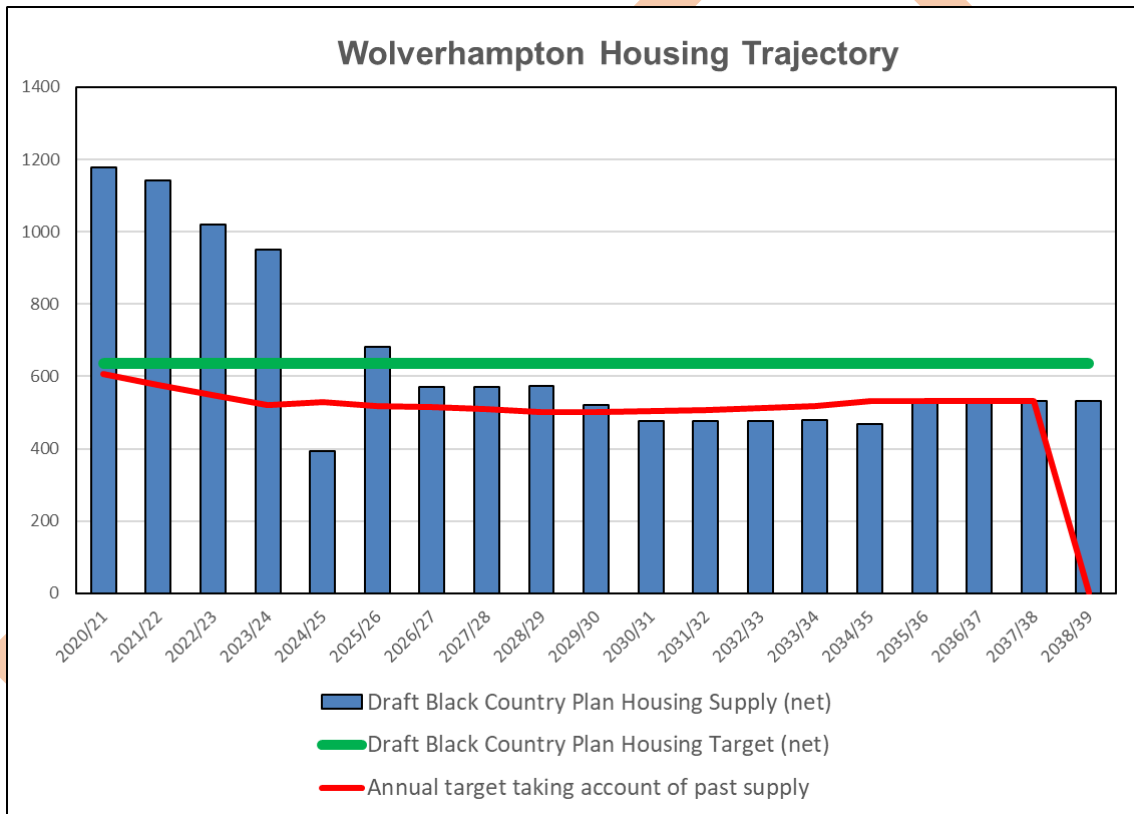




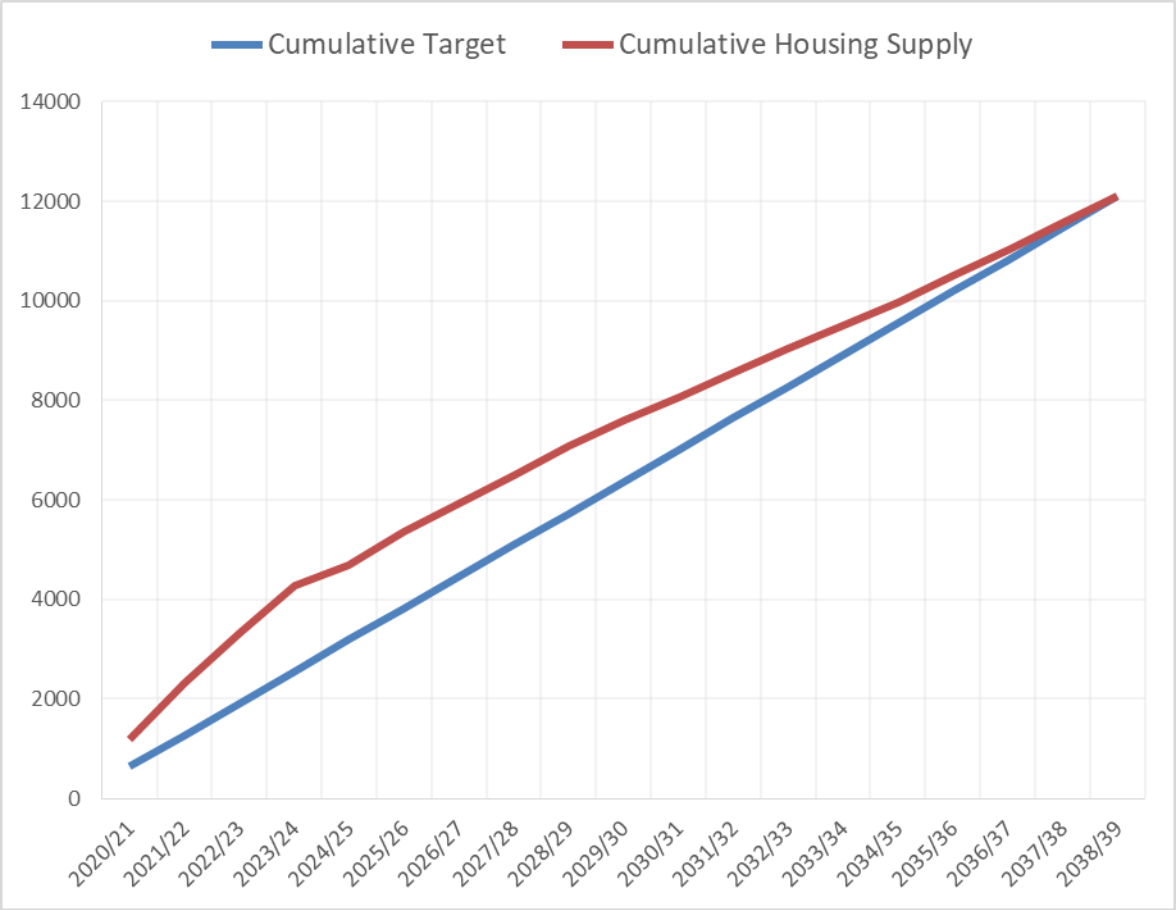
## 6) Wolverhampton Housing Trajectory

Year	Draft Black Country Plan Housing Supply (net)	Draft Black Country Plan Housing Target (net)	Cumulative Housing Supply	Cumulative Target	Annual target taking account of past supply	Variation from Cumulative Target
2020/21	1177	637	1177	637	607	-540
2021/22	1141	637	2318	1274	575	-1045
2022/23	1019	637	3338	1911	548	-1427
2023/24	949	637	4287	2547	521	-1739
2024/25	392	637	4679	3184	530	-1495
2025/26	681	637	5360	3821	518	-1539
2026/27	572	637	5932	4458	514	-1474
2027/28	572	637	6503	5094.8	509	-1409
2028/29	573	637	7076	5732	502	-1345
2029/30	522	637	7598	6369	500	-1229
2030/31	477	637	8075	7005	503	-1069
2031/32	477	637	8551	7642	507	-909
2032/33	477	637	9028	8279	512	-749
2033/34	478	637	9506	8916	519	-590
2034/35	468	637	9974	9553	532	-421
2035/36	531	637	10505	10190	532	-315
2036/37	531	637	11036	10826	532	-210

Year	Draft Black Country Plan Housing Supply (net)	Draft Black Country Plan Housing Target (net)	Cumulative Housing Supply	Cumulative Target	Annual target taking account of past supply	Variation from Cumulative Target
2037/38	531	637	11567	11463	533	-104
2038/39	532	637	12100	12100	1	1







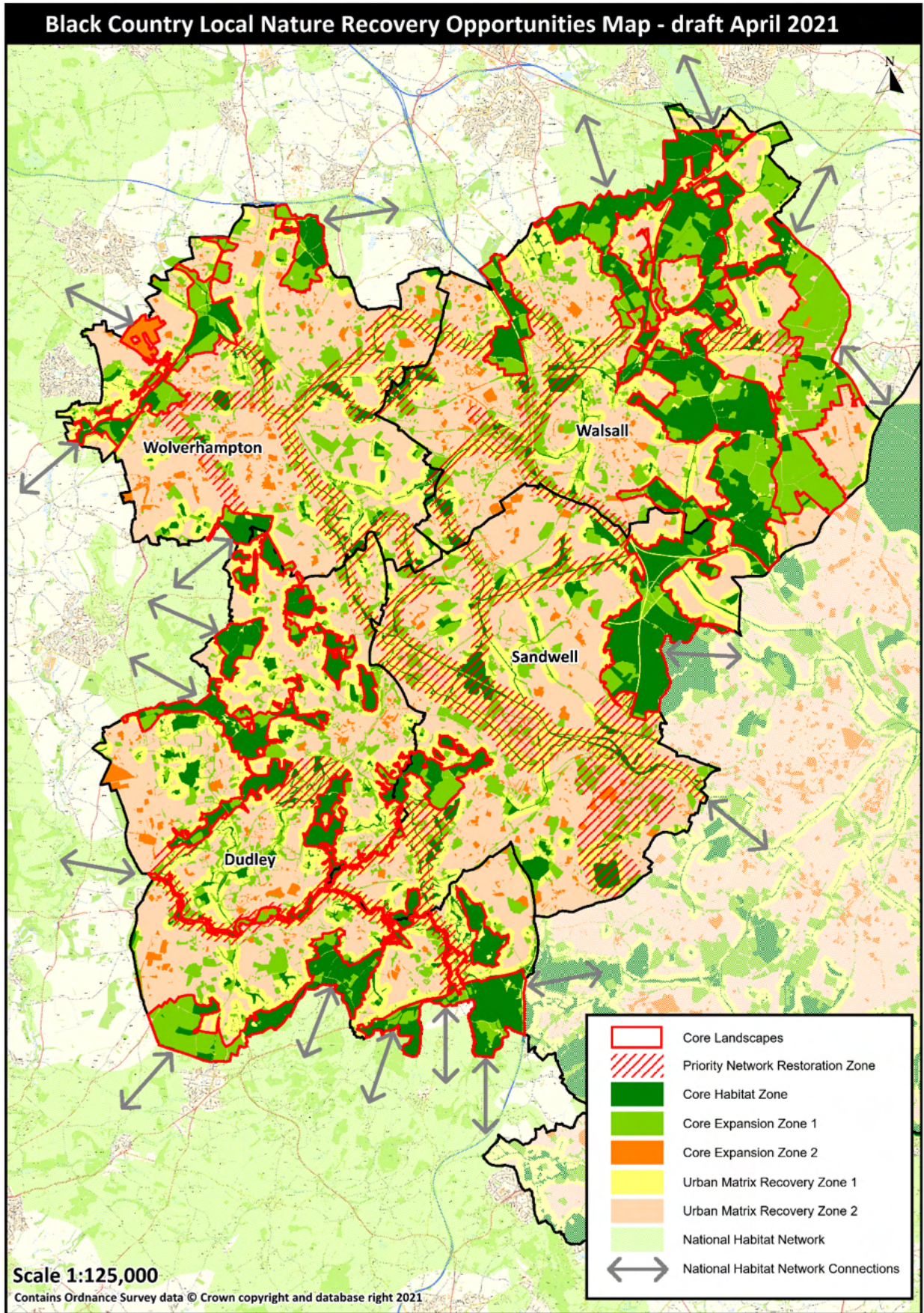
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## 18 Appendix – Nature Recovery Network

### Black Country Local Nature Recovery Opportunity Map (draft April 2021)

1. A requirement of the Environment Bill is a Local Habitat Map that identifies the existing distribution of different habitat types and the location of areas already important for biodiversity, overlaid by locations considered suitable for delivering the outcomes and measures identified in the Statement of Biodiversity Priorities.
2. The draft Black Country Local Nature Recovery Opportunity Map has been produced by the Wildlife Trust for Birmingham and the Black Country and the Local Environmental Records Centre (EcoRecord) through analysis of local and national data sets including designated sites, priority habitats, species distribution, land use and ecological connectivity. The map comprises a number of components that depict the areas of current high ecological value, ecological connectivity between these areas, and prioritises opportunities for investment in nature's recovery on a landscape scale.
3. Core Landscapes are large areas of land comprised of multiple land use parcels that are ecologically coherent, often sharing similar geology, soil types, habitats, landscape character and land use history. Core Landscapes typically support the highest abundance and diversity of semi-natural and Priority Habitats. They provide significant opportunity and are a priority for investment in ecological recovery (e.g. habitat restoration and creation).
4. Priority Network Restoration Zones are areas where investment in ecological recovery outside of Core Landscapes has been prioritised. They have been selected on the basis of being those areas that contain the highest density of Core Habitat and Core Expansion land use parcels which collectively link Core Landscapes. Their purpose is to support the creation of a coherent ecological network across the Black Country landscape.
5. The Core Habitat Zone is comprised of land use parcels that contain the most ecologically valuable habitats, and includes all areas with a high ecological value, all sites with a nature conservation designation, and priority habitat areas identified in Natural England's Combined Habitat Network data set. The Core Habitat Zone is a priority for protection and restoration.

6. Core Expansion Zone 1 comprises land use parcels that are of lower ecological value than those in the Core Habitat Zone but, due to inherent value or location, have the most potential to contribute to a coherent ecologic network. These sites are a priority for investment in the restoration and creation of new habitats.
7. Core Expansion Zone 2 sites provide an opportunity for the restoration and creation of new habitats but investment in these areas is a lower priority than in Zone 1.
8. Urban Matrix Recovery Zone 1 comprises all features of the built environment within c. 150 metres of the Core Habitat Zone, and may include residential and commercial properties, gardens, road verges, street trees and minor watercourses. The protection, enhancement and creation of green infrastructure within these areas is a priority.
9. Urban Matrix Recovery Zone 2 comprises all features of the built environment outside of Zone 1. These areas provide an opportunity for the protection, enhancement and creation of green infrastructure but investment in these areas is a lower priority than in Zone 1.
10. National Habitat Network is Natural England's Combined Habitat Networks data set.



## 19 Appendix – Glossary (to follow)

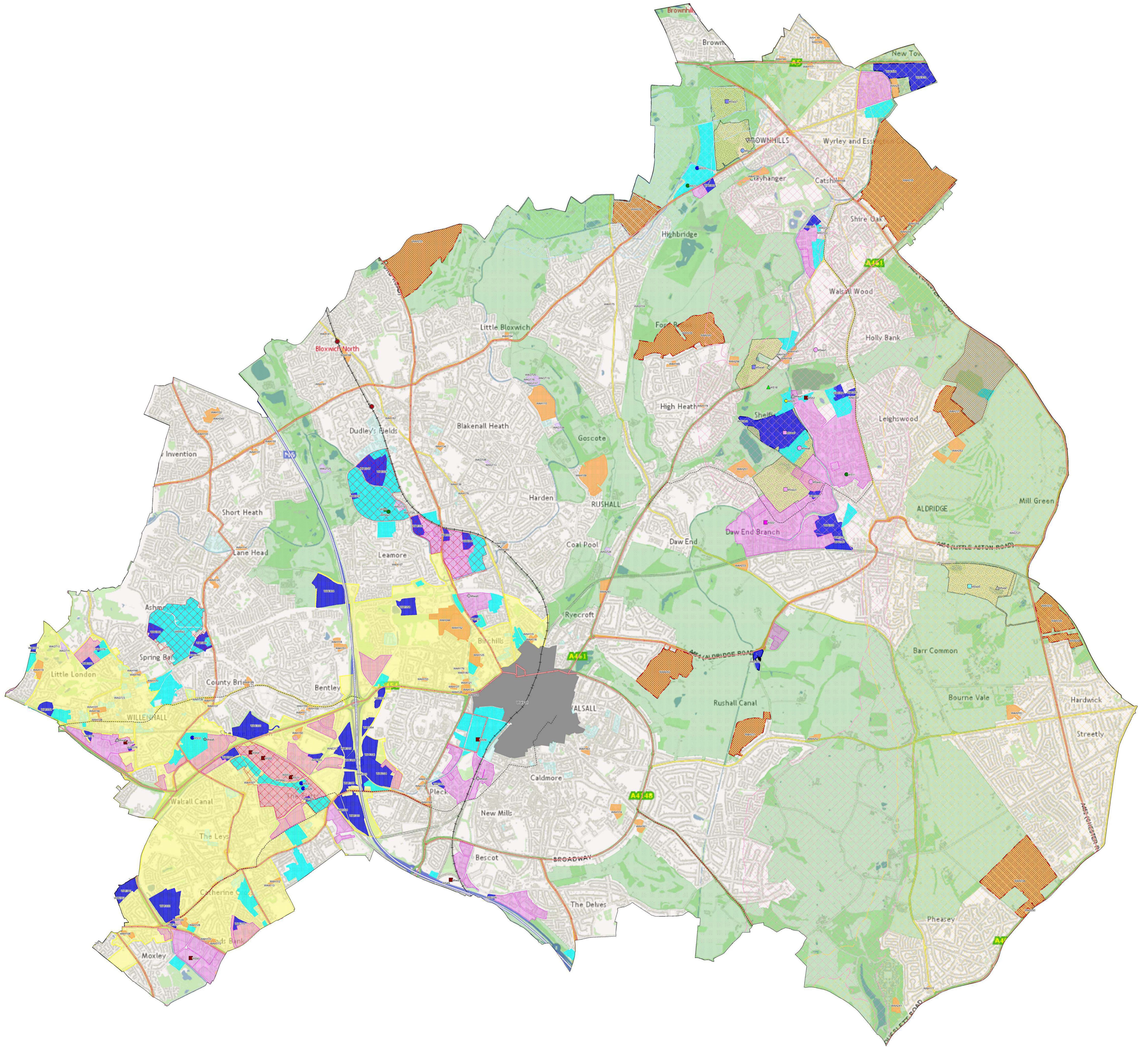
Word / Phrase	Acronym	Meaning
Black Country Core Strategy	BCCS	
Black Country Authorities	BCA	The four local authorities of Dudley Council, Sandwell Council, Walsall Council and City of Wolverhampton Council
Black Country Plan	BCP	
Sustainability Appraisal	SA	
National Planning Policy Framework	NPPF	
National Planning Policy Guidance	NPPG	
Development Plan Document	DPD	
Supplementary Planning Document	SPD	
Area Action Plan	AAP	
sui generis	-	
Use Classes Order	-	
Minerals Safeguarding Area	MSA	
Unitary Development Plan	UDP	
Local Enterprise Partnership	LEP	
West Midlands Combined Authority	WMCA	
Core Regeneration Areas		
Neighbourhood Growth Areas		
Towns and Neighbourhoods Areas		







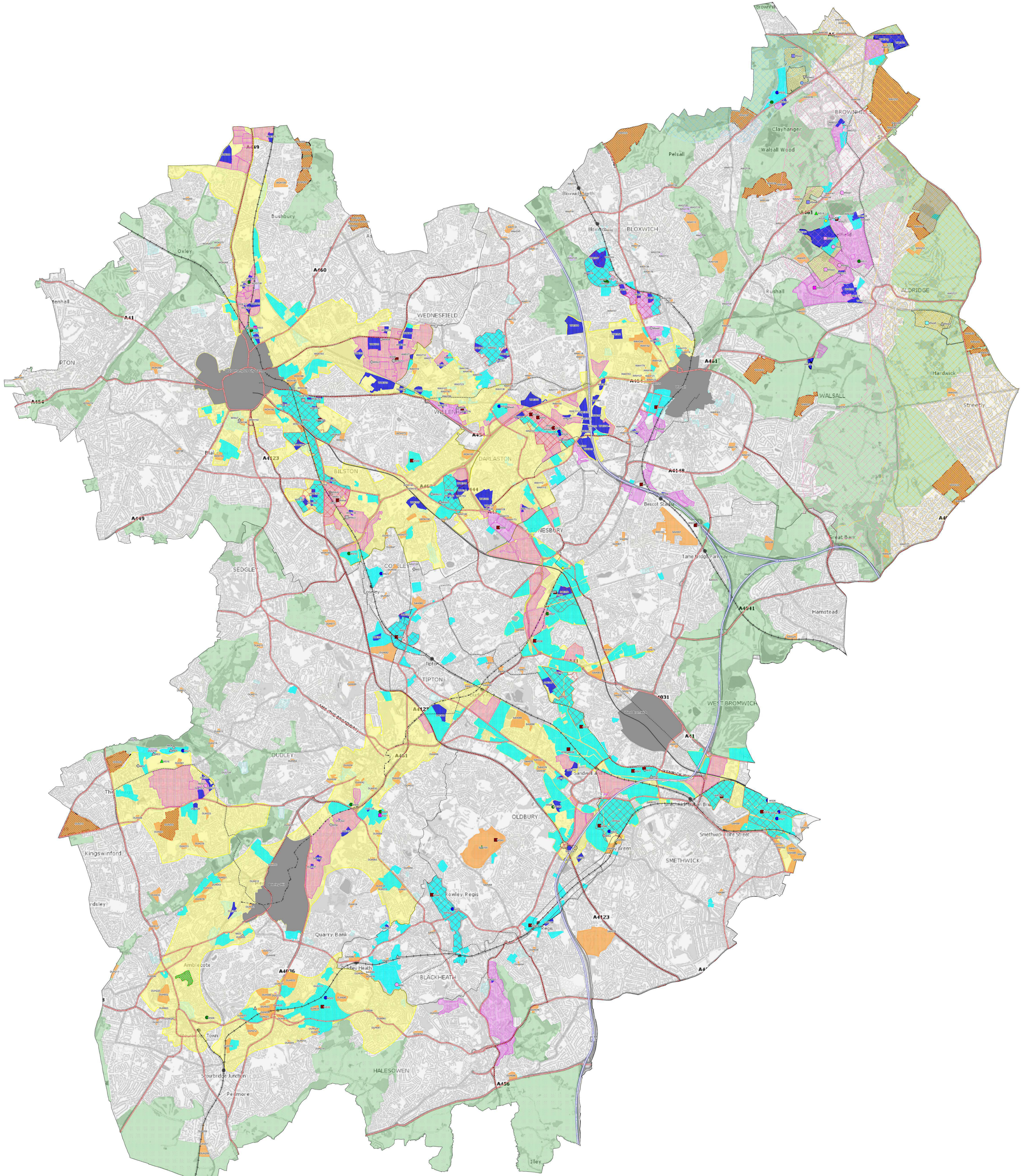




**Key**

- |  |   |  |   |  |  |
|--|---|--|---|--|--|
| <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #f4a460; border: 1px solid black; margin-right: 5px;"></span> Housing Allocation (HOU1)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #d8bfd8; border: 1px solid black; margin-right: 5px;"></span> Gypsy and Traveller Pitch Allocations (HOU4)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0000ff; border: 1px solid black; margin-right: 5px;"></span> Employment Development Sites (EMP1)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #ff00ff; border: 1px solid black; margin-right: 5px;"></span> Strategic Employment Areas (EMP2)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #00ffff; border: 1px solid black; margin-right: 5px;"></span> Local Employment Areas (EMP3)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #add8e6; border: 1px solid black; margin-right: 5px;"></span> Other Employment Areas (EMP4)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #00ff00; border: 1px solid black; margin-right: 5px;"></span> Local Greenspace (DSA.6)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #a0522d; border: 1px solid black; margin-right: 5px;"></span> Strategic Allocations</li> </ul> | <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #696969; border: 1px solid black; margin-right: 5px;"></span> Strategic Centres (CEN2)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #ffff00; border: 1px solid black; margin-right: 5px;"></span> Core Regeneration Areas (CSP2)</li> <li><span style="display: inline-block; border: 1px dashed black; width: 15px; height: 15px; margin-right: 5px;"></span> Neighbourhood Growth Areas (CSP3)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #90ee90; border: 1px solid black; margin-right: 5px;"></span> Green Belt (GB1)</li> </ul> | <p><b>Existing Mineral Sites and Mineral Infrastructure Sites (MIN 2)</b></p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #add8e6; border: 1px solid black; margin-right: 5px;"></span> Pre-operational Quarry</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #ff00ff; border: 1px solid black; margin-right: 5px;"></span> Active Quarry</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0000ff; border: 1px solid black; margin-right: 5px;"></span> Dormant Quarry</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0000ff; border: 1px solid black; margin-right: 5px;"></span> Brickworks</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0000ff; border: 1px solid black; margin-right: 5px;"></span> Pot Clay Factory</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0000ff; border: 1px solid black; margin-right: 5px;"></span> Fireclay Stockpile</li> </ul> <p><b>Mineral Infrastructure Sites</b></p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0000ff; border: 1px solid black; margin-right: 5px;"></span> Rail Linked Aggregates Depot</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0000ff; border: 1px solid black; margin-right: 5px;"></span> Aggregates Recycling Facilities</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0000ff; border: 1px solid black; margin-right: 5px;"></span> Concrete Batching Plant</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0000ff; border: 1px solid black; margin-right: 5px;"></span> Concrete Products</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0000ff; border: 1px solid black; margin-right: 5px;"></span> Coating Plant</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0000ff; border: 1px solid black; margin-right: 5px;"></span> Dry Silo Mortar Plant</li> </ul> | <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #f08080; border: 1px solid black; margin-right: 5px;"></span> Brick Clay Minerals Safeguarding Area (MIN2)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #add8e6; border: 1px solid black; margin-right: 5px;"></span> Fireclay Minerals Safeguarding Area (MIN2)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #ffff00; border: 1px solid black; margin-right: 5px;"></span> Sand and Gravel Minerals Safeguarding Area (MIN2)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #a0522d; border: 1px solid black; margin-right: 5px;"></span> Preferred Area for Sand and Gravel (MIN3)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #f08080; border: 1px solid black; margin-right: 5px;"></span> Preferred Area for New Waste Facilities (W3)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #d2b48c; border: 1px solid black; margin-right: 5px;"></span> Mineral Extraction Sites (MIN2)</li> </ul> | <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #ffff00; border: 1px solid black; margin-right: 5px;"></span> Hazardous Waste Treatment Infrastructure (W2)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0000ff; border: 1px solid black; margin-right: 5px;"></span> Metal Recycling Sites (W2)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #00ff00; border: 1px solid black; margin-right: 5px;"></span> Waste Disposal Installations (W2)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #ff00ff; border: 1px solid black; margin-right: 5px;"></span> Municipal Waste Recovery Installations (W2)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0000ff; border: 1px solid black; margin-right: 5px;"></span> Municipal Waste Recovery-Supporting Infrastructure (W2)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0000ff; border: 1px solid black; margin-right: 5px;"></span> Other Significant Waste Management Infrastructure (W2)</li> </ul> | <p><b>Transport</b></p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0000ff; border: 1px solid black; margin-right: 5px;"></span> Motorways</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #ff0000; border: 1px solid black; margin-right: 5px;"></span> Key Route Network (TRAN1)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0000ff; border: 1px solid black; margin-right: 5px;"></span> Rail Network (TRAN4)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0000ff; border: 1px solid black; margin-right: 5px;"></span> Existing West Midlands Metro (TRAN4)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0000ff; border: 1px solid black; margin-right: 5px;"></span> Wednesbury- Brierley Hill Metro Extension (TRAN4)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0000ff; border: 1px solid black; margin-right: 5px;"></span> Metro Extension (TRAN4)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0000ff; border: 1px solid black; margin-right: 5px;"></span> Cycle Network (TRAN5)</li> </ul> |
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**Key**

Housing Allocation (HOU1)	Strategic Centres (CEN2)	<b>Existing Mineral Sites and Mineral Infrastructure Sites (MIN 2)</b>	Brick Clay Minerals Safeguarding Area (MIN2)	Hazardous Waste Treatment Infrastructure (W2)	Motorways
Gypsy and Traveller Pitch Allocations (HOU4)	Core Regeneration Areas (CSP2)	<b>Mineral Sites</b>	Fireclay Minerals Safeguarding Area (MIN2)	Metal Recycling Sites (W2)	Key Route Network (TRAN1)
Employment Development Sites (EMP1)	Neighbourhood Growth Areas (CSP3)	Pre-operational Quarry	Sand and Gravel Minerals Safeguarding Area (MIN2)	Waste Disposal Installations (W2)	Rail Network (TRAN4)
Strategic Employment Areas (EMP2)	Green Belt (GB1)	Active Quarry	Preferred Area for Sand and Gravel (MIN3)	Municipal Waste Recovery Installations (W2)	Existing West Midlands Metro (TRAN4)
Local Employment Areas (EMP3)		Dormant Quarry	Preferred Area for New Waste Facilities (W3)	Municipal Waste Recovery-Supporting Infrastructure (W2)	Metro Extension (TRAN4)
Other Employment Areas (EMP4)		Brickworks	Mineral Extraction Sites (MIN2)	Other Significant Waste Management Infrastructure (W2)	Cycle Network (TRAN5)
Local Greenspace (DSA.6)		Pot Clay Factory			
Strategic Allocations		Fireclay Stockpile			
		<b>Mineral Infrastructure Sites</b>			
		Rail Linked Aggregates Depot			
		Aggregates Recycling Facilities			
		Concrete Batching Plant			
		Concrete Products			
		Coating Plant			
		Dry Silo Mortar Plant			

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# Black Country | **Plan**

Planning for the future of the Black Country



HOUSING



ENVIRONMENT



EMPLOYMENT



TRANSPORT

## Draft Plan Consultation

August - October 2021

## Walsall borough summary



Walsall Council

CITY OF  
WOLVERHAMPTON  
COUNCIL

# We are reviewing the Black Country Plan and would like to hear your views.

## Introduction

The Black Country Authorities of Dudley, Sandwell, Walsall and Wolverhampton are consulting on a new Draft Plan for the Black Country. This Plan will identify where new employment and housing development will be located and where investment for new infrastructure, such as transport, schools and green space will be made.

This document provides a summary of the main proposals covered in the Draft Black Country Plan relating to Walsall. If you would like to read the full version of the Draft Plan you can find this on the Black Country Plan website at: <https://blackcountryplan.dudley.gov.uk/bcp/> and in key buildings across the borough. Details can be found at the back of this document.

## What is a Local Plan?

All Local Planning Authorities are required by Government to write a Local Plan that describes where the necessary development over the next 20 years or so will be located and how it will be dealt with through the planning process.

The Local Plan is a planning document which is used to help decide planning applications. It considers the amount of land required to support future jobs and provide new housing, and where additional retail, office and leisure development is needed. The Local Plan also considers whether any additional supporting infrastructure (e.g. schools, green space, utilities, health provision, public transport, cycle routes and highway improvements) is required.

## What is the Black Country Plan?

The Black Country Plan is a joint Local Plan prepared by the four Black Country Authorities (Dudley, Sandwell, Walsall and Wolverhampton). The Plan will direct where new housing and employment development will be located in the Black Country up to 2039.

It will guide key issues like:

- **New Housing** - How much new housing is needed? How much can be provided in sustainable locations and where will it go? What type and density of housing should be provided and how much affordable housing?
- **Employment land** - Where does employment land need protection? How much new employment land is needed and where should it go?
- **Supporting infrastructure and services** - What improvements to transport, schools, green space, etc, will be needed to support new development? Where will new services be located?
- **In the face of new development** how will the natural and historic environment be protected and improved?

## Why are we reviewing the Black Country Plan?

The Government requires Local Authorities to have Local Plans that are less than five years old and are based on up to date information. If a Local Plan is not up to date it will have less weight at planning appeals and this will mean that the local planning authorities are less able to control new development. Having an up to date Plan in place helps local planning authorities to turn down development proposed by landowners and developers, where it considers the proposal to be inappropriate.

We need to review the Black Country Plan to ensure that we can plan for new homes and jobs in the right places. If we don't review the Plan, we risk seeing unplanned development which might not be supported by the right services and facilities.

## **Do we have a plan in place now?**

Yes, our current plan, called the Black Country Core Strategy, was formally adopted in 2011. This Plan provided the framework to allocate enough housing and employment land to meet the Black Country's development needs up to 2026. Sites to ensure these targets are met are allocated through other local plan documents – in Walsall these are the Walsall Site Allocation Document and Town Centre Area Action Plan.

When we have finished the new Black Country Plan and it is adopted (after it has been examined by an Independent Planning Inspector and approved by Councillors) it will replace the Black Country Core Strategy and most of the Walsall Site Allocation Document.

## **When did we start reviewing the Black Country Plan?**

We started reviewing the Black Country Plan in 2017. We held a public consultation for eight weeks in July 2017 – September 2017 on the issues facing the Black Country and some possible solutions. Following the Issues and Options consultation we have now produced the next stage of the Plan preparation process which is the Draft Plan. The Draft Plan considers the responses we receive to the Issues and Options consultation along with a range of other technical studies we have produced on planning issues.

## **What does the Black Country Plan need to plan for?**

The Draft Black Country Plan we are consulting on sets out proposed planning policies and proposed land allocations to guide and manage the development of the Black Country up to 2039.

Our economy, our population and the number of households is growing, and the Plan needs to identify land to meet our future employment needs and ensure that enough homes can be built to accommodate new households. We need to provide enough land to build approximately 76,076 homes by 2039. This would mean increasing the number of homes that are currently built across the Black Country from 2,600 homes per year to 4,000 homes per year. We know this because the Government has published the housing need figures for each local authority which must be used when preparing a Local Plan.

We also need around 565 hectares (ha) of employment land to provide enough jobs to accommodate the growth needs of our existing and future businesses.

We also need to plan for:

- How we will address climate change
- How we will create healthy and safe places
- How we will protect and enhance the historic and natural environment
- The design standards that new development should meet
- How we will provide housing to meet the needs of different residents, including affordable housing
- How we will maintain vibrant and attractive town centres

## What does the Draft Black Country Plan propose?

- The Plan allocates around 1,200 hectares (ha) of housing land (the equivalent of 1,800 football pitches) to provide at least 47,837 new homes. This will be provided on a mix of existing sites (including those with planning permission and carried over from current Local Plan documents) and new sites.
- The Plan supports the recovery and growth of the economy, particularly in key employment sectors such as advanced manufacturing; and will deliver the development of at least 354ha of employment land, which is the equivalent of 531 football pitches.
- In the light of the challenges facing our high streets, the Plan will facilitate the rejuvenation and diversification of our centres as places to live, work, shop and visit.
- The Plan seeks to minimise the amount of waste generated across all sectors and increase the re-use, recycling, and recovery rates of waste material.
- Identifies provision within the Black Country for up to 6.2 million tonnes of quarried construction aggregate (sand and gravel) to 2039, and around 720,800 tonnes per annum of secondary and recycled aggregates each year.
- The Plan ensures that sufficient physical, social and environmental infrastructure will be delivered to meet identified needs and support growth.

## Where will the growth be?

- The Draft Plan seeks to deliver the majority of development in the existing urban area making use of brownfield land (i.e. previously developed land), vacant properties and surplus industrial land. The density of the housing development (i.e. the amount of housing build on a site) will be increased to ensure this land is used efficiently. This will provide enough land to build around 40,117 new homes and 306 ha of employment land. This land is located in:
  - o The Strategic Centres of Brierley Hill, West Bromwich Town Centre, Walsall Town Centre and Wolverhampton City Centre;
  - o Core Regeneration Areas in and around town/district centres and along transport networks, such as Walsall to Wolverhampton; and
  - o existing Towns and Neighbourhoods Areas such as Walsall itself, Aldridge, Bloxwich and Brownhills.
- We are aiming to use as much land in the urban area as possible but there is a significant shortage of sites in the urban area to meet our future housing and employment needs.
- Therefore, we are proposing to remove sites from the green belt to provide an additional 7,720 homes and 47.8 ha of employment land. The majority of these homes are provided in the proposed new Neighbourhood Growth Areas with the remainder provided on small sites on the edge of the Towns and Neighbourhood Areas.
- The proposed Neighbourhood Growth Areas are located in highly sustainable locations and will provide 250 homes or more on the edge of the urban area where there are existing pedestrian and public transport routes and high levels of access to local services (such as schools or health services). In some cases, new services may need to be provided as part of a new development.

You can see these areas for Walsall on the plan shown in this document.

## **Why are we proposing to develop in the green belt?**

The green belt around the Black Country forms part of the West Midlands Green Belt which has been in place since 1975. Green belt is a national planning designation and national policy strictly controls which types of development can take place within it.

The Black Country Councils attach great importance to the green belt. However, the green belt boundary is drawn tightly around the urban edges. To help meet our future housing and employment land needs, there is an exceptional circumstance to alter the green belt boundaries through the Black Country Plan review process, to release land for housing and employment development. It is proposed to remove 6% of the green belt area in the Black Country for development. The new Black Country green belt boundaries are intended to be permanent and should not need to be changed in future.

The Councils have undertaken an extensive review of the green belt, taking into account evidence on historical, ecological and landscape value and local character. A comprehensive site assessment process has taken place to ensure that all sites selected for removal from the green belt can deliver sustainable development and the necessary supporting infrastructure by 2039, and will not cause harm to the natural or historic character of the Black Country or breach any other planning policies. Where sites are removed from the green belt, developers will be required to pay for improvements to the environmental quality and accessibility of remaining green belt land nearby.

## **Are we able to build all future housing and employment land that we need in the Black Country?**

No. We need to find enough land to build 76,076 homes and provide 565 ha of new employment land. The land we have identified in the Draft Plan will provide 47,837 homes and 354ha of employment land, this will allow most of our housing and employment land needs to be met in the Black Country. However, there will be a shortfall of 28,239 homes and 211 ha of employment land as we do not have enough land available to accommodate all of our development needs.

The Government requires neighbouring local authorities to work together to meet housing and employment land needs when producing Local Plans – this is called the “Duty to Cooperate”. Under the Duty to Cooperate, we are asking neighbouring authorities, such as South Staffordshire, Lichfield, Cannock Chase, Shropshire and Telford & Wrekin, to provide additional housing and employment land in their areas to meet the needs of the Black Country. Currently there have been offers from neighbouring authorities of between 8,000 to 9,500 homes and 102- 173 ha of employment land to be tested through their own Local Plan reviews.

## What does this mean for Walsall?

In Walsall we are proposing to provide enough land to build an additional 13,344 new homes and provide 164ha of employment land over the period to 2039.

### Where will future growth be allocated?

The majority (7,926) of these new homes will be provided in the urban area on brownfield sites (sites that have been previously developed), with a small number on surplus open space. 128ha of the employment land also comprises brownfield sites in the urban area.

The brownfield sites are identified for housing or employment in our existing plans and many of them have planning permission. We will carry these sites forward into the new Black Country Plan.

5,418 of the homes and 47ha of the employment land will be provided on land that is currently in the green belt. A total of 347ha of land is involved. This is the equivalent of roughly 485 football pitches. Not all of this land will be built on. Some of it will be used to provide new areas of open space to serve the new homes, and land to enhance nature conservation.

There are 32 new housing and employment sites currently in the green belt that are proposed for allocation in the Black Country Plan. These including the following large sites:

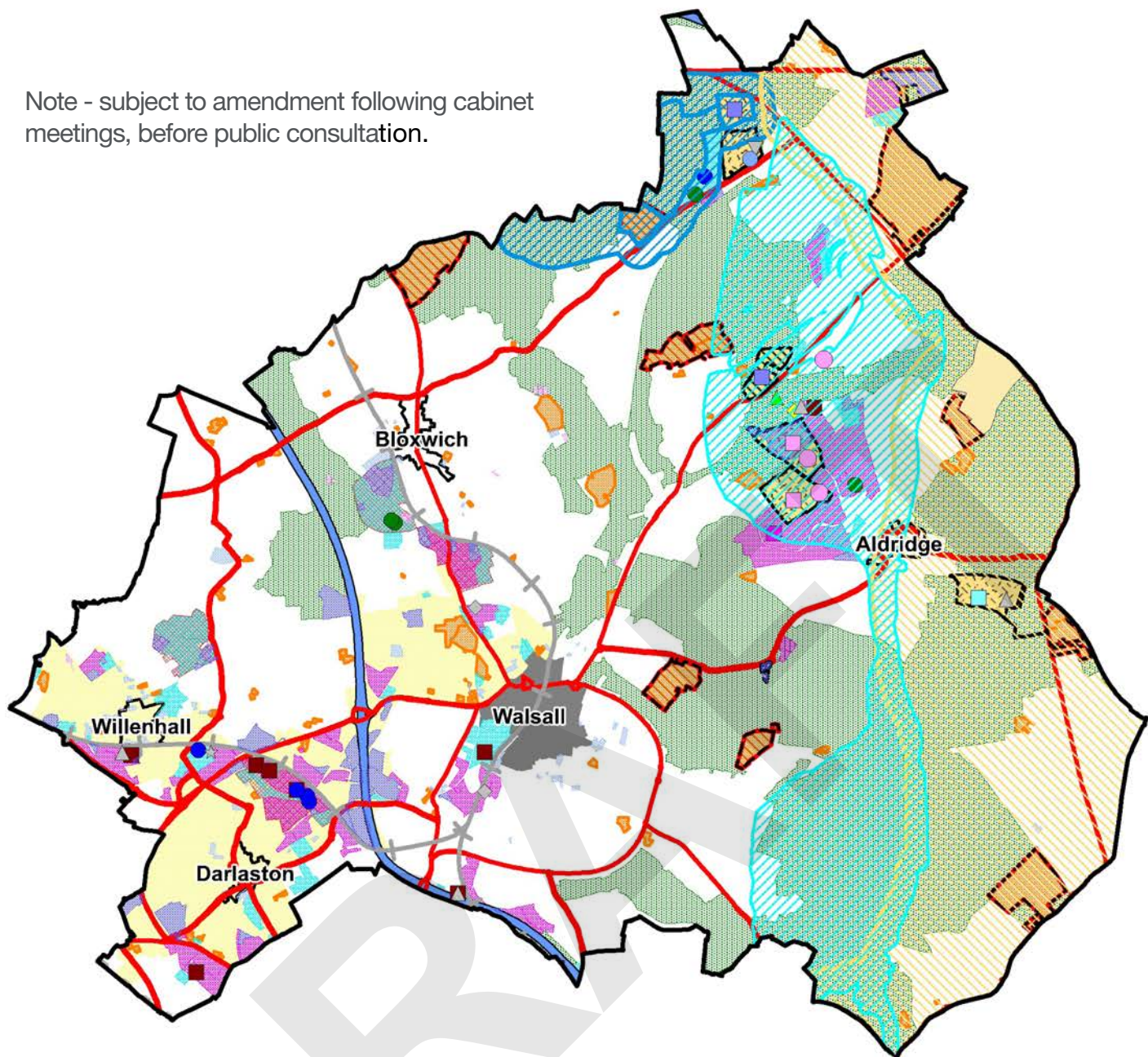
Site Name		Hectares (ha) of land to be developed (net)	Number of homes to be built
<b>Home Farm, Sandhills</b>	Aldridge North and Walsall Wood	54	800
<b>Yieldsfield Farm, Bloxwich</b>	Bloxwich East	37	600
<b>Queslett Road East/ Aldridge Road</b>	Streetly	42	960
<b>Sutton Road/ Longwood Lane</b>	Pheasey Park Farm	8	202
<b>Yorks Bridge, Pelsall</b>	Pelsall	13	580
<b>Coronation Road/ Mob Lane</b>	Aldridge North and Walsall Wood	30	763
<b>Calderfield, Aldridge Road</b>	St Matthews	19	442
<b>Bentley Lane (Beatwaste)</b>	Short Heath	11	Employment
<b>Johnsons Farm/ Meadow Farm, Watling Street</b>	Brownhills	8	Employment

The map overleaf below shows the proposed distribution of all new housing and employment land for Walsall.

A more detailed map showing all the sites can be found on the following link <https://blackcountryplan.dudley.gov.uk/t2/p4/> or paper copies can be viewed in local libraries or key Walsall Council buildings.



Note - subject to amendment following cabinet meetings, before public consultation.



NORTH

## Walsall Spatial Strategy

### Key

- |  |   |  |   |
|--|---|--|---|
| Housing Allocations (HOU1)                           | Metal Recycling Sites (MRSs)                      | Active Quarry  |   |
| Gypsy and Traveller Pitch Allocations (HOU4)         | Waste Disposal Installations                      | Pre-operational Quarry   |   |
| Land For Employment (EMP1)                           | Other Significant Waste Management Infrastructure | Dormant Quarry   |   |
| Strategic Employment Areas (EMP2)                    | Hazardous Waste Treatment Infrastructure          | <b>Mineral Extractions Sites &amp; Mineral Safeguarding Areas (MIN2)</b> |   |
| Local Employment Areas (EMP3)                        | Preferred areas for new Waste Facilities (W3)     | Mineral Extraction Site  | Mineral Extraction Site                   |
| Other Employment Areas (EMP4)                        | <b>Mineral Infrastructure(MIN1)</b>               |  |   |
| Core Regeneration Area (CPS2)                        | Aggregates Recycling Facilities                   | Fire Clay Mineral Safeguarding Area                                      |   |
| Neighbourhood Growth Area (CPS3)                     | Concrete Batching Plant                           | Fire Clay Mineral Safeguarding Area                                      | Sand and Gravel Mineral Safeguarding Area |
| Strategic Allocations                                | Fireclay Stockpile                                | Fire Clay Mineral Safeguarding Area                                      | Sand and Gravel Mineral Safeguarding Area |
| Tier 1 Strategic Centre (CEN2)                       | Coating Plant                                     | Fire Clay Mineral Safeguarding Area                                      | Sand and Gravel Mineral Safeguarding Area |
| Town Centres (CEN3)                                  | Concrete Products                                 | Fire Clay Mineral Safeguarding Area                                      | Sand and Gravel Mineral Safeguarding Area |
| <b>Waste Infrastructure (W2)</b>                     |   | Preferred Area for Sand & Gravel (MIN3)                                  | Motorway                                  |
| Municipal Waste Recovery Installations               | Dry Silo Mortar Plant                             | Key Route Network (TRAN1)  | Rail Network (TRAN4)                      |
| Municipal Waste Recovery – Supporting Infrastructure | Pot Clay Factory                                  | Green Belt (GB1)   |   |
|  | Brickworks  |  |   |

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# What happens next?

## We want your views

You can view the Draft Plan and evidence documents at <https://blackcountryplan.dudley.gov.uk/t2/p4/> . You can also view copies of the Draft Plan documents and a map of proposed land allocations at the following venues:

**Walsall First Stop Shop**

**Bloxwich Library**

**Darlaston Library**

**Willenhall Library**

**Lichfield Street Hub**

**Brownhills Library**

**Streetly Community Library**

**Mobile Library Services**

**Aldridge Library**

## Have your say

### Visit the website:

Complete our online response form at: [www.blackcountryplan.co.uk](http://www.blackcountryplan.co.uk)

### Email:

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

### Write to us:

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

You can also fill in a response form and leave it at the library or Walsall Council First Stop Shop Receptions.

We will use the responses to inform the preparation of the next stage of the Plan which is called the Draft Pre-submission of the Black Country Plan. We intend to publish this in summer 2022 and there will be an opportunity to make representations about this at that time.

## Plan making process timetable

Stage	Date
Consultation on the Draft Publication Plan	August - September 2022
Submission of Plan to Secretary of State for Examination	March 2023
Examination in Public	April 2023 – March 2024
Adoption	April 2024

# Sustainability Appraisal of the Black Country Plan

## Volume 1 of 2: Regulation 18 SA Report

June 2021



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

# Sustainability Appraisal of the Black Country Plan

## Volume 1 of 2: Regulation 18 SA Report

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# About this report & notes for readers

Lepus Consulting Ltd (Lepus) has prepared this report for the use of Black Country Authorities (City of Wolverhampton Council, Dudley Metropolitan Council, Sandwell Metropolitan Council and Walsall Council). There are a number of limitations that should be borne in mind when considering the conclusions of this report. No party should alter or change this report without written permission from Lepus.

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This Regulation 18 SA Report is based on the best available information, including that provided to Lepus by the Black Country Authorities and information that is publicly available. No attempt to verify these secondary data sources has been made and they have assumed to be accurate as published. This report was prepared between December 2019 and June 2021 and is subject to and limited by the information available during

this time. This report has been produced to assess the sustainability effects of the Black Country Plan and meets the requirements of the SEA Directive. It is not intended to be a substitute for an Environmental Impact Assessment (EIA) or Appropriate Assessment (AA).

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# Acronyms & Abbreviations

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

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

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# Executive Summary

## About this report

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

## Summary findings

### *Housing and Employment Growth*

- E3 A total of five housing and five employment growth options have been assessed as part of the SA to consider different approaches to meeting the housing and employment requirements across the Plan period. These options assess different growth forecasts, considering different proportions of development between the urban areas, greenbelt land and the potential for directing a proportion of development to neighbouring authorities.
- E4 Housing Option 1 proposes the least quantity of development, solely focused in urban areas. This option would be likely to result in the least adverse impacts in regard to a range of SA criteria including landscape, biodiversity and natural resources. However, Option 1 would not meet the identified housing needs for the plan area and may also have a range of negative socio-economic and health implications if pursued in isolation. Options 2 and 5 seek to provide for some development within the Green Belt, which would likely have a negative impact on sustainability criteria such as landscape and natural resources, but to a lesser extent than Options 3 and 4 which seek to deliver the highest proportion of development in the greenbelt. Options 2 and 5 would therefore likely present greater scope for avoiding and mitigating adverse impacts, compared to Options 3 and 4, but Option 2 would also not meet the identified housing needs for the plan area. The BCP therefore proposes a strategy that is most closely aligned with Option 5 which aims to utilise land efficiently through the use of previously developed land but also acknowledges there is a shortage of deliverable sites to meet housing needs and therefore some carefully considered greenbelt release is likely to be required. For housing growth approximately 40,117 homes of the projected housing need of 76,076 homes are proposed to be located in the existing urban areas. Approximately 7,720 homes are proposed to be located on Green Belt release land at the edge of settlements during the plan period. The potential for the remaining shortfall is to be explored through a Duty to Co-operate with neighbouring authorities.

- E5 Employment Options 1 and 2 would fail to meet the minimum low growth scenario in the Economic Development Needs Assessment 2 (364ha + replacement) and therefore are considered to have a minor negative impact on the local economy. Options 3 and 4 could potentially meet the medium growth scenario in EDNA2 (433-522ha + replacement) and are therefore considered to have a minor positive impact on the economy. Option 5 is the only option that could potentially meet the high growth scenario in EDNA2 (502-806ha + replacement) and is therefore considered to have a major positive impact on the economy. In a similar manner to housing it can be assumed that the larger the quantity of development proposed, the greater the risk of adverse impacts on landscape and biodiversity features and natural resources. As a result, Employment Option 1, which proposes the lowest quantity of development, would be expected to have greater scope for avoiding adverse impacts on the natural environment, but would not meet the employment development needs for the area. Option 3 posing the greatest risk of adverse impacts due to involving the greatest loss of Green Belt land at approximately 118-207ha, compared to Options 2, 4 and 5 which would involve 47ha of Green Belt release. The BCA have undertaken an extensive Green Belt and landscape sensitivity assessment and have used this to ensure that development is designed to minimise harm to the purposes of the Green Belt and to landscape character, as identified through the site assessment process. Both employment and housing growth options have been informed by this study, alongside transport and accessibility modelling and other studies undertaken as part of the evidence base. For employment growth, approximately 307 ha of the projected employment land requirements of 565ha are proposed to be located within the existing built-up areas and approximately 48 ha via Green Belt release, with the remaining shortfall to be potentially explored with neighbouring authorities, especially where there may be functional employment or transport linkages.
- E6 The analysis highlights that many sustainability impacts associated with housing and employment growth are based on the spatial distribution of growth and site-specific contextual factors, which are assessed in greater detail in the following sections of the SA report.

### *Spatial Distribution of Growth*

- E7 The overall spatial approach has evolved from consideration of 11 spatial options for development. These have been informed by the evidence base underpinning the Draft BCP and have been subjected to SA. The most sustainable option was considered to be 'balanced growth' with the spatial strategy focusing growth within the existing Strategic Centres, Core Regeneration Areas and Town and Neighbourhood Areas in the sub-region and taking advantage of their existing infrastructure capacity, alongside a limited number of new Neighbourhood Growth Areas near to the edge of settlements that takes account of environmental, climate change, accessibility and socio-economic requirements. Overall, this option is considered to perform the best, as it strikes a balance between retaining valuable environmental assets whilst also prioritising development in the most sustainable locations.

### ***Reasonable Alternative Sites***

- E8 A total of 635 reasonable alternative sites have been identified across the plan area. Potential future land use includes residential, employment and Gypsies, Traveller and Travelling Showpeople sites and alternative sites for these uses have been assessed as part of the SA process.
- E9 The SA has identified a range of positive and negative potential impacts of the reasonable alternative sites on the objectives within the SA Framework. Negative impacts were mainly related to issues associated with development located in the Green Belt outside of the existing urban areas, including the loss of previously undeveloped land, soil and mineral resources, impacts on biodiversity and landscape features, potential pollutants and greenhouse gas emissions associated with a large scale of development, and the access of site end users to a number of social facilities including healthcare services, local shops, schools and transport services.
- E10 Some (but not all) of these negative impacts may be mitigated through policy and site design.
- E11 Reasons for selection / rejection of the reasonable alternative sites considered in plan making process have been informed by the detailed site assessment process undertaken by the BCA and includes consideration of the findings of the SA.
- E12 A summary overview of the reasons for site selection / rejection for the reasonable alternatives considered have been provided by the BCA and are included in this SA report.

### ***BCP Policies***

- E13 The Draft Plan sets out a series of policies that aim to support the delivery of the vision for the Black Country. The Draft BCP aims to achieve a balance between conserving the Black Country's landscapes, heritage and environmental assets whilst securing the necessary infrastructure to support development and housing and employment needs.
- E14 The policies that form the Draft BCP have been individually assessed against each of the 14 SA Objectives contained within the SA Framework.
- E15 The policies contained within the BCP would be anticipated to help ensure that potential adverse impacts on sustainability identified as a result of the development proposed within the BCP 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. Opportunities for enhancement may also be secured through policies in the BCP. Where there are opportunities to improve the sustainability performance of draft policies these have been identified in SA process.

### Next steps

- E16 This Regulation 18 SA Report is subject to consultation alongside the Draft Black Country Plan 2018-2039.
- E17 This report represents the latest stage of the SA process. The SA process will take on-board any comments on this report and use them to furnish the next report with greater detail and accuracy.
- E18 Once the Black Country Authorities have reviewed consultation comments in preparing the next version of the Plan (Regulation 19 stage) preparation of an Environmental Report will begin, also known as a full SA report: the Environmental Report will include all of the legal requirements set out in Annex 1 of the SEA Directive.

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# 1 Introduction

## 1.1 Background

1.1.1 The Black Country Authorities (BCA), which include Dudley Metropolitan Council, Sandwell Metropolitan Council, Walsall Council and City of Wolverhampton Council, are in the process of writing the Black Country Plan (BCP), previously referred to as the Black Country Core Strategy Review. As part of this process, a Sustainability Appraisal (SA) is being undertaken that incorporates the requirements of the Strategic Environmental Assessment (SEA) Regulations 2004 (SI 1633). The purpose of SA is to assess the likely social, environmental and economic consequences of a plan from the outset, and throughout its iterative development, to ensure that sustainability considerations are taken into account.

1.1.2 The BCA prepared an Issues and Options document in June 2017 as part of the plan-making process. The Issues and Options document set out to review the adopted Black Country Core Strategy in light of these challenges and opportunities. This Regulation 18 SA Report follows on from the SA Scoping Report<sup>1</sup> and SA Issues and Options Report<sup>2</sup> prepared by Lepus Consulting in 2017.

1.1.3 The purpose of this report is to provide an appraisal of each option in the Regulation 18 version of the Draft Black Country Plan 2018-2039, to identify their likely sustainability impacts on each objective of the SA Framework. This will help the BCA to identify the most sustainable options and prepare a BCP which is economically, environmentally and socially sustainable.

## 1.2 The Black Country

1.2.1 The Black Country is a predominantly urban sub-region of the West Midlands, located to the north west of Birmingham (see **Figure 1.1**). The sub-region includes the boroughs of Dudley, Sandwell, Walsall and the City of Wolverhampton. The Black Country covers an area of 35,728ha and has a combined population of approximately 1,198,900<sup>3</sup>. The sub-region is culturally diverse, and home to a greater proportion of people of people from Asian ethnic

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<sup>1</sup> Lepus Consulting (2017) Sustainability Appraisal Scoping Report. Available at: <https://blackcountryplan.dudley.gov.uk/media/11545/sa-scoping-report-feb-2017.pdf> [Date Accessed: 28/01/21]

<sup>2</sup> Lepus Consulting (2017) SA of the Black Country Core Strategy review - Issues and Options Report. Available at: [https://blackcountryplan.dudley.gov.uk/media/11544/lc-309\\_bccs\\_sa\\_report\\_17\\_130617rc.pdf](https://blackcountryplan.dudley.gov.uk/media/11544/lc-309_bccs_sa_report_17_130617rc.pdf) [Date Accessed: 28/01/21]

<sup>3</sup> Nomis (2019) Labour Market Profile – Black Country. Available at: <https://www.nomisweb.co.uk/reports/lmp/lep/1925185537/report.aspx> [Date Accessed: 15/06/21]



groups (14.64%) and Black ethnic groups (4.19%) in comparison to the national averages (7.5% and 3.3% respectively)<sup>45</sup>.

1.2.2 The area has a rich industrial heritage, including its extensive canal network, which opened up the mineral wealth of the area for exploitation during the Industrial Revolution. The area owes its name to black smoke, particularly from iron and coal industries, during a time when the Black Country became one of the most heavily industrialised areas in Britain.

1.2.3 Mining ceased in the area in the late 1960s, but manufacturing continues today, although on a much smaller scale. There is a total of 445,000 employee jobs across the Plan area<sup>6</sup>. In addition to manufacturing, which equate to approximately 14.6% of employee jobs in the Black Country, the biggest employment sectors include wholesale and retail trade (18.7%) and human health and social work activities (15.3%)<sup>7</sup>.

1.2.4 Today, the Black Country contains four Strategic Centres (the towns of Brierley Hill, Walsall and West Bromwich and the City of Wolverhampton), as well as a network of smaller towns and local centres. The major centres provide a wide range of employment, leisure, retail and tourism opportunities to serve the Black Country and the wider area.

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

1.2.6 The Draft Black Country Plan (referred to as the BCP throughout this document) contains planning policies and land allocations to support the growth and regeneration of the Black Country over the next 20 years.

1.2.7 The BCP, which includes both strategic and local policies, will provide a policy framework to:

- Facilitate the delivery of the right development types to meet identified and emerging needs in the most sustainable places;
- Prevent uncoordinated development;
- Provide certainty over the types of development that is likely to be approved;
- Meet housing needs between now and 2039;
- Attract new businesses and jobs and offer existing businesses the space to grow by meeting employment land needs;

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<sup>4</sup> Office of National Statistics (2018) Population of England and Wales. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/uk-population-by-ethnicity/national-and-regional-populations/population-of-england-and-wales/latest> [Date Accessed: 20/01/20]

<sup>5</sup> Office of National Statistics (2018) Regional ethnic diversity. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/uk-population-by-ethnicity/national-and-regional-populations/regional-ethnic-diversity/latest#download-the-data> [Date Accessed: 20/01/20]

<sup>6</sup> Nomis (2019) Labour Market Profile – Black Country. Available at: <https://www.nomisweb.co.uk/reports/lmp/lep/1925185537/report.aspx> [Date Accessed: 15/06/21]

<sup>7</sup> Ibid

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- Increase employment opportunities to support the delivery of the Black Country and West Midlands Combined Authority Strategic Economic Plans (SEP), Local Industrial Strategy and Covid-19 recovery plans;
  - Address the issue of climate change
  - Promote and enhance health and well-being in accordance with the four local authorities' health and well-being strategies;
  - Protect and enhance designated areas;
  - Ensuring infrastructure, such as roads, public transport, new schools, new healthcare facilities, upgraded utilities and broadband, waste and sewage disposal, is provided at the right time to serve the new homes and employment provision it supports;

1.2.8 When adopted the Black Country Plan will replace the Black Country Core Strategy (2011) and substantial elements of 'Tier 2' Plans in the form of Area Action Plans and Site Allocations Documents.

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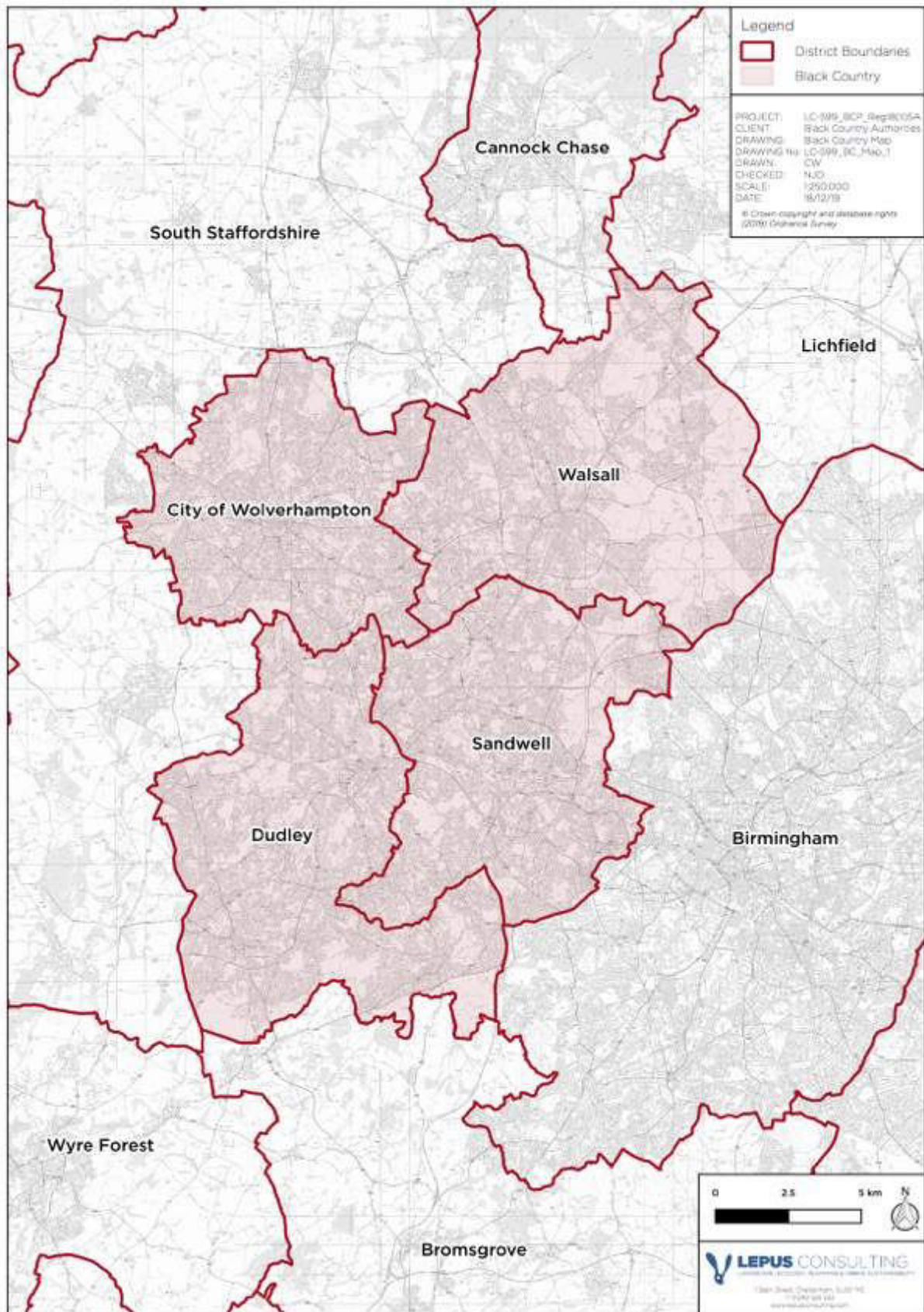


Figure 1.1: City of Wolverhampton, Dudley, Sandwell and Walsall authority boundaries

## 1.3 The Black Country Plan

- 1.3.1 The Black Country covers the areas of Dudley Metropolitan Borough Council (MBC), Sandwell MBC, Walsall Council and the City of Wolverhampton Council. The four authorities worked together to produce the Black Country Core Strategy<sup>8</sup>, which was adopted in 2011.
- 1.3.2 The Black Country Plan (BCP) was formerly known as the Black Country Core Strategy Review. The BCP is the planning framework for the whole of the Black Country. Once adopted, the BCP will supplant the adopted Black Country Core Strategy.
- 1.3.3 The aim of the BCP is to enable the four authorities to consider future development beyond the current Plan period up to 2026. As a result, the BCP aims to meet development needs up to 2039.

## 1.4 Duty to Cooperate

- 1.4.1 The Duty to Cooperate was created in the Localism Act 2011<sup>9</sup> and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.
- 1.4.2 In July 2018, the four BCA asked neighbouring authorities to provide an update regarding strategic plan making and raised the issue of meeting the housing and employment need across the Black Country. In particular, asking if the Local Authorities would be able and willing to accommodate some of the Black Country's housing and employment need.
- 1.4.3 The neighbouring authorities which would be likely to take some of the housing and employment need for the BCP are: South Staffordshire; Stafford; Lichfield; and Cannock. Further exporting to Telford and Wyre Forest is also being considered.
- 1.4.4 As a result, the housing and employment number options include the possibility to export development to neighbouring authorities. As the precise quantum of development to be exported to each neighbouring authority has not been concluded at time of writing, the housing and employment number option assessments do not consider the sustainability impacts of exporting development. This development will be considered as part of the Local Plans for each neighbouring authority.
- 1.4.5 The Duty to Co-operate Statement included in the Draft Black Country Plan Statement of Consultation documents how the BCA have fulfilled the duty through the plan preparation process, and how the bodies referred to in the Act have helped to shape the draft BCP. It is

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<sup>8</sup> Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Council and Wolverhampton City Council (2011) Black Country Core Strategy. Available at: <https://blackcountryplan.dudley.gov.uk/t1/p2/> [Date Accessed: 28/01/21]

<sup>9</sup> Localism Act 2011. Available at: <https://www.legislation.gov.uk/ukpga/2011/20/contents> [Date Accessed: 28/01/21]

intended to draft and agree Statements of Common Ground with relevant authorities and bodies on key duty to co-operate issues at the BCP's publication stage.

## 1.5 Integrated approach to SA and SEA

1.5.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.

1.5.2 The European Union (EU) Directive 2001/42/EC<sup>10</sup> (SEA Directive) applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types). The objective of the SEA procedure can be summarised as follows: *“the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”*.

1.5.3 The SEA Directive has been transposed into English law by The Environmental Assessment of Plans and Programmes Regulations 2004<sup>11</sup> (SEA Regulations). Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the LPR to be subject to SEA throughout its preparation.

1.5.4 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is a legal requirement as specified by S19(5) of the Planning and Compulsory Purchase Act 2004<sup>12</sup> and should be an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA lies in The Town and Country Planning (Local Planning) (England) Regulations 2012<sup>13</sup>. SA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.

1.5.5 Public consultation is an important aspect of the integrated SA/SEA process.

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<sup>10</sup> SEA Directive. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date Accessed: 15/06/21]

<sup>11</sup> The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date Accessed: 15/06/21]

<sup>12</sup> Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date Accessed: 15/06/21]

<sup>13</sup> The Town and Country Planning Regulations 2012. Available at: <http://www.legislation.gov.uk/uksi/2012/767/contents/made> [Date Accessed: 15/06/21]

## 1.6 Best Practice Guidance

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

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment<sup>14</sup>.
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive<sup>15</sup>.
- Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework (NPPF)<sup>16</sup>.
- Ministry of Housing, Communities and Local Government (2019) Planning Practice Guidance (PPG)<sup>17</sup>.
- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans<sup>18</sup>.

## 1.7 Sustainability Appraisal

1.7.1 This document is a component of the SA of the BCP. It provides an assessment of the likely effects of reasonable alternatives, as per Stage B of **Figure 1.2**, according to Planning Practice Guidance.

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<sup>14</sup> European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: [http://ec.europa.eu/environment/archives/eia/pdf/030923\\_sea\\_guidance.pdf](http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf) [Date Accessed: 20/01/20]

<sup>15</sup> Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguidesea.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf) [Date Accessed: 20/01/20]

<sup>16</sup> Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework. <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 20/01/20]

<sup>17</sup> Ministry of Housing, Communities and Local Government (2019) Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date Accessed: 20/01/20]

<sup>18</sup> Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <http://www.rtpi.org.uk/media/2668152/sea-sapracticeadvicefull2018c.pdf> [Date Accessed: 20/01/20]

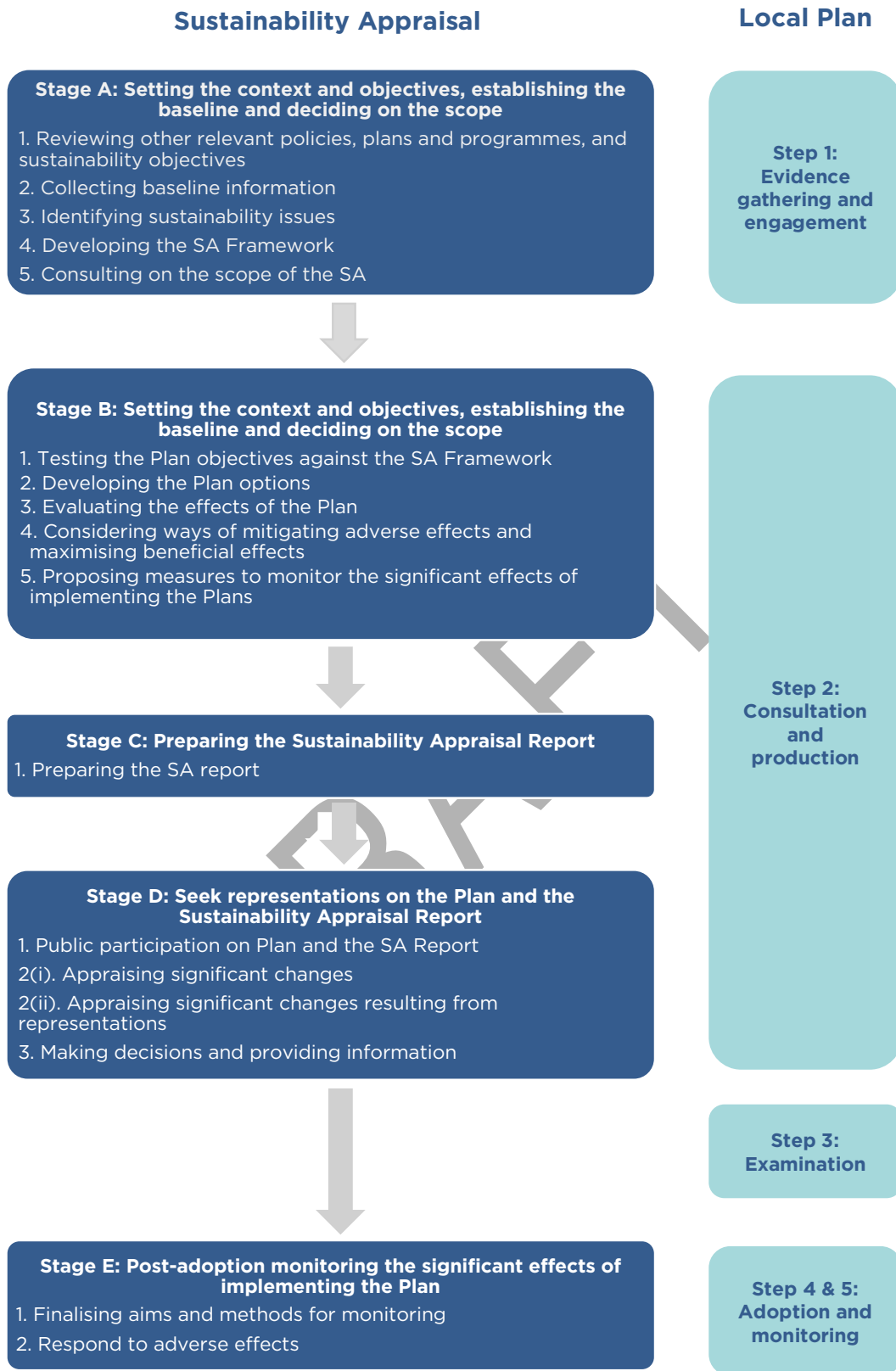


Figure 1.2: Sustainability Appraisal process

## 1.8 The SA process so far

1.8.1 **Table 1.1** below presents a timeline of stages of the BCP and SA process so far. This represents Stages A and B set out in **Figure 1.2**. Detail on these SA stages are presented in **sections 1.9 to 1.12** below.

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

Date	BCP Stage	Sustainability Appraisal
February 2017		<b>SA Scoping Report<sup>19</sup></b> The Scoping Report set out the key issues in relation to sustainability across the Black Country. It also presents the SA Framework against which future sustainability appraisals will be based on.
June 2017	<b>Issues and Options Report<sup>20</sup></b> The report considered nine key challenges and opportunities across the Black Country, which focused on housing and employment need, protecting the environment, providing infrastructure and close working with neighbouring authorities.	<b>Issues and Options SA Report<sup>21</sup></b> The Issues and Options SA Report assessed eight strategic options, five strategic policies and eight policy areas.
June 2021	<b>Regulation 18 version of the Draft Black Country Plan 2018-2039</b>	<b>Regulation 18 SA Report (This report)</b> This SA report contains an assessment of 635 reasonable alternative sites, 77 draft policies, five housing options, five employment options and eleven spatial options.

## 1.9 Scoping Report

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

- Identifying other relevant plans, programmes and environmental protection objectives;
- Collecting baseline information;
- Identifying sustainability problems and key issues;
- Preparing the SA Framework; and

<sup>19</sup> Lepus Consulting (2017) Sustainability Appraisal of the Black Country Core Strategy: Scoping Report. Available at: <https://blackcountryplan.dudley.gov.uk/media/11545/sa-scoping-report-feb-2017.pdf> [Date Accessed: 22/01/20]

<sup>20</sup> Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Council and City of Wolverhampton Council (2017) Black Country Core Strategy: Issues and Options Report. Available at: [https://blackcountryplan.dudley.gov.uk/media/11458/cs\\_final\\_amended\\_200717.pdf](https://blackcountryplan.dudley.gov.uk/media/11458/cs_final_amended_200717.pdf) [Date Accessed: 22/01/20]

<sup>21</sup> Lepus Consulting (2017) Sustainability Appraisal of the Black Country Core Strategy Review 2016 – 2036. Issues and Options Report: Regulation 18 Report. Available at: [https://blackcountryplan.dudley.gov.uk/media/11544/lc-309\\_bccs\\_sa\\_report\\_17\\_130617rc.pdf](https://blackcountryplan.dudley.gov.uk/media/11544/lc-309_bccs_sa_report_17_130617rc.pdf) [Date Accessed: 22/01/20]



- Consultation arrangements on the scope of SA with the consultation bodies.

1.9.2 The Scoping report was consulted on with the statutory bodies Natural England, Historic England and the Environment Agency, as well as other relevant parties and the public. Following consultation, the Scoping report was updated in light of the comments received. Each of the reasonable alternatives or options appraised in this report have been assessed for their likely impacts on each SA Objective of the SA Framework. The SA Framework, which is presented in its entirety in **Appendix A**, is comprised of the following SA Objectives:

- **Cultural heritage:** Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.
- **Landscape:** Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place.
- **Biodiversity, flora, fauna and geodiversity:** Protect, enhance and manage biodiversity and geodiversity.
- **Climate change mitigation:** Minimise the Black Country's contribution to climate change.
- **Climate change adaptation:** Plan for the anticipated levels of climate change.
- **Natural resources:** Protect and conserve natural resources.
- **Pollution:** Reduce air, soil and water pollution.
- **Waste:** Reduce waste generation and disposal and achieve the sustainable management of waste.
- **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.
- **Housing:** Provide affordable, environmentally sound and good quality housing for all.
- **Equality:** Reduce poverty, crime and social deprivation and secure economic inclusion.
- **Health:** Safeguard and improve community health, safety and well-being.
- **Economy:** Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.
- **Education, skills and training:** Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness.

1.9.3 The SA Framework is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Annex 1(f)<sup>22</sup> of the SEA Directive. Including the SEA topics in the SA Objectives helps ensure that all of the environmental criteria of the SEA Directive are

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<sup>22</sup> Annex 1(f) identifies: 'the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors'.

represented. Consequently, the SA Objectives reflect all subject areas to ensure the assessment process is transparent, robust and thorough.

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

1.9.5 The Black Country authorities consulted with Historic England, Natural England, the Environment Agency and other relevant bodies on the content of the SA Scoping Report. These comments were taken into consideration and the SA Scoping Report amended where appropriate. The comments received during the consultation period are presented in **Appendix B**.

## 1.10 Issues and Options

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

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

1.10.3 The consultation was held for ten weeks between July and September 2017. The comments received during the consultation period are presented in **Appendix B**.

1.10.4 The recommendations provided within the Issues and Options SA Report and how the BCA have responded to the recommendations are presented in **Table 1.2** below.

**Table 1.2: Recommendations made in the Issues and Options SA Report**

SA Recommendation	Black Country Authorities' Response
<i>"The Black Country soil resource ... could be further safeguarded under, for example, a natural resources policy".</i>	See supporting text for Policy ENV4 in relation to soils with regards to woodland, veteran trees and new tree planting.
<i>"It is recommended that the evidence base be updated to include transport modelling".</i>	Accessibility and transport modelling has informed the evidence base for the BCP in evaluating site alternatives and this has also informed the SA process. The data includes information relating to the location of healthcare facilities, schools, employment locations and fresh food and centres, and identifies areas within the Black Country providing sustainable access to these services for pedestrians , cyclists and via public transport.
<i>Policy ENV1 "will be amended to include ancient woodland in the list of nationally designated sites".</i>	<p>Ancient woodland and veteran trees represent irreplaceable habitat as specified in the NPPF paragraph 175(c) and government guidance<sup>23</sup>.</p> <p>Policy ENV4 seeks to ensure that <i>"Development that would result in the loss of or damage to ancient trees, ancient woodland or veteran trees will not be permitted. Development adjacent to ancient woodland will be required to provide an appropriate landscaping buffer, with a minimum depth of 15m and a preferred depth of 50m"</i> and <i>"Opportunities for increasing tree provision through habitat creation and the enhancement of ecological networks, including connecting up areas of ancient woodland, will be maximised, in particular by means of the biodiversity net gain and nature recovery network initiatives (see Policy ENV3)."</i></p>

## 1.11 Regulation 18

- 1.11.1 This Regulation 18 SA Report provides an appraisal of housing and employment growth options, spatial options, reasonable alternative sites and policies contained in the Draft Local Plan.
- 1.11.2 The Regulation 18 SA Report will be subject to consultation with a range of stakeholders and the public alongside the Draft BCP. It will enable interested persons to comment on the preferred planning strategy and preferred sites intended to help achieve the strategy. Comments received will provide a basis of any changes that may need to be made to the strategy and preferred sites.

<sup>23</sup> Forestry Commission and Natural England (Updated November 2018). Ancient woodland, ancient trees and veteran trees: protecting them from development. Available at <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences> [Accessed 13th May 2021].

## 1.12 Assessment of reasonable alternatives

1.12.1 The purpose of this document is to provide an appraisal of the reasonable alternatives (RAs), also known as 'options' (those listed in **para 1.11.1**), in line with Article 5 Paragraph 1 of the SEA Directive<sup>24</sup>:

1.12.2 *“Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.”*

1.12.3 PPG Paragraph: 018 Reference ID: 11-018-20140306 states that *“Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings”*.

1.12.4 Different types of RA are possible and may include:

- Different quantas of development over the plan period. This RA option considers the overall dwelling numbers, employment floorspace and / or retail provision options being considered across the plan period. Options may include aspects such as an uplift above the standard method, housing affordability, or a Duty to Co-operate.
- Spatial Options – This RA option considers how the overall level of housing or employment floorspace will be distributed across the area and can include different models for growth or follow specific thematic priorities/ approaches;
- Strategic sites – This option considers reasonable alternative locations for strategic sites. Strategic sites are characterised by larger sites, typically between 300 to 2500 homes (or more in the case of new settlements) and may also include urban extensions;
- Specific sites (typically derived from a criteria-based process to identifying RA sites, informed by the Call for Sites and strategic reviews of housing and employment availability); and
- Policies – It may not always be possible to identify RA to policies but approaches can include the 'policy verses no policy' approach or variations on a given policy.

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<sup>24</sup> EU Council (2001) Directive 2001/42/EC of the European Parliament and of the Council. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date Accessed: 13/07/18]

1.12.5 Key aspects both the BCP and Regulation 19 SA reporting outputs need to consider in respect to RA are:

- What reasonable alternatives have been identified and on what basis?
- How they have been assessed and compared (including consideration of sustainability issues)?
- What are the preferred alternatives and why they are preferred over other alternatives?

1.12.6 The RPTI have produced best practice guidance on ‘SEA and Improving the effectiveness and efficiency of SEA/SA for land use plans’<sup>25</sup>. This recommends a sequential approach to assessing RA as set out in **Figure 1.3** below.

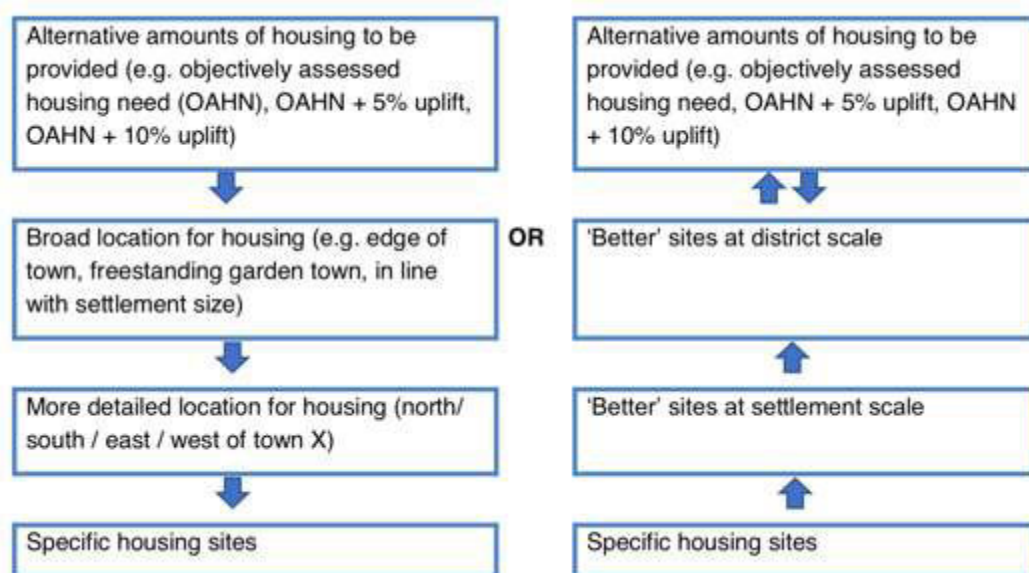


Figure 1.3: Sequencing of Reasonable Alternatives (Source: RPTI)

1.12.7 The BCA have followed the approach set out on the left-hand side of **Figure 1.3** for both housing and employment growth. Details of the alternatives assessed, and their comparative performance against different SA objectives, are presented in **Chapters 3, 4 and 5** of this report.

1.12.8 This report also provides information in relation to the likely characteristics of effects, as per the SEA Directive (see **Box 1.1**).

<sup>25</sup> Royal Town Planning Institute (January 2018). Strategic Environmental Assessment -Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at <https://www.rtpi.org.uk/research/2018/january/strategic-environmental-assessment-seasa-for-land-use-plans/> [Accessed 14/04/21].

**Box 1.1: Annex II of the SEA Directive<sup>26</sup>**

Criteria for determining the likely significance of effects (Article 3(5) of SEA Directive)

**The characteristics of plans and programmes, having regard, in particular, to:**

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme; and
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).

**Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:**

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
  - special natural characteristics or cultural heritage;
  - exceeded environmental quality standards or limit values;
  - intensive land-use; and
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

## 1.13 Signposting for this report

### 1.13.1 This Regulation 18 SA Report is structured as follows:

- **Chapter 2** – baseline and local context of the Black Country, set out by SA Objective.
- **Chapter 3** – methodology and summary of the appraisal of housing and employment number options.
- **Chapter 4** – methodology and summary of the appraisal of the spatial options.
- **Chapter 5** – methodology and summary of the appraisal of reasonable alternative sites by SA Objective.
- **Chapter 6** – reasons for selection / rejection of reasonable alternative sites.
- **Chapter 7** – methodology and summary of the appraisal of draft policies.
- **Chapter 8** – sets out the next steps for the SA and Local Plan.
- **Appendix A** – the SA Framework against which all appraisals are based.

<sup>26</sup> EU Council (2001) Directive 2001/42/EC of the European Parliament and of the Council. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date Accessed: 20/01/20]

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- **Appendix B** – the consultation responses received during previous stages of the SA preparation.
  - **Appendix C** – the appraisal of the five housing number options.
  - **Appendix D** – the appraisal of the five employment number options.
  - **Appendix E** – the appraisal of the eleven spatial options.
  - **Appendices F, G, H & I** – the full appraisal of the 635 reasonable alternative site assessments.
  - **Appendix J** – the appraisal of the 77 draft policies.
  - **Appendix K** – the appraisal of Gypsy, Traveller and Travelling Showpeople Sites

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## 2 Baseline

### 2.1 SA Objective 1: Cultural heritage

- 2.1.1 There are eleven Registered Parks and Gardens (RPG), 27 Scheduled Monuments (SM), 80 Conservation Areas, ten Grade I Listed Buildings, 57 Grade II\* Listed Buildings and 944 Grade II Listed Buildings located within the Plan area, at the time of writing (see **Figure 2.1** and **2.2**).
- 2.1.2 The Black Country has a rich industrial history. Many of the Listed Buildings and other designated heritage assets within the Plan area are associated with the numerous warehouses, factories, and network of canals that were opened during the Industrial Revolution, as well as the main town centres within Dudley, Sandwell, Walsall and Wolverhampton.
- 2.1.3 Some of the historic assets within the Black Country include the Iron Age Hillfort in Walsall, a late Saxon Cross in Wolverhampton and a medieval castle in Dudley. Walsall is a medieval town first mentioned as a settlement in 1159<sup>27</sup>. By 1200 there was a church, manor house and park created. The medieval town covered approximately 22ha. Wolverhampton is also a medieval town which is estimated to have originated as a Mercian royal estate<sup>28</sup>. There is evidence of Sunday market in Wolverhampton in 1180 and is estimated to have been approximately 22ha.
- 2.1.4 It should be noted that not all of the Black Country's historic environment resource and heritage assets are subject to statutory designations; non-designated features comprise a significant aspect of heritage, which is often experienced on a daily basis. This may include buildings and other features of historic interest which are not listed, as well as both discovered and undiscovered archaeological remains.
- 2.1.5 The Black Country Historic Landscape Characterisation Study<sup>29</sup> aimed to create a strategic landscape-level understanding of the historic character and environment of the Black Country. The study identified 103 Historic Environment Area Designations (HEADs) within the Black Country Green Belt and 354 HEADs in the urban area. The study also identified a number of Archaeological Priority Areas, which are considered to contain particularly rare or well-preserved remains of high archaeological and historic interest.

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<sup>27</sup> Black Country History (no date) Walsall: Medieval Town. Available at:  
[http://blackcountryhistory.org/collections/aetrecord/WAHER\\_MBL1915/](http://blackcountryhistory.org/collections/aetrecord/WAHER_MBL1915/) [Date Accessed: 02/04/20]

<sup>28</sup> Black Country History (no date) Wolverhampton: Medieval Town. Available at:  
[http://blackcountryhistory.org/collections/aetrecord/WOHER\\_MBL5060/](http://blackcountryhistory.org/collections/aetrecord/WOHER_MBL5060/) [Date Accessed: 02/04/20]

<sup>29</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at:  
[https://blackcountryplan.dudley.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf) [Date Accessed: 27/02/20]



- 2.1.6 Archaeological Priority Areas (APAs) are identified within the Historic Landscape Characterisation as *“sites with a high potential for archaeological remains of regional or national significance that have not been considered for designation as scheduled monuments, or where there is insufficient data available about the state or preservation of any remains to justify a designation”*. The APAs have been identified using the ‘Scheduled Monuments and nationally important but non-scheduled monuments’<sup>30</sup> and are presented in **Figure 2.3**.
- 2.1.7 Areas of High Historic Townscape Value (AHHTVs) and Designed Landscapes of High Historic Value (DLHHVs) have also been identified within the Historic Landscape Characterisation (see **Figure 2.4**). AHHTVs are areas *“where built heritage makes a significant contribution to the local character and distinctiveness”* and have been identified due to their sense of place, street plan and form, streetscape, views and setting, and representation. DLHHVs are *“designed landscapes that make an important contribution to local historic character but do not meet the criteria for inclusion on the national Register of Parks and Gardens”* and have been identified due to the date, preservation, aesthetics, and associations with people and past events.
- 2.1.8 Impacts on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. The level of the impact has been assessed based on the nature and significance of, and proximity of the proposal to, the heritage asset in question. Additionally, where features identified on Historic England’s Heritage at Risk Register<sup>31</sup> could potentially be affected by the proposed development, this has been stated.
- 2.1.9 Adverse impacts on heritage assets can include direct loss or truncation of an asset, impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset. These negative impacts are expected to be long-term and irreversible.
- 2.1.10 It is assumed that designated heritage assets will not be lost as a result of development, unless otherwise specified by the BCA.
- 2.1.11 It is anticipated that the BCA will require a Heritage Statement or Archaeological Desk-Based Assessment to be prepared to accompany future planning applications, where appropriate. The Heritage Statement should describe the significance of any heritage assets affected by the proposals, including any contribution made by their settings.

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<sup>30</sup> Department for Culture, Media and Sport (2013) Scheduled Monuments and nationally important but non-scheduled monuments. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/249695/SM\\_policy\\_statement\\_10-2013\\_2\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/249695/SM_policy_statement_10-2013_2_.pdf) [Date Accessed: 15/06/21]

<sup>31</sup> Historic England Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register> [Date Accessed: 15/06/21]



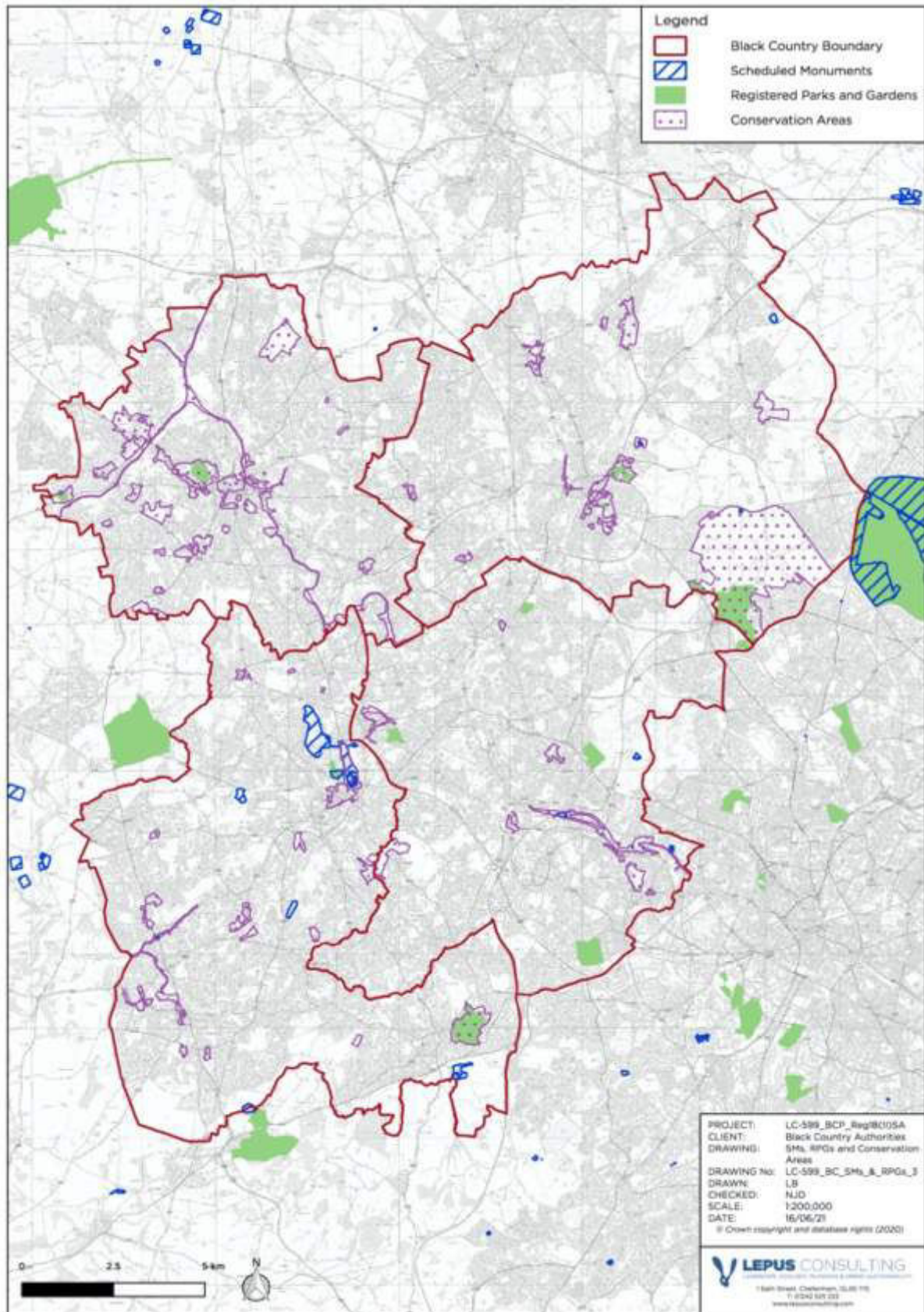


Figure 2.2: Scheduled Monuments, Registered Parks and Gardens and Conservation Areas in and around the Black Country (source: Historic England and BCA)

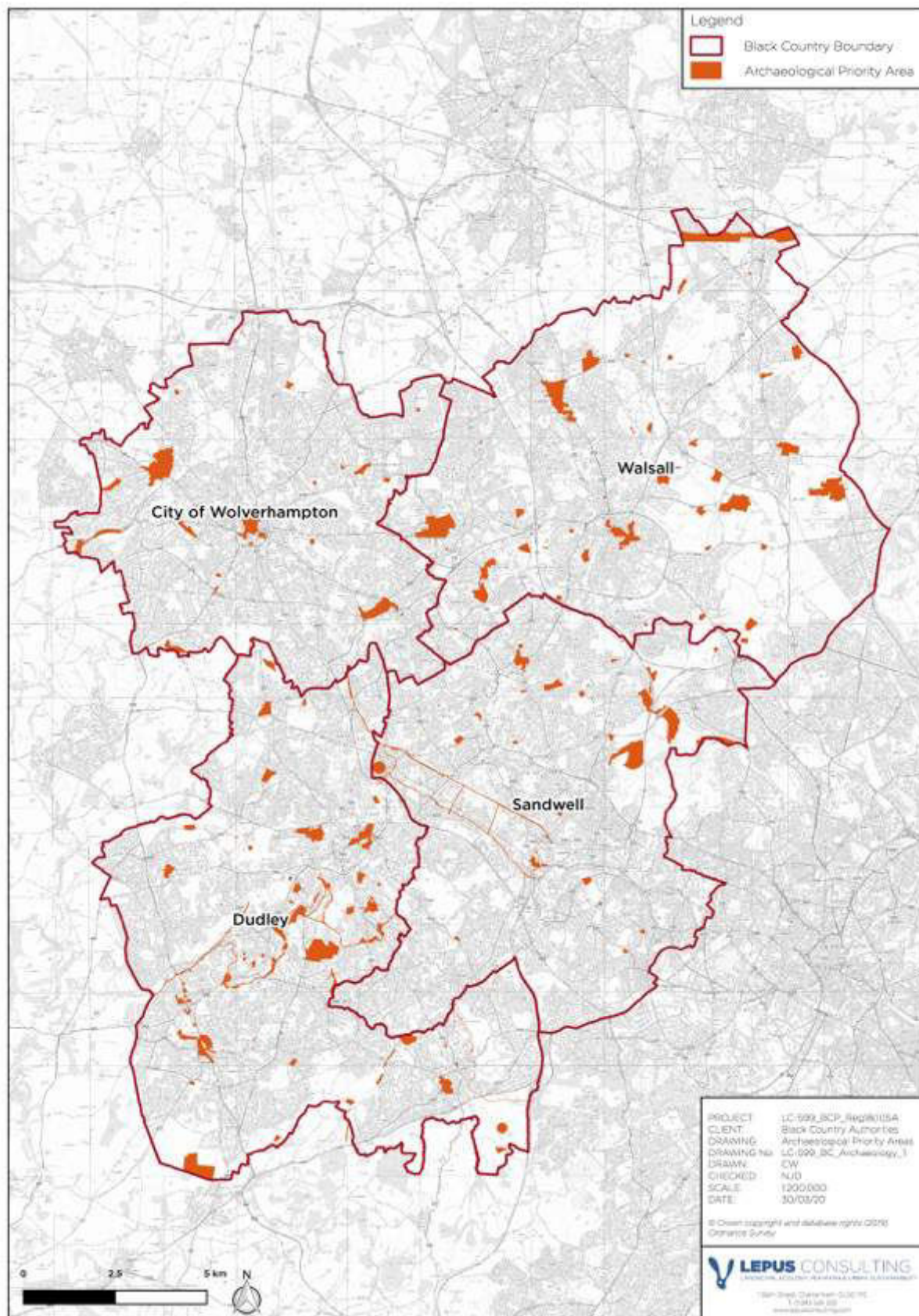


Figure 2.3: Archaeological Priority Areas (APAs) within the Black Country (source: BCA)

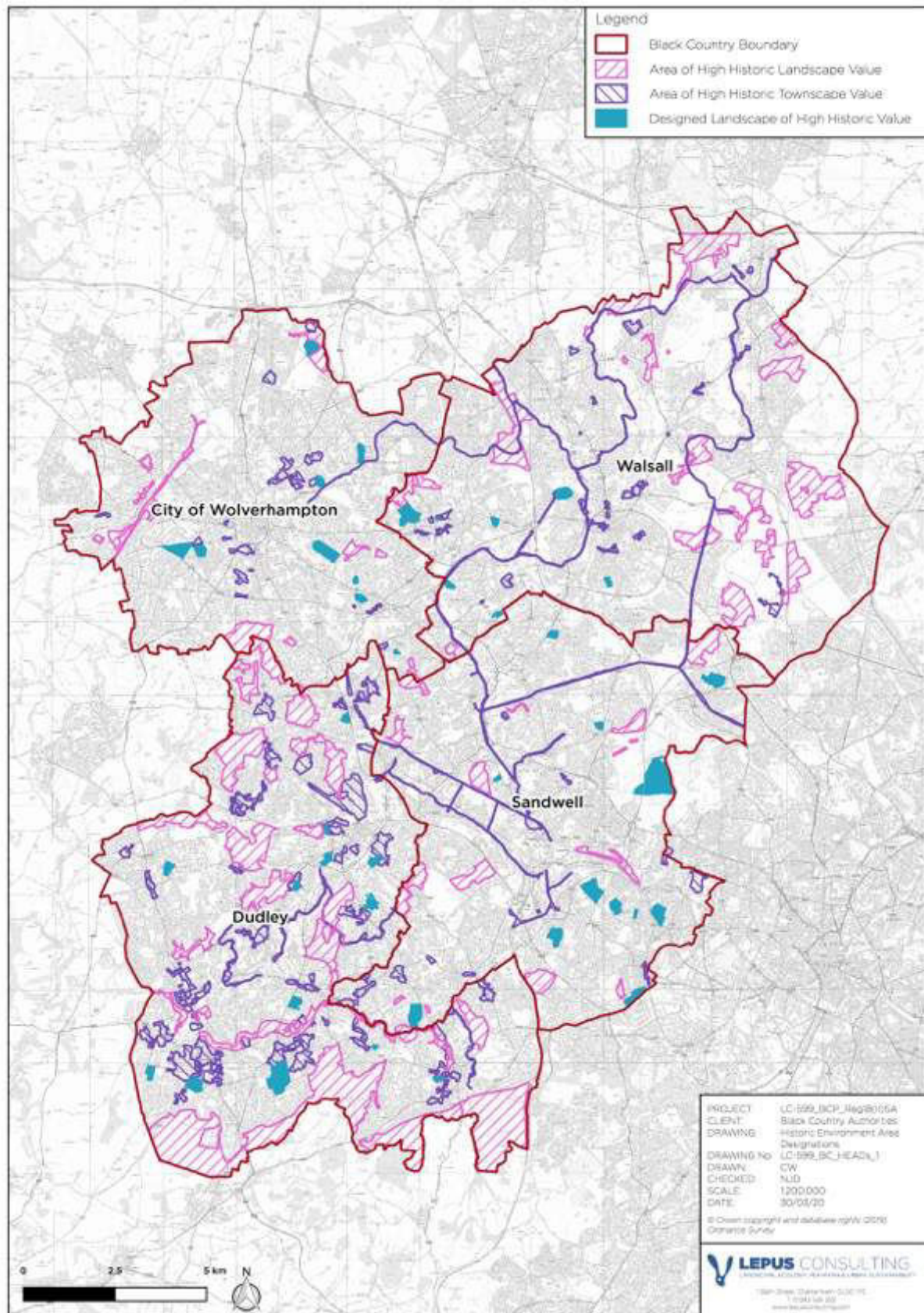


Figure 2.4: Historic Environment Area Designations (HEADs) within the Black Country (source: BCA)

## 2.2 SA Objective 2: Landscape

2.2.1 Impacts on landscape are typically determined by the specific layout and design of development proposals, and their perceived impact on the surrounding environment and associated landscape and/or townscape features. Detailed designs for each development proposal are uncertain at this stage of the assessment. Therefore, the nature of the potential impacts on the landscape are, to an extent, uncertain. There is a risk of negative effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a development proposal is located in close proximity to sensitive receptors or considered to contradict the values and characteristics of the surrounding area. The level of impact has been identified based on the nature and value of the landscape receptor in question and its proximity to the proposed development location.

2.2.2 In order to consider the potential visual effects of development, it has been assumed that the development proposals would, broadly, reflect the character of nearby development of the same type.

2.2.3 It is anticipated that the BCA will require developers to undertake Landscape and Visual Impact Assessments (LVIAs) or Landscape and Visual Appraisals (LVAs) to accompany any future proposals, where relevant. The LVIAs or LVAs should seek to provide greater detail in relation to the landscape character of the proposal and its surroundings, the views available towards the development proposal, the character of those views and the sensitivity and value of the relevant landscape and visual receptors.

### National Character Areas

2.2.4 The Black Country lies within three National Character Areas (NCAs), as illustrated in **Figure 2.5**:

- 'Mid Severn Sandstone Plateau' with open arable fields and steep wooded gorges of the Severn Valley;
- 'Cannock Chase and Cank Wood' ranging from the open heathlands and plantations associated with the AONB to dense urban areas; and
- 'Arden' which is associated with the historic Forest of Arden, a landscape now characterised by wooded farmland and meandering rivers.

### Cannock Chase Area of Outstanding Natural Beauty (AONB)

2.2.5 Cannock Chase AONB is a nationally designated landscape, located approximately 3.7km to the north of the Plan area (see **Figure 2.6**). Whilst new development in the Black Country could potentially lead to adverse impacts on the AONB, such as through increased visitor pressures, it is not anticipated that there would be any adverse visual impacts on the AONB as a result of development proposed within the BCP, due to the distance from the development to the AONB.

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## Green Belt

- 2.2.6 The majority of the central and western part of the Black Country is heavily urbanised, although parts of all four local authorities lie within the Black Country Green Belt (see **Figure 2.7**). The Black Country Green Belt forms part of the West Midlands Green Belt, surrounding the West Midlands Conurbation. Although Green Belt itself is not necessarily of high landscape value, it often serves to protect the character and setting of historic towns and support landscape-scale biodiversity networks. New development could potentially increase noise and light pollution and reduce the perception of tranquillity in some areas.
- 2.2.7 The purposes of the Green Belt include restricting the sprawl of the large built-up areas into the countryside, preventing coalescence and encouraging urban regeneration to be prioritised over development in these areas. Due to the Black Country's highly urbanised nature, this means that the identified housing requirement for the Plan period cannot be met with development only within the existing urban areas. As such, appropriate areas of the Green Belt which can support a limited amount of development will be identified through using the findings of the Green Belt Study<sup>32</sup>.
- 2.2.8 The Green Belt Study, carried out by LUC, classified parcels of Green Belt land into different 'harm' ratings, based on the assessment of potential harm caused by removing each parcel from the Green Belt based on a range of criteria. A summary of the harm ratings is presented in **Figure 2.8**, which shows that in general the areas of lowest harm are areas of Green Belt land surrounded by built development within the urban areas.

## Landscape Sensitivity

- 2.2.9 The Black Country Landscape Sensitivity Assessment<sup>33</sup>, also carried out by LUC, assessed the sensitivity of Green Belt land to housing and commercial development. The aim of the study was to identify the extent to which the character and quality of Black Country Green Belt land is susceptible to change as a result of future development. A summary of the landscape sensitivity assessment is presented in **Figure 2.9**, showing parcels of Green Belt land ranging from 'high' to 'low' sensitivity.
- 2.2.10 It should be noted that although there is a relationship between the Landscape Sensitivity Assessment and the Green Belt Harm Assessment, the Green Belt Study states that "*there are fundamental distinctions in the purposes of the two assessments, reflecting the fact that landscape quality is not a relevant factor in determining the contribution to Green Belt purposes, or harm to those purposes resulting from the release of land*".

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<sup>32</sup> LUC (2019) Black Country Green Belt Study. Available at: [https://blackcountryplan.dudlev.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced\\_redacted.pdf](https://blackcountryplan.dudlev.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced_redacted.pdf) [Date Accessed: 15/06/21]

<sup>33</sup> LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: [https://blackcountryplan.dudlev.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr\\_redacted.pdf](https://blackcountryplan.dudlev.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf) [Date Accessed: 15/06/21]

2.2.11 Within the existing urban areas, development could potentially impact the surrounding townscapes, and surrounding features of note amongst the built form, such as the Barr Beacon, Iron Age hillforts and the network of canals and waterways<sup>34</sup>. Regeneration and development of brownfield sites within the built-up areas may present opportunities to improve the local character, however, the design and layout of potential development is unknown at present. Consideration of the potential impact of development on sensitive townscapes is considered in terms of the historic landscape character within SA Objective 1 (Cultural Heritage).

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<sup>34</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: [https://archaeologydataservice.ac.uk/catalogue/adsdata/arch-939-1/dissemination/pdf/BCHLC\\_FullRpt.pdf](https://archaeologydataservice.ac.uk/catalogue/adsdata/arch-939-1/dissemination/pdf/BCHLC_FullRpt.pdf) [Date Accessed: 07/04/20]



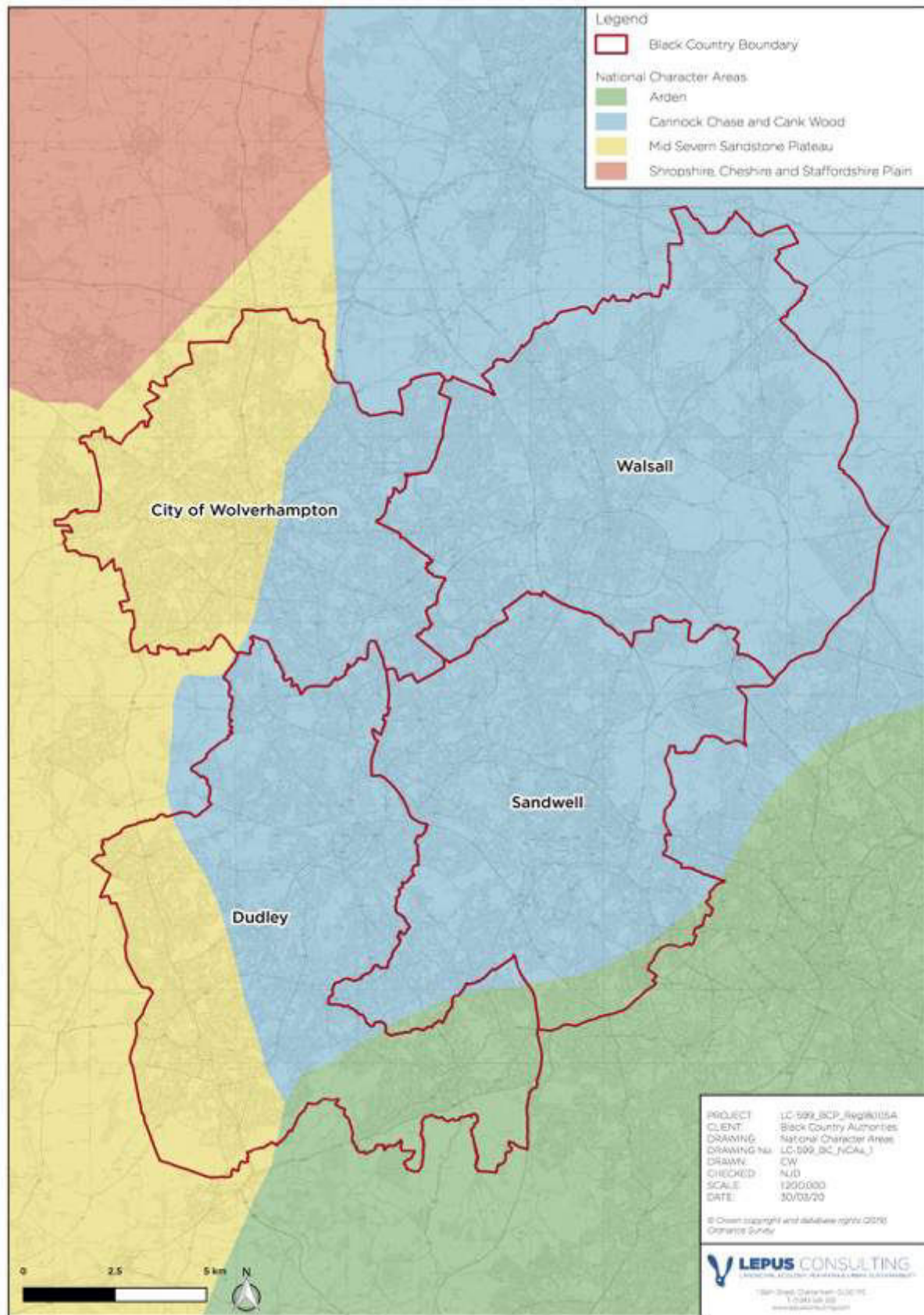
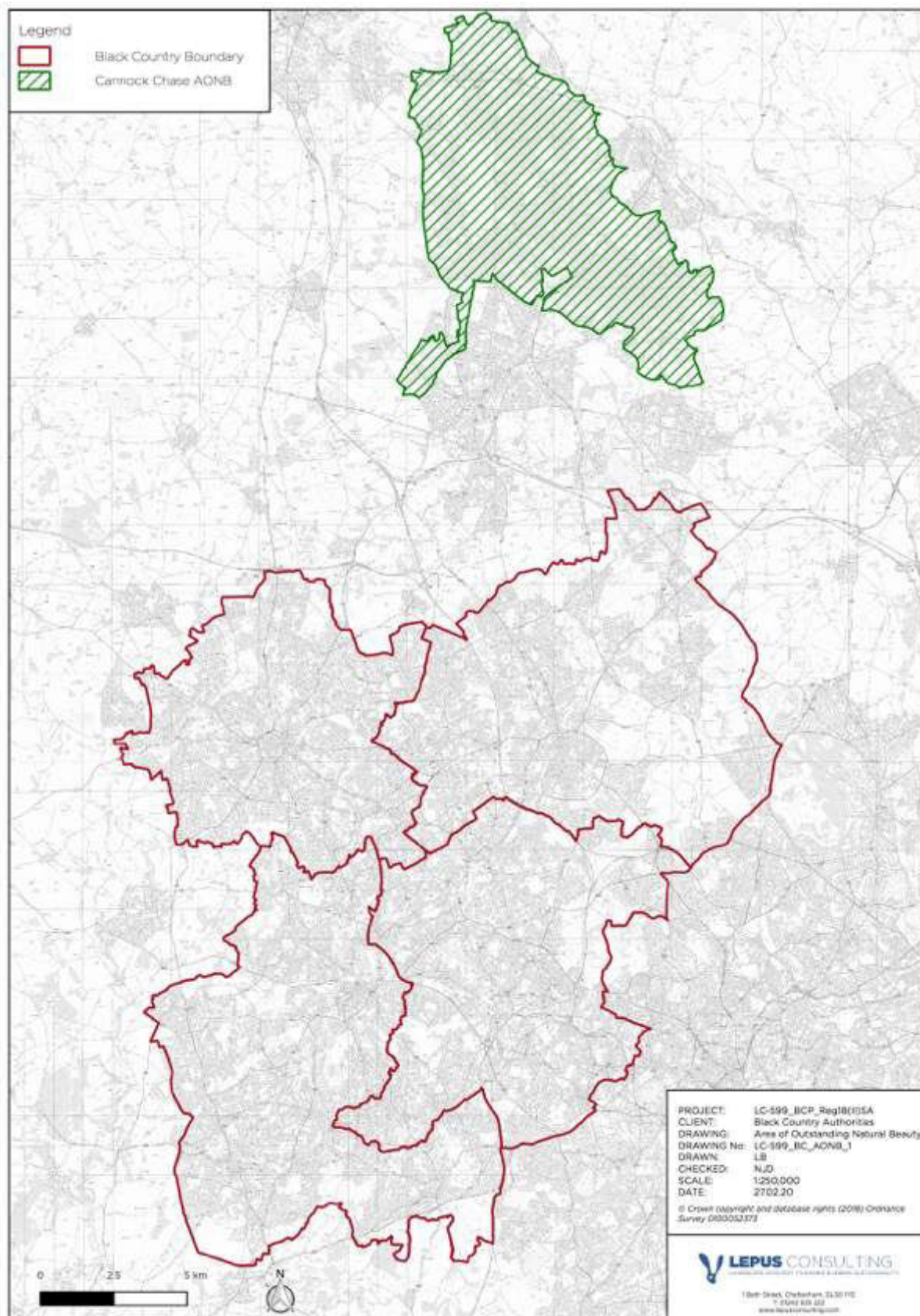


Figure 2.5: National Character Areas (NCAs) within the Black Country



**Figure 2.6:** Location of Cannock Chase Area of Outstanding Natural Beauty (AONB) in relation to the Black Country (source: Natural England)

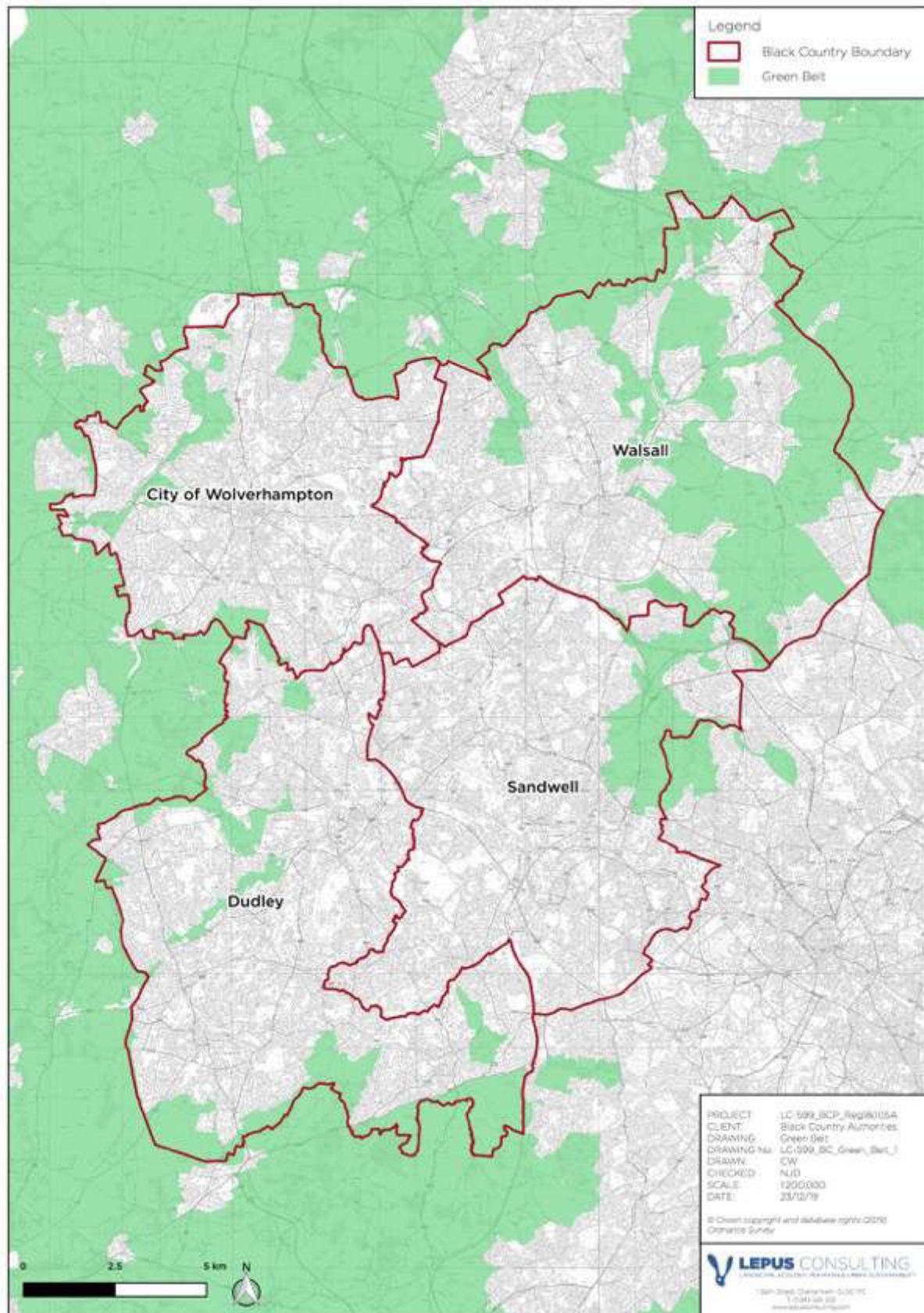


Figure 2.7: Green Belt in and around the Black Country (source: MHCLG)

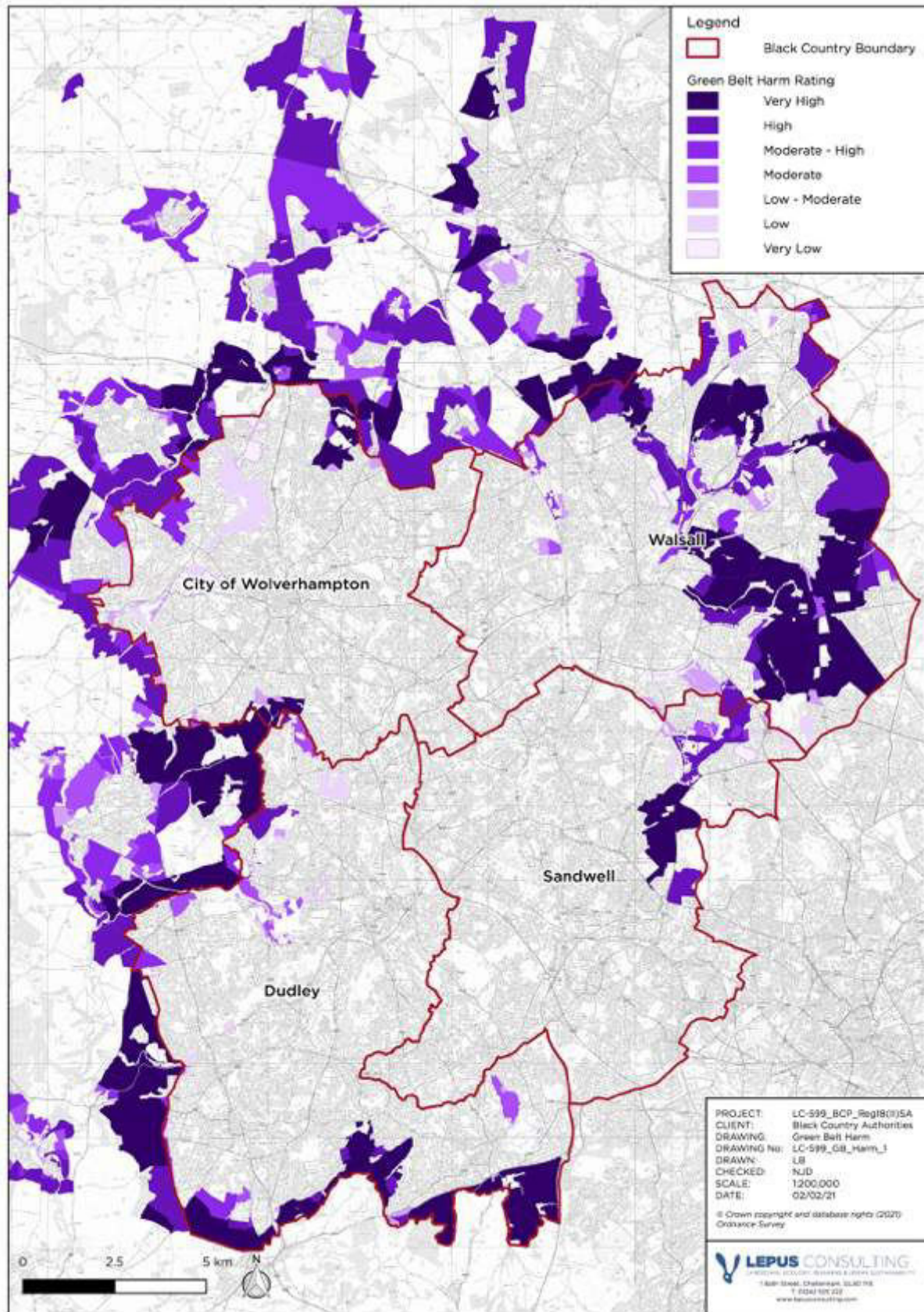


Figure 2.8: Green Belt Harm Rating within and surrounding the Black Country (source: LUC)

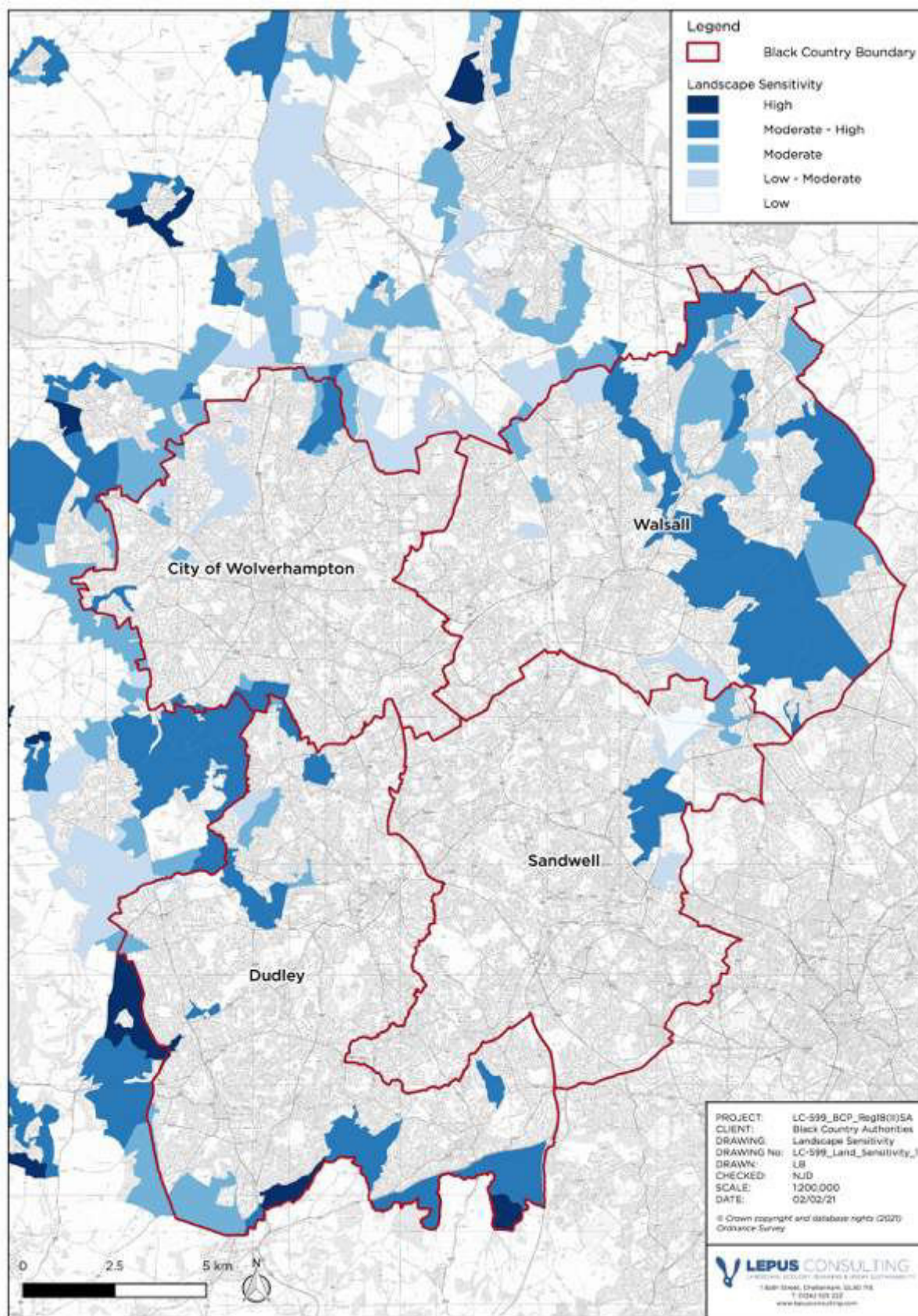


Figure 2.9: Landscape Sensitivity within and surrounding the Black Country (source: LUC)

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

2.3.1 The biodiversity and geodiversity objective considers the potential for adverse impacts resulting from proposed development at a landscape-scale. It focuses on the potential impacts on a network of designated and undesignated sites, wildlife corridors and individual habitats and features within the Plan area.

### Internationally and European designated sites

2.3.2 European sites provide valuable ecological infrastructure for the protection of rare, endangered and/or vulnerable natural habitats and species of exceptional importance within the EU. These sites consist of Special Areas of Conservation (SACs), designated under European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive), and Special Protection Areas (SPAs), classified under European Directive 2009/147/EC on the conservation of wild birds (the Birds Directive). Additionally, paragraph 176 of the NPPF requires that sites listed under the Ramsar Convention (The Convention on Wetlands of International Importance, especially as Waterfowl Habitat) are to be given the same protection as fully designated European sites.

2.3.3 Following the UK's exit from the EU, all European designated sites and species will retain the same levels of protection. A publication from Defra<sup>35</sup> outlines the extent of the changes made to the Conservation of Habitats and Species Regulations 2017 (as amended), which largely relate to transferring functions from the European Commission to the relevant authorities in the UK.

2.3.4 The area within which development proposals could potentially have direct, indirect and in-combination impacts on the integrity of a European site is referred to as the Zone of Influence (ZOI). This is determined through an identification of sensitive receptors at each European site (its qualifying features) and pathways via which the Local Plan may have an impact.

2.3.5 There are two European sites located within the Plan area; 'Fens Pools' SAC and 'Cannock Extension Canal' SAC (see **Figure 2.10**). Threats and pressures which could potentially be exacerbated by the development set out in the BCP at Fens Pools SAC include habitat fragmentation and water pollution<sup>36</sup>. Some of the threats and pressures to Cannock Extension Canal SAC include water pollution and air pollution<sup>37</sup>. No ZOIs have been identified for these sites at the time of writing.

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<sup>35</sup> Defra (2021) Changes to the Habitats Regulations 2017. Available at: <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017> [Date Accessed: 01/02/21]

<sup>36</sup> Natural England (2014) Site Improvement Plan: Fens Pools. Available at: <http://publications.naturalengland.org.uk/file/4872756676001792> [Date Accessed: 15/06/21]

<sup>37</sup> Natural England (2014) Site Improvement Plan: Cannock Extension Canal. Available at: <http://publications.naturalengland.org.uk/file/6749431462363136> [Date Accessed: 15/06/21]

- 2.3.6 'Cannock Chase' SAC lies some 7.5km to the north of the Black Country boundary at Walsall. The identified threats and pressures to the qualifying features of Cannock Chase SAC include air pollution (atmospheric nitrogen deposition), hydrological changes, wildfire/arson and public access and disturbance<sup>38</sup>. A 15km ZOI for Cannock Chase SAC has been identified through analysis of visitor survey data<sup>39</sup> (see **Figure 2.10**). Development proposed within this zone could potentially have an adverse impact on the SAC.
- 2.3.7 A Habitats Regulations Assessment (HRA) is being prepared alongside the development of the Local Plan to provide an in-depth assessment of the potential threats and pressures to a number of European sites and analysis of potential impact pathways. The final report to inform the HRA has not been completed at the time of writing, and as such, mention has only been made within the SA to the European sites within the Plan area, or sites with an identified ZOI within the Plan area. It should be noted that the HRA will identify further impact pathways and consider the potential for adverse impacts at other European sites outside the Plan area and those presented in **Figure 2.10** below.

#### **Nationally designated sites**

- 2.3.8 There are 18 Sites of Special Scientific Interest (SSSIs) located within the Plan area, all of which fall within Dudley or Walsall (see **Figure 2.11**). These include Wren's Nest SSSI, The Leasowes SSSI, Clayhanger SSSI and Jockey Fields SSSI.
- 2.3.9 Natural England has developed Impact Risk Zones (IRZs) for each SSSI unit in the country. IRZs are a Geographical Information System (GIS) tool which allow a rapid initial assessment of the potential risks posed by development proposals to SSSIs. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts<sup>40</sup>. Where a development proposal falls within more than one SSSI IRZ, the worst-case risk zone is reported upon in the assessment.
- 2.3.10 The IRZ attribute data draws a distinction between 'rural' and 'non-rural' development. For the purposes of this assessment, non-rural proposals are considered to be those that are located within an existing built-up area. Proposals at greenfield locations at the edge of a settlement (i.e. those within the Green Belt) have been considered to be rural.
- 2.3.11 There are three National Nature Reserves (NNRs) located in close proximity to the Plan area; Wren's Nest NNR, located to the north of Dudley, Saltwells NNR in the east of Dudley, and Sutton Park NNR, located adjacent to Walsall's eastern boundary (see **Figure 2.12**).

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<sup>38</sup> Natural England (2014) Site Improvement Plan: Cannock Chase. Available at: <http://publications.naturalengland.org.uk/publication/495779988977920> [Date Accessed: 15/06/21]

<sup>39</sup> Underhill-Day, J. & Liley, D. (2012) Cannock Chase Visitor Impacts Mitigation Report. Footprint Ecology. Unpublished Report.

<sup>40</sup> Natural England (2021) Natural England's Impact Risk Zones for Sites of Special Scientific Interest, 02 June 2020. Available at: <https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/sssi-impact-risk-zones> [Date Accessed: 15/06/21]

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### Locally designated sites

- 2.3.12 The Black Country contains an important network of local designations running through the urban area, including Local Nature Reserves (LNR), Sites of Importance for Nature Conservation (SINC) and Sites of Local Importance for Nature Conservation (SLINC) (see **Figures 2.12** and **2.13**). These also form important wildlife corridors, allowing species to move between habitats.
- 2.3.13 Additionally, there are some small areas of ancient woodland located within the Black Country, generally restricted to the Green Belt (see **Figure 2.14**). Ancient woodland is defined as an area that has been “*wooded continuously since at least 1600 AD*”<sup>41</sup>, providing important habitat for rare and threatened species, as well as ecosystem services including soil stability and cultural value.
- 2.3.14 There are a number of priority habitats, protected under the 2006 NERC Act<sup>42</sup>, distributed throughout the Black Country (see **Figure 2.15**). These include deciduous woodland, good quality semi-improved grassland and coastal and floodplain grazing marsh.

### Geological conservation

- 2.3.15 Relative to its size, the Black Country has the most diverse geology in the world<sup>43</sup>, with a number of geological sites of note, including those with exposures of geological features and formations, and areas of geoscientific interest. Geology across the region has been influenced by human settlement, water supply and industry location, in particular major industries such as mining, iron and steel production, foundries, glass manufacture and brickmaking across the mineral-rich area.
- 2.3.16 The UNESCO Global GeoParks are single, unified geological areas where sites and landscapes of international geological significance are managed<sup>44</sup>. The Black Country submitted an application to the Global Geopark Network and UNESCO in 2015<sup>45</sup>, and was awarded Global Geopark status in July 2020. A number of SSSIs and SINCs across the Plan area have been

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<sup>41</sup> Forestry Commission and Natural England (2018) Ancient woodland, ancient trees and veteran trees: protecting them from development. Available at: <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences> [Date Accessed: 15/06/21]

<sup>42</sup> Natural Environment and Rural Communities Act 2006. Available at: <http://www.legislation.gov.uk/ukpga/2006/16/contents> [Date Accessed: 15/06/21]

<sup>43</sup> The Black Country Geological Society (2020) Black Country geology. Available at: <https://bcgs.info/pub/local-geology/black-country-geology/> [Date Accessed: 15/06/21]

<sup>44</sup> Global Geoparks Network (no date) What is a UNESCO Global Geopark? Available at: <http://www.globalgeopark.org/aboutGGN/6398.htm> [Date Accessed: 15/06/21]

<sup>45</sup> Black Country Geopark (2020) Black Country Geopark. Available at: <https://blackcountrygeopark.dudley.gov.uk/bcg/> [Date Accessed: 15/06/21]



designated for their geological importance. In addition, there are numerous 'Geosites' which now form part of the Black Country Global GeoPark<sup>46</sup> and are presented in **Figure 2.16**.

### **Green Infrastructure**

2.3.17 Green Infrastructure (GI) is another important aspect of biodiversity. It is often described as a strategically planned network of multifunctional assets including natural and semi-natural areas, features and green spaces in rural and urban, terrestrial and freshwater environments, which together enhance ecosystem health and resilience, contribute to biodiversity conservation and benefit human populations through the maintenance and enhancement of ecosystem services.

2.3.18 Development proposals could potentially result in benefits to biodiversity, through the incorporation of GI, delivery of environmental net gain and contributions towards strategic Nature Recovery Networks. A Nature Recovery Network is a connected system of habitats that are important for flora and fauna<sup>47</sup>. The redevelopment of brownfield sites could also help to improve the biological and geological value of an area.

### **Potential impact of development**

2.3.19 Adverse impacts on ecological and geological receptors are expected to include those that occur during the construction phase (associated with the construction process and construction vehicles, for example, habitat loss, habitat fragmentation, habitat degradation, as well as noise, air, water and light pollution) and those associated with the operation/occupation phases of development (e.g. public access associated disturbances, increases in local congestion resulting in a reduction in air quality, changes in noise levels, visual disturbance, light pollution, and impacts on water levels and quality). These negative impacts are anticipated to be long-term.

2.3.20 It is assumed that development proposals located on previously undeveloped land would result in a net reduction in vegetation cover and natural capital in the Plan area, leading to greater levels of fragmentation and isolation for the wider ecological network, due to the loss of stepping-stones and corridors that contribute to the sub-region's natural capital. The loss of greenfield land is considered under SA Objective 6.

2.3.21 It should be noted that no detailed ecological surveys have been completed by Lepus to inform the assessments made in this report. Although protected species survey information is available from the local biological records centre, consideration of this data on a site-by-site basis within this assessment would have the potential to skew results – favouring well recorded areas of the Plan area. As such, impacts on protected species have not been

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<sup>46</sup> Black Country Geopark (2021) Black Country Geopark. Available at: <https://blackcountrygeopark.dudley.gov.uk/bcg/> [Date Accessed: 19/01/21]

<sup>47</sup> The Wildlife Trusts Birmingham and Black Country (no date) Nature Recovery Network. Available at: <https://www.bbcwildlife.org.uk/NatureRecoveryNetwork> [Date Accessed: 15/06/21]

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assessed within this report. It is anticipated that the BCA will require detailed ecological surveys and assessments to accompany future planning applications to determine the presence of priority species and priority habitats protected under the NERC Act and other protected species.

- 2.3.22 It is assumed that the loss of biodiversity assets, such as ancient woodland or an area of priority habitat, are permanent and irreversible effects. It is assumed that components of natural capital which include for example ancient woodlands, mature trees and hedgerows will be retained where possible.

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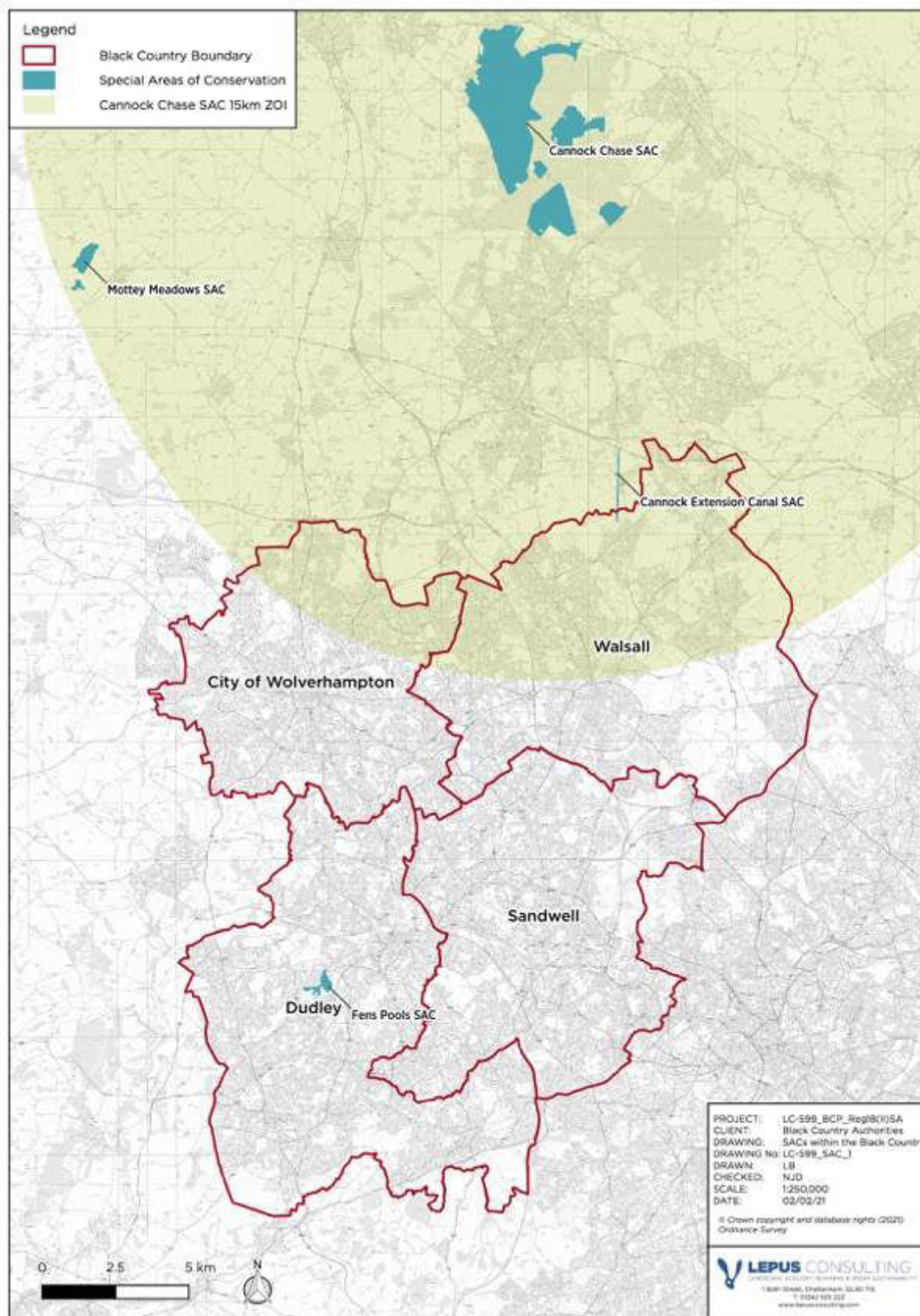


Figure 2.10: Location of European sites and identified Zone of Influence within the Black Country (source: Natural England)



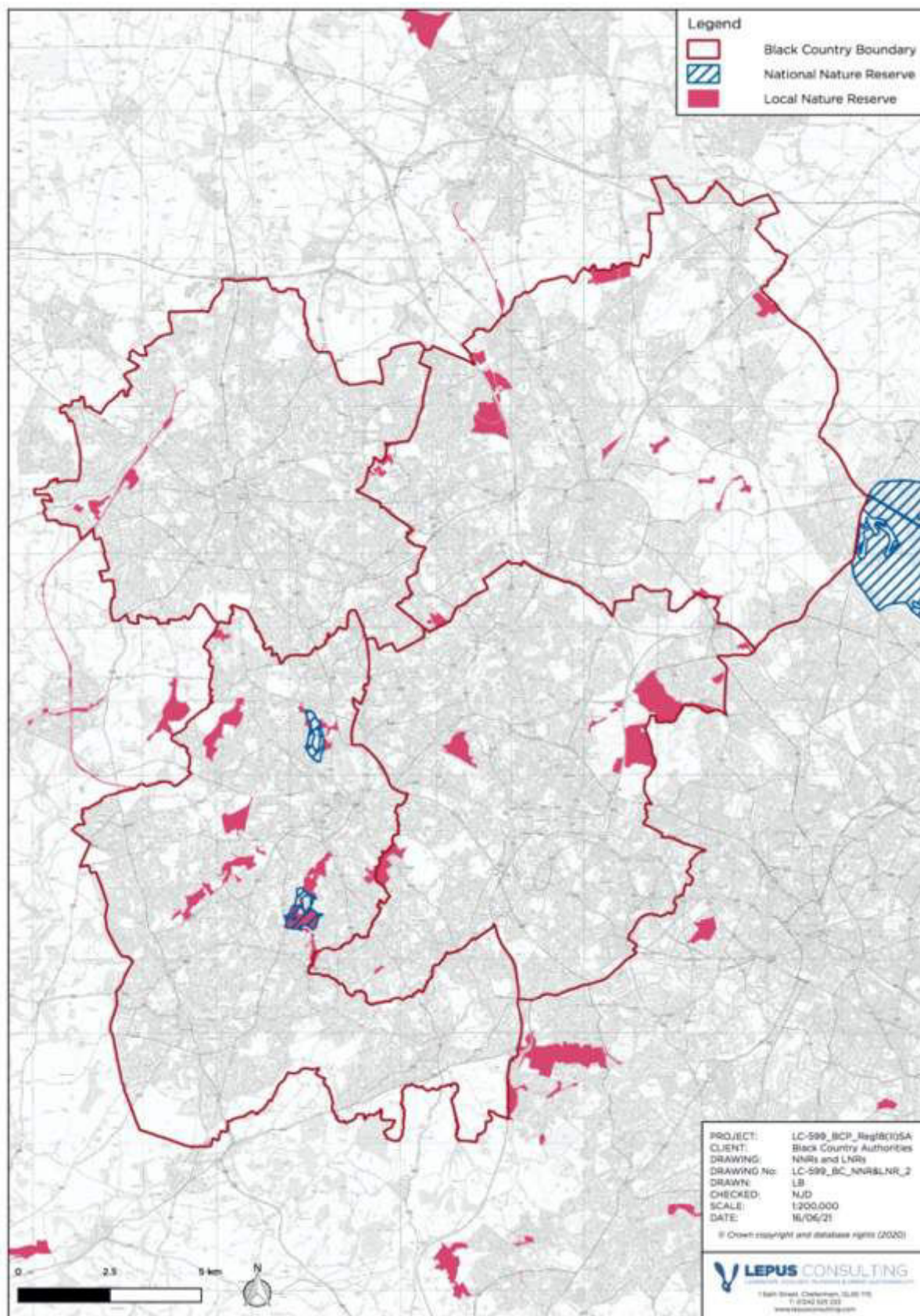


Figure 2.12: National Nature Reserves and Local Nature Reserves in and around the Black Country (source: Natural England)

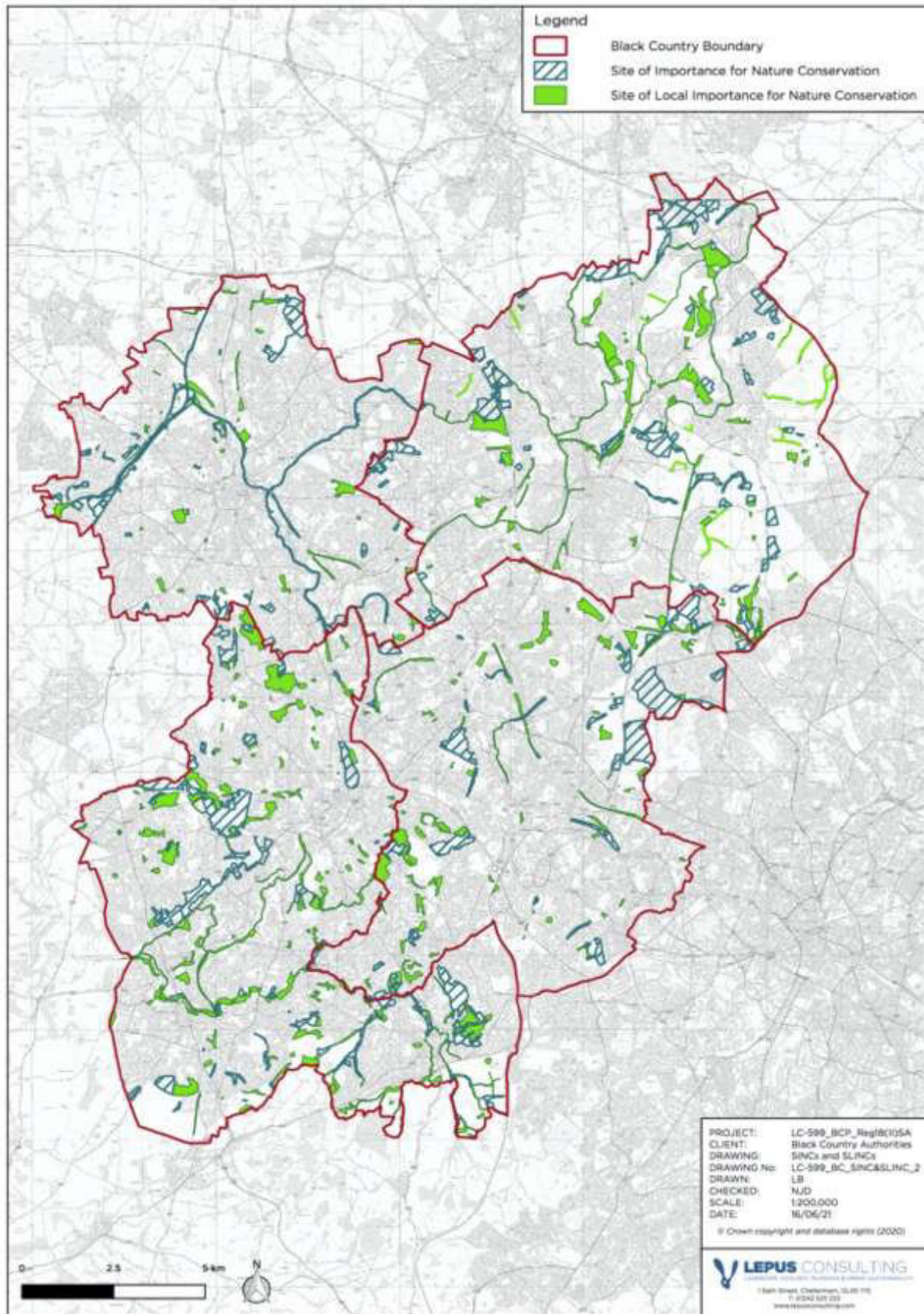


Figure 2.13: Sites of Importance for Nature Conservation and Sites of Local Importance for Nature Conservation within the Black Country (source: BCA)

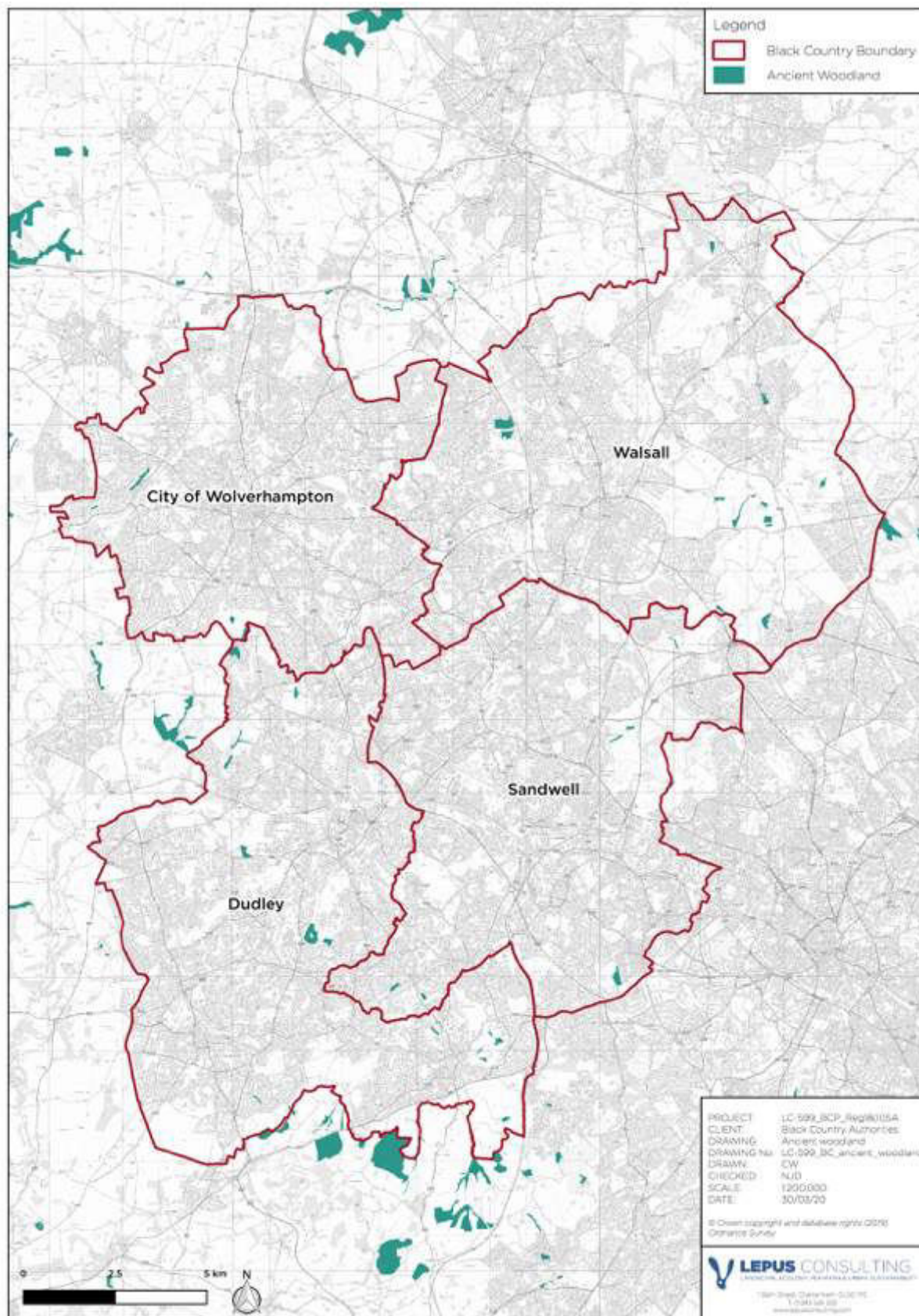


Figure 2.14: Ancient woodland in and around the Black Country (source: Natural England)

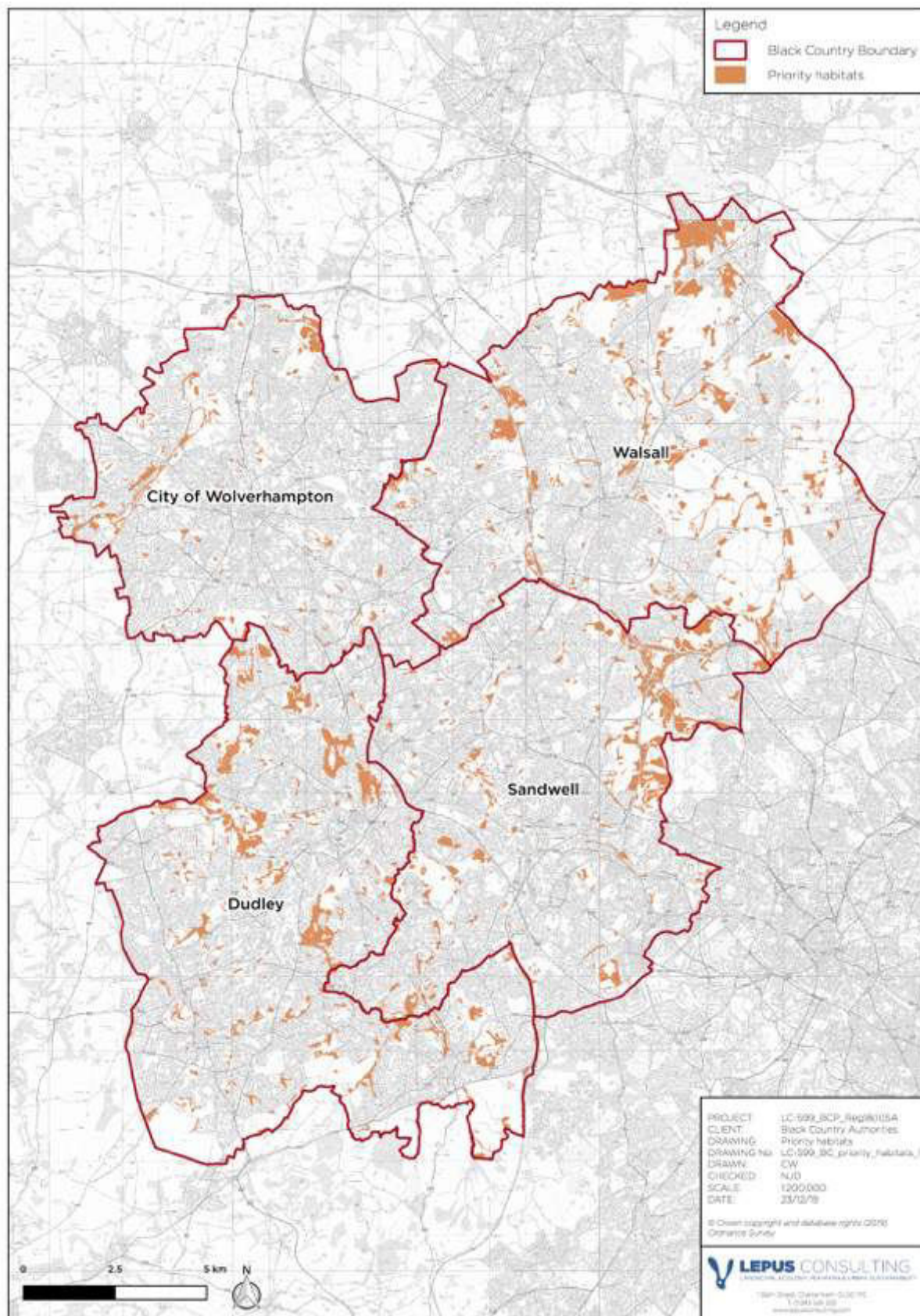


Figure 2.15: Priority habitats within the Black Country (source: Natural England)



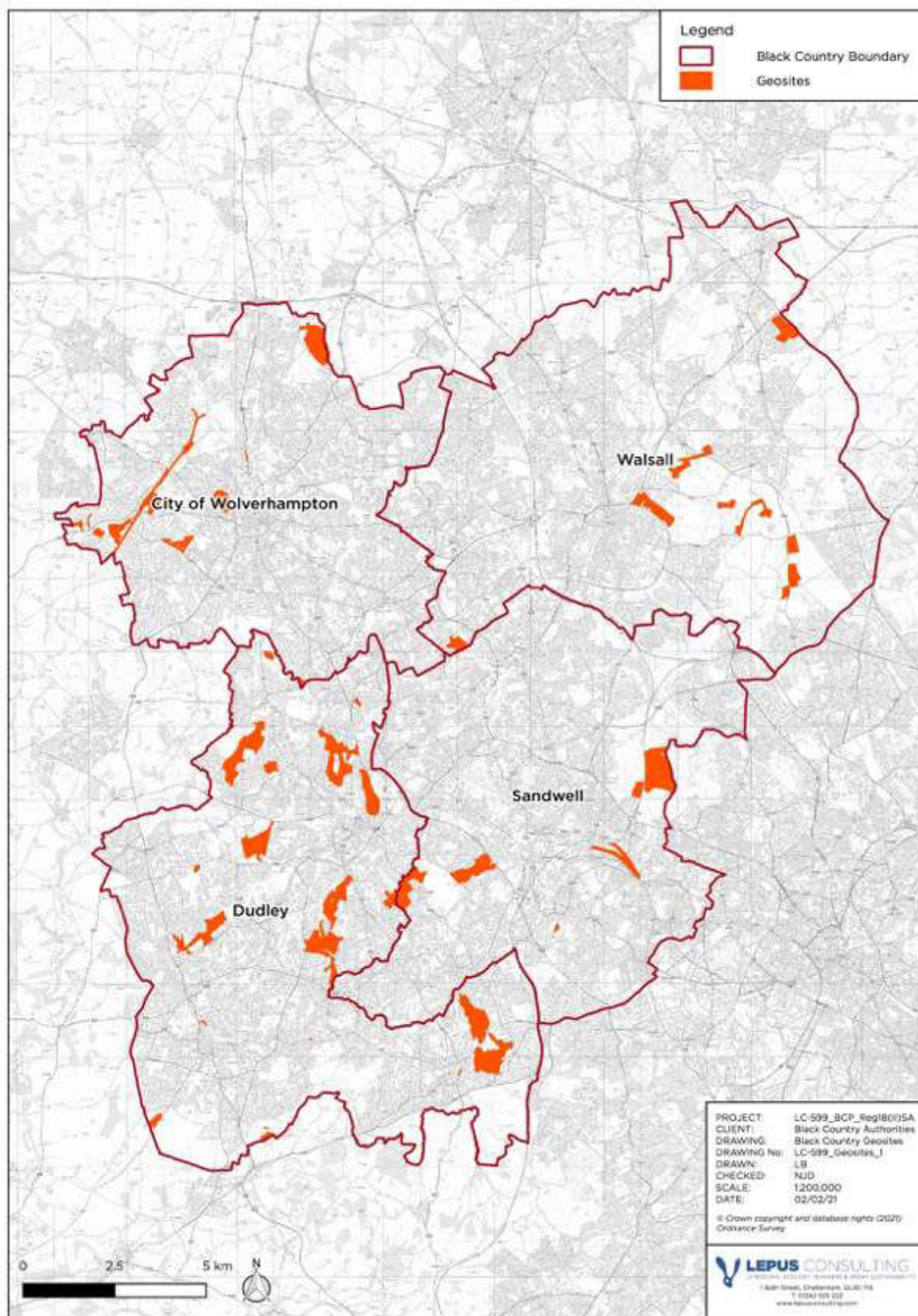


Figure 2.16: Location of 'Geosites' within the Black Country (source: BCA)

## 2.4 SA Objective 4: Climate change mitigation

2.4.1 Anthropogenic climate change is predominantly the result of greenhouse gas (GHG) emissions. GHGs are emitted from a wide variety of sources, including transport, construction, agriculture and waste. Typically, development leads to a net increase in GHG emissions in the local area, although efforts can be made to help limit these increases.

2.4.2 The Climate Change Act 2008<sup>48</sup> is the basis for the UK’s approach to tackling and responding to climate change. It requires that emissions of carbon dioxide and other greenhouse gases are reduced and that climate change risks are prepared for. The Act also establishes the framework to deliver on these requirements.

2.4.3 The UK is a member of the United Nations Framework Convention on Climate Change (UNFCCC). The UNFCCC is the key forum which oversees international action to tackle climate change. The UNFCCC led the development and adoption of The Paris Agreement in 2015<sup>49</sup>. A total of 160 countries have pledged to cut their emissions as part of this process. The Committee on Climate Change (CCC) report ‘Net Zero – The UK’s contribution to stopping global warming’<sup>50</sup> recommended new emission targets: reducing GHG emissions by at least 100% of 1990 levels (net zero) by 2050. The estimated carbon dioxide (CO<sub>2</sub>) emissions in the four authorities in 2017 are presented in **Table 2.1** below.

*Table 2.1: Estimated CO<sub>2</sub> emissions per authority in 2017<sup>51</sup>*

	Total CO <sub>2</sub> emissions estimates (tonnes)	Per Capita CO <sub>2</sub> emissions estimates (tonnes)
Dudley	1,188,200	3.7
Sandwell	1,485,900	4.6
Walsall	1,118,700	4.0
Wolverhampton	972,700	3.7
<b>Black Country Authorities</b>	<b>4,765,500</b>	<b>4.0</b>

2.4.4 A major source of GHGs is from vehicle emissions. The vast majority of residents would be likely to have at least one vehicle per household. It is likely that residential development proposed within the Plan area would result in an associated increase in the number of vehicles on the road in the Plan area, and as such a consequent increase in GHG emissions would be expected, contributing to the Greenhouse Effect and exacerbating anthropogenic

<sup>48</sup> Climate Change Act 2008. Available at: <http://www.legislation.gov.uk/ukpga/2008/27/contents> [Date Accessed: 18/02/20]

<sup>49</sup> United Nations Climate Change (2015) The Paris Agreement. Available at: <https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement> [Date Accessed: 18/02/20]

<sup>50</sup> Committee on Climate Change (2019) Net Zero – The UK’s contribution to stopping global warming. Available at: <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/> [Date Accessed: 18/02/20]

<sup>51</sup> DBEI (2019) 2005 to 2017 UK local and regional CO<sub>2</sub> emissions – data tables. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/812142/2005-17\\_UK\\_local\\_and\\_regional\\_CO2\\_emissions\\_tables.xlsx](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812142/2005-17_UK_local_and_regional_CO2_emissions_tables.xlsx) [Date Accessed: 21/01/20]

climate change. Encouraging active travel or the use of public transport are effective ways to help reduce vehicle numbers and as a result, reduce GHG emissions.

2.4.5 One strategy to combat GHG emissions is to reduce the quantity of energy produced via fossil fuel led energy production<sup>52</sup>. In the last two decades, there has been a significant increase in the volume of energy generated through renewable energy sources. In 2017, 29.3% of the electricity generated in the UK was from renewable sources, compared to 24.5% in 2016<sup>53</sup>.

2.4.6 The promotion of on-site renewable or low carbon technologies incorporated with new development in the BCP would help to decrease reliance on energy that is generated from unsustainable sources, such as fossil fuels. A reduction in the use of fossil fuels would help to reduce the volume of GHGs that are emitted into the atmosphere. This in turn would reduce the Black Country’s contribution towards the causes of climate change.

2.4.7 Renewable energy generated in each of the authorities in 2018 is presented in **Table 2.2**.

*Table 2.2: Renewable energy generation (MWh) in 2018 across the Black Country<sup>54</sup>*

	Dudley	Sandwell	Walsall	Wolverhampton
Renewable Energy Generation (MWh)	25,995	18,271	17,782	21,178

2.4.8 Climate change has the potential to result in a range of environmental risks within the Black Country and nationally, such as those associated with increased heatwaves in the summer months and more frequent storm events in the winter. This can have knock-on implications across a range of receptors, such as for sewer capacity due to heavy rainfall, and biodiversity in terms of the habitat distribution of species sensitive to local conditions.

2.4.9 Vegetation acts as a carbon sink, providing an important ecosystem service. Some site allocations proposed in the SWDPR would be likely to result in a net loss in vegetation cover (i.e. those comprising previously undeveloped land), and as such, may compromise the carbon storage capacity of the natural environment.

2.4.10 Much of the Black Country is heavily urbanised, with a lack of mature trees within the district centres. Lack of green infrastructure results in a reduced capability of the environment to provide ecosystem services including the storage and filtration of water, providing natural flood protection, as well as reduced availability of habitats and connectivity within the green

<sup>52</sup> RTPI (2018) Renewable Energy: Planning’s role in delivering renewable energy in the new low carbon economy. Available at: <https://www.rtpi.org.uk/research/2018/june/renewable-energy/> [Date Accessed: 08/04/20]

<sup>53</sup> Department for Business, Energy and Industrial Strategy (2018) UK Energy in Brief. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/728374/UK\\_Energy\\_in\\_Brief\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728374/UK_Energy_in_Brief_2018.pdf) [Date Accessed: 08/04/20]

<sup>54</sup> Department for Business, Energy and Industrial Strategy (2018) Regional Renewable Statistics: Renewable electricity by local authority. Available at: <https://www.gov.uk/government/statistics/regional-renewable-statistics> [Date Accessed: 08/04/20]

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network enabling movement of species. Loss of green infrastructure and previously undeveloped land is considered within the assessment for SA Objective 6 (Natural Resources). Flooding is considered within SA Objective 5 (Climate Change Adaptation).

- 2.4.11 The layout and design of future development can have benefits to achieving sustainable development and reducing contributions to climate change. Although specific detail of development is outside the scope of a Local Plan, the BCP could potentially help encourage the development of more energy efficient homes to help reduce the overall carbon emissions of the Black Country. Energy efficient homes are those that are designed to reduce the demand on energy and improve energy efficiency in the home. Energy efficient homes can include Eco Houses; Zero Carbon Homes and Passivhaus<sup>55</sup>.

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<sup>55</sup> Urbanist Architecture. How to design Eco, Passivhaus and Zero Carbon Homes. Available at: <https://urbanistarchitecture.co.uk/how-to-design-eco-houses-passivhaus-and-zero-carbon-houses/> [Date Accessed: 29/01/20]

## 2.5 SA Objective 5: Climate change adaptation

- 2.5.1 Watercourses that pass through the Black Country include the River Tame, River Stour and Ford Brook, as well as 15 canals. Fluvial flood risk across the four authorities is primarily associated with the River Tame and Stour and their tributaries, in particular along the River Tame in Sandwell and Walsall (see **Figure 2.17**). Surface water flood risk is prevalent across much of the Plan area, typically following roads and the canal network located within the Black Country, including the Birmingham Canal, Walsall Canal and Dudley Canal (see **Figure 2.18**).
- 2.5.2 Climate change has the potential to increase the risk of fluvial and surface water flooding, due to increased frequency of extremes in weather including torrential rainfall events in the winter, and soil shrinkages and subsidence associated with summer droughts reducing the natural water storage capacity. Flooding events are likely to increase in both frequency and severity as a result of climate change, leading to the potential for increased damage to development.
- 2.5.3 A Level 1 Strategic Flood Risk Assessment (SFRA) has been carried out for the Black Country<sup>56</sup> to inform the BCA of flood risk across the Plan area from all sources, in the present and in the future. The assessment has identified potential increases in flood risk due to climate change and produced modelled outputs. **Figure 2.19** presents the 'Indicative Flood Zones' identified in this study. Indicative Flood Zones 2 and 3a contain the results of the 'Jflow' modelling of ordinary watercourses in Walsall. Indicative Flood Zone 3b has been compiled using available hydraulic modelling scenarios, and for areas outside of detailed model coverage, Flood Zone 3a is used as a conservative indication.
- 2.5.4 Many of the watercourses in the urban areas of the Black Country have been heavily modified, including approximately 63km of culverted watercourses<sup>57</sup>. These modifications have the potential to cause or exacerbate flood risk, for example due to blockages forming in culverts or becoming overwhelmed in high rainfall events. Future development within the Black Country could increase the risk of flooding posed to neighbouring areas if not carefully managed.
- 2.5.5 The Black Country's GI network has an important role to play in reducing flood risk. It includes LNRs, SLINCs, SINCs, allotments, playing fields, parks, woodlands, agricultural land and margins, hedgerows, ridgelines, disused railways and canals. These green assets should be protected, maintained and enhanced, in order to safeguard the ecosystem services they provide, including the natural storage of flood water and slowing of surface water run-off rates.

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<sup>56</sup> JBA Consulting (2020) The Black Country Authorities Level 1 Strategic Flood Risk Assessment Final Report 25<sup>th</sup> June 2020. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date Accessed: 03/02/21]

<sup>57</sup> Ibid

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- 2.5.6 Opportunities should be sought alongside development to improve the management of flooding across the Black Country. Increased naturalisation of watercourses and restoration of the flood plain, including the opening up of culverts where possible, would help to reduce the risk of flooding, as well as provide benefits to biodiversity, amenity and water quality.
- 2.5.7 It is assumed that development proposals will be permanent, and it is therefore likely that the development would be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of flooding.

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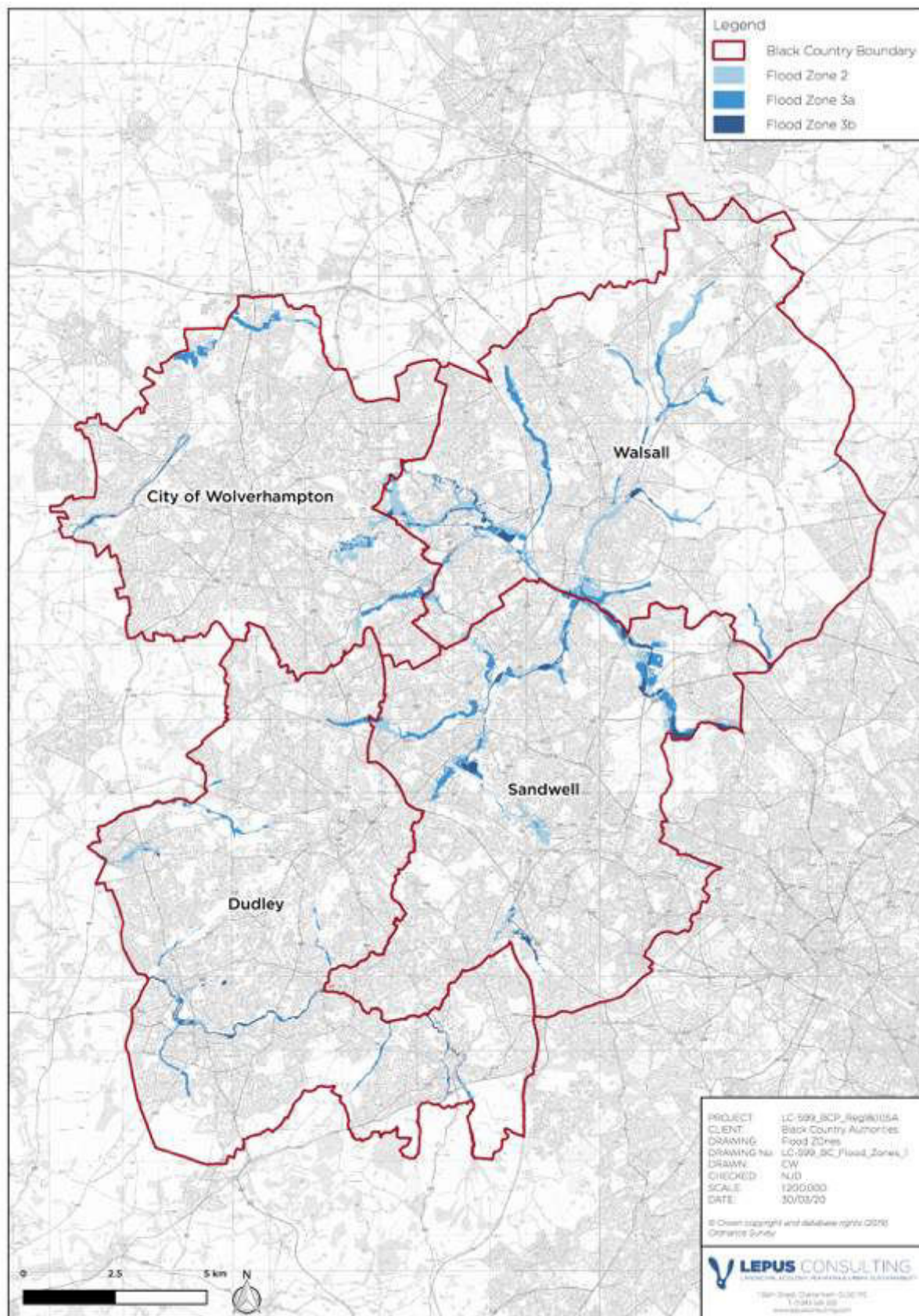


Figure 2.17: Fluvial flood zones in and around the Black Country (source: JBA Consulting and Environment Agency)

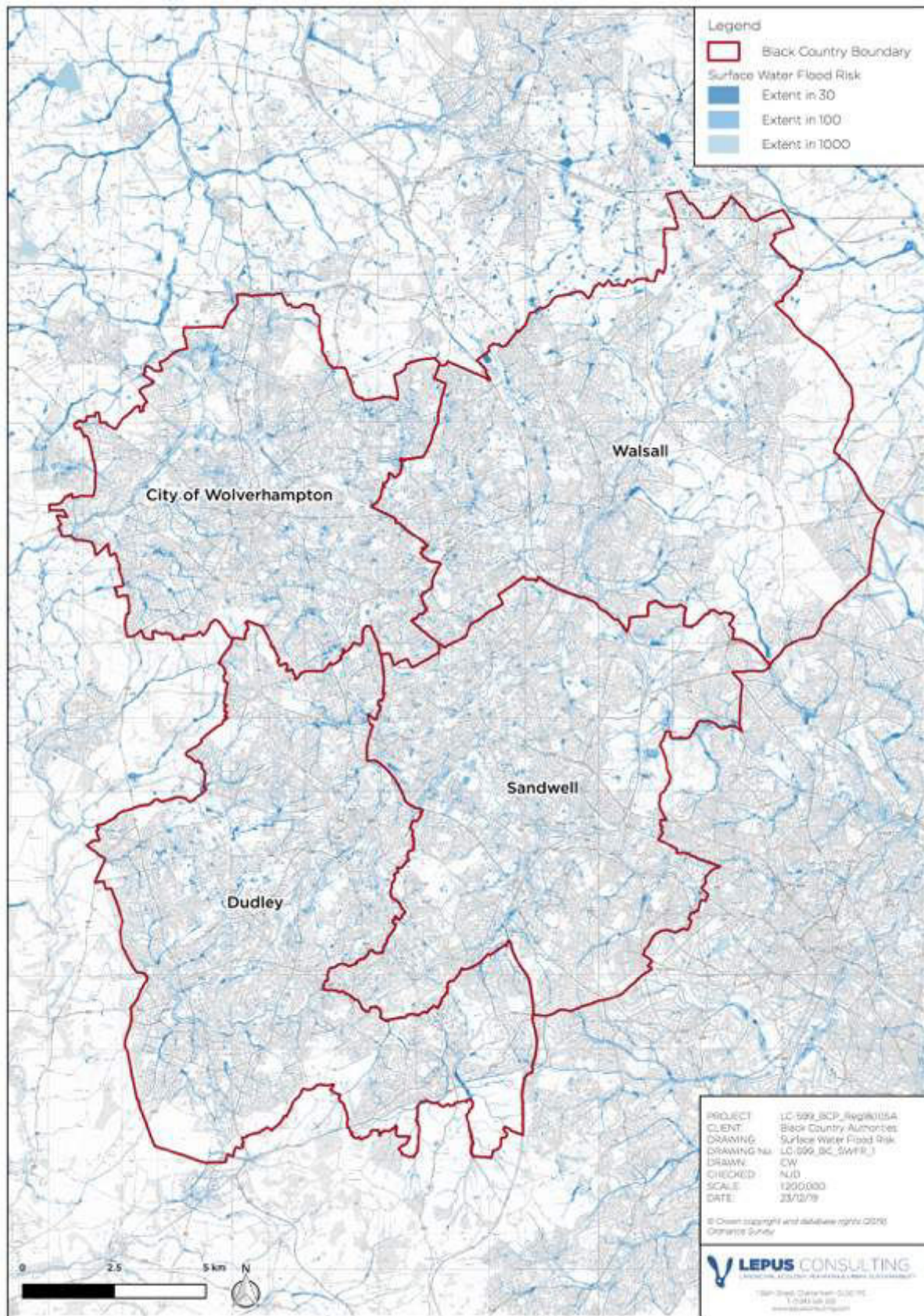


Figure 2.18: Surface water flood risk in and around the Black Country (source: JBA Consulting and Environment Agency)



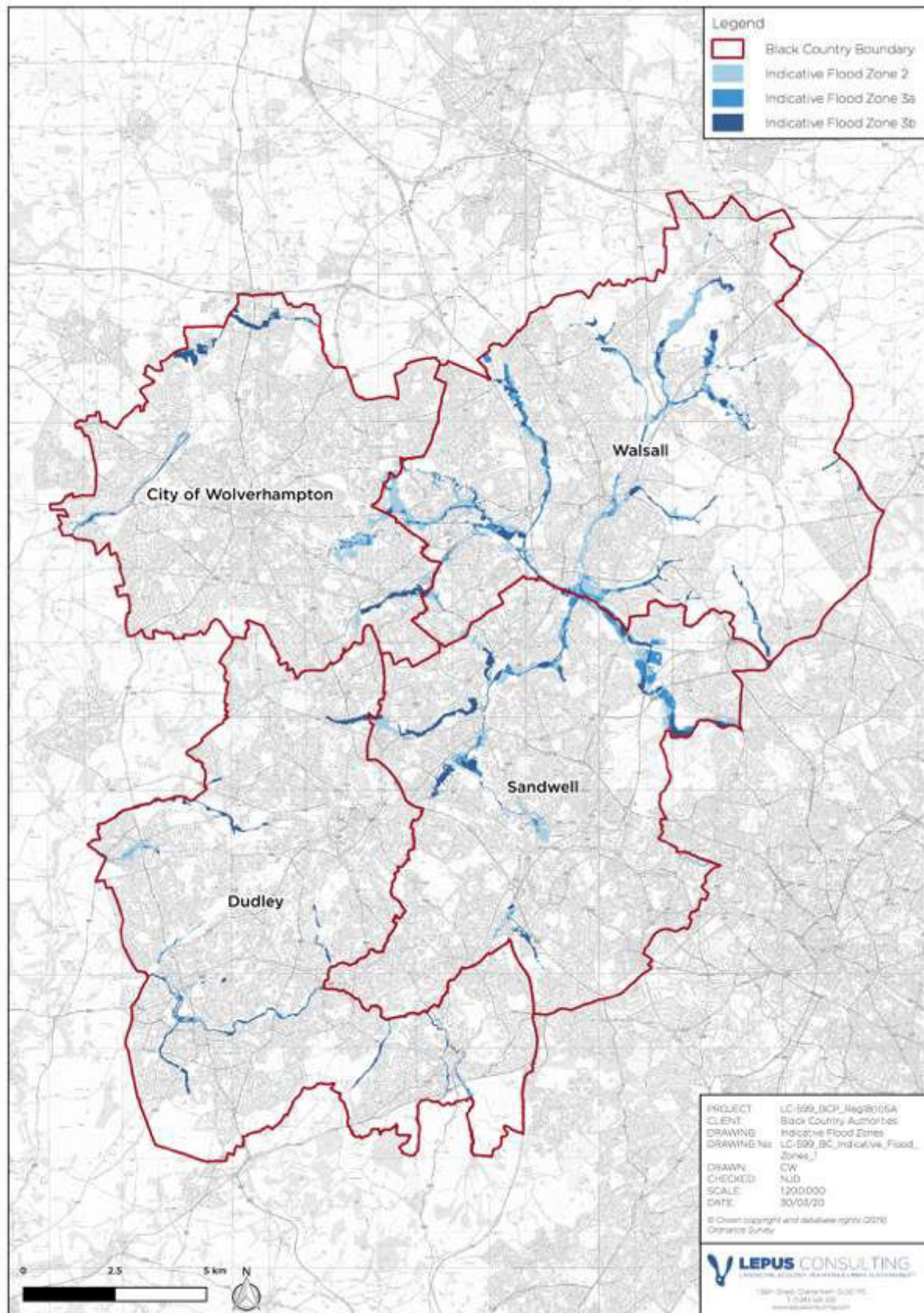


Figure 2.19: Indicative fluvial flood zones in and around the Black Country (source: JBA Consulting and Environment Agency)

## 2.6 SA Objective 6: Natural resources

2.6.1 Soil is an essential and non-renewable resource that provides a wide range of ecosystem services. It filters air, stores and cycles water and nutrients, decomposes and cycles organic matter, supports plant growth and provides medicines<sup>58</sup>. Soil is also one of the most important natural carbon sinks globally and its protection is vital in efforts to mitigate anthropogenic climate change. It can reduce flood risk, alleviate flood damage and improve local water and air quality to the benefit of ecosystem and human health.

### Previously developed/brownfield land

2.6.2 In accordance with the core planning principles of the NPPF<sup>59</sup>, development on previously developed land (PDL) will be recognised as an efficient use of land. Development on previously undeveloped land is not considered to be an efficient use of land.

2.6.3 Development proposals situated on previously undeveloped land are expected to pose a threat to the soil resource within the proposal perimeter due to excavation, soil compaction, erosion and an increased risk of soil pollution and contamination during the construction phase. This is expected to be a permanent and irreversible impact.

2.6.4 It should be noted that PDL could also be of environmental value, and as such, potential impacts on natural resources shall be considered on a site-by-site basis.

### Agricultural Land Classification

2.6.5 The Agricultural Land Classification (ALC) system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grades 1, 2 and Subgrade 3a, are referred to as the 'best and most versatile' (BMV) land<sup>60</sup>. Where site-specific ALC studies have not been completed, it is not possible to identify Subgrade 3a and 3b land. Therefore, a precautionary approach is taken, and potential BMV land is assessed as Grades 1, 2 and 3.

2.6.6 The Provisional ALC data<sup>61</sup> has been used for the appraisal of the BCP, as this dataset provides strategic information on the extent of BMV land across the Plan area. The post-1988 ALC dataset<sup>62</sup> only covers small areas of the Black Country, and therefore, does not

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<sup>58</sup> Food and Agriculture Organization of the United Nations (2020) Soil ecosystem services. Available at: <http://www.fao.org/agriculture/crops/thematic-sitemap/theme/spi/soil-biodiversity/soil-ecosystems-services/en/> [Date Accessed: 16/06/21]

<sup>59</sup> Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 16/06/21]

<sup>60</sup> Natural England (2019) Agricultural Land Classification (ALC) (England). Available at: [https://naturalengland-defra.opendata.arcgis.com/datasets/5d2477d8d04b41d4bbc9a8742f858f4d\\_0?geometry=-3.131%2C52.513%2C-0.667%2C53.094](https://naturalengland-defra.opendata.arcgis.com/datasets/5d2477d8d04b41d4bbc9a8742f858f4d_0?geometry=-3.131%2C52.513%2C-0.667%2C53.094) [Date Accessed: 16/06/21]

<sup>61</sup> Ibid

<sup>62</sup> Natural England (2019) Agricultural Land Classification (ALC) Grades – Post 1988 (England). Available at: [https://naturalengland-defra.opendata.arcgis.com/datasets/26d1ef630b9f46ea8fc4e96711d81376\\_0](https://naturalengland-defra.opendata.arcgis.com/datasets/26d1ef630b9f46ea8fc4e96711d81376_0) [Date Accessed: 16/06/21]

provide consistent and reliable information for an assessment of agriculturally important soil resources to be made.

- 2.6.7 The majority of the Black Country is located on land classified as ‘urban’ in accordance with the ALC. As such, it can be assumed that development located within the urban area would not result in the loss of BMV land. However, there are some areas of high-quality agricultural land (Grade 2 and 3) within the Plan area, including a significant proportion of Walsall’s Green Belt, which may be under threat from new growth areas and associated infrastructure (see **Figure 2.20**).

### Minerals

- 2.6.8 The presence of mineral resources, in particular coal, was a key reason for the original prosperity and development of the Black Country. The legacy of mineral extraction on ground stability and contamination remains a key issue affecting future development, and some minerals are still of economic importance with active quarries and brickworks, especially in Walsall.
- 2.6.9 The Black Country has identified potentially important mineral resources, which should be safeguarded against loss or sterilisation by non-mineral development<sup>63</sup>. The mineral resources of local and national importance in accordance with the definition set out in the NPPF include sand, gravel, brick clay and fireclay. The Review of the Evidence Base for Minerals<sup>64</sup> recommended the BCA to adopt more tightly defined MSAs focused on these resources.
- 2.6.10 Mineral Safeguarding Areas (MSAs) have been proposed across a large proportion of Walsall borough, in the east (see **Figure 2.21**). These include sand and gravel, brick clay and fireclay resources. Furthermore, a number of ‘Areas of Search’ (AOS) have been identified within the west of Dudley, and the north east of Walsall.
- 2.6.11 There is a need for a balanced approach between safeguarding mineral resources and supporting housing and economic growth. The protection and extraction of mineral resources is important to help support the levels of development proposed over the Plan period and to meet demand for aggregates.
- 2.6.12 The extraction of minerals can also lead to long-term positive impacts following restoration. Restored mineral sites can provide valuable GI including open space and wildlife habitats, once mineral works are complete.

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<sup>63</sup> wood (2020) Review of the Evidence Base for Minerals to support preparation of the Black Country Plan. Available at: <https://blackcountryplan.dudlev.gov.uk/t2/p4/t2p4f/> [Date Accessed: 02/02/21]

<sup>64</sup> “Minerals resources of local and national importance: Minerals which are necessary to meet society’s needs, including aggregates, brickclay (especially Etruria Marl and fireclay), silica sand (including high grade silica sands), cement raw materials, gypsum, salt, fluorspar, shallow and deep-mined coal, oil and gas (including conventional and unconventional hydrocarbons), tungsten, kaolin, ball clay, potash, polyhalite and local minerals of importance to heritage assets and local distinctiveness”.

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### **Contaminated land**

- 2.6.13 Many urban brownfield sites in the Black Country, and some greenfield sites, are affected by the legacy of mining in the area. The exploitation of minerals has led to some localised issues with ground contamination and instability<sup>65</sup>. It is anticipated that development proposals within the BCP will require site-specific assessments of ground contamination and effective remediation of soils affected prior to development. Contaminated land and soil pollution are considered within SA Objective 7 – Pollution.

### **Water resource**

- 2.6.14 The national mandatory water efficiency standard is 125 litres per person per day, as set out in the Building Regulations 2010<sup>66</sup>. The BCA are aiming to introduce a higher standard of 110 litres per person per day in line with the Building Regulations Part G<sup>67</sup> optional requirement.
- 2.6.15 It is assumed that all residential-led development proposals in the BCP will be subject to appropriate approvals and licensing for sustainable water supply from the Environment Agency.

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<sup>65</sup> Mott Macdonald (2009) Black Country JCS Stage 2: Infrastructure and Deliverability Study. Available at: <https://blackcountryplan.dudley.gov.uk/t1/p1/t1p1f/> [Date Accessed: 03/02/21]

<sup>66</sup> The Building Regulations 2010. Available at: <http://www.legislation.gov.uk/ukxi/2010/2214/contents/made> [Date Accessed: 22/01/20]

<sup>67</sup> MHCLG (2016) Sanitation, hot water safety and water efficiency: Approved Document G. Available at: <https://www.gov.uk/government/publications/sanitation-hot-water-safety-and-water-efficiency-approved-document-g> [Date Accessed: 01/02/21]

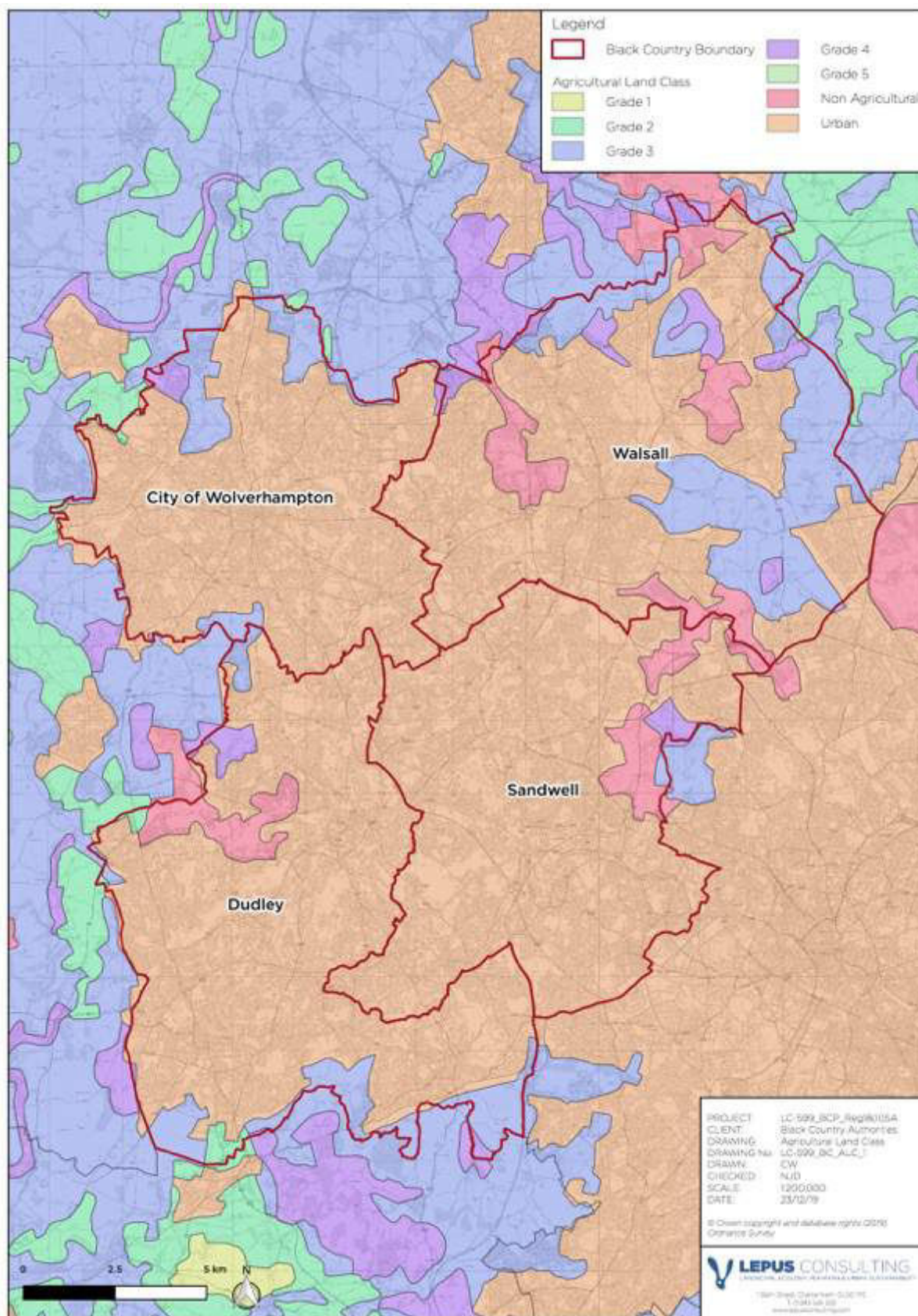


Figure 2.20: Agricultural Land Classification (ALC) in and around the Black Country (source: Natural England)

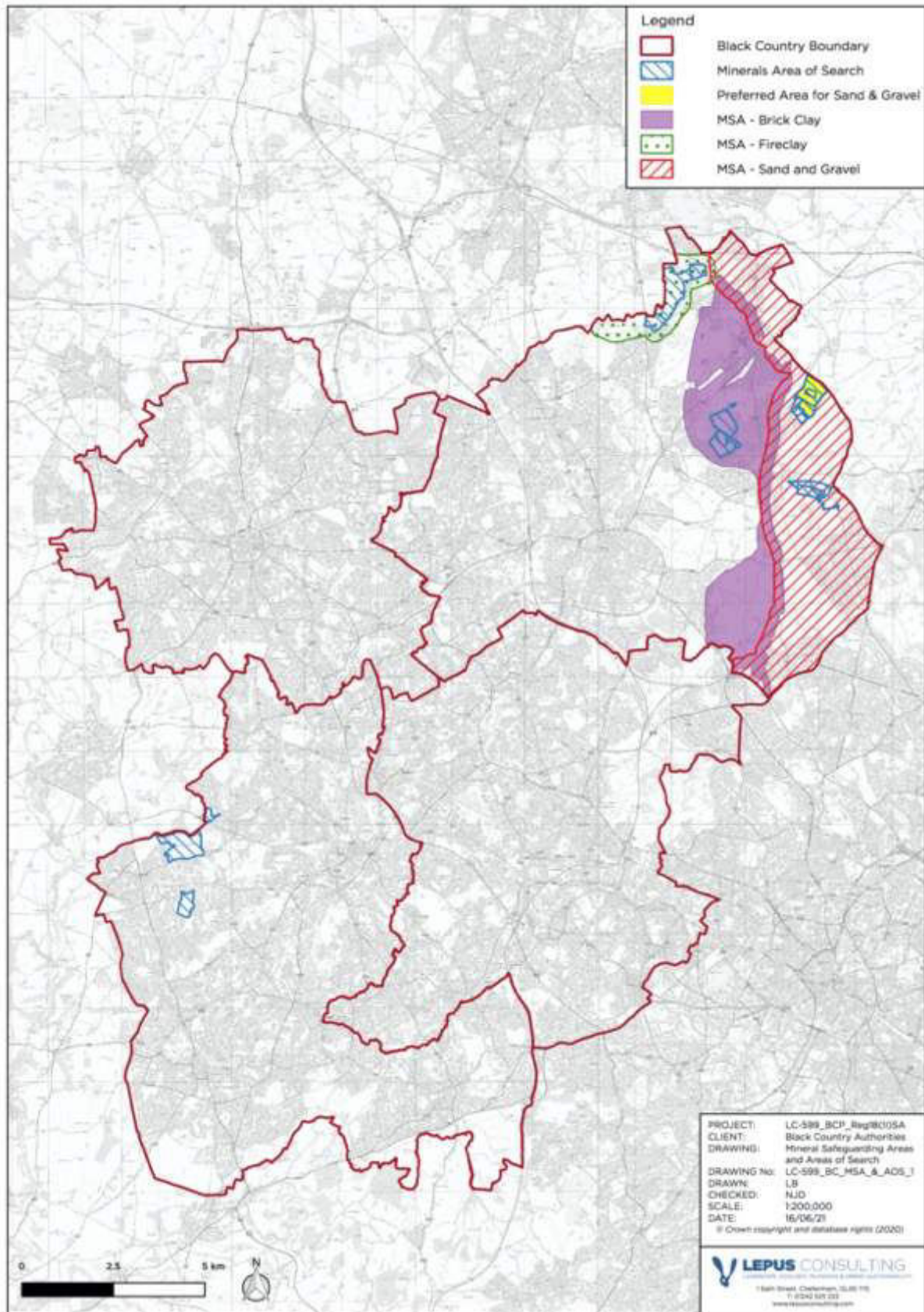


Figure 2.21: Proposed Mineral Safeguarding Areas and Areas of Search in the Black Country (source: BCA and wood consultants)

## 2.7 SA Objective 7: Pollution

### Air pollution

- 2.7.1 The entirety of the Black Country is designated as Air Quality Management Areas (AQMA)<sup>68</sup>; 'Dudley AQMA', 'Sandwell AQMA', 'Walsall AQMA' and 'Wolverhampton AQMA' (see **Figure 2.22**). 'Chuckery AQMA' is located in the centre of Walsall. AQMAs located adjacent to the Plan area include; 'Birmingham AQMA', 'Hagley AQMA' and 'CCDC AQMA 2'. The four local authority AQMAs are identified due to excessive levels of NO<sub>2</sub>, largely attributed to road traffic, and 'Chuckery AQMA' due to PM<sub>10</sub>.
- 2.7.2 There are a large number of motorways and A-roads which cross the Plan area, each of which represent traffic-related sources of air pollution (see **Figure 2.23**). It is widely accepted that the effects of air pollution from road transport decreases with distance from the source of pollution. The Department for Transport (DfT) in their Transport Analysis Guidance (TAG) consider that, *"beyond 200m from the link centre, the contribution of vehicle emissions to local pollution levels is not significant"*<sup>69</sup>. This statement is supported by Highways England and Natural England based on evidence presented in a number of research papers<sup>70 71</sup>.
- 2.7.3 As all the proposed development is located within an AQMA, this is likely to lead to adverse impacts on health and may prevent the BCA from achieving air quality targets. It is assumed that new development proposals within the Black Country would also result in an increase in traffic and thus could potentially increase traffic-related air pollution. Both existing and future residents would be exposed to this change in air quality.
- 2.7.4 The Black Country Air Quality Supplementary Planning Document (SPD)<sup>72</sup> outlines the context and importance of air quality in the Black Country and sets out methods for identifying, calculating and mitigating air quality issues associated with development proposals.

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<sup>68</sup> Dudley Metropolitan Borough Council (2016) Black Country Air Quality Supplementary Planning Document (SPD) September 2016. Available at: <https://www.dudley.gov.uk/media/6381/adopted-black-country-air-quality-spd-september-2016.pdf> [Date Accessed: 24/01/20]

<sup>69</sup> Department for Transport (2019) TAG unit A3 Environmental Impact Appraisal. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf) [Date Accessed: 22/01/20]

<sup>70</sup> Bignal, K., Ashmore, M & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

<sup>71</sup> Ricardo-AEA (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report No. 199.

<sup>72</sup> Black Country Authorities (2016) Black Country Air Quality Supplementary Planning Document (SPD) September 2016. Available at: <https://www.dudley.gov.uk/residents/planning/planning-policy/dudley-local-plan/black-country-air-quality-spd/> [Date Accessed: 01/02/21]

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### Noise pollution

2.7.5 Noise is an inevitable consequence of development and urbanisation; however, it is also an important public health issue which can have a range of adverse impacts on human health and wellbeing<sup>73</sup>.

2.7.6 The Black Country is part of the West Midlands Urban Area Agglomeration as defined in the Defra Noise Action Plans<sup>74</sup>. The main source of noise pollution in the Black Country is road traffic, and therefore, most areas affected are those near to major road corridors.

2.7.7 Defra's Noise Action Plan for roads aims to promote good health and quality of life through describing a framework for the effective management of noise. Approaches to control noise pollution include: controlling noise at the source by reducing vehicle emissions; national and local planning controls; specific road infrastructure such as low-noise surfaces and noise barriers; and mitigation of noise at receptors such as insulation.

### Soil pollution

2.7.8 Soil pollution can refer to land which is contaminated by a range of pollutants including heavy metals, oils, chemicals and radioactive substances<sup>75</sup>. Land is legally defined as 'contaminated land' where substances have the potential to cause:

- significant harm to people, property or protected species;
- significant pollution of surface water (for example lakes and rivers) or groundwater; or
- harm to people as a result of radioactivity.

2.7.9 In the Black Country, the history of mining has led to some localised issues with soil pollution and contamination as discussed in **section 2.6**. It is anticipated that sites within the BCP affected by contaminated land would be subject to relevant contaminated land assessments<sup>76</sup> and remediation prior to development.

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<sup>73</sup> World Health Organisation (2018) Environmental Noise Guidelines for the European Region (2018). Available at: <https://www.euro.who.int/en/publications/abstracts/environmental-noise-guidelines-for-the-european-region-2018> [Date Accessed: 03/02/21]

<sup>74</sup> Defra (2019) Noise action plans: large urban areas, roads and railways (2019). Available at: <https://www.gov.uk/government/publications/noise-action-plans-large-urban-areas-roads-and-railways-2019> [Date Accessed: 03/02/21]

<sup>75</sup> Contaminated land. Available at: <https://www.gov.uk/contaminated-land> [Date Accessed: 03/02/21]

<sup>76</sup> Environment Agency (2016) Technical guidance on the management of contaminated land including how to investigate, assess and manage the risks. Available at <https://www.gov.uk/government/collections/land-contamination-technical-guidance> [Date Accessed: 03/02/21]



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## Water pollution

- 2.7.10 Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact upon the quality of the water<sup>77</sup>. Watercourses that pass through the Black Country include the River Tame, River Stour and Ford Brook (see **Figure 2.24**).
- 2.7.11 An approximate 10m buffer zone from a watercourse should be used in which no works, clearance, storage or run-off should be permitted<sup>78</sup>. However, it is considered that development further away than this has the potential to lead to adverse impacts such as those resulting from runoff. Each development proposal would need to be evaluated according to land use type, size of development and exact location to determine the potential impacts on water quality.
- 2.7.12 The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater. Groundwater Source Protection Zones (SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants. As such, any proposal that is located within a groundwater SPZ could potentially have an adverse impact on groundwater sources. In the Black Country, these are restricted to the west of Wolverhampton and Dudley, and the east of Walsall and Sandwell (see **Figure 2.25**).

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<sup>77</sup> World Health Organisation (1996) Water Quality Monitoring - A Practical Guide to the Design and Implementation of Freshwater Quality Studies and Monitoring Programmes: Chapter 2 – Water Quality. Available at: [https://www.who.int/water\\_sanitation\\_health/resourcesquality/wqmchap2.pdf](https://www.who.int/water_sanitation_health/resourcesquality/wqmchap2.pdf) [Date Accessed: 03/02/21]

<sup>78</sup> Department of Agriculture, Environment and Rural Affairs (no date) Advice and Information for planning approval on land which is of nature conservation value. Available at: <https://www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value> [Date Accessed: 16/06/21]

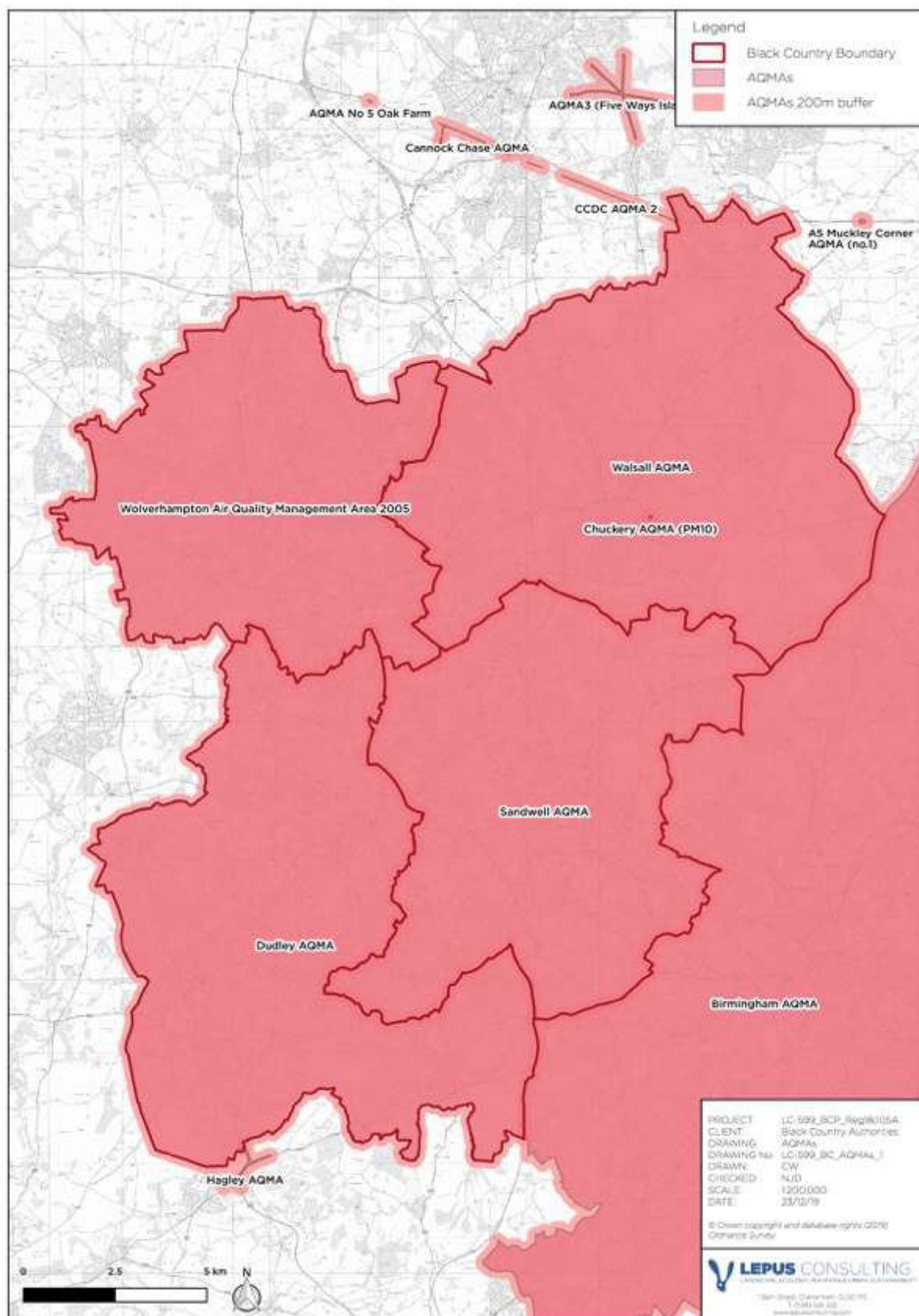


Figure 2.22: Air Quality Management Areas (AQMAs) in and around the Black Country (source: Defra)



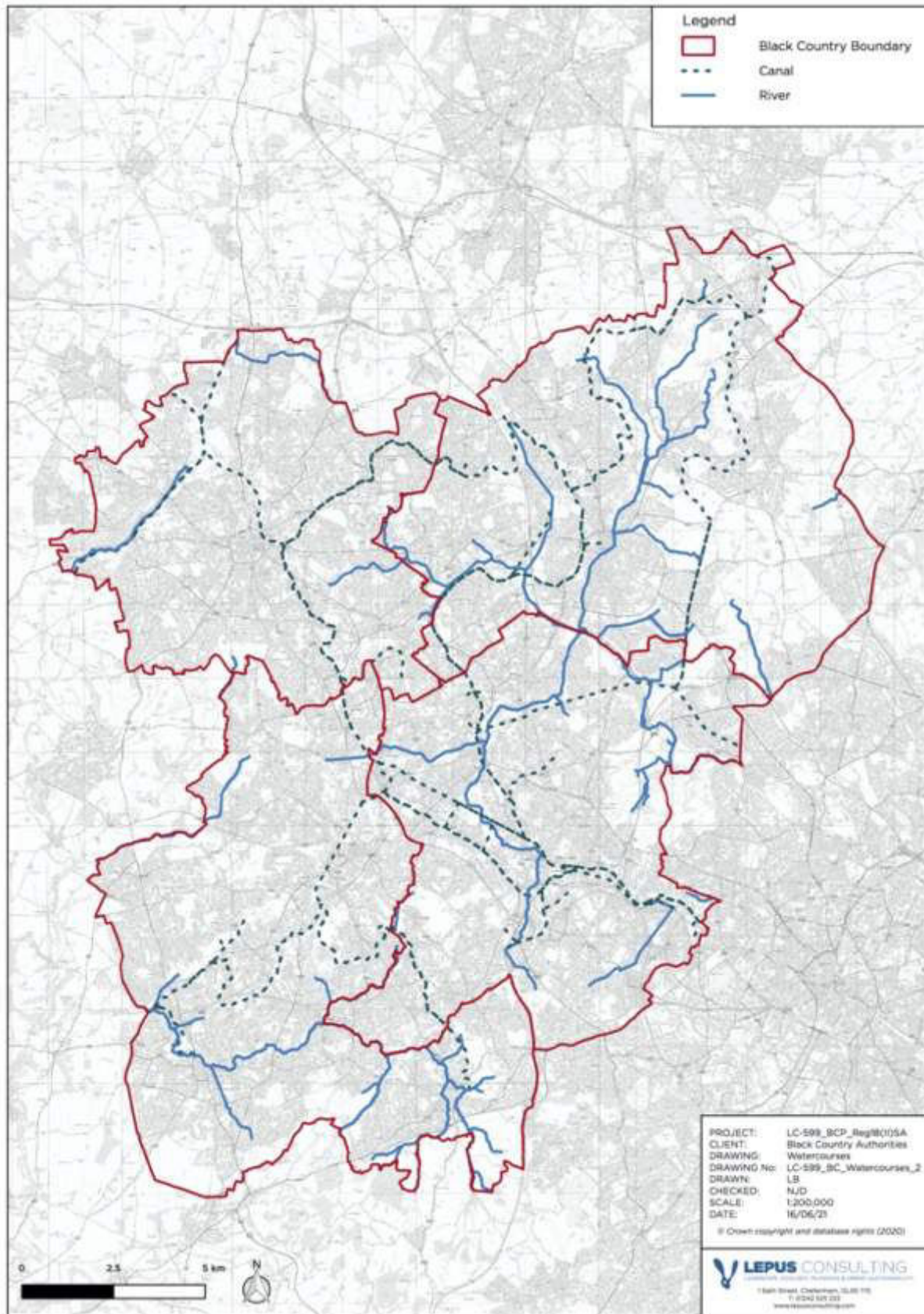


Figure 2.24: Watercourses within the Black Country (source: Ordnance Survey)

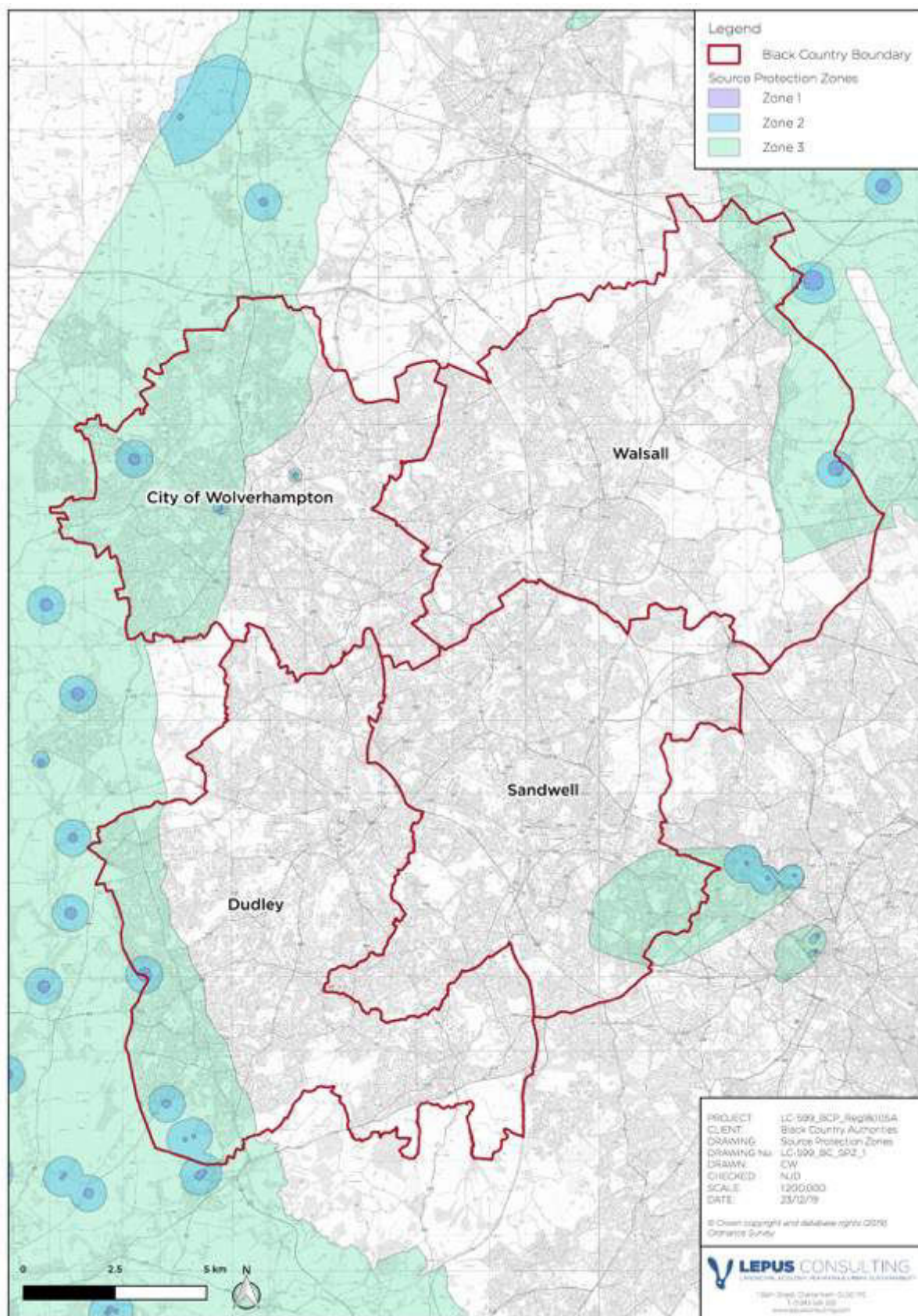


Figure 2.25: Groundwater Source Protection Zones (SPZs) in and around the Black Country (source: Environment Agency)

## 2.8 SA Objective 8: Waste

2.8.1 Throughout the Black Country and nationally, there is a need to increase the proportion of waste sent for reuse, recycling or compost and move away from the use of landfill for waste disposal. Government guidance documents including the 25 Year Environment Plan<sup>79</sup> and Waste Strategy for England<sup>80</sup> highlight the importance of moving towards sustainable waste management and in particular cutting down on hazardous waste and single-use plastics which lead to adverse implications for the health of people and the environment.

2.8.2 The total local authority collected waste within the Black Country between 2018 and 2019 is presented in **Table 2.3** below.

**Table 2.3:** Total local authority collected household and non-household waste collected per authority in 2018/2019<sup>81</sup>

	Total household waste (tonnes)	Total non-household waste (tonnes)
Dudley	122,929	14,634
Sandwell	129,019	12,729
Walsall	107,005	10,279
Wolverhampton	106,305	20,100
<b>Black Country Authorities</b>	<b>465,258</b>	<b>57,742</b>

2.8.3 The proposed development within the Black Country and associated increase in residents would be expected to result in a significant increase in waste produced. It is assumed that new residents in the Black Country will have an annual waste production of 409.3kg per person, in line with the average for England<sup>82</sup>.

2.8.4 The proportion of local authority collected waste in the West Midlands sent for recycling and composting is below the national levels, whereas the waste managed through incineration is higher than national levels. According to the Black Country Waste Study<sup>83</sup>, in 2017 waste from the Black Country received at permitted sites was managed in the following ways:

- 21% re-used and recycled;
- 34% recovered or treated;

<sup>79</sup> Defra (2018) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) [Date Accessed: 06/05/20]

<sup>80</sup> Defra (2018) Our Waste, Our Resources: A Strategy for England. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/765914/resources-waste-strategy-dec-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf) [Date Accessed: 06/05/20]

<sup>81</sup> Department for Environment Food and Rural Affairs (2019) Local authority collected waste generation from April 2000 to March 2019 (England and regions) and local authority data April 2018 to March 2019. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/849136/LA\\_and\\_Regional\\_Spreadsheet\\_1819.xlsx](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/849136/LA_and_Regional_Spreadsheet_1819.xlsx) [Date Accessed: 21/01/20]

<sup>82</sup> Ibid

<sup>83</sup> Wood (2020) Black Country Waste Study – Review of the Evidence Base for Waste to support Preparation of the Black Country Plan Revised Final Report. Available at: [https://blackcountryplan.dudley.gov.uk/media/15811/black-country-waste-study-final-report\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/15811/black-country-waste-study-final-report_redacted.pdf) [Date Accessed: 03/02/21]

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- 9% temporarily stored at transfer stations; and
  - 36% disposed of to landfill.

2.8.5 Although national trends suggest that the volume of household waste produced is decreasing, the Waste Study<sup>84</sup> indicates that additional capacity for certain types of waste management will be required, taking into account the large amount of projected growth in the area as well as continuing to facilitate the import of waste from other neighbouring authorities.

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<sup>84</sup> Wood (2020) Black Country Waste Study – Review of the Evidence Base for Waste to support Preparation of the Black Country Plan Revised Final Report. Available at: [https://blackcountryplan.dudley.gov.uk/media/15811/black-country-waste-study-final-report\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/15811/black-country-waste-study-final-report_redacted.pdf) [Date Accessed: 03/02/21]

## 2.9 SA Objective 9: Transport and accessibility

2.9.1 Growth within the Plan area would be expected to increase pressure on the road network and transport infrastructure. In the Black Country as well as nationally, there is a need for modal shift to lower carbon transport to reduce the environmental impact of transport, especially as the majority of residents commute to work by car in the West Midlands<sup>85</sup>.

### Road Network

2.9.2 There is a vast road network across the Black Country, including motorway links to the south west, south east and north west of England. The primary non-motorway routes include the A454, A4123, A461, A4041 and A456, with the A34, A5 and A449 providing key links between the Black Country and the wider area. Road congestion is an existing problem in the Black Country, in particular following road incidents on the M5 and M6 and at junction pinch-points<sup>86</sup>.

### Public Transport

2.9.3 A number of railway lines pass through the four boroughs in the Black Country, providing good rail links to Birmingham and Stafford. There are four passenger rail lines within the Plan area, in addition to the Midland Metro light rail system that operates between Birmingham and Wolverhampton (see **Figure 2.26**).

2.9.4 The Black Country is served by regular bus links across the area provided by a number of bus operators acting within the West Midlands Bus Alliance<sup>87</sup> (see **Figure 2.27**). Furthermore, the Sprint network<sup>88</sup>, providing a bus-based rapid transit system, is currently under development and seeks to improve reliability and connectivity between the public transport networks and create new links from Birmingham to Dudley and Walsall.

2.9.5 In terms of onward and international travel, the nearest airport is Birmingham Airport, located in Solihull approximately 15km east of the Black Country.

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<sup>85</sup> Nomis (2011) Method of Travel to Work. Available at: [https://www.nomisweb.co.uk/census/2011/QS701EW/view/2013265925?rows=cell&cols=rural\\_urban](https://www.nomisweb.co.uk/census/2011/QS701EW/view/2013265925?rows=cell&cols=rural_urban) [Date Accessed: 22/01/20]

<sup>86</sup> West Midlands Combined Authority (2016) Movement For Growth: The West Midlands Strategic Transport Plan. Available at: <https://www.tfwm.org.uk/media/1099/movement-for-growth.pdf> [Date Accessed: 22/01/20]

<sup>87</sup> West Midlands Combined Authority (2017) Transport Plan 2017/18. Available at: <https://wolverhampton.moderngov.co.uk/documents/s38731/Item%204.1%20-%20Transport%20Plan%202017-18-v12.pdf> [Date Accessed: 09/04/20]

<sup>88</sup> Transport for West Midlands (2020) Sprint: a new, rapid transit system for local people. Available at: <https://www.tfwm.org.uk/development/sprint/> [Date Accessed: 09/04/20]



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### **Pedestrian and Cycle Access**

- 2.9.6 There is an extensive Public Right of Way (PRoW) and cycle network in the Black Country. This includes many routes along the canal network and disused railway lines, which provide a recreational resource as well as links to other modes of transport. **Figure 2.28** below indicates the location of some of these routes. Additionally, the Monarch's Way, Beacon Way and the Forest of Mercia Trail pass through the Black Country.
- 2.9.7 Across the West Midlands, there are over 193km of cycle and walking routes<sup>89</sup>. Ongoing development and upgrades to the cycling and walking network seek to connect communities and promote active travel as a healthy and sustainable mode of transport.

### **Local Accessibility**

- 2.9.8 The Black Country contains a range of settlements including strategic centres, towns and local centres, which would be expected to provide a range of shops and services to support the population within these areas.
- 2.9.9 The BCA have provided Lepus with data to show the location of fresh food and centres throughout the Black Country, as well as modelled data indicating areas within a 15-minute walking distance or travel time via public transport to these services (see **Figure 2.29**). The figure shows that the majority of the four authority areas lie within 15-minute travel time, and as such, the majority of new residents would be expected to have sustainable access to local shops and facilities providing fresh food.

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<sup>89</sup> Transport for West Midlands (2019) Cycling and Walking Network. Available at: [https://www.tfwm.org.uk/media/47547/feb19-759487472899466-lcwip-roadmap\\_v30.pdf](https://www.tfwm.org.uk/media/47547/feb19-759487472899466-lcwip-roadmap_v30.pdf) [Date Accessed: 09/04/20]

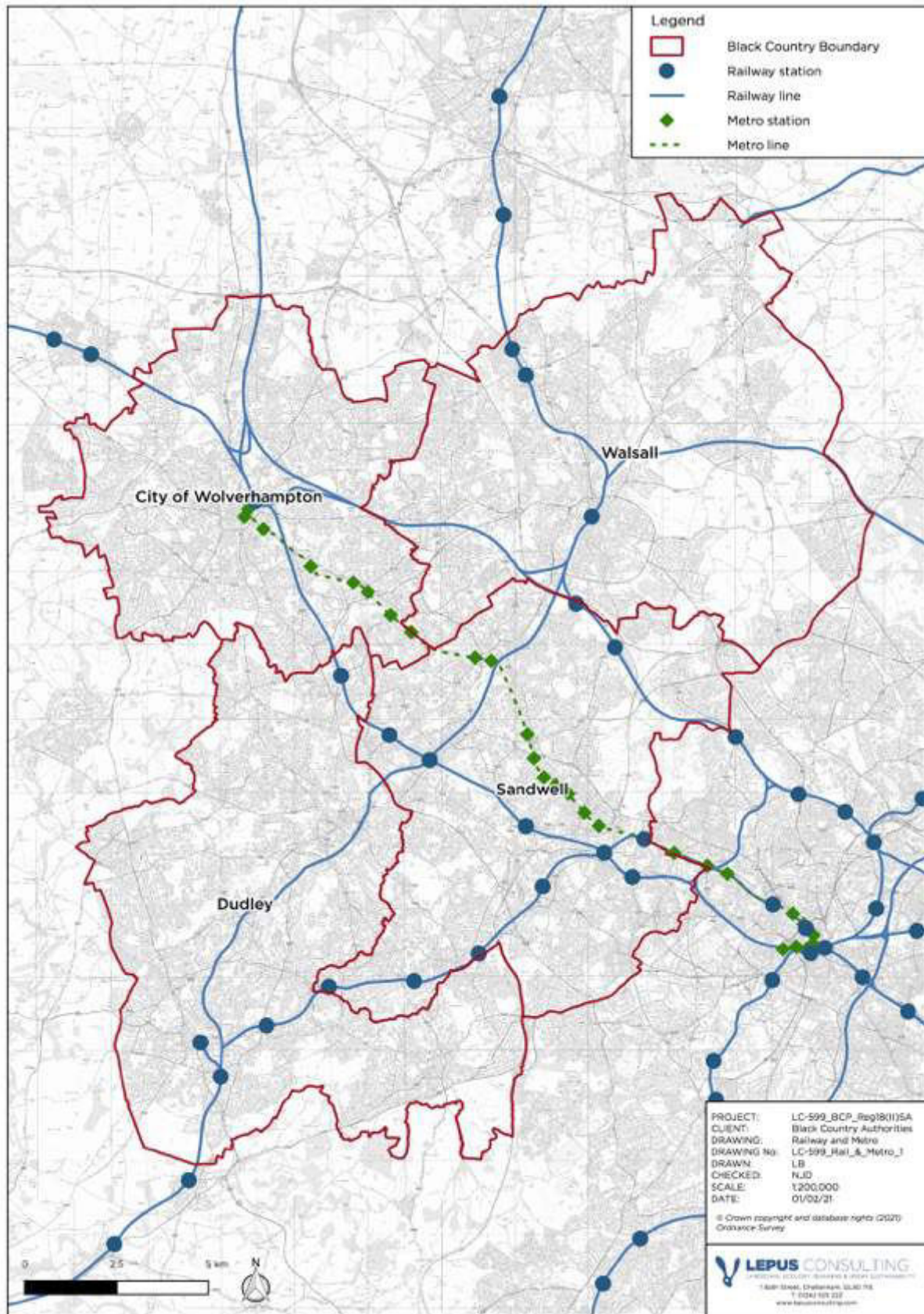


Figure 2.26: Railway and Metro stations in and around the Black Country (source: Transport for West Midlands)

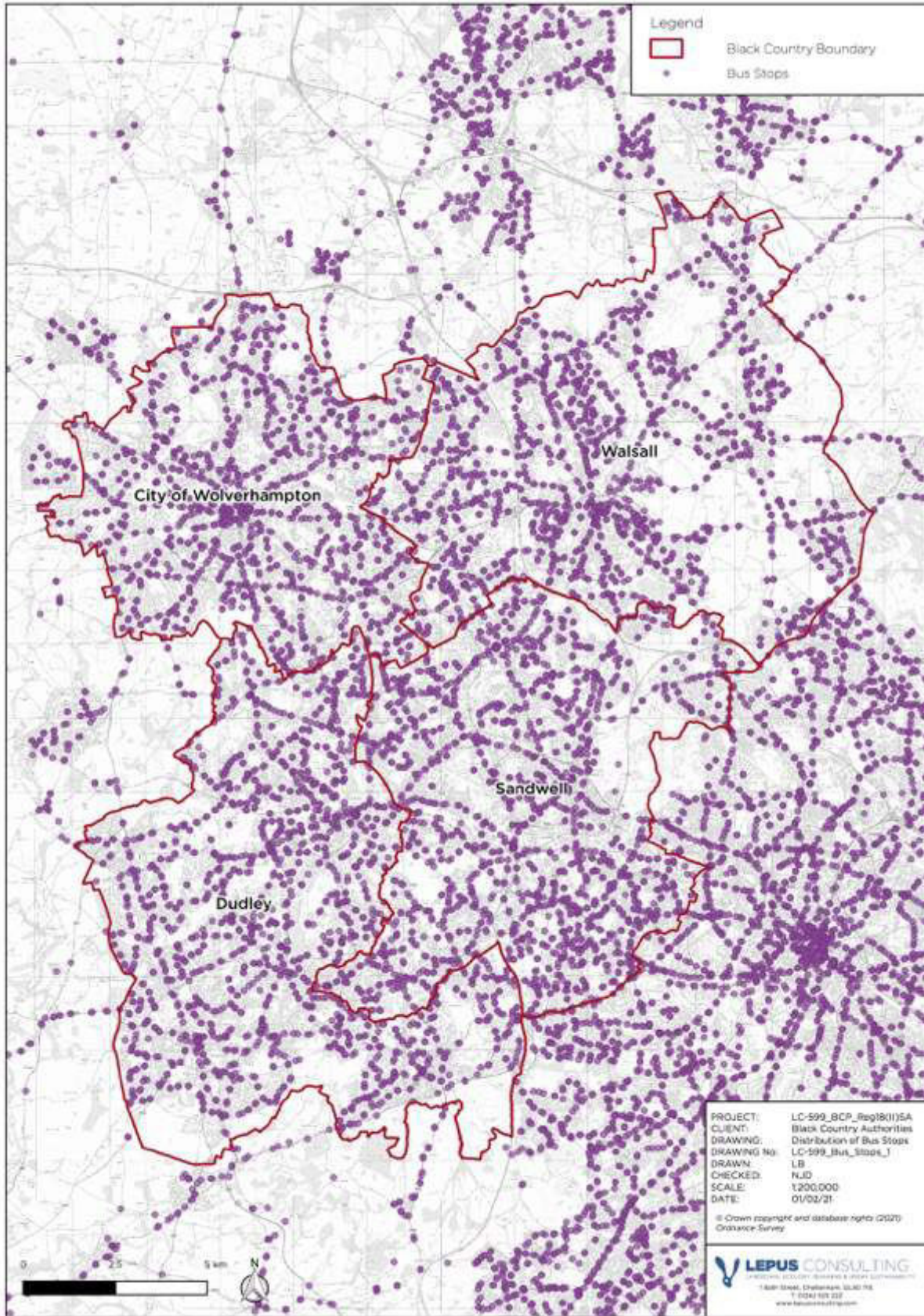


Figure 2.27: Distribution of bus stops in and around the Black Country (source: Transport for West Midlands)

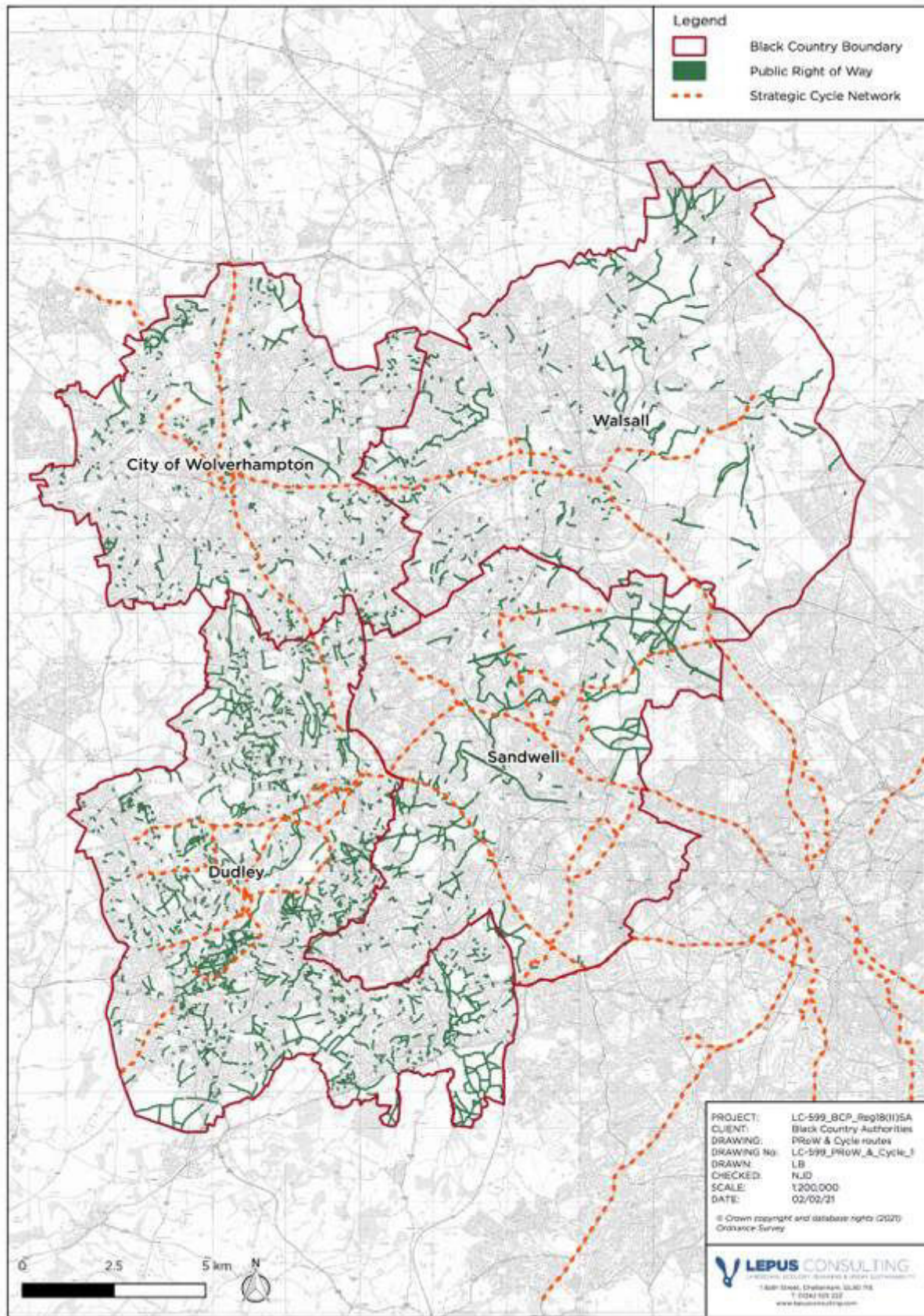


Figure 2.28: Public Rights of Way and Strategic Cycle Network within the Black Country (source: BCA and Transport for West Midlands)

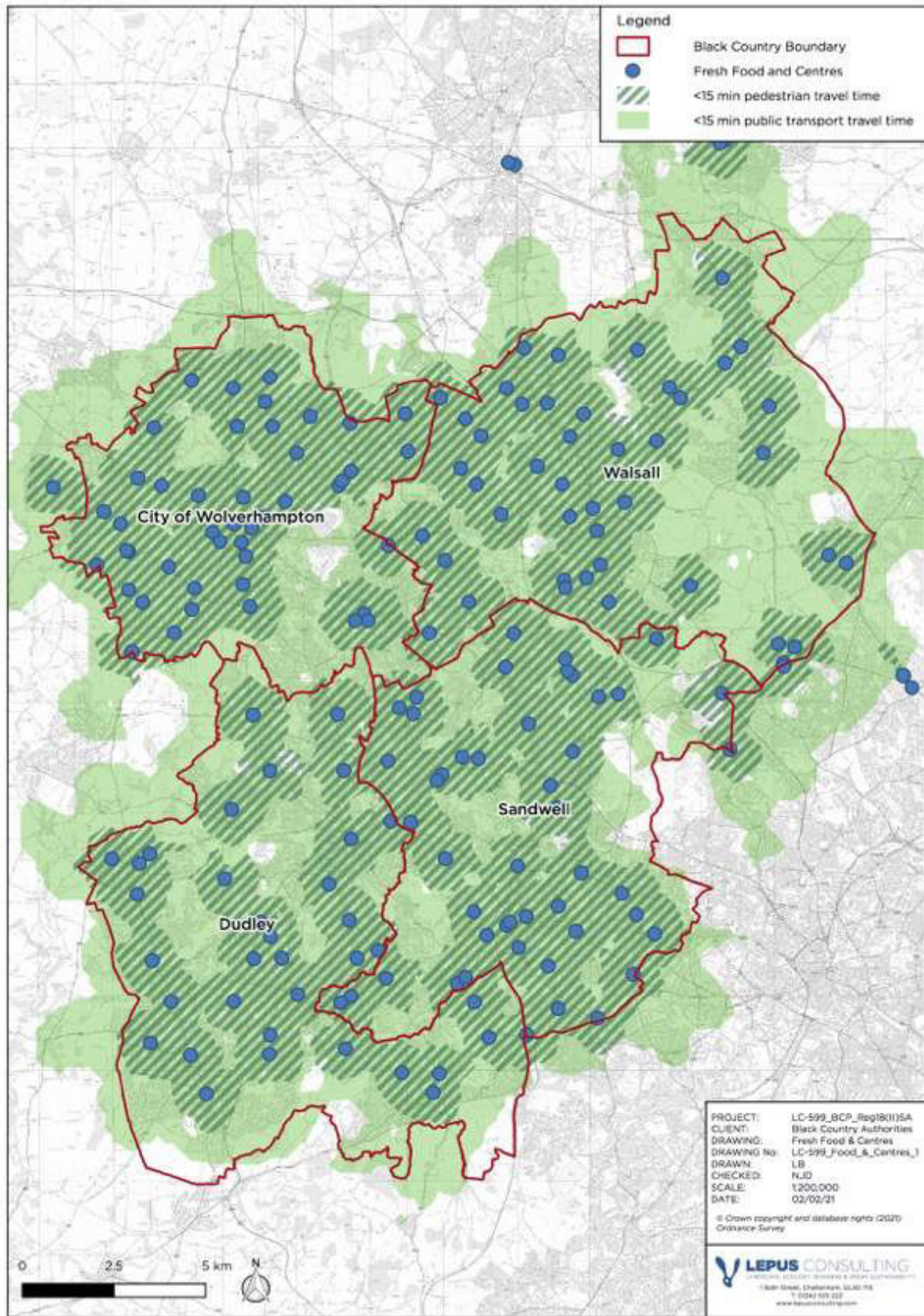


Figure 2.29: Location of Fresh Food and Centres and modelled travel time across the Black Country (source: BCA)

## 2.10 SA Objective 10: Housing

- 2.10.1 According to the Urban Capacity Review<sup>90</sup> (2019), there is a requirement for the development of 71,459 dwellings over the Plan period to 2038 in the Black Country. This has subsequently been updated to a requirement for 76,076 dwellings over the plan period to 2039 based on the standard method (See **Section 3**).
- 2.10.2 Each authority in the Black Country has produced a Strategic Housing Land Availability Assessment (SHLAA)<sup>91</sup>, which will be updated annually, to assess land with potential for development in order to inform the housing land supply and trajectory. Sites for consideration in the BCP have been identified through the ‘call for sites’ process.
- 2.10.3 The majority of the housing requirement in the Black Country will be met though sites with planning permission and sites allocated for housing. New sites and windfall sites within the urban area and strategic centres will also provide an additional supply of housing. Due to the constraints on housing delivery within the urban area of the Black Country, a proportion of the development will also be directed to the Green Belt and exported to neighbouring authorities through the Duty to Cooperate.
- 2.10.4 A key element of the vision of the BCP is to create a network of cohesive, healthy and prosperous communities across the Black Country. It is assumed that the development proposals will provide a good mix of housing types and tenures in order to meet the identified needs for the population, including affordable housing, and accessible housing options particularly for people aged 65 and over.

### House prices

- 2.10.5 The average UK house price was £239,000 as of August 2020<sup>92</sup>, with house prices in the West Midlands increasing by 2.3% in the year to August 2020. In general, house prices in the Black Country are below the average for the UK (see **Table 2.4**).

**Table 2.4:** Houses: Average price paid within the four authorities<sup>93</sup>

	Dudley	Sandwell	Walsall	Wolverhampton
House: Average Price Paid	£168,404	£144,333	£188,290	£194,321

<sup>90</sup> Black Country Plan (2019) Black Country Urban Capacity Review December 2019 <https://blackcountryplan.dudley.gov.uk/media/13807/bc-urban-capacity-review-update-final-december-2019.pdf> [Date Accessed: 21/01/20]

<sup>91</sup> Dudley Metropolitan Borough Council (2019) Black Country Plan: Housing. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4c/> [Date Accessed: 03/02/21]

<sup>92</sup> Office for National Statistics (2020) UK House Price Index: August 2020. Available at: <https://www.ons.gov.uk/economy/inflationandpriceindices/bulletins/housepriceindex/august2020> [Date Accessed: 03/02/21]

<sup>93</sup> Zoopla (2020) House prices and values. Available at: <https://www.zoopla.co.uk/house-prices/> [Date Accessed: 08/04/20]

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### Affordable housing

- 2.10.6 Affordable housing is defined as “*social rented, affordable rented and intermediate housing, provided to specified eligible households whose needs are not met by the market*”<sup>94</sup>. It is estimated that we need to build 3.1 million more social homes in England in the next 20 years<sup>95</sup>.

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<sup>94</sup> Ministry of Housing, Communities and Local Government (2020) Affordable housing supply. Available at: <https://www.gov.uk/government/collections/affordable-housing-supply> [Date Accessed: 29/10/20]

<sup>95</sup> Shelter (2019) Building for Our Future: A Vision for Social Housing. Available at: [https://england.shelter.org.uk/\\_data/assets/pdf\\_file/0005/1642613/Shelter\\_UK\\_-\\_A\\_vision\\_for\\_social\\_housing\\_full\\_interactive\\_report.pdf](https://england.shelter.org.uk/_data/assets/pdf_file/0005/1642613/Shelter_UK_-_A_vision_for_social_housing_full_interactive_report.pdf) [Date Accessed: 03/02/21]

## 2.11 SA Objective 11: Equality

2.11.1 The Black Country is an ethnically diverse area, with individuals from many different religions, cultures, communities and backgrounds<sup>96</sup>. According to the 2011 Census, 77.1% of the Black Country identified as White, 14.4% as Asian, 4.1%, 3.2% as Mixed and 1.2% as 'other'<sup>97</sup>, however, the proportion of different communities varies greatly across the region.

2.11.2 The Equality Act 2010<sup>98</sup> provides a legal framework to protect individuals from unfair treatment and promotes a fair and equal society. It seeks to highlight and strengthen the laws which prevent discrimination. Under the Equality Act, there are nine protected characteristics:

- Age;
- Disability;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief;
- Sex; and
- Sexual orientation.

2.11.3 The Equality Act focuses on four main types of discrimination: direct discrimination; indirect discrimination; harassment; and victimisation.

2.11.4 Furthermore, the Black Country is home to a people from a range of socio-economic status who may also experience discrimination, poverty and social exclusion. Child poverty levels are relatively high. In the West Midlands, 22.7% of children are from low-income families<sup>99</sup>.

### Indices of Multiple Deprivation

2.11.5 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England<sup>100</sup>. LSOAs are small areas designed to be of similar population, of approximately 1,500 residents or 650 households.

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<sup>96</sup> Black Country Healthcare Foundation Trust (no date) Equality, Diversity, Inclusion and Human Rights. Available at: <https://www.bcoft.nhs.uk/about-us/equality-and-diversity> [Date Accessed: 07/04/20]

<sup>97</sup> Active Black Country (2020) Population – Demographics. Available at: <https://www.activeblackcountry.co.uk/insight-hub/data/communities/population-%E2%80%93-demographics/> [Date Accessed: 07/04/20]

<sup>98</sup> Equality Act 2010. Available at: <http://www.legislation.gov.uk/ukpga/2010/15/contents> [Date Accessed: 07/04/20]

<sup>99</sup> Department for Work and Pensions (2013) Households below average income (HBAI) statistics. Available at: <https://www.gov.uk/government/collections/households-below-average-income-hbai--2> [Date Accessed: 01/02/21]

<sup>100</sup> Ministry of Housing, Communities and Local Government (2019) The English Indices of Deprivation 2019. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/835115/loD2019\\_Statistical\\_Release.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/loD2019_Statistical_Release.pdf) [Date Accessed: 07/04/20]



- 2.11.6 In general, deprivation is spread across England, with approximately 61% of local authority districts contain at least one of the most deprived neighbourhoods in England. Middleborough, Liverpool, Knowsley, Kingston upon Hull and Manchester have the highest proportions of neighbourhoods amongst the most deprived in England.
- 2.11.7 IMD follows an established methodology which broadly defines deprivation to encompass a range of an individual's living conditions. The calculation is based on 39 indicators separated into seven distinct domains which are combined and weighted to calculate IMD. The seven domains are: income; employment; health deprivation and disability; education, skills and training; crime; barriers to housing and services; and living environment. All neighbourhoods, or LSOAs, are then ranked according to their level of deprivation in comparison to other areas.
- 2.11.8 It should be noted that the IMD does not apply to every individual living in each LSOA. The IMD is designed to identify and measure specific aspects of deprivation, rather than measure individual affluence.
- 2.11.9 According to the IMD, the majority of the most deprived 10% of neighbourhoods in England face multiple challenges, with 137 neighbourhoods in the most deprived 10% ranking as highly deprived in six of the seven domains.
- 2.11.10 The IMD was last updated in 2019<sup>101</sup>. Out of 317 Local Authorities in England, Dudley is ranked as the 91<sup>st</sup> most deprived, Sandwell 12<sup>th</sup>, Walsall 25<sup>th</sup> and Wolverhampton 24<sup>th</sup><sup>102</sup>. Overall deprivation is high across the Black Country, with 21 of the LSOAs in Dudley, 36 in Sandwell, 42 in Walsall and 33 in Wolverhampton ranked among the 10% most deprived in England (see **Figure 2.30**).

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<sup>101</sup> Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date Accessed: 17/12/19]

<sup>102</sup> Black Country Consortium (2019) The English Indices of Deprivation 2019. Available at: <https://www.the-blackcountry.com/upload/BC%20IMD%202019.pdf> [Date Accessed: 17/12/19]

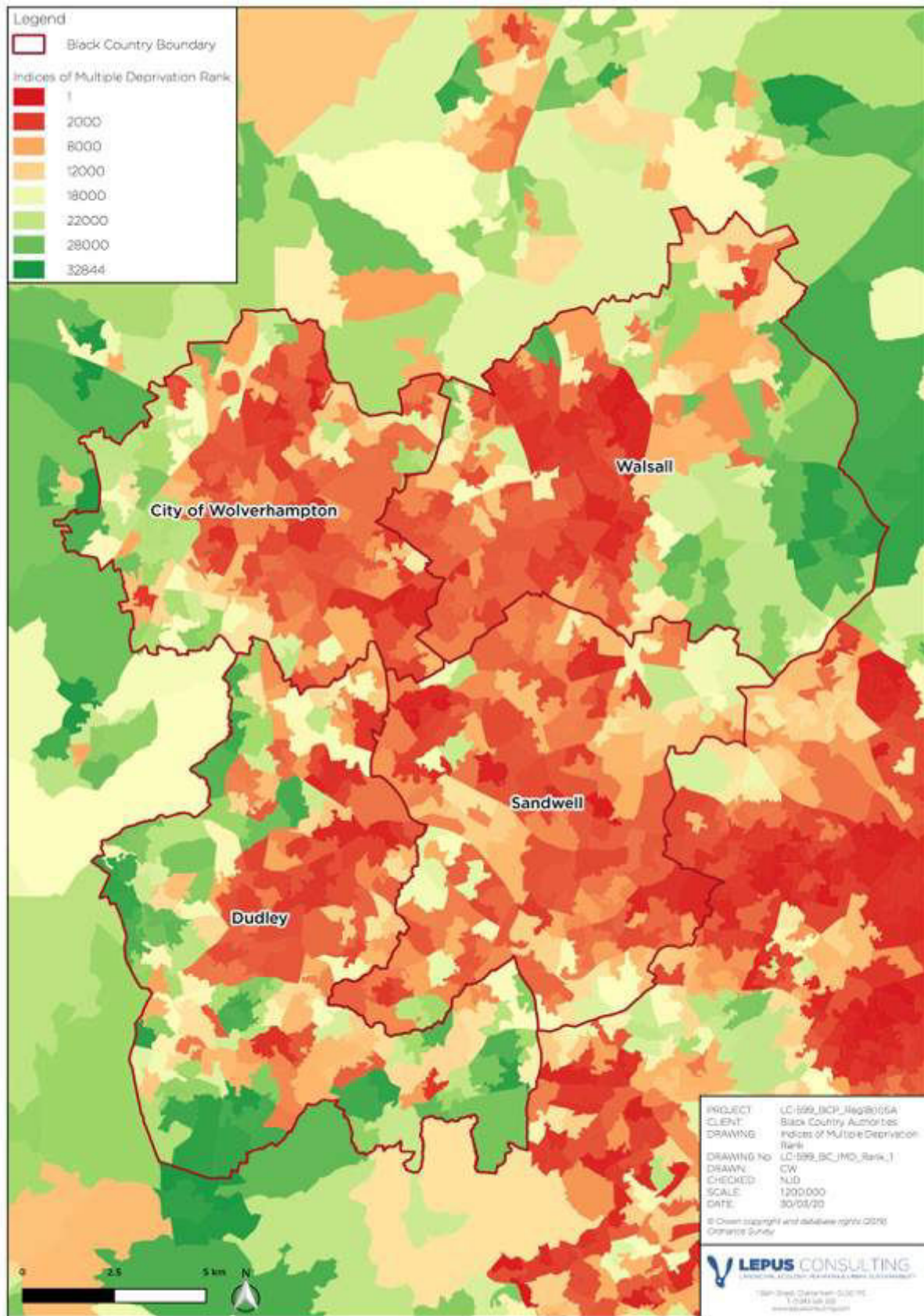


Figure 2.30: Indices of Multiple Deprivation in and around the Black Country (source: Ministry of Housing, Communities and Local Government)

## 2.12 SA Objective 12: Health

### Air Pollution

- 2.12.1 As discussed in **section 2.7.1**, the entirety of the four authorities are designated as Air Quality Management Areas (AQMAs)<sup>103</sup>.
- 2.12.2 Development proposals located in close proximity to AQMAs or main roads would be likely to expose site end users to transport associated noise and air pollution, with adverse impacts on health and wellbeing. It is widely accepted that the effects of air pollution from road transport decreases with distance from the source of pollution. The Department for Transport (DfT) in their Transport Analysis Guidance (TAG) consider that, *“beyond 200m from the link centre, the contribution of vehicle emissions to local pollution levels is not significant”*<sup>104</sup>. This statement is supported by Highways England and Natural England based on evidence presented in a number of research papers<sup>105 106</sup>.
- 2.12.3 As all the proposed development within the Black Country is located within an AQMA, this is likely to lead to adverse impacts on health and may prevent the BCA from achieving air quality targets. It is assumed that new development proposals within the Black Country would also result in an increase in traffic and thus traffic-related air pollution. Both existing and future residents would be exposed to this change in air quality.

### Healthcare Facilities

- 2.12.4 In order to facilitate healthy and active lifestyles for existing and new residents, it is expected that the BCA should seek to ensure that residents have good access to NHS hospitals and GP surgeries.
- 2.12.5 There are four NHS hospitals with A&E departments located within the Black Country: Russells Hall Hospital in Dudley, Sandwell General Hospital in Sandwell, Manor Hospital in Walsall and New Cross Hospital in Wolverhampton (see **Figure 2.31**). Birmingham City Hospital and Queen Elizabeth Hospital are also located in close proximity to the Black Country boundary. Accessibility to other NHS facilities (e.g. community hospitals and treatment centres) or private hospitals has not been taken into consideration in this assessment.

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<sup>103</sup> Dudley Metropolitan Borough Council (2016) Black Country Air Quality Supplementary Planning Document (SPD) September 2016. Available at: <https://www.dudley.gov.uk/media/6381/adopted-black-country-air-quality-spd-september-2016.pdf> [Date Accessed: 24/01/20]

<sup>104</sup> Department for Transport (2019) TAG unit A3 Environmental Impact Appraisal. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf) [Date Accessed: 22/01/20]

<sup>105</sup> Bignal, K., Ashmore, M & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

<sup>106</sup> Ricardo-AEA (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report No. 199.

- 2.12.6 The BCA have provided Lepus with information regarding the location of local healthcare facilities and accessibility modelling data (see **Figure 2.32**). According to this data, there are a total of 325 GP surgeries located across the Plan area. As shown in the figure below, a large proportion of the Black Country is located within a 15-minute walking distance or travel time via public transport from a GP surgery. Therefore, the majority of new residents would be expected to be located in areas with sustainable access to healthcare facilities.
- 2.12.7 At this stage, there is not sufficient information available to accurately predict the effect of new development on the capacity of these health facilities.

### **Green Network**

- 2.12.8 Within the Black Country, there is a rich and diverse range of public open spaces, formal parks, outdoor recreational spaces, as well as the PRow network and the canal system. There are two Country Parks located within the Plan area: 'Roughwood' Country Park in Walsall and 'Sandwell Valley' Country Park in Sandwell (see **Figure 2.33**). There are also several other Country Parks surrounding the Black Country. All these open spaces positively contribute towards the health and wellbeing of residents, by helping to encourage physical exercise through sports, recreation and active travel. The recreational green spaces combined with the natural green space network would also benefit the mental health and wellbeing of residents.

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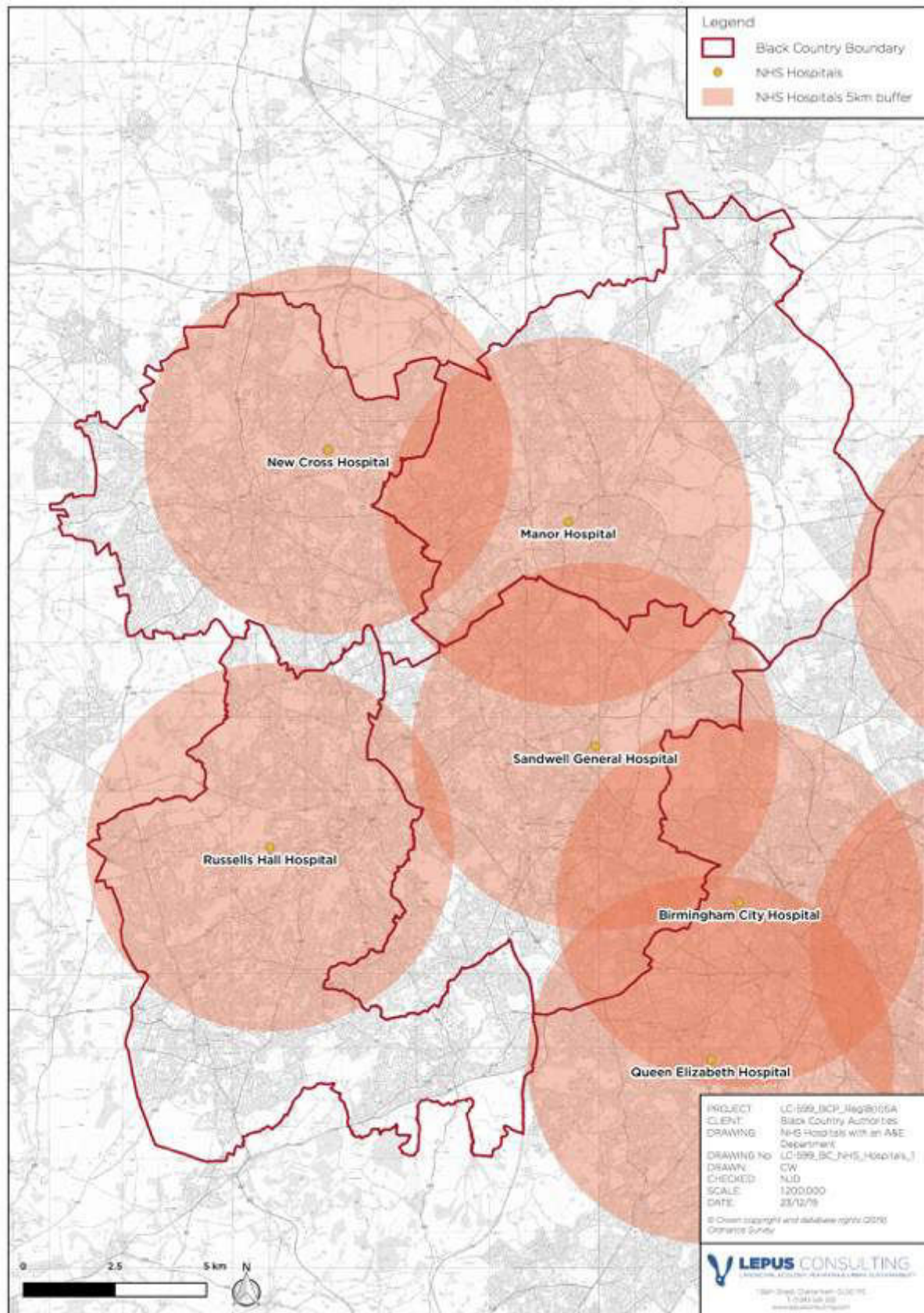


Figure 2.31: NHS Hospitals with an A&E department in and around the Black Country (source: NHS)

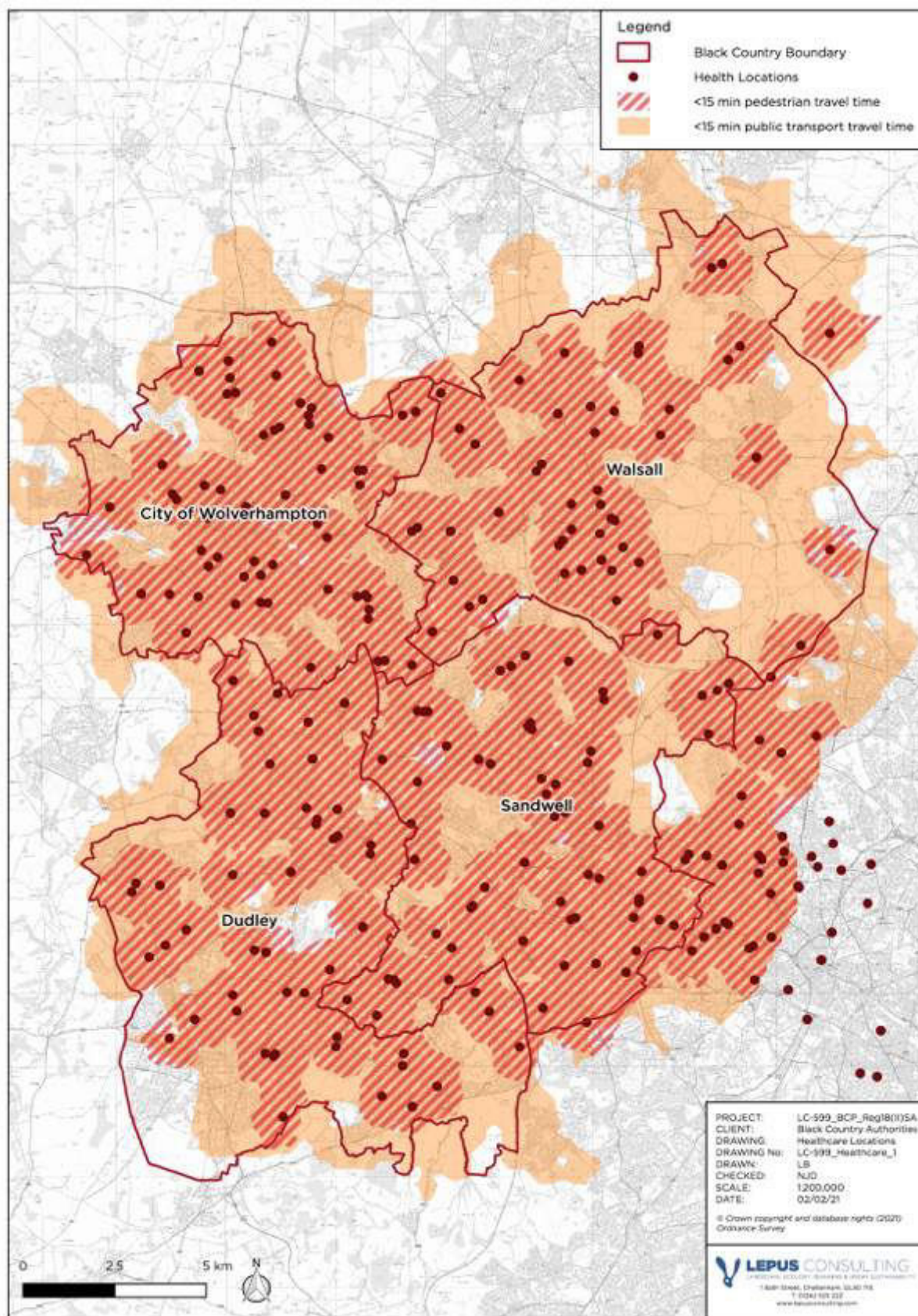


Figure 2.32: Location of healthcare facilities and modelled travel time across the Black Country (source: BCA)

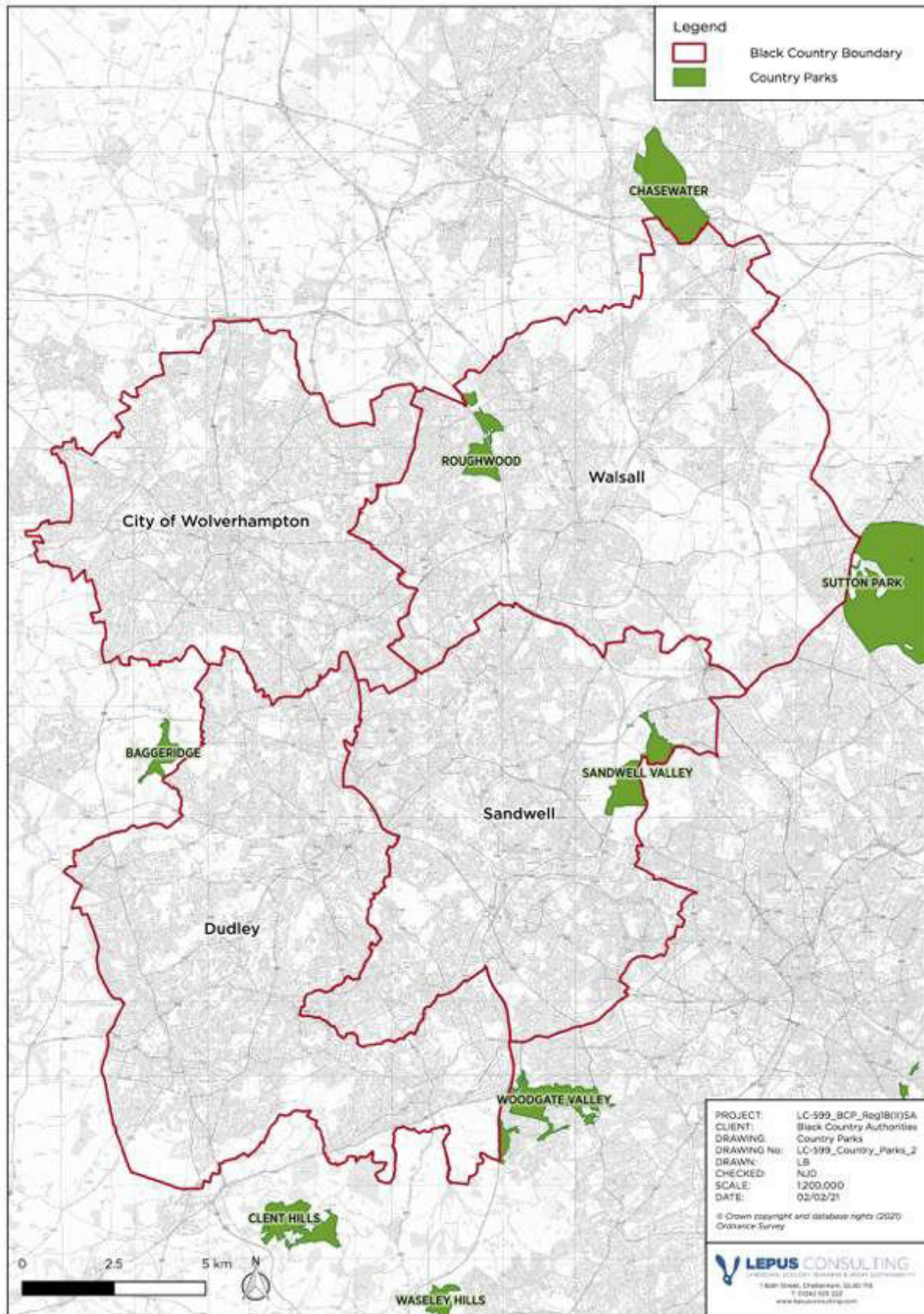


Figure 2.33: Country Parks in and around the Black Country (source: Natural England)

## 2.13 SA Objective 13: Economy

2.13.1 Approximately 554,500 people in the Black Country were economically active as of September 2019<sup>107</sup>. Of this, approximately 73.8% were in employment, 9.6% of which were self-employed. In addition, there were estimated to be 68,500 workless households across the Black Country in 2018. **Table 2.5** presents employment by occupations and **Table 2.6** presents business counts across the Black Country.

**Table 2.5: Employment by occupation within the Black Country and Great Britain October 2018 – September 2019**<sup>108</sup>

Occupation	Dudley	Sandwell	Walsall	Wolverhampton	Black Country	Great Britain
Managers, Directors and Senior Officials	10.7	5.7	10.2	7.4	8.4	11.3
Professional Occupations	16.3	13.6	15.4	14.6	15.0	21.2
Associate Professional and Technical	13.1	10.0	14.6	9.4	11.8	14.8
Administrative and Secretarial	13.1	11.4	11.5	11.8	12.0	9.7
Skilled Trades Occupations	14.2	13.6	12.5	12.1	13.2	10.0
Caring, Leisure and Other Service Occupations	8.1	10.0	11.1	10.5	9.8	9.0
Sales and Customer Service Occupations	5.5	7.3	7.2	8.2	7.0	7.3
Process Plant and Machine Operatives	6.4	11.7	8.3	11.5	9.4	6.2
Elementary Positions	11.8	15.6	9.2	14.4	12.8	10.2

**Table 2.6: UK Business Counts (Local Units) 2019**<sup>109</sup>

Local Units	Dudley	Sandwell	Walsall	Wolverhampton
Micro (0 to 9)	9,350	8,585	7,385	7,245
Small (10 to 49)	1,645	1,595	1,275	1,365
Medium (50 to 249)	350	395	315	295
Large (250+)	35	55	45	40
Total	11,380	10,630	9,020	8,945

<sup>107</sup> Nomis (2020) Labour Market Profile – Black Country. Available at: <https://www.nomisweb.co.uk/reports/lmp/lep/1925185537/report.aspx?town=black%20country#tabempunemp> [Date Accessed: 07/04/20]

<sup>108</sup> Nomis (2020) Labour Market Profile – Black Country. Available at: <https://www.nomisweb.co.uk/reports/lmp/lep/1925185537/report.aspx?town=black%20country#tabempunemp> [Date Accessed: 07/04/20]

<sup>109</sup> Nomis (2020) Labour Market Profile. Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157191/report.aspx?c1=1946157192&c2=2092957698> [Date Accessed: 08/04/20]



2.13.2 In 2018, the Black Country Gross Value Added (GVA) rose by 2.5% to £21.2 billion in comparison to 2017<sup>110</sup>. Nationally, GVA increased by 3.1%. Per head, GVA in the Black Country has increased 1.9% in comparison to 2017, whereas nationally, there was a 2.5% increase.

#### **Employment Opportunities**

2.13.3 Key employment areas are defined as locations which would provide a range of employment opportunities from a variety of employment sectors, including retail parks, industrial estates and major local employers.

2.13.4 Some of the strategic centres of the four authorities in the Black Country include Walsall Town Centre, West Bromwich, Wolverhampton Town Centre and Brierley Hill. These areas provide retail, office and leisure floorspace. **Figure 2.34** below shows the location of major employment sites across the Black Country, alongside accessibility modelling data provided to Lepus by the BCA. The map shows that almost the entirety of the Black Country is within a 30-minute travel time to an employment site, either via walking or public transport.

2.13.5 The majority of new residents across the Plan area would therefore be expected to be located within a sustainable distance to employment opportunities. Development proposals located in urban areas would be expected to have good sustainable transport connections to nearby employment opportunities.

#### **Employment Floorspace**

2.13.6 The Black Country Economic Development Needs Assessment 1 (EDNA)<sup>111</sup> aims to assess employment land needs across the Black Country for the length of the Plan period. A Stage 2 EDNA Assessment has also been undertaken in May 2021 and forms part of the evidence base for the BCP.

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<sup>110</sup> Black Country Consortium (2019) Gross Value Added (GVA) and Gross Domestic Product (GDP): December 2019. Available at: <https://www.the-blackcountry.com/upload/GVA%20Dec%202019%20BC.pdf> [Date Accessed: 08/04/20]

<sup>111</sup> Warwick Economics and Development (2017) Black Country Economic Development Needs Assessment May 2017 Stage 1 Report. Available at: <https://blackcountryplan.dudley.gov.uk/media/11530/black-country-edna-stage-1-report.pdf> [Date Accessed: 22/01/20]

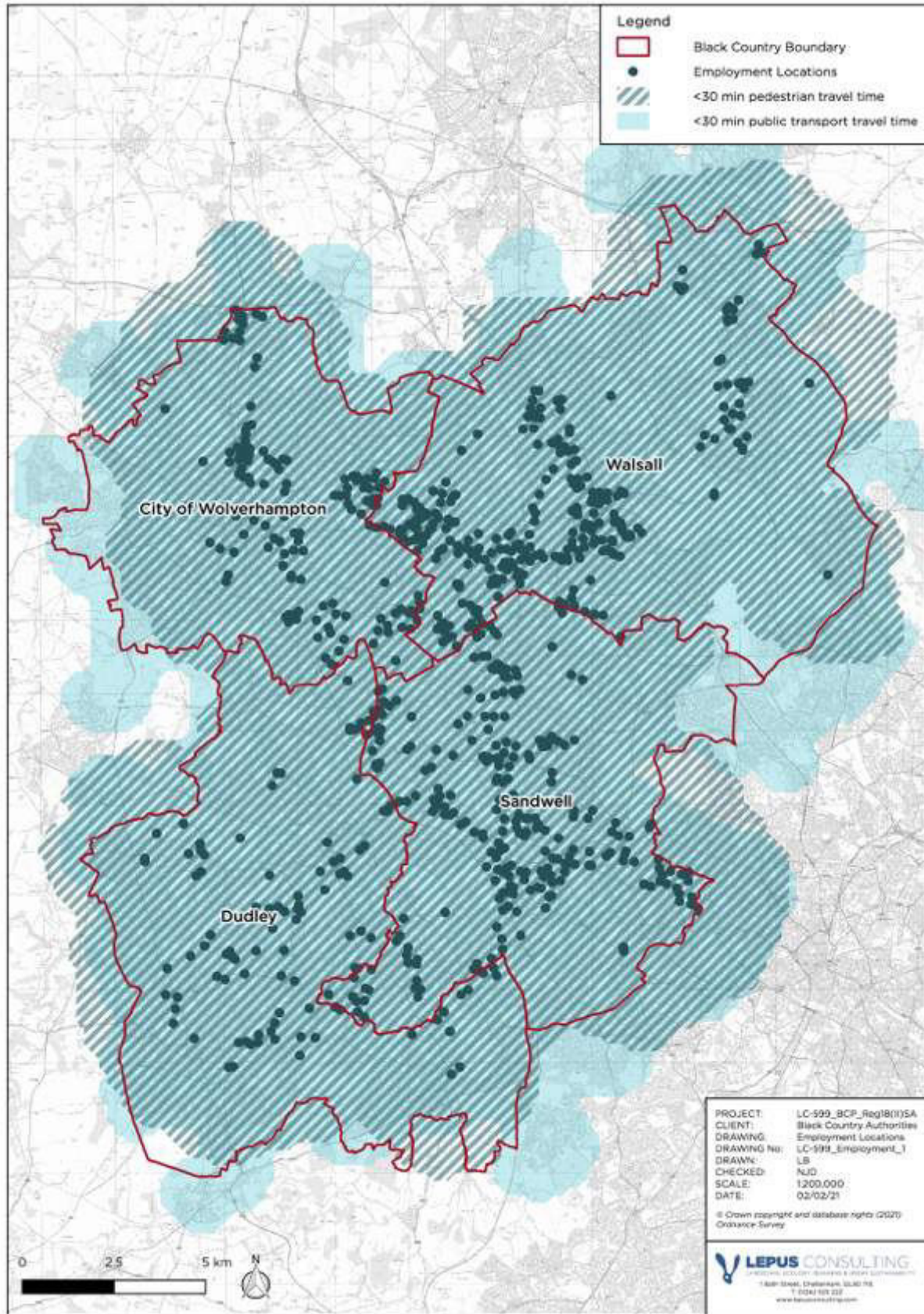


Figure 2.34: Key employment locations and modelled travel time across the Black Country (source: BCA)

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

2.14.1 In general, education attainment is lower in the Black Country than England. **Table 2.7** below presents the qualifications levels across the four authorities. The Black Country Local Enterprise Partnership (LEP) has identified that the number of Black Country residents with no qualifications will need to decrease by approximately 57,000 by 2033 to enable the Plan area to equal the national average, as of 2017<sup>112</sup>.

**Table 2.7: Qualifications across the Black Country, January 2018 – December 2018**<sup>113</sup>

Qualifications	Dudley	Sandwell	Walsall	Wolverhampton
NVQ4 and above	24.4	21.1	30.2	22.8
NVQ3 and above	39.4	35.1	50.8	36.9
NVQ2 and above	61.3	56.4	67.4	58.1
NVQ1 and above	75.4	68.4	79.4	73.0
Other Qualifications	10.5	11.2	9.2	10.8
No Qualifications	14.1	20.3	11.4	16.3

2.14.2 There are a large number of schools located across the Plan area, with a total of 406 primary schools and 127 secondary schools across the four boroughs (see **Figures 2.35** and **2.36**).

2.14.3 It is assumed that new residents in the Plan area require access to primary and secondary education to help facilitate good levels of education, skills and qualifications of residents.

2.14.4 It is recognised that not all schools within the Black Country are accessible to all pupils. For instance, independent and academically selective schools may not be accessible to all, and some secondary schools may only be for girls or boys. This has been considered within the assessment.

2.14.5 There are 56 schools with sixth-forms on the Plan area, plus 13 special schools with post-16 education provision and one special post-16 institution<sup>114</sup>.

2.14.6 There are also a number of further education and higher education opportunities within the Black Country, including the University of Wolverhampton, Dudley College of Technology and Sandwell College. Within the wider West Midlands, there are several universities including the University of Birmingham, Birmingham City University and Aston University.

<sup>112</sup> Department for Education (2017) Black Country Areas Review. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/582028/Black\\_Country\\_AR\\_-\\_Report\\_-\\_Final.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/582028/Black_Country_AR_-_Report_-_Final.pdf) [Date Accessed: 08/04/20]

<sup>113</sup> Nomis (2020) Labour Market Profile. Available at: <https://www.nomisweb.co.uk/reports/lmp/ia/1946157188/report.aspx?c1=1946157189&c2=1946157192> [Date Accessed: 08/04/20]

<sup>114</sup> Department for Education (2017) Black Country Areas Review. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/582028/Black\\_Country\\_AR\\_-\\_Report\\_-\\_Final.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/582028/Black_Country_AR_-_Report_-_Final.pdf) [Date Accessed: 08/04/20]

2.14.7 At this stage, there is not sufficient information available to be able to accurately predict the effect of new development on the capacity of local schools, or to incorporate local education attainment rates into the assessment.

**Access to schools**

2.14.8 Accessibility modelling data has been provided to Lepus by the BCA. The location of primary and secondary schools within the Black Country and the areas within a sustainable travel time to these schools have been mapped.

2.14.9 **Figure 2.35** shows the areas of the Black Country within a 15-minute walking distance to a primary school. **Figure 2.36** shows the areas of the Black Country within a 25-minute walking distance and 25-minute distance via public transport to a secondary school. These travel times are assumed to be sustainable for the purposes of SA.

2.14.10 The maps indicate that the majority of the Black Country is located within areas providing sustainable access to primary and secondary schools. However, some areas of the Black Country may experience longer travel times, particularly to primary schools, often in the outskirts of settlements as illustrated below. In these areas, travel via car may be relied upon more and these areas are therefore considered to be less sustainable for the purposes of SA.

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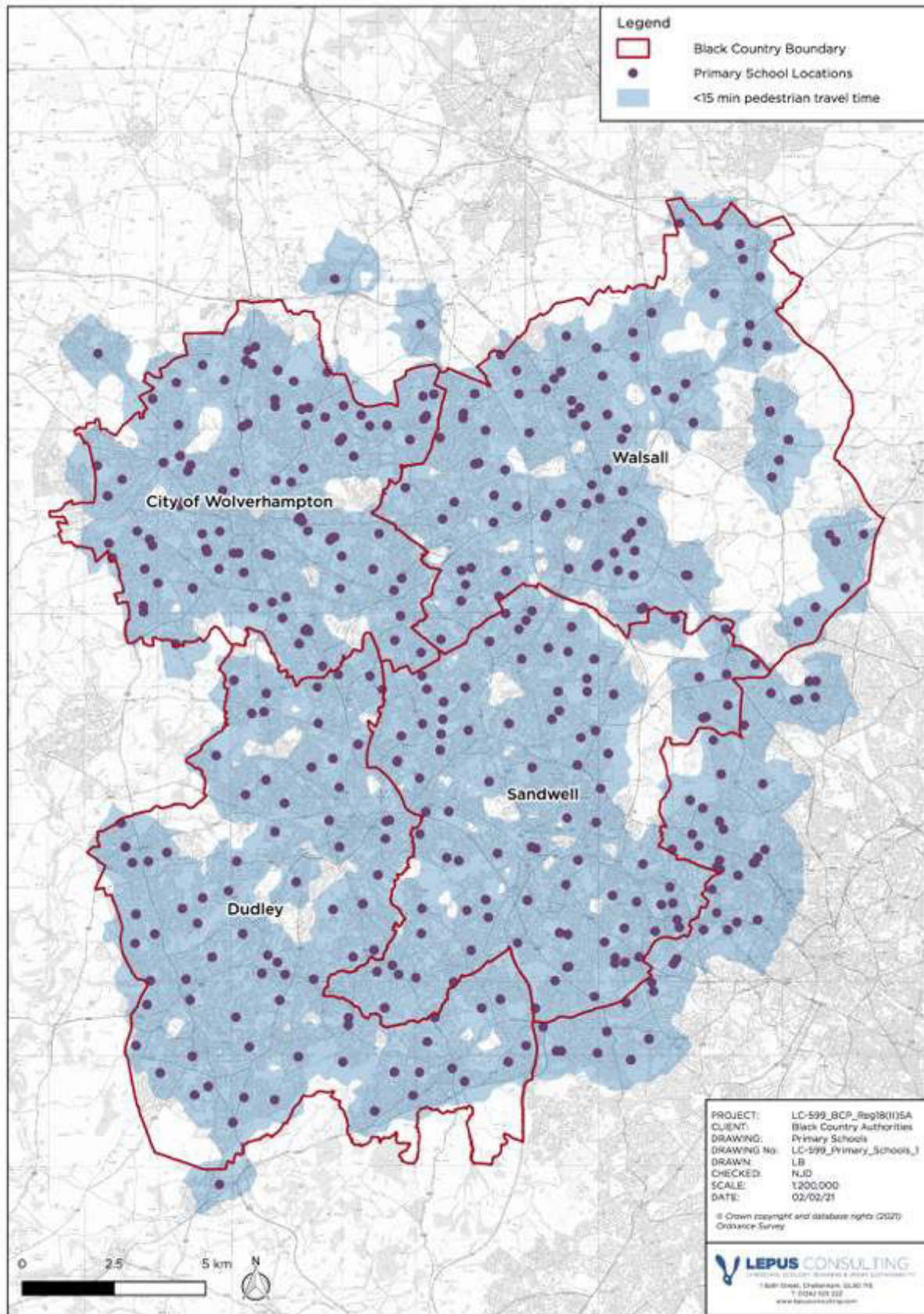


Figure 2.35: Location of primary schools and modelled travel time across the Black Country (source: BCA)

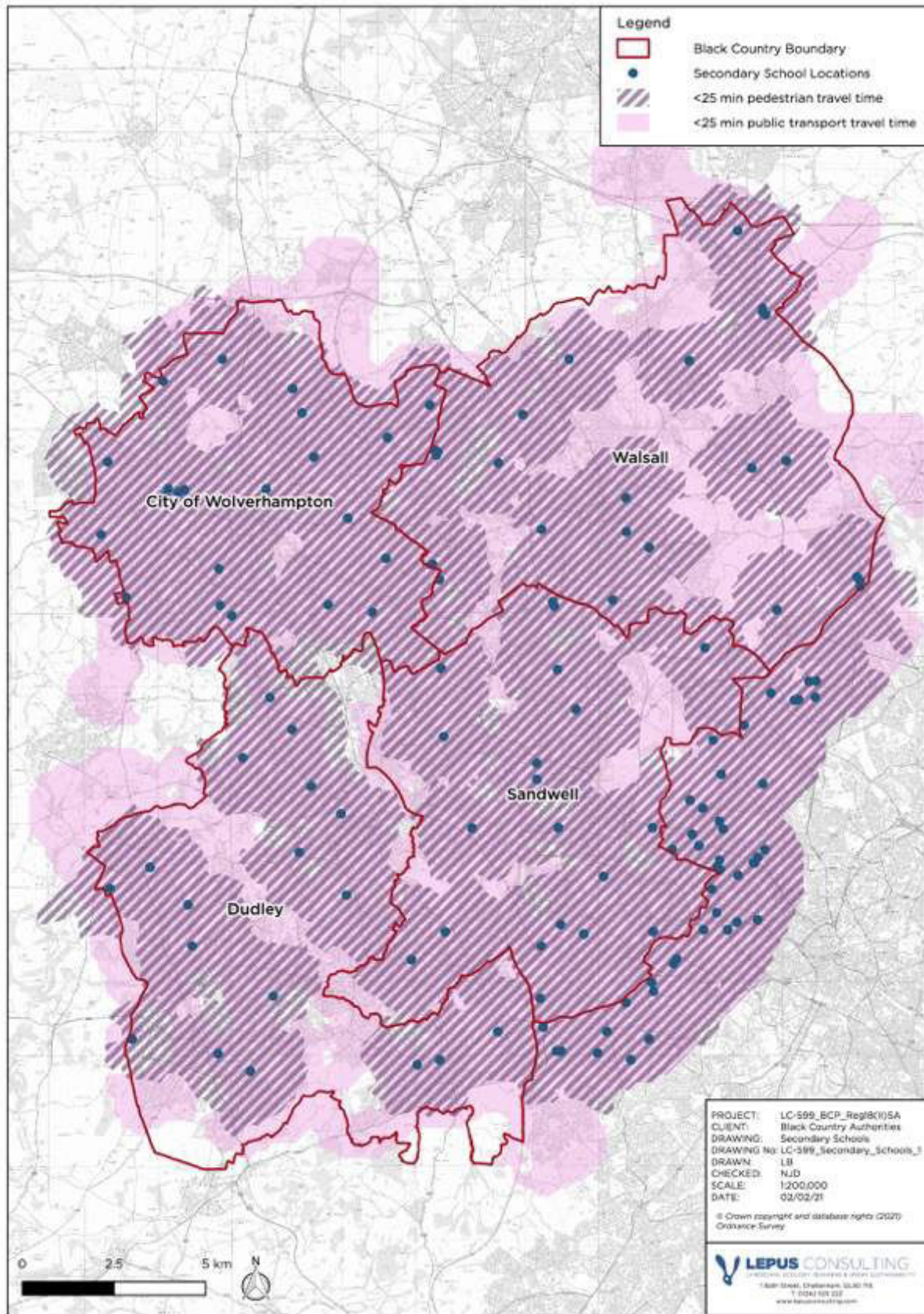


Figure 2.36: Location of secondary schools and modelled travel time across the Black Country (source: BCA)

## 3 Housing and Employment Number Options

### 3.1 Preface

3.1.1 The NPPF requires Local Authorities to consider reasonable alternatives for the overall levels of growth across the Plan period.

3.1.2 As part of the iterative plan making process, and in order for the SA to inform the development strategy, the four authorities developed five housing number and five employment number options to be subject to sustainability appraisal. The preliminary options were assessed in sustainability terms in January 2020 and were informed by the evidence base at that time. The January 2020 options are provided in the following appendices:

- **Appendix C** – Housing Number Options Assessment (Lepus Consulting, January 2020)
- **Appendix D** – Employment Number Options Assessment (Lepus Consulting, January 2020)

3.1.3 The original options considered in January 2020 have subsequently been updated below to reflect the emerging evidence base including (but not limited to):

- The Government's 'Response to the local housing need proposals in "Changes to the current planning system"<sup>115</sup>' issued on 1st April 2021 which includes an uplift to the standard method of 35% across 20 authorities including Wolverhampton. **Table 3.1** therefore reflects the housing projections for the BCA incorporating national requirements in relation to this uplift to the standard method (total projected need of 76,076 homes).
- Updates to the Economic Development Needs Assessment Part 2 (EDNA2) (May 2021). **Table 3.2** reflects the latest employment evidence up to May 2021<sup>116</sup>.

3.1.4 Through the appraisal of these ten options, this process compares the potential impacts of the options, and provides the BCA with the opportunity to consider different approaches to meeting the housing and employment requirements across the Plan period.

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<sup>115</sup> Available at: <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system> [Accessed 10th May].

<sup>116</sup> In addition it is noted that since January 2020 the West Midlands Interchange (WMI) has been granted consent by the Secretary of State through a development consent order. The WMI is a 300ha rail served B8 logistics development. The Site is located in South Staffordshire but has functional Black Country. This scheme however has not be included within any of the employment growth options due to its location in a neighbouring authority.

3.1.5 The subsequent tables presented in **Tables 3.1** and **3.2** reflects the evolution of the evidence base and national policy which has informed the consideration of reasonable alternative growth and employment options for the Draft BCP up until June 2021.

*Table 3.1: The five housing options (May 2021)*

Option	Description of Option
Option 1	'Do nothing'. Stick with the existing strategy 'brownfield first' and only focus development within the urban area. <ul style="list-style-type: none"> <li>40,117 net homes in urban area.</li> </ul>
Option 2	Stick with the existing strategy 'brownfield first' plus sustainable and deliverable Black Country Green Belt release, totalling 47,837 homes. <ul style="list-style-type: none"> <li>40,117 net homes in urban area.</li> <li>7,720 homes on land released from Black Country Green Belt and deliverable by 2039 and 1,715 homes on land released from Black Country Green Belt and deliverable after 2039.</li> </ul>
Option 3	2020-39 housing requirement of 76,076 homes all located within the Black Country. <ul style="list-style-type: none"> <li>40,117 net homes in urban area.</li> <li>35,959 homes on land released from Black Country Green Belt.</li> </ul>
Option 4	2020-39 housing requirement of 76,076 homes plus 3,000 homes of Birmingham's housing shortfall, totalling 79,076, all located within the Black Country. <ul style="list-style-type: none"> <li>40,117 net homes in urban area.</li> <li>38,959 homes on land released from Black Country Green Belt.</li> </ul>
Option 5	2020-39 housing requirement of 76,076 homes within the Black Country and neighbouring authorities <ul style="list-style-type: none"> <li>40,117 net homes in urban area.</li> <li>7,720 homes on land released from Black Country Green Belt and deliverable by 2039, and 1,715 homes on land released from Black Country Green Belt and deliverable after 2039.</li> <li>28,239 homes exported through Duty to Cooperate.</li> </ul>

*Table 3.2: The five employment options (May 2021)*

Option	Description of Option
Option 1	Retain existing brownfield strategy by focussing development wholly within the urban area. <ul style="list-style-type: none"> <li>306 ha in the urban area</li> </ul>
Option 2	Retain the existing strategy 'brownfield first' plus Black Country Green Belt release. <ul style="list-style-type: none"> <li>306ha in the urban area.</li> <li>47ha on land released from the Black Country Green Belt.</li> </ul>
Option 3	Retain the existing strategy 'brownfield first' plus substantial Green Belt release of 118-207ha. <ul style="list-style-type: none"> <li>306ha in the urban area.</li> <li>118-207ha on land released from the Black Country Green Belt.</li> </ul>
Option 4	Retain the existing strategy 'brownfield first' plus Black Country Green Belt release and exporting to neighbouring authorities. <ul style="list-style-type: none"> <li>306ha in the urban area.</li> <li>47ha on land released from the Black Country Green Belt.</li> <li>71-160ha exported through Duty to Cooperate.</li> </ul>
Option 5	Retain the existing strategy 'brownfield first' plus Black Country Green Belt release and exporting to neighbouring authorities. <ul style="list-style-type: none"> <li>306ha in the urban area.</li> </ul>



- 47ha on land released from the Black Country Green Belt.
- 140-444ha exported through Duty to Cooperate.

### 3.2 Methodology

3.2.1 The appraisal of housing and employment number options aims to assess the likely significant effects of each proposed option, based on the criteria set out in the SEA Directive (see **Box 1.1**).

3.2.2 For the appraisal against each SA Objective, an ‘impact symbol’ (see **Table 3.1**) has been allocated for each option. The symbols help to identify the overall sustainability impact for each SA Objective. These overall impacts have not been determined through ‘adding-up’ likely significant effects on receptors, but have been identified through professional judgement, and more often than not, taking a ‘worse-case scenario’ in line with the precautionary principle<sup>117</sup>.

3.2.3 The appraisal commentary provided should be read alongside the impact symbols.

*Table 3.3: Presenting likely impacts*

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

3.2.4 The appraisal of housing and employment number options should be read alongside the local context and assumptions set out in **Chapter 2**.

### 3.3 Housing Number Options

3.3.1 The BCA have identified five options for the quanta of housing provision across the Plan area. The five options considered are presented in **Table 3.1** above.

<sup>117</sup> Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.

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**3.3.2** **Table 3.4** below summarises the likely impacts of each housing option in relation to the 14 SA Objectives. The text below provides a summary of the likely significant effects of the five housing number options.

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**Table 3.4: Impact matrix of the five housing options**

Option Number	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
1	+/-	+/-	0	--	+/-	++	-	--	-	-	+/-	+/-	+/-	+/-
2	+/-	-	+/-	--	+/-	-	-	--	-	-	+/-	+/-	+/-	+/-
3	+/-	--	+/-	--	+/-	--	-	--	-	++	+/-	+/-	+/-	+/-
4	+/-	--	+/-	--	+/-	--	-	--	-	++	+/-	+/-	+/-	+/-
5	+/-	-	+/-	--	+/-	-	-	--	-	++	+/-	+/-	+/-	+/-

3.3.3 All housing options would be expected to result in major negative impacts in regard to climate change mitigation (SA Objective 4) and waste (SA Objective 8) due to the large quanta of development proposed under each option. Each option would be expected to increase carbon emissions through construction and operation and lead to an increase in household waste generation through residential occupancy.

3.3.4 The construction, occupation and operation of development would potentially exacerbate air pollution, including particulate matter (PM) and generate potential impacts on water quality. The entirety of the four authorities are designated as Air Quality Management Areas (AQMAs); ‘Dudley AQMA’, ‘Sandwell AQMA’, ‘Walsall AQMA’ and ‘Wolverhampton AQMA’. In addition, there are a large number of motorways and A-roads which cross the Plan area, each of which represent traffic-related sources of air pollution. All options are therefore considered likely to result in minor negative impacts in relation to pollution (SA Objective 7).

3.3.5 Minor negative impacts are recorded in relation to transport and accessibility (SA Objective 9) as the development under all options has potential to increase pressures and congestion on the strategic and local road network. It is also acknowledged that by locating residents in proximity to services, facilities and public transport in the urban centres and at the edge of settlements this could potentially help to reduce the need to travel by private car and also facilitate utilisation of, and investment in, sustainable travel modes. Transport and accessibility modelling therefore forms an important component of the BCP to guide the development strategy.

3.3.6 Mixed effects are identified in terms of equality (SA Objective 11) as the growth strategy has the potential to have positive impacts in terms of accessibility to key services and facilities, employment opportunities and access to housing, including affordable housing, across the BCA area. However, potential negative impacts could arise if high-quality employment land

is lost to housing development in urban areas. The spatial distribution of growth and investment it also an important consideration when considering equality.

- 3.3.7 As the location, site context and proximity to receptors of the proposed housing provision is unknown, all of the options have been identified as having uncertain impacts in relation to cultural heritage (SA Objective 1), climate change adaptation (SA Objective 5), health (SA Objective 12), economy (SA Objective 13), and education (SA Objective 14).
- 3.3.8 Housing Options 3, 4 and 5 would be expected to meet the identified housing requirement of 76,076 homes, and therefore, have a major positive impact on housing provision (SA Objective 10). However, the proposed development under Housing Options 1 and 2 would not deliver enough dwellings to meet the identified housing need, and therefore, these two options would be likely to have a minor negative impact on housing provision. The capacity of the urban areas (40,117 dwellings) has been informed through urban capacity and employment land reviews as well as the Strategic Housing Land Availability Assessments (SHLAAs) for each of the 4 authorities including density uplifts (where appropriate) and redevelopment of vacant or under-utilised employment land. These aspects need to be carefully considered as development solely focused in urban areas could, without careful planning, have adverse impacts on loss of employment opportunities, access to greenspaces for health and well-being and the capacity of education, health and other facilities to accommodate growth. The identified capacity of 40,117 dwellings in the urban areas has taken these and other considerations into account in identifying the capacity of potential growth in the urban areas.
- 3.3.9 Development in the urban areas under Option 1 would help to minimise the overall vegetation cover lost to development and would therefore minimise the potential for negative effects on biodiversity (SA Objective 3). Development under Options 2, 3, 4 and 5 would result in a loss of previously undeveloped land and would involve the loss of natural habitat and soil resources which provide an important ecosystem service. The extent of impacts on habitats, species and habitat connectivity will depend on location and contextual factors as well as site design. The construction of a new dwellings in the Green Belt under Options 2-5 would be expected to result in the loss of biodiversity features to some extent, and this would likely to be more pronounced for Options 3 and 4 owing to the higher proportion of development on Green Belt land. Adhering to biodiversity net gain principles and a commitment to Green Infrastructure improvements could also deliver positive effects in the long term for Options 2, 3, 4 and 5.
- 3.3.10 Options 2, 3, 4 and 5 would lead to some loss of open countryside and therefore varying degrees of adverse impacts on landscape resources are likely (SA Objective 2). The extent of impacts on the surrounding landscape and visual receptors will depend on location and contextual factors and site design. It can be assumed that the larger the quantity of development proposed, the greater the risk of adverse impacts on SA Objective 2. As a result, Housing Option 1, which proposes the lowest quantity of development and within the

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urban areas, would be expected to have greater scope for avoiding and mitigating adverse impacts, followed by Options 2 and 5.

- 3.3.11 Housing Option 1 solely focuses development in the urban areas of the Black Country. This strategy would support the redevelopment of brownfield land within the BCA which represents an efficient use of land in accordance with the NPPF. As such, this option would be likely to result in major positive impacts on Natural Resources (SA Objective 6). Housing Options 2, 3, 4 and 5, which direct a proportion of development to the Green Belt, and therefore, on previously undeveloped land would lead to the loss of soil resources which could potentially include some of the 'best and most versatile' (BMV) agricultural land and potentially mineral resources in some locations. Housing Option 1 is likely to situate new residents in areas with good access to existing services, including healthcare facilities (SA Objective 12) and schools (SA Objective 14). However, capacity for new provision would likely be more limited.
- 3.3.12 Housing Option 5 directs a proportion of development to neighbouring districts. As the quanta of development within each district and location of development within each authority is currently unknown, the impact of exporting development outside of the Black Country Plan area is uncertain.
- 3.3.13 Overall, as Housing Option 1 proposes the least quantity of development focused in urban areas, this option would be likely to result in the least adverse impacts in regard to a range of environmental objectives including landscape (SA Objective 2), biodiversity (SA Objective 3) and natural resources (SA Objective 6). However, Option 1 would not meet the identified housing needs for the plan area and may also have a range of negative socio-economic implications if pursued in isolation. Whilst higher density development in urban areas would help to minimise effects on natural resources, this needs to be carefully planned and designed to ensure that there are no adverse impacts on health and wellbeing. Options 2 and 5 seek to provide for some development within the Green Belt, which would likely have a negative impact across a number of environmental criteria including landscape (SA Objective 2) and natural resources (SA Objective 6), but to a lesser extent than Options 3 and 4 which seek to deliver the highest proportion of development in the greenbelt.

### 3.4 Employment Number Options

3.4.1 The Black Country Authorities have identified five options for the quanta of employment floorspace across the Plan area. The five options considered are presented in **Table 3.2** above.

3.4.2 **Table 3.5** below presents the likely impacts of each employment option in relation to the 14 SA Objectives. The text below provides a summary of the likely significant effects of the five employment number options.

*Table 3.5: Impact matrix of the five employment options*

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Option Number	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
1	+/-	+/-	0	+/-	+/-	++	-	+/-	-	0	+	0	-	0
2	+/-	-	+/-	+/-	+/-	-	-	+/-	-	0	+	0	-	0
3	+/-	--	+/-	+/-	+/-	--	-	+/-	-	0	+	0	+	0
4	+/-	-	+/-	+/-	+/-	-	-	+/-	-	0	+	0	+	0
5	+/-	-	+/-	+/-	+/-	-	-	+/-	-	0	+	0	++	0

3.4.3 Employment Options 1 and 2 would fail to meet the minimum low growth scenario in EDNA2 (364ha + replacement) and therefore are considered to have a minor negative impact on the local economy (SA Objective 13). Options 3 and 4 could potentially meet the medium growth scenario in EDNA2 (433-522ha + replacement) and are therefore considered to have a minor positive impact on the economy. Option 5 is the only option that could potentially meet the high growth scenario in EDNA2 (502-806ha + replacement) and is therefore considered to have a major positive impact on the economy.

3.4.4 The delivery of employment floorspace would not be likely to impact local housing provision, or access to healthcare and education facilities. Therefore, the five employment options would be expected to have a negligible impact in regard to housing, health and education (SA Objectives 10, 12 and 14).

3.4.5 By directing development towards the urban area, new site users would be located in areas with good access to sustainable transport options, such as rail and bus services. However, additional development in the urban area could also exacerbate existing issues with congestion and increase pressures on the road network. As a result, all employment options would be expected to result in minor negative impacts in relation to pollution (SA Objective

- 7) and transport (SA Objective 9), primarily as all five options propose 306 ha of employment floorspace within the urban area.
- 3.4.6 All five employment options would be likely to have a minor positive impact on equality of local communities, due to an increase in a range of employment opportunities (SA Objective 11).
- 3.4.7 As the location, site context and proximity to receptors of the proposed employment provision is unknown, all of the options have been identified as having uncertain impacts in relation to cultural heritage (SA Objective 1) and climate change adaptation (SA Objective 5). As the scale and type of employment floorspace proposed is currently unknown, uncertain impacts have been identified for climate change mitigation (SA Objective 4) and waste (SA Objective 8).
- 3.4.8 It can be assumed that the larger the quantity of development proposed, the greater the risk of adverse impacts on landscape and biodiversity features (SA Objectives 2 and 3). As a result, Employment Option 1, which proposes the lowest quantity of development, would be expected to have greater scope for avoiding adverse impacts, with Option 3 posing the greatest risk of adverse impacts due to involving the greatest loss of Green Belt land at approximately 118-207ha, compared to Options 2, 4 and 5 which would involve 47ha of Green Belt release.
- 3.4.9 Development on previously developed land is classed as an efficient use of land. As a result, Employment Option 1 would be likely to help protect the Plan area's natural resources (SA Objective 6).
- 3.4.10 Employment Options 4 and 5 direct a proportion of development to neighbouring authorities. As the quanta of development within each authority and location of development within each authority is currently unknown, the impact of exporting development outside of the Black Country Plan area is uncertain.
- 3.4.11 Overall, as Employment Option 1 proposes the least quantity of development, this option would be likely to result in the least adverse impacts in regard to landscape (SA Objective 2), biodiversity (SA Objective 3) and natural resources (SA Objective 6). However, this option would fail to meet the low growth scenario in EDNA2 (364ha + replacement) and would therefore be unlikely to meet identified employment needs (SA Objective 13).
- 3.4.12 The above analysis highlights that many sustainability impacts associated with housing and employment growth are based on the spatial distribution of growth and site-specific contextual factors, which are assessed in greater detail in the following sections of this SA report.

## 3.5 BCP Preferred Approach - Housing and Employment Growth

3.5.1 Housing capacity has been identified based on the following information:

- Strategic Housing Land Availability Assessments (SHLAAs) and the Black Country Employment Area Review (BEAR);
- An estimate of the likely scale of housing renewal up to 2039;
- An estimate of likely windfall development on small sites up to 2039;
- An assessment of the likely capacity of strategic centres above existing supply, drawing on the Black Country Centres Study;
- Application of a density uplift to existing allocations likely to gain permission after 2024, in line with Policy HOU2; and
- A comprehensive Green Belt review and site assessment process, which has identified new sites suitable and available for release for housing development, and deliverable within the Plan period and beyond.

3.5.2 Housing Growth Evidence base:

- Dudley, Sandwell, Walsall, and Wolverhampton SHLAAs (2021);
- Black Country Urban Capacity Review Update (2021);
- Black Country Employment Area Review (2021); and
- Black Country Viability and Delivery Study (2021).

3.5.3 Employment Growth Evidence Base:

- Economic Development Needs Assessment Part One (2017) and Part Two (2021);
- Black Country Urban Capacity Review Update (2021);
- Black Country Plan Site Assessment Report (2020);
- Black Country BEAR;
- Black Country Strategic Employment Land Reviews; and
- Statements of Common Ground.

3.5.4 These provisions are set out in Policies CPS1-5, HOU 1 and EMP1 of the Draft Plan (See also **Appendix J** for the sustainability assessment of these policies).

3.5.5 The BCA are aiming to utilise land efficiently through the use of previously developed land, vacant properties and surplus industrial land, and maximising housing densities where appropriate, but there is a shortage of deliverable sites to meet housing and economic growth needs.

3.5.6 For housing growth approximately 40,117 homes of the projected housing need of 76,076 homes would be located in the existing urban areas. Approximately 7,720 homes within the plan period to 2039 would be located on greenfield land<sup>118</sup> the majority of which comprises

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<sup>118</sup> A further housing capacity of 1,715 homes has been identified post 2039 (beyond the plan period) on two large green belt release sites, due to housing market delivery constraints.



- Green Belt release land located in a limited number of Neighbourhood Growth Areas on the edge of settlements.
- 3.5.7 For employment growth, approximately 307 ha of the projected employment land requirements of 565ha would be met within the existing built-up areas and approximately 48 ha via Green Belt release.
- 3.5.8 This strategy would support the redevelopment of brownfield land within the BCA which represents an efficient use of land in accordance with the NPPF by locating the majority of housing within the existing urban areas.
- 3.5.9 For housing growth, approximately 63% (47,835 homes) of the overall projected housing need of 76,076 homes for the plan period up to 2039 would be met within the Black Country administrative authorities, leaving a shortfall of 37% which would need to be explored through potential contributions through Duty to Co-operate.
- 3.5.10 For employment growth, approximately 63% of the 565ha of identified employment land requirements would be provided within the Black Country authority administrative areas, with a shortfall of 211ha or 37% of employment land which would need to be explored via a Duty to Co-operate, particularly where there is a strong existing or potential functional economic relationship with the Black Country, for example in terms of migration patterns, commuting links and / or connectivity through physical infrastructure such as rail and motorway.
- 3.5.11 The BCA have undertaken an extensive Green Belt and landscape sensitivity assessment and have used this to ensure that development is designed to minimise harm to the purposes of the Green Belt and to landscape character, as identified through the site assessment process. In determining potential allocations, sites have also been assessed in terms of their accessibility by all modes of transport as part of the evidence base for the draft BCP and well as a range of other evidence sources.
- 3.5.12 A number of the proposed strategic housing allocations are located within areas predicted to have a negligible or minor adverse effect on landscape sensitivity (including sites SA-0004-DUD, SA0017-DUD, SA-0025-DUD, SA-0014-WAL, SA-0022-WAL, SA-0048-WAL, SA-0187-WAL, SA-0009-WOL, SA-0010-WOL, SA-0015-WOL and SA-0030-WOL), which relate to areas of 'low', 'low-moderate' or 'moderate' landscape sensitivity as identified in the landscape sensitivity study. A number of the proposed strategic allocations are located within areas predicted to have a minor impact on the Green Belt (including sites SA-0004-DUD, SA-0017-DUD, SA-0009-WOL, SA-0010-WOL, SA-0015-WOL and SA-0030-WOL). Many of the proposed strategic housing allocations in Walsall (as well as other identified reasonable alternatives) are located in more sensitive areas with respect to landscape sensitivity and Green Belt harm which needs to be weighed in the planning balance. In taking forward development plans, it is envisaged that opportunities would be sought to integrate high quality multi-functional GI into the designs and strengthen a wider GI network for all

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developments with further consideration of providing areas accessible to the public for the benefit of mental health and wellbeing.

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# 4 Spatial Options

## 4.1 Preface

4.1.1 **Table 4.1** below outlines the eleven spatial options identified by the Councils. Each option has been assessed for its likely sustainability impacts, a summary of which is presented in **Table 4.3**. Full explanations and reasonings behind each overall 'score' outlined in **Table 4.3** are set out per SA Objective in **Appendix E**.

*Table 4.1: Black Country Spatial Options*

Spatial Option	Description of Spatial Option
<b>Option A</b>	Business as Usual – Retain current housing and employment allocations
<b>Option A1</b>	Employment-led growth - Business as Usual plus employment-led green belt releases
<b>Option B</b>	Reconfigure uses in the Urban Area to Promote Mixed Use and Local Employment – Retain more local employment land, intensify existing employment areas and explore potential to changes uses in Strategic and Town Centres
<b>Option C</b>	Maximise Densities and Invest in Services to reduce climate change impacts – Increase densities to 50 dph / 200 dph in Centres and invest to fill gaps in residential services (schools, GPs, fresh food, employment)
<b>Option D</b>	Market-Led – Allocate housing in high demand areas and employment land in most attractive commercial locations
<b>Option E</b>	Open Space Protection / Health Promotion - Protect publicly accessible open space within the urban area and create new open space to serve developments, as this is more functional for local communities than Green Belt
<b>Option F1</b>	Green Belt and Landscape Character Protection - Protect all areas of highest Green Belt harm and landscape sensitivity, regardless of potential positive sustainability impact of development in these locations
<b>Option F2</b>	Green Belt Protection – Protect all areas of highest Green Belt harm
<b>Option G</b>	Garden Village / urban greening to adapt to climate change - Lower density, mixed use development on larger sites (Key Large Sites?) with more open space which supports the Nature Recovery Strategy (funded by Biodiversity Net Gain) and flood risk mitigation and more on-site residential services
<b>Option H</b>	Maximise Sustainable Access to reduce climate change impacts - Only build housing in locations with highest levels of sustainable transport access to residential services (schools, GPs, fresh food, employment) and only locate new employment land where good public transport access
<b>Option J</b>	Balanced Growth

## 4.2 Methodology

4.2.1 For the appraisal against each SA Objective, an ‘impact symbol’ (see **Table 4.2**) has been allocated for each option. The symbols help to identify the overall sustainability impact for each SA Objective.

*Table 4.2: Presenting likely impacts*

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

4.2.2 In order to identify the best performing spatial option, a ranking exercise has been carried out in Appendix E to determine the most sustainable options under each SA Objective. The ranking exercise considered the findings of the SA as presented below, as well as applying local knowledge and expert judgement. This is therefore a subjective exercise and should not be relied upon alone in determining likely sustainability impacts. The accompanying narrative in **Appendix E** explains how these ranks have been determined.

4.2.3 **Table 4.3** presents the likely overall SA impacts, with respect to that particular objective.

### 4.3 Assessment of Spatial Options

Table 4.3: Impact matrix of all spatial option assessments

Spatial Option	A	A1	B	C	D	E	F1	F2	G	H	J
Description	Business as Usual	Employment-led growth	Reconfigure uses in the Urban Area	Maximise Densities and Invest in Services	Market-Led	Open Space Protection / Health Promotion	Green Belt and Landscape Character Protection	Green Belt Protection	Garden Village / urban greening	Maximise Sustainable Access	Balanced Growth
SA Objective 1 Cultural Heritage	O	-	O	-	-	O	-	-	O	-	O
Objective 2 Landscape	O	-	+	-	-	+	+	+	-	-	+
Objective 3 Biodiversity & Geodiversity	+	-	+	+	+	+	-	-	+	+	+
Objective 4 Climate Change Mitigation	+	-	+	+	+	+	-	-	+	+	+
Objective 5 Climate Change Adaptation	+	-	+	+	+	+	-	-	O	+	O
Objective 6 Natural Resources	+	-	+	+	+	O	-	-	-	+	O
Objective 7 Pollution	-	-	-	-	-	+	O	O	+	-	O
Objective 8 Waste	+/-	+/-	-	-	-	-	-	-	-	-	-
Objective 9 Transport	-	-	+	+	-	+	-	-	O	+	+
Objective 10 Housing	-	-	-	+	-	-	-	-	+	+	+
Objective 11 Equality	-	-	+	-	-	+	-	-	+	+	+
Objective 12 Health	+	+	-	-	+	+	O	O	+	-	O
Objective 13 Economy	--	-	+	+	+	-	-	-	-	+	+
Objective 14 Education	-	-	-	+	-	-	-	-	+	+	+

- 4.3.1 In terms of cultural heritage (SA Objective 1) adverse impacts are predicted in association with **Spatial Options A1, C, D, F1, F2** and **H**, largely due to the likelihood of impacts on the character and setting of the historic environment as a result of development in these broad locations. **Spatial Options A, B, E, G** and **J** are unlikely to result in significant adverse effects on the cultural heritage of the Black Country as they present more opportunities to avoid or mitigate harm to the historic environment. Spatial Option C is considered the best performing option for this objective.
- 4.3.2 In terms of landscape (SA Objective 2) development under **Spatial Option A** would be unlikely to significantly affect the landscape as this option involves changing uses of existing development. **Spatial Options B, E, F1, F2** and **J** are considered to contribute towards sustainable development in a positive way, through directing development towards areas of lower sensitivity and promoting open spaces. Spatial Option B is considered the best performing option for this objective.
- 4.3.3 In terms of biodiversity (SA Objective 3), adverse impacts have been identified under **Spatial Options A1, F1** and **F2**, largely associated with the promotion of development in the Green Belt resulting in likely losses and fragmentation of the ecological network. On the whole, **Spatial Options A, B, C, D, E, G, H** and **J** are likely to provide more opportunities to benefit biodiversity and geodiversity due to the protection of sensitive features, and delivery of development at higher densities in the existing urban area. There is very little difference identified between the performance of these options. Overall option E is considered the best performing spatial option for this objective.
- 4.3.4 In terms of climate change mitigation (SA objective 4) is likely that the development proposed under all spatial options would result in mixed effects with regard to climate change mitigation. It is likely that the development proposed under all spatial options would result in mixed effects with regard to climate change mitigation. In comparison, **Spatial Options A, B, C, D, E, G, H** and **J** could potentially result in positive impacts on climate change mitigation overall, as these options would seek to protect open spaces, limit the loss of greenfield land and/or ensure services and facilities are accessible via sustainable means. Overall option J is considered the best performing spatial option for this objective.
- 4.3.5 In terms of climate change adaptation (SA Objective 5), adverse impacts have been identified under **Spatial Options A1, F1** and **F2**, primarily due to the promotion of development in the Green Belt resulting in larger-scale losses of green infrastructure compared to the other options. Overall, **Spatial Options G** and **J** are considered to result in a neutral impact on this objective, associated with a mixture of positive and negative sustainability impacts. The development under **Spatial Options A, B, C, D, E** and **H** could potentially result in a minor positive impact on climate change adaptation overall, associated with the protection of open spaces and promotion of higher density development to limit losses of green infrastructure. Spatial Option A is considered the best performing option for this objective.

- 4.3.6 In terms of natural resources (SA Objective 6) adverse impacts have been identified under **Spatial Options A1, F1, F2, and G**, primarily due to the promotion of development in the Green Belt resulting in larger-scale losses of soil and natural resources compared to the other options. Neutral impacts have been identified under **Spatial Options E and J** overall, balancing the mixture of positive and negative sustainability impacts that could be expected from the protection of open spaces alongside development. Positive impacts have been identified under **Spatial Options A, B, C, D and H**. These options would be likely to present the most opportunities out of the eleven to make the best use of natural resources through delivering higher density development and ensuring under-utilised urban spaces are prioritised for development.
- 4.3.7 In terms of pollution (SA Objective 7) overall, adverse impacts are likely to be associated with **Spatial Options A, A1, B, C, D and H**. This is primarily due to these options leading to a larger proportion of development directed to areas with existing pollution issues. Neutral impacts are identified for **Spatial Options F1, F2 and J** because these three options would lead to mixed effects when considering the balance between Green Belt releases and development in existing urban areas. The spatial options with the greatest potential for positive impacts in terms of pollution are considered to be **Options E and G**, as these two options would be likely to provide the most opportunities to protect people from adverse impacts associated with pollution.
- 4.3.8 In terms of waste (SA Objective 8) there is some uncertainty regarding the likely sustainability impacts associated with all spatial options when considering waste generation. Overall, **Options B, C, D, E, F1, F2, G, H and J** are considered likely to result in more adverse impacts on waste generation associated with the large scale of new development and would place pressure on existing waste management systems. Uncertain scores have been identified for **Spatial Options A and A1**, primarily due to the unknown impact on waste associated with the conversion of employment land to residential use. However, overall, these two options are likely to result in less generation of waste compared to the other nine options.
- 4.3.9 In terms of transport and accessibility (SA Objective 9) overall, **Spatial Options A, A1, D, F1 and F2** would be expected to result in a minor negative impact on transport and accessibility, primarily due to the potential for development to be directed towards unsustainable areas or these options increasing the need to travel. A neutral impact has been identified under **Spatial Option G**, associated with the combination of positive and negative impacts from directing some development to a garden village. Positive impacts have been identified in association with **Spatial Options B, C, E, H and J** because these five options would promote the highest proportion of developments to areas with sustainable access to services and employment.
- 4.3.10 In terms of housing (SA Objective 10) negative impacts have been identified for **Spatial Options A, A1, B, D, E, F1 and F2** as these options would be unlikely to deliver enough housing

to meet identified needs. Positive impacts have been identified for **Spatial Options C, G, H** and **J**, as these four options would be expected to make the greatest contributions towards delivering sustainable housing to meet needs, although there remains some uncertainty as to the housing mix under several options.

- 4.3.11 In terms of equality (SA Objective 11) adverse impacts have been identified, associated with **Spatial Options A, A1, C, D, F1** and **F2**, largely due to these options directing growth towards potentially unsustainable locations with reduced access to services, facilities and open space and/or promoting higher density development which could increase the risk of crime and the fear of crime. Positive impacts have been identified under **Spatial Options B, E, G, H** and **J** due to the more balanced approach within these options providing access to services and facilities as well as open spaces for recreation and community cohesion.
- 4.3.12 In terms of health (SA Objective 12) negative impacts have been identified for **Spatial Options B, C** and **H**, primarily because these options would be expected to deliver higher density development and reduce accessibility to open space. Negligible/neutral impacts have been identified under **Spatial Options F1, F2** and **J**, when considering the mixed effects anticipated with providing open space and lower density development, alongside potential reduced accessibility to healthcare as a consequence. Positive impacts have been identified for **Spatial Options A, A1, D, E** and **G**, as these five options would be likely to deliver the greatest benefits in terms of accessibility to healthcare and open space.
- 4.3.13 In terms of the economy (SA Objective 13) a major negative impact on the economy has been identified for **Spatial Option A**, because this option would result in a loss of employment land without seeking to replace this elsewhere. Minor negative impacts have been identified for **Spatial Options A1, E, F1, F2** and **G**, as these options could lead to employment development in inappropriate locations and would not be expected meet identified needs. Minor positive impacts have been identified for **Spatial Options B, C, D, G** and **J**, primarily associated with the more considered approaches towards the sustainable location of employment development under these options.
- 4.3.14 In terms of education (SA Objective 14) there is a level of uncertainty with regards to the impact each of the eleven spatial options on education, in terms of accessibility as well as capacity of schools in each area. Overall, adverse impacts would be anticipated under **Spatial Options A, A1, B, D, E, F1** and **F2**, due to the reduced access to education, or significant pressure to school capacity, resulting from development in these locations. Positive impacts could be achieved under **Spatial Options C, G, H** and **J**. This is primarily because these options would be likely to result in the most development being situated in areas with good access to education.



## 4.4 Summary of Sustainability Appraisal for Spatial Options

4.4.1 The best performing option has been identified as **Spatial Option J**. This option performs the best across SA Objectives 4 and 9, and second-best across SA Objectives 3, 10, 11 and 13 largely due to the balanced approach to growth under this strategy.

4.4.2 This is followed by **Spatial Option E**, which performs best across SA Objectives 1, 3, 7 and 11 but performs poorly under several other objectives, primarily as a result of the lower density development likely to be delivered under this option resulting in benefits to human and ecological health, but wider spread environmental impacts in some contexts.

4.4.3 There is little difference in the overall ranking between **Spatial Options G, B, A, H, C and D**. These options would be likely to result in a range of sustainability impacts, performing well under some SA Objectives but poorly under others, and so would be expected to perform worse than balanced growth under **Option J** overall.

4.4.4 The highest summed ranks, and as such potentially the least sustainable options, would be **Spatial Options A1, F2 and F1**. These options include larger proportions of development within the Green Belt, and **Options F1 and F2** focus on limiting landscape character and sensitivity impacts rather than delivering growth which is necessarily the most sustainable across all topics.

## 4.5 BCP Preferred Option – Spatial Strategy

4.5.1 The overall spatial approach has evolved from consideration of a number of spatial and growth options for development. These have been informed by the evidence base underpinning the Draft BCP and were subjected to SA (see SA **Appendices C to E**). The most sustainable option was considered to be ‘balanced growth’ with the spatial strategy focusing growth within the existing Strategic Centres, Core Regeneration Areas and Town and Neighbourhood Areas in the sub-region and taking advantage of their existing infrastructure capacity, alongside a limited number of new Neighbourhood Growth Areas near to the edge of settlements that takes account of environmental, climate change, accessibility and socio-economic requirements. Overall, this option is considered to perform the best, as it strikes a balance between retaining valuable environmental assets whilst also prioritising development in the most sustainable locations.

4.5.2 The Distribution of Growth as proposed in the Development Strategy can be summarised as:

- Strategic Centres (CSP2) - Brierley Hill, Walsall, West Bromwich and Wolverhampton (existing key urban areas).
- Core Regeneration Areas (CSP2) – Near to urban areas comprising large parcels of employment land across the Black Country. The strategy for the Core Regeneration Areas reflects two key issues arising from the evidence base – firstly, the need to provide for economic growth through the protection and enhancement of sustainable employment land and premises; and secondly,

delivering housing growth through the release of poor quality and underused land to support the ongoing regeneration of the Black Country.

- Neighbourhood Growth Areas (CSP3)- Urban edge housing developments in accessible locations. These areas are sites or clusters of sites that can provide at least 250 homes, creating opportunities to deliver houses of various sizes, types and tenures to meet a variety of needs.
- Towns and Neighbourhood Areas (CSP3) The Towns and Neighbourhoods Areas make up most of the existing urban area and are where the majority of residents live as well as a number of Local Employment Areas. The overall land use-pattern within the Towns and Neighbourhoods Areas is not expected to alter greatly by 2039, but there will be some incremental change through a mix of permitted and allocated sites, windfall developments and town centre regeneration activity.
- Small windfall housing sites (outside strategic centres)
- Exported through Duty to co-operate

#### 4.5.3 Evidence base

- Dudley, Sandwell, Walsall and Wolverhampton SHLAAs (2021)
- Black Country Urban Capacity Review Update (2021)
- Black Country Employment Area Review (2021)
- Black Country Viability and Delivery Study (2021)
- Black Country Green Belt Study (2019)
- Black Country Landscape Sensitivity Assessment (2019)
- Black Country Economic Development Needs Assessment (2017 and 2021)
- Strategic Transport Evidence
- Strategic Environmental Evidence.
- Draft Black Country Plan Statement of Consultation

4.5.4 The details of the spatial strategy are shown on the Spatial Strategy figure in the BCP. Housing and employment allocations for each Black Country authority are provided in Chapter 13 and shown on the Policies Map. The SA of the preferred option (Option J 'Balanced Growth') is provided in **Appendix E**.

# 5 Reasonable Alternative Site Assessments

## 5.1 Preface

5.1.1 The Black Country Call for Sites request opened in July 2017 and this continued until August 2020<sup>119</sup>. Each of the four authorities have carried out a Strategic Housing Land Availability Assessment (SHLAA) of sites within which have the potential to accommodate new housing development and an Employment Development Land Review for sites with potential to accommodate employment development. Some sites have been assessed for both potential uses.

5.1.2 Across the four authorities, a total of 334 'new' housing and employment sites were identified by BCA as reasonable alternatives to be assessed as part of the SA, informed by the Call for Sites process and other studies undertaken as part of the evidence base for the BCP. A total of 288 'carried forward' housing and employment sites were also assessed as part of the SA, comprising sites which have been previously allocated in the adopted Development Plans. 13 GTTS sites have also been assessed.

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

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

- Flood Risk Zone 3
- Site of Special Scientific Interest
- Local Nature Reserve
- Special Area of Conservation
- Site of Importance for Nature Conservation
- Ancient Woodland
- Scheduled Ancient Monuments
- Registered Parks & Gardens
- Burial Grounds
- Existing residential

<sup>119</sup> Available at <https://blackcountryplan.dudley.gov.uk/t2/p3/> [Accessed 18<sup>th</sup> May 2021].

- Operational sites (education, leisure, utilities, places of worship, canal network, transport infrastructure)
- Open Space not surplus against current standards
- Sites <0.25 ha with no “call for site” submitted
- Local authority land with no “call for site” submitted
- HSE Inner Zone (for residential)
- Landowner has expressed unwillingness

5.1.5 Identification of a site as a reasonable alternative does not imply that the site is not subject to other constraints or indeed that any receptor listed in para 5.1.4 will not in some way be potentially affected by a reasonable alternative site. Further potential constraints are assessed as part of the SA and plan making process for identified reasonable alternatives, using available evidence derived from publicly accessible data sources and information supplied by the BCA.

5.1.6 **Section 5.2** sets out the methodology used to appraise the reasonable alternative sites in the SA process and presents a summary of the appraisal against each SA Objective. The SA findings have been grouped per authority in **Appendix F** (Dudley), **Appendix G** (Sandwell), **Appendix H** (Wolverhampton) and **Appendix I** (Walsall). Reasonable alternative Gypsy and Traveller sites are presented in **Appendix K**.

## 5.2 SA Assessment Methodology

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

5.2.2 The receptors considered for each SA Objective have been discussed within the local context and assumptions set out in **Chapter 2**. The appraisal of reasonable alternative sites should be read in conjunction with this Chapter.

5.2.3 The topic-specific methodologies set out in **Boxes 5.1 to 5.14** below sets out how the likely impact per receptor has been identified in line with the local context and the impact symbols presented in **Table 5.1**.

5.2.4 All distances stated in site assessments are measured ‘as the crow flies’ from the closest point of the site/receptor in question, unless otherwise stated.

*Table 5.1: Presenting likely impacts*

Likely Impact	Description	Impact Symbol
Major Positive Impact	The proposed option contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option contributes to the achievement of the SA Objective to some extent.	+

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

5.2.5 **Appendices F, G, H, I and K** set out the detailed appraisal of each reasonable alternative site proposed. The appraisal evaluates the likely significant effects of each reasonable alternative against the 14 SA Objectives.

5.2.6 The following sections of this report set out the topic-specific methodologies used to appraise the reasonable alternative sites and provides a summary of the likely significant effects of the reasonable alternative sites.

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## 5.3 SA Objective 1: Cultural heritage

5.3.1 **Box 5.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 1: Cultural heritage.

### *Box 5.1: SA Objective 1: Cultural heritage strategic assessment methodology*

Likely Impact		Notes
<b>Grade I Listed Buildings</b>		
--	Development proposal coincides with, is located adjacent to, or could significantly impact the setting of, a Grade I Listed Building.	Grade I Listed Buildings are considered to be those of exceptional interest.  Data for heritage assets <sup>120</sup> , including the Heritage at Risk Register <sup>121</sup> , available from Historic England.
-	Development proposal located within the wider setting of a Grade I Listed Building.	
0	Development proposal is not considered likely to affect the setting or character of a Grade I Listed Building.	
+	Development proposal which could potentially enhance a Grade I Listed Building or its setting.	
<b>Grade II* Listed Buildings</b>		
--	Development proposal coincides with, or could significantly impact the setting of, a Grade II* Listed Building.	Grade II* Listed Buildings are considered to be those of more than special interest.  Data sourced from Historic England as above.
-	Development proposal located within the setting of a Grade II* Listed Building.	
0	Development proposal not considered likely to impact a Grade II* Listed Building or its setting.	
+	Development proposal which could potentially enhance a Grade II* Listed Building or its setting.	
<b>Grade II Listed Buildings</b>		
--	Development proposal coincides with a Grade II Listed Building.	Grade II Listed Buildings are considered to be those of special interest.  Data sourced from Historic England as above.
-	Development proposal located within the setting of a Grade II Listed Building.	
0	Development proposal not considered likely to impact a Grade II Listed Building or its setting.	
+	Development proposal which could potentially enhance a Grade II Listed Building or its setting.	
<b>Scheduled Monuments</b>		
--	Development proposal coincides with a SM.	Scheduling is the selection of a sample of nationally
-	Development proposal located within the setting of a SM.	

<sup>120</sup> Historic England (2020) Download Listing Data. Available at: <https://historicengland.org.uk/listing/the-list/data-downloads/> [Date Accessed: 16/06/21]

<sup>121</sup> Historic England (2020) Search the Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/> [Date Accessed: 16/06/21]

Likely Impact		Notes
0	Development proposal not considered to impact an SM or its setting.	important archaeological sites.  Data sourced from Historic England as above.
+	Development proposal which could potentially enhance an SM or its setting.	
<b>Registered Parks and Gardens</b>		
--	Development proposal coincides with an RPG.	The main purpose of the Register is to celebrate designed landscapes of note and encourage appropriate protection.  Data sourced from Historic England as above.
-	Development proposal located within the setting of an RPG.	
0	Development proposal not considered likely to impact an RPG or its setting.	
+	Development proposal which could potentially enhance an RPG or its setting.	
<b>Conservation Areas</b>		
-	Development proposal located within a Conservation Area or considered to be located within the setting of a Conservation Area.	Conservation Area data provided by the BCA.  Information available for Dudley <sup>122</sup> , Sandwell <sup>123</sup> , Walsall <sup>124</sup> and Wolverhampton <sup>125</sup> authorities.
0	Development proposal not considered to impact a Conservation Area or its setting.	
+	Development proposals which could potentially enhance the character or setting of a Conservation Area.	
<b>Archaeological Priority Area</b>		
-	Development proposal coincides with an APA.	Archaeology data provided by the BCA and detailed within the HLC report <sup>126</sup> .
0	Development proposal does not coincide with an APA.	
+	Development proposal which could potentially enhance an APA.	
<b>Historic Landscape Characterisation</b>		
-	Development proposal located within an area of high historic landscape or townscape value and/or area designed landscape of high historic value	
0	Development proposal located outside of areas of high historic landscape or townscape value and designed landscapes	

<sup>122</sup> Dudley Metropolitan Borough Council (2021) Conservation Areas. Available at: <https://www.dudley.gov.uk/residents/planning/historic-environment/conservation-areas/> [Date Accessed: 16/06/21]

<sup>123</sup> Sandwell Metropolitan Borough Council (2021) Listed buildings and conservation areas. Available at: [http://www.sandwell.gov.uk/info/200275/planning\\_and\\_buildings/444/listed\\_buildings\\_and\\_conservation\\_areas](http://www.sandwell.gov.uk/info/200275/planning_and_buildings/444/listed_buildings_and_conservation_areas) [Date Accessed: 16/06/21]

<sup>124</sup> Walsall Council (2021) Conservation areas. Available at: [https://go.walsall.gov.uk/conservation\\_areas](https://go.walsall.gov.uk/conservation_areas) [Date Accessed: 16/06/21]

<sup>125</sup> City of Wolverhampton Council (2021) Conservation. Available at: <https://www.wolverhampton.gov.uk/planning/conservation> [Date Accessed: 16/06/21]

<sup>126</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf) [Date Accessed: 16/06/21]

Likely Impact	Notes
+ Development proposal which could potentially enhance historic character.	HLC data provided by the BCA and detailed within the HLC report <sup>127</sup> .

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<sup>127</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf) [Date Accessed: 16/06/21]



## 5.4 SA Objective 2: Landscape

5.4.1 **Box 5.2** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 2: Landscape.

*Box 5.2: SA Objective 2: Landscape strategic assessment methodology*

Likely Impact		Notes
<b>Cannock Chase AONB</b>		
-	Development proposals which could potentially alter views experienced of or from the AONB and/or alter its setting.	Development within the Black Country would not be anticipated to result in direct adverse impacts on the special qualities of the AONB.  Data available from Natural England <sup>128</sup> .  Further information and specific objectives for the AONB are available within the Cannock Chase AONB Management Plan 2019-2024 <sup>129</sup> .
0	Development proposals are not located in close proximity to the AONB, or the nature of development is determined not to affect the character or setting of the AONB.	
+	Development proposals which would increase the understanding and enjoyment of the special qualities of the AONB.	
<b>Landscape Sensitivity Assessment</b>		
--	Development proposals located within areas of 'moderate-high' or 'high' landscape sensitivity.	Appraisal of sites informed by the Black Country Landscape Sensitivity Assessment <sup>130</sup> .
-	Development proposals located within areas of 'low-moderate' or 'moderate' sensitivity.	
0	Development proposals located within areas of 'low' sensitivity, or those not assessed in the study.	
+	Development proposals which would protect or enhance features of the landscape as identified within the study.	
<b>Views for Local Residents</b>		
-	Development proposals which may alter views of a predominantly rural or countryside landscape experienced by local residents.	Views and proximity to existing residential development have been identified through the use of aerial photography and Google Maps <sup>131</sup> .  Potential positive impacts would be dependent upon the current views, and level of detail of the proposed development.
0	Development proposals are not considered to significantly alter views experienced by local residents.	
+	Development proposals which could potentially improve the views experience by some local residents.	

<sup>128</sup> Natural England (2020) Areas of Outstanding Natural Beauty (England). Available at: <https://data.gov.uk/dataset/8e3ae3b9-a827-47f1-b025-f08527a4e84e/areas-of-outstanding-natural-beauty-england> [Date Accessed: 16/06/21]

<sup>129</sup> Cannock Chase Area of Outstanding Natural Beauty (2020) Cannock Chase Area of Outstanding Natural Beauty Management Plan 2019 – 2024. Available at: <https://cannock-chase.co.uk/wp-content/uploads/2019/10/AONB-Cannock-Chase-Management-Plan-2019-24.pdf> [Date Accessed: 16/06/21]

<sup>130</sup> LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: [https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf) [Date Accessed: 16/06/21]

<sup>131</sup> Google Maps (2021) Available at: <https://www.google.co.uk/maps> [Date Accessed: 16/06/21]

Likely Impact		Notes
<b>Views from the PRow Network</b>		
-	Development proposals which may alter views of a predominantly rural or countryside landscape experienced by users of the PRow network.	PRow data provided by the BCA. Views have been identified through the use of aerial photography and Google Maps <sup>132</sup> .
0	Development proposals are not considered to significantly alter views experienced by users of the PRow network.	
+	Development proposals which could potentially improve the views experienced from the nearby PRow network.	
<b>Green Belt Harm</b>		
--	Development proposals located within areas of 'moderate-high', 'high' or 'very high' Green Belt harm.	Appraisal of sites informed by the Black Country Green Belt Study <sup>133</sup> .  It should be noted that, as stated in the Green Belt Study, " <i>landscape quality is not a relevant factor in determining the contribution to Green Belt purposes, or harm to those purposes resulting from the release of land</i> ".
-	Development proposals located within areas of 'low-moderate' or 'moderate' Green Belt harm.	
0	Development proposals located within areas of 'very low' or 'low' Green Belt harm, or those not assessed in the study.	
+	Development proposals which would protect or enhance features of the landscape as identified within the study.	

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<sup>132</sup> Ibid

<sup>133</sup> LUC (2019) Black Country Green Belt Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced_redacted.pdf) [Date Accessed: 22/06/21]

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

5.5.1 **Box 5.3** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 3: Biodiversity, flora, fauna and geodiversity.

### *Box 5.3: SA Objective 3: Biodiversity, flora, fauna and geodiversity strategic assessment methodology*

Likely Impact		Notes
European site e.g. SAC, SPA or Ramsar site		
--	Development proposal coincides with, or is located in close proximity to, a SAC. Likelihood of direct impacts.	Data for SACs from Natural England <sup>134</sup> .
-	Development proposal is located within a recognised Zol or similar spatial catchment relative to the European site. Likelihood of direct or indirect impacts.	It should be noted that the HRA will provide further detail relating to potential impacts on European sites within and surrounding the Plan area.
+/-	Development located outside of a recognised Zol where, in absence of HRA conclusions, the effect of development is uncertain.	
0	Development not anticipated to result in adverse impacts on SACs.	
+	Development proposals which would be expected to enhance features within a European site.	
SSSI		
--	Development coincides with, or is located adjacent to, an SSSI.	Data for SSSIs and IRZs from Natural England <sup>135</sup> .
-	Within an IRZ which indicates proposed development should be consulted on with Natural England. Likelihood of direct or indirect impacts.	
0	Development within an IRZ which does not indicate the proposed development need to consult with Natural England.	
+	Development proposals which would enhance features of an SSSI.	
NNR		
--	Development coincides with an NNR. Likelihood of direct impacts.	Data for NNRs from Natural England <sup>136</sup> .
-	Development could potentially result in adverse impacts on an NNR. Likelihood of direct or indirect impacts.	
0	Development not anticipated to result in adverse impacts on NNRs.	
+	Development proposals which would enhance or create an NNR.	

<sup>134</sup> Natural England (2019) Special Areas of Conservation (England). Available at: [https://naturalengland-defra.opendata.arcgis.com/datasets/e4142658906c498fa37f0a20d3fdfcff\\_0](https://naturalengland-defra.opendata.arcgis.com/datasets/e4142658906c498fa37f0a20d3fdfcff_0) [Date Accessed: 30/01/20]

<sup>135</sup> Natural England (2019) Natural England's Impact Risk Zones for Sites of Special Scientific Interest, 22 November 2019. Available at: <https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/ssi-impact-risk-zones> [Date Accessed: 21/01/20]

<sup>136</sup> Natural England (2019) National Nature Reserves (England). Available at: <https://data.gov.uk/dataset/726484b0-d14e-44a3-9621-29e79fc47bfc/national-nature-reserves-england> [Date Accessed: 22/01/20]

Likely Impact		Notes
<b>Ancient woodland</b>		
--	Development proposal coincides with a stand of ancient woodland. Likelihood of direct impacts.	Data for ancient woodlands from Natural England <sup>137</sup> .
-	Development proposal anticipated to result in adverse impacts on a stand of ancient woodland. Likelihood of direct or indirect impacts.	
0	Development proposal would not be anticipated to impact ancient woodland.	
+	Development proposals which would enhance ancient woodland.	
<b>SINC</b>		
--	Development proposal coincides with a SINC. Likelihood of direct impacts.	Data for SINC provided by the BCA.
-	Development proposal anticipated to result in adverse impacts on a SINC. Likelihood of direct or indirect impacts.	
0	Development not anticipated to result in adverse impacts on a SINC.	
+	Development proposals which would enhance or create a SINC.	
<b>LNR</b>		
-	Development proposal could potentially result in adverse impacts on an LNR, such as those which coincide or are located in close proximity. Likelihood of direct or indirect impacts.	Data for LNRs from Natural England <sup>138</sup> .
0	Development proposal not anticipated to result in adverse impacts on an LNR.	
+	Development proposals which would enhance or create an LNR.	
<b>SLINC</b>		
-	Development proposal anticipated to result in adverse impacts on a SLINC, such as those which coincide or are located in close proximity. Likelihood of direct or indirect impacts.	Data for SLINC provided by the BCA.
0	Development not anticipated to result in adverse impacts on a SLINC.	
+	Development proposals which would enhance or create a SLINC.	
<b>Geological Conservation</b>		
-	Development proposal anticipated to result in adverse impacts on a geological site, due to location or proximity. Likelihood of direct or indirect impacts.	Data for geological sites provided by the BCA and data for underlying

<sup>137</sup> Natural England (2021) Ancient Woodland (England). Available at: <https://data.gov.uk/dataset/9461f463-c363-4309-ae77-fcd7e9df7d3/ancient-woodland-england> [Date Accessed: 16/06/21]

<sup>138</sup> Natural England (2021) Local Nature Reserves (England). Available at: <https://data.gov.uk/dataset/acdf4a9e-a115-41fb-bbe9-603c819aa7f7/local-nature-reserves-england> [Date Accessed: 16/06/21]

Likely Impact		Notes
0	Development proposal not anticipated to result in adverse impacts on a Geological Site.	geological context provided by British Geological Survey.
+	Development proposal anticipated to enhance a geological site.	
Priority Habitat		
-	Development proposal coincides with a priority habitat.	Data for priority habitats from Natural England <sup>139</sup> .
0	Development proposal does not coincide with a priority habitat.	
+	Development proposals which enhance or create a priority habitat.	

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<sup>139</sup> Natural England (2020) Priority Habitat Inventory (England). Available at: <https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england> [Date Accessed: 16/06/21]

## 5.6 SA Objective 4: Climate change mitigation

5.6.1 **Box 5.4** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 4: Climate change mitigation.

*Box 5.4: SA Objective 4: Climate change mitigation strategic assessment methodology*

Likely Impact	Notes
Carbon Emissions	
--	Residential-led development which could potentially result in an increase in CO <sub>2</sub> emissions by 1% or more in comparison to current levels.
-	Residential-led development which could potentially result in an increase in CO <sub>2</sub> emissions by 0.1% or more in comparison to current levels.
0	Development would be expected to result in a negligible increase in CO <sub>2</sub> emissions.
+/-	Non-residential development where the carbon emissions produced as a result of the proposed development is uncertain.
+	Development proposals which include energy saving or renewable energy technologies. Development proposals which would reduce reliance on personal car use, encourage active travel or the use of public transport.

Figures calculated using UK local authority CO<sub>2</sub> emissions data<sup>140</sup> and the number of people per dwelling<sup>141</sup>, such that proposals for the following housing numbers are expected to increase carbon emissions by 1% or more in comparison to the current estimates:

- Dudley – 963 homes;
- Sandwell – 1,346 homes;
- Walsall – 1,165 homes; and
- Wolverhampton – 1,095 homes.

Proposals for the following housing numbers are expected to increase carbon emissions by 0.1% or more in comparison to current estimates:

- Dudley – 96 homes;
- Sandwell – 135 homes;
- Walsall – 117 homes; and
- Wolverhampton – 110 homes.

<sup>140</sup> UK local authority and regional carbon dioxide emissions national statistics: 2005-2017. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2017> [Date Accessed: 21/01/20]

<sup>141</sup> People per Dwelling has been calculated using the population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>) and dwellings stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

## 5.7 SA Objective 5: Climate change adaptation

5.7.1 **Box 5.5** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 5: Climate change adaptation.

### *Box 5.5: SA Objective 5: Climate change adaptation strategic assessment methodology*

Likely Impact		Notes
<b>Fluvial Flooding</b>		
--	Development proposals which coincide with Flood Zones 3a and/or 3b.	Data for fluvial flooding produced by JBA Consulting as part of the Level 1 Strategic Flood Risk Assessment (SFRA) <sup>142</sup> , such that: <ul style="list-style-type: none"> <li>Flood Zone 3b: Functional Floodplain – land where water has to flow or be stored in times of flood;</li> <li>Flood Zone 3a: Greater or equal to 1% chance of river flooding in any given year or greater than 0.5% chance of sea flooding in any given year;</li> <li>Flood Zone 2: Between 1% and 0.1% chance of river flooding in any given year or 0.5% and 0.1% chance of sea flooding in any given year; and</li> <li>Flood Zone 1: Less than 0.1% chance of river and sea flooding in any given year.</li> </ul>
-	Development proposals which coincide with Flood Zone 2.	
+	Development proposals which are located wholly within Flood Zone 1.	
<b>Surface Water Flooding</b>		
--	Development proposals which coincide with areas at high risk of surface water flooding.	Based on the Environment Agency surface water flood risk data <sup>143</sup> , such that: <ul style="list-style-type: none"> <li>High risk: 3.3+% chance of flooding each year;</li> <li>Medium risk: between 1% - 3.3% chance of flooding each year; and</li> <li>Low risk: between 0.1% - 1% chance of flooding each year.</li> </ul>
-	Development proposals which coincide with areas at low and/or medium risk of surface water flooding.	
0	Development proposals which are not located in areas determined to be at risk of surface water flooding.	
+	Development proposals which include the integration of GI, open space, SUDS or other surface water flood risk alleviating measures	
<b>Indicative Flood Zone</b>		
--	Development proposals which coincide with Indicative Flood Zone 3b.	Data for Indicative Flood Zones produced by JBA Consulting as part of the Level 1 Strategic Flood Risk Assessment (SFRA) <sup>144</sup>
0	Development proposals which do not coincide with Indicative Flood Zone 3b.	

<sup>142</sup> JBA Consulting (2020) The Black Country Authorities Level 1 Strategic Flood Risk Assessment Final Report 25<sup>th</sup> June 2020. Available at: <https://blackcountryplan.dudlev.gov.uk/t2/p4/t2p4h/> [Date Accessed: 16/06/21]

<sup>143</sup> Environment Agency (2013) Risk of flooding from surface water. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/297429/LIT\\_8986\\_eff63d.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/297429/LIT_8986_eff63d.pdf) [Date Accessed: 16/06/21]

<sup>144</sup> JBA Consulting (2020) The Black Country Authorities Level 1 Strategic Flood Risk Assessment Final Report 25<sup>th</sup> June 2020. Available at: <https://blackcountryplan.dudlev.gov.uk/t2/p4/t2p4h/> [Date Accessed: 16/06/21]

## 5.8 SA Objective 6: Natural resources

5.8.1 **Box 5.6** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 6: Natural resources.

### Box 5.6: SA Objective 6: Natural resources strategic assessment methodology

Likely Impact	Notes
<b>Previously Developed (Brownfield) Land / Land with Environmental Value</b>	
--	Development proposal located on previously undeveloped land of environmental value comprising 20ha or more.
-	Development proposal located on previously undeveloped land of environmental value comprising less than 20ha.
+	Development proposal located on previously developed land with no environmental value.
<b>ALC</b>	
-	Development proposals which are situated on Grade 1, 2 or 3a ALC land.
0	Development proposals located on previously undeveloped land with no environmental value.
+	Development proposals which are situated on Grade 4 and 5 ALC land, or land classified as 'urban' or 'non-agricultural'.
<b>Mineral Safeguarding Areas / Areas of Search</b>	
-	Development proposal coincides with an MSA or AOS.
0	Development proposal does not coincide with an MSA or AOS.
+	Development proposals for the extraction of mineral resources.

<sup>145</sup> Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 15/11/19]

<sup>146</sup> Natural England (2009) Agricultural Land Classification: protecting the best and most versatile agricultural land. Available at: <http://publications.naturalengland.org.uk/publication/35012> [Date Accessed: 22/01/20]

<sup>147</sup> Natural England (2019) Agricultural Land Classification o(ALC) (England). Available at: [https://naturalengland-defra.opendata.arcgis.com/datasets/5d2477d8d04b41d4bbc9a8742f858f4d\\_0?geometry=-3.131%2C52.513%2C-0.667%2C53.094](https://naturalengland-defra.opendata.arcgis.com/datasets/5d2477d8d04b41d4bbc9a8742f858f4d_0?geometry=-3.131%2C52.513%2C-0.667%2C53.094) [Date Accessed: 27/01/20]

<sup>148</sup> wood (2020) Review of the Evidence Base for Minerals to support preparation of the Black Country Plan. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4f/> [Date Accessed: 11/06/21]



## 5.9 SA Objective 7: Pollution

5.9.1 **Box 5.7** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 7: Pollution.

### Box 5.7: SA Objective 7: Pollution strategic assessment methodology

Likely Impact	Notes
<b>AQMA</b>	
-	All development proposals in the Black Country are located within an AQMA. UK AQMA data available from Defra <sup>149</sup> .
<b>Main road</b>	
-	Development proposals located within 200m of a main road. Road data available from the Ordnance Survey <sup>150</sup> . A 200m buffer distance from main roads (motorways and A-roads) has been used, in line with the Department for Transport guidance <sup>151</sup> .
0	Development proposals located over 200m from a main road.
+	Development proposals which would help to reduce the number of cars used, promote the use of public transport and active travel and reduce congestion on nearby roads.
<b>Water quality</b>	
-	Development proposals located within 10m of a watercourse. Watercourse mapping data available from the Ordnance Survey <sup>152</sup> . A 10m buffer zone from a watercourse in which no works, clearance, storage or run-off should be permitted has been used as per Defra guidance <sup>153</sup> .
0	Development proposals located over 10m from a watercourse.
+	Development proposal includes integration of GI or the naturalisation of watercourses.

<sup>149</sup> Department for Environment Food and Rural Affairs (2019) UK Air Information Resource. Available at: <https://uk-air.defra.gov.uk/aqma/maps/> [Date Accessed: 16/06/21]

<sup>150</sup> Ordnance Survey (2019) OS Open Roads. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-roads> [Date Accessed: 16/06/21]

<sup>151</sup> Department for Transport (2019) TAG unit A3 Environmental Impact Appraisal. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf) [Date Accessed: 16/06/21]

<sup>152</sup> Ordnance Survey (2019) OS Open Rivers. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-rivers> [Date Accessed: 16/06/21]

<sup>153</sup> Department for Environment Food and Rural Affairs (2019) Advice and Information for planning approval on land which is of nature conservation value. Available at: <https://www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value> [Date Accessed: 16/06/21]

Likely Impact		Notes
Groundwater SPZ		
-	Development proposal coincides with a groundwater SPZ.	SPZ data available from the Environment Agency <sup>154</sup> . Groundwater source catchments are divided into three zones <sup>155</sup> : <ul style="list-style-type: none"> <li>• Inner Zone (Zone I) – 50-day travel time from any point below the water table to the source;</li> <li>• Outer Zone (Zone II) – 400-day travel time; and</li> <li>• Total Catchment (Zone III) – within which all groundwater recharge is presumed to be discharged at the source.</li> </ul>
0	Development proposal does not coincide with a groundwater SPZ.	
Increase in Air Pollution		
--	Development proposals which could potentially result in a significant increase in air pollution.	It is assumed that development would result in an increase in traffic and thus traffic generated air pollution. Residential sites proposed for the development of between ten and 99 dwellings would therefore be expected to have a minor negative impact on local air pollution <sup>156</sup> . Residential sites proposed for the development of 100 dwellings or more would be expected to have a major negative impact. Employment sites which propose the development of between 1ha and 9.9ha of employment space would be expected to have a minor negative impact and sites which propose 10ha or more would be expected to have a major negative impact.  Where a site is proposed for the development of nine dwellings or less, or for 0.99ha of employment floorspace or less, a negligible impact on local air quality would be anticipated.
-	Development proposals which could potentially result in a minor increase in air pollution.	
0	Development would be expected to result in a negligible increase in air pollution.	
+/-	The air pollution likely to be generated as a result of development proposals is uncertain. Residential-led development sites for which the net housing capacity was unknown at the time of writing.	

<sup>154</sup> Environment Agency (2019) Source Protection Zones. Available at: <https://data.gov.uk/dataset/09889a48-0439-4bbe-8f2a-87bba26fbbf5/source-protection-zones-merged> [Date Accessed: 16/06/21]

<sup>155</sup> Environment Agency (2018) Groundwater source protection zones. Available at: <http://apps.environment-agency.gov.uk/wivby/37833.aspx> [Date Accessed: 16/06/21]

<sup>156</sup> Institute of Air Quality Management (2017) Land-Use Planning & Development Control: Planning for Air Quality. Paragraph 5.8.

## 5.10 SA Objective 8: Waste

5.10.1 **Box 5.8** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 8: Waste.

### *Box 5.8: SA Objective 8: Waste strategic assessment methodology*

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

Figures calculated using UK local authority waste data<sup>157</sup> and the number of people per dwelling<sup>158</sup>, such that proposals for the following housing numbers are expected to increase household waste generation by 1% or more in comparison to the current estimates:

- Dudley – 1,251 homes;
- Sandwell – 1,313 homes;
- Walsall – 1,089 homes; and
- Wolverhampton – 1,082 homes.

Proposals for the following housing numbers are expected to increase household waste generation by 0.1% or more in comparison to current estimates:

- Dudley – 125 homes;
- Sandwell – 131 homes;
- Walsall – 109 homes; and
- Wolverhampton – 108 homes.

<sup>157</sup> Department for Environment, Food and Rural Affairs (2019) Local Authority Collected Waste Statistics. Available at: <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables> [Date Accessed: 24/01/20]

<sup>158</sup> People per Dwelling has been calculated using the population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>) and dwellings stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

## 5.11 SA Objective 9: Transport and accessibility

5.11.1 **Box 5.9** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 9: Transport and accessibility.

### *Box 5.9: SA Objective 9: Transport and accessibility strategic assessment methodology*

Likely Impact		Notes
<b>Bus Stop</b>		
-	Development proposals are located over 400m from a bus stop	Bus stop data available from Transport for West Midlands <sup>159</sup> .
+	Development proposals are located within 400m of a bus stop	Target distance of 400m to a bus stop in line with Barton <i>et al.</i> sustainable distances <sup>160</sup> .
<b>Railway or Metro Station</b>		
-	Development proposals are located over 2km from a railway or metro station.	Railway station data available from Transport for West Midlands.
+	Development proposals are located within 2km of a railway or metro station.	Target distance of 2km to a railway station in line with Barton <i>et al.</i> sustainable distances.
<b>Pedestrian Access</b>		
-	Development proposals located in areas which currently have poor access to the surrounding footpath network.	Assessment of proximity to existing footpaths has been made through reference to aerial photography and the use of Google Maps <sup>161</sup> .
+	Development proposals which are well connected to the existing footpath network and would be expected to provide safe access for pedestrians.	
<b>Road Access</b>		
-	Development proposals located in areas which currently have poor access to the surrounding road network.	Assessment of proximity to existing roads has been made through reference to aerial photography and the use of Google Maps <sup>162</sup> .
+	Development proposals which are adjacent to an existing road.	
<b>Pedestrian Access to Local Services</b>		
-	Development proposals are located over a 15-minute walk to local services.	Data on fresh food centre locations and accessibility modelling (travel

<sup>159</sup> Transport for West Midlands (2021) Transport for West Midlands Data Portal. Available at: <https://data-tfwm.opendata.arcgis.com/> [Date Accessed: 02/02/21]

<sup>160</sup> Barton, H., Grant, M. & Guise, R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

<sup>161</sup> Google Maps (2021) Available at: <https://www.google.co.uk/maps> [Date Accessed: 16/06/21]

<sup>162</sup> Ibid

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

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**5.12 SA Objective 10: Housing**

5.12.1 **Box 5.10** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 10: Housing.

*Box 5.10: SA Objective 10: Housing strategic assessment methodology*

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

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**5.13 SA Objective 11: Equality**

5.13.1 **Box 5.11** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 11: Equality.

*Box 5.11: SA Objective 11: Equality strategic assessment methodology*

Likely Impact		Notes
Index of Multiple Deprivation		
-	Development proposals within most deprived 10 percent LSOAs in England.  Development proposals would result in the loss of affordable housing, community services or could potentially increase crime/the fear of crime in the area.	UK Indices of Multiple Deprivation (IMD) available from MHCLG <sup>163</sup> .
0	Development proposals outside most deprived 10 percent LSOAs in England.  Development proposals would be expected to have no significant impact on equality.	
+	Development proposals would result in the provision of affordable housing, community services or would reduce crime/the fear of crime in the area.	

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<sup>163</sup> Ministry of Housing, Communities and Local Government (2019) Indices of Multiple Deprivation (IMD). Available at: <http://data-communities.opendata.arcgis.com/datasets/indices-of-multiple-deprivation-imd-2019-1?geometry=-2.688%2C52.422%2C-1.456%2C52.714>  
 [Date Accessed: 16/06/21]

## 5.14 SA Objective 12: Health

5.14.1 **Box 5.12** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 12: Health.

### Box 5.12: SA Objective 12: Health strategic assessment methodology

Likely Impact		Notes
<b>AQMA</b>		
-	All development proposals in the Black Country are located within an AQMA.	UK AQMA data available from Defra <sup>164</sup> .
<b>Main Road</b>		
-	Development proposals located within 200m of a main road.	Road data available from the Ordnance Survey <sup>165</sup> .
+	Development proposals located over 200m from a main road.	A 200m buffer distance from main roads (motorways and A-roads) has been used, in line with the Department for Transport guidance <sup>166</sup> .
<b>NHS Hospital</b>		
-	Development proposals located over 5km from an NHS hospital providing an A&E service.	NHS hospital department data available from the NHS website <sup>167</sup> , and local hospital data provided by the BCA.
+	Development proposals located over 5km from an NHS hospital providing an A&E service.	The target distance of 5km to an NHS hospital with and A&E service has been used in line with Barton et al. sustainable distances <sup>168</sup> .
<b>Pedestrian Access to GP Surgery</b>		
-	Development proposals are located over a 15-minute walk to a healthcare location.	Data on healthcare locations and accessibility modelling (travel time to healthcare) provided by BCA.
+	Development proposals are located within a 15-minute walk to a healthcare location.	

<sup>164</sup> Department for Environment Food and Rural Affairs (2019) UK Air Information Resource. Available at: <https://uk-air.defra.gov.uk/aqma/maps/> [Date Accessed: 16/06/21]

<sup>165</sup> Ordnance Survey (2019) OS Open Roads. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-roads> [Date Accessed: 16/06/21]

<sup>166</sup> Department for Transport (2019) TAG unit A3 Environmental Impact Appraisal. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf) [Date Accessed: 16/06/21]

<sup>167</sup> NHS (2020) NHS hospitals overview. Available at: <https://www.nhs.uk/service-search/other-services/Accident-and-emergency-services/LocationSearch/428> [Date Accessed: 16/06/21]

<sup>168</sup> Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010



Likely Impact		Notes
<b>Public Transport Access to GP Surgery</b>		
-	Development proposals are located over a 15-minute travel time via public transport to a healthcare location.	Data on healthcare locations and accessibility modelling (travel time to healthcare) provided by BCA.
+	Development proposals are located within a 15-minute travel time via public transport to a healthcare location.	
<b>Access to / Net Loss of Greenspace</b>		
-	Development proposals which coincide with greenspace. Development proposals located over 600m from greenspace.	Assessment of proximity to/net loss of greenspaces based on Ordnance Survey Open Greenspaces <sup>169</sup> . It is assumed that these greenspaces are publicly accessible. The SA has not referred to other locally designated green spaces or recreational facilities due to inconsistency of data availability across the BCA.  The target distance of 600m to a public greenspace has been used in line with Barton <i>et al.</i> sustainable distances <sup>170</sup> .
0	Development proposals do not coincide with greenspace.	
+	Development proposals located within 600m of a greenspace.	
<b>Access to PRow / Cycle Routes</b>		
-	Development proposals which are located over 600m from a PRow and cycle route.	PRow data provided by BCA.  Strategic cycle route data available from Transport for West Midlands <sup>171</sup> . The SA has not referred to other locally designated cycle paths due to inconsistency of data availability across the BCA.  The target distance of 600m to a footpath or cycle path has been used in line with Barton <i>et al.</i> sustainable distances.
+	Development proposals which are located within 600m from a PRow and/or cycle route.	

<sup>169</sup> Ordnance Survey (2018) OS Open Greenspace. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-greenspace> [Date Accessed: 16/06/21]

<sup>170</sup> Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

<sup>171</sup> Transport for West Midlands (2021) Transport for West Midlands Data Portal. Available at: <https://data-tfwm.opendata.arcgis.com/> [Date Accessed: 18/06/21]

## 5.15 SA Objective 13: Economy

5.15.1 **Box 5.13** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 13: Economy.

### *Box 5.13: SA Objective 13: Economy strategic assessment methodology*

Likely Impact		Notes
<b>Pedestrian Access to Employment Opportunities</b>		
-	Residential development proposals are located over a 30-minute walk to a key employment location.	Data on key employment locations and accessibility modelling (travel time to employment) provided by BCA.
0	Development proposals for non-residential use.	
+	Residential development proposals are located within a 30-minute walk to a key employment location.	
<b>Public Transport Access to Employment Opportunities</b>		
-	Residential development proposals are located over a 30-minute travel time via public transport to a key employment location.	Data on key employment locations and accessibility modelling (travel time to employment) provided by BCA.
0	Development proposals for non-residential use.	
+	Residential development proposals are located within a 30-minute travel time via public transport to a key employment location.	
<b>Employment Floorspace</b>		
--	Development proposals which result in a significant net decrease in employment floorspace.	Assessment of current land use has been made through reference to aerial photography and the use of Google Maps <sup>172</sup> .
-	Development proposals which result in a minor net decrease in employment floorspace.	
0	Development proposals would not impact employment floorspace.	
+/-	It is uncertain whether the proposed development would result in a net change in employment floorspace.	
+	Development proposals which result in a minor net increase in employment floorspace.	
++	Development proposals which result in a significant net increase in employment floorspace.	

<sup>172</sup> Google Maps (2021) Available at: <https://www.google.co.uk/maps> [Date Accessed: 16/06/21]

**5.16 SA Objective 14: Education, skills and training**

5.16.1 **Box 5.14** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 14: Education, skills and training.

*Box 5.14: SA Objective 14: Education, skills and training strategic assessment methodology*

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



## 5.17 Overview of Site Assessments Pre-Mitigation

- 5.17.1 **Appendices F, G H and I** provide an appraisal of each reasonable alternative site considered by the BCA in Dudley, Sandwell, Walsall and Wolverhampton respectively. **Appendix K** provides an appraisal of each reasonable alternative Gypsy and Traveller site considered by the BCA.
- 5.17.2 A summary of the impact matrices for all reasonable alternative site assessments pre-mitigation are presented in **Tables 5.2-5.5**. These impacts should be read in conjunction with the assessment text narratives in **Appendices F-I** and **K** as well as the topic specific methodologies and assumptions presented in **Boxes 5.1 - 5.14**.
- 5.17.3 It should be noted that the site assessments include an overall impact symbol, summarised in **Table 5.1**, for each of the 14 SA Objectives. The appendices document likely impacts on receptors within each SA Objective, which have been included to provide the reader with contextual information that is relevant to each SA Objective. The overall impact symbol in **Tables 5.2-5.5** below for each SA Objective is always represented by the lowest common denominator. It may be possible that positive or negligible receptor impacts are relevant to an SA Objective, however, if one of the receptor impacts is identified as a major negative impact, the SA Objective will be identified as major negative overall.
- 5.17.4 Each appraisal includes a SA impact matrix which provides an indication of the nature and magnitude of impacts **pre-mitigation**. Assessment narratives follow the impact matrices for each site, within which the findings of the appraisal and the rationale for the recorded impacts are described.
- 5.17.5 All assessment information excludes consideration of detailed mitigation i.e. additional detail or modification to the reasonable alternative that has been introduced specifically to reduce identified environmental effects of that site. Presenting assessment findings 'pre-mitigation' facilitates transparency to the decision makers.
- 5.17.6 The appraisal of the 635 reasonable alternative sites demonstrated that all development proposals would be likely to result in a range of sustainability impacts as shown in **Tables 5.2 - 5.5** below.

**Table 5.2: Impact matrix of all sites assessed in this report - Dudley**

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
<b>Dudley Residential Sites</b>														
SA-0001-DUD	0	--	-	0	+	-	-	0	+	+	0	-	+	-
SA-0005-DUD-A	0	--	-	-	--	-	--	-	-	++	0	-	+	-
SA-0005-DUD-B	0	--	--	-	--	-	--	-	-	++	0	-	+	+
SA-0008-DUD	-	--	+/-	0	+	-	-	0	-	+	0	-	+	-
SA-0009-DUD	-	--	+/-	0	--	-	-	0	-	+	0	-	-	-
SA-0010-DUD-A	-	-	-	0	--	-	-	0	-	+	0	-	+	-
SA-0010-DUD-B	-	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0013-DUD	-	--	-	0	+	-	-	0	+	+	0	-	+	+
SA-0015-DUD	-	--	-	-	-	-	--	-	-	++	0	-	+	-
SA-0016-DUD	-	--	+/-	-	-	-	--	-	-	++	0	-	+	-
SA-0017-DUD	-	-	-	-	-	-	--	-	-	++	0	-	+	+
SA-0018-DUD-A	-	--	--	+/-	--	--	-	+/-	-	+/-	0	-	-	-
SA-0018-DUD-B	-	--	-	+/-	-	--	-	+/-	-	+/-	0	-	-	-
SA-0018-DUD-C	-	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0019-DUD	-	--	+/-	0	+	-	-	0	-	+	0	-	-	-
SA-0021-DUD	-	--	-	0	+	-	-	0	-	+	0	-	+	+
SA-0025-DUD	-	--	+/-	-	-	-	--	-	-	++	0	-	+	-
SA-0026-DUD	-	--	-	-	--	-	--	0	+	++	0	-	+	-
SA-0027-DUD	-	--	+/-	-	-	-	--	-	-	++	0	-	+	-
SA-0028-DUD	-	--	-	0	+	-	-	0	-	+	0	-	+	+
SA-0031-DUD-A	-	--	-	-	+	-	--	-	-	++	0	-	+	+
SA-0031-DUD-B	-	--	-	-	+	-	--	-	-	++	0	-	+	-
SA-0033-DUD	-	-	+/-	0	+	-	-	0	-	+	0	-	+	+
SA-0039-DUD	0	-	+/-	0	--	-	-	0	+	+	-	-	+	+
SA-0040-DUD	-	--	+/-	0	-	-	-	0	-	+	0	-	+	-
SA-0041-DUD	0	-	+/-	0	+	-	-	0	-	+	0	-	+	+
SA-0042-DUD	0	-	+/-	0	--	-	-	0	-	+	0	-	+	+
SA-0043-DUD	-	-	-	0	-	-	-	0	+	+	-	-	+	+
SA-0044-DUD	-	-	+/-	0	+	-	-	0	+	+	0	-	+	+
SA-0045-DUD	0	-	-	0	+	-	-	0	-	+	0	-	+	-
SA-0046-DUD	-	-	+/-	0	+	-	-	0	-	+	-	-	+	-
SA-0047-DUD	0	-	+/-	0	-	-	-	0	-	+	0	-	+	+
SA-0050-DUD	0	-	-	-	-	-	--	0	-	++	-	-	+	+
SA-0051-DUD-A	0	-	+/-	0	+	-	-	0	+	+	0	-	+	+
SA-0052-DUD	0	-	-	-	-	-	--	-	-	++	0	-	-	+
SA-0058-DUD	0	--	+/-	0	-	-	-	0	-	+	0	-	+	+
SA-0059-DUD	0	--	-	-	-	-	--	-	-	++	0	-	-	-
SA-0060-DUD	0	--	-	0	--	-	-	0	-	+	0	-	+	+

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SA-0061-DUD	-	-	-	-	--	-	--	-	-	++	0	-	+	-
SA-0064-DUD-A	-	-	-	0	--	-	-	0	-	+	-	-	+	+
SA-0064-DUD-B	0	-	-	0	-	-	-	0	-	+	0	-	+	+
SA-0068-DUD (south)	0	-	-	0	-	-	-	0	-	+	0	-	+	+
SA-0068-DUD (north)	-	-	-	0	-	-	-	0	-	+	0	-	+	+
SA-0076-DUD	0	--	+/-	-	+	-	--	-	-	++	0	-	+	-
SA-0078-DUD	-	-	-	-	--	-	-	0	-	+	0	-	+	-
SA-0079-DUD	-	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0080-DUD	-	-	+/-	0	-	-	-	0	+	+	0	-	+	+
SA-0081-DUD	--	--	--	+/-	--	--	-	+/-	-	+/-	0	-	+	-
SA-0084-DUD	0	0	+/-	0	-	+	-	0	+	+	0	-	+	+
SA-0091-DUD	-	--	-	0	-	-	-	0	-	+	0	-	-	-
SA-0105-DUD-A	0	--	+/-	-	+	-	--	0	-	++	0	-	+	-
SA-0105-DUD-B	-	--	+/-	+/-	+	-	-	+/-	-	+/-	0	-	+	-
SA-0109-DUD	-	--	-	0	--	-	-	0	-	+	0	-	+	+
SA-0114-DUD	-	-	-	-	--	-	--	-	-	++	0	-	+	-
SA-0126-DUD	0	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0132-DUD	-	0	-	-	-	+	--	-	+	++	-	-	--	+
SA-0134-DUD	-	-	-	0	+	+	-	0	-	+	0	-	-	-
SA-0135-DUD	-	--	--	--	--	--	--	--	-	++	0	-	+	-
SA-0139-DUD	0	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0145-DUD	-	-	--	-	-	-	--	-	-	++	0	-	-	-
SA-0173-DUD	0	-	-	0	+	-	-	0	-	+	0	-	+	+
SA-0174-DUD	0	-	+/-	0	-	-	-	0	-	+	0	-	+	-
SA-0175-DUD	0	-	+/-	0	-	-	-	0	-	+	0	-	+	+
SA-0176-DUD	0	-	+/-	0	+	-	-	0	-	+	-	-	+	+
SA-0181-DUD	0	-	-	0	-	-	-	0	-	+	0	-	+	+
SA-0182-DUD	0	-	-	-	-	-	--	0	+	++	-	-	+	-
SA-0185-DUD	-	-	-	0	--	-	-	0	+	+	0	-	+	+
SA-0186-DUD	0	-	-	-	-	-	--	0	-	++	0	-	+	+
SA-0187-DUD	-	-	+/-	0	-	-	-	0	-	+	0	-	+	+
SA-0188-DUD	0	-	+/-	0	-	-	-	0	+	+	0	-	+	+
SA-0189-DUD	0	-	-	0	--	-	-	0	-	+	-	-	+	+
SA-0191-DUD	0	-	+/-	0	-	-	-	0	+	+	0	-	+	+
SA-0192-DUD	0	-	+/-	0	-	-	-	0	+	+	0	-	+	-
SA-0193-DUD	-	-	-	0	--	-	-	0	-	+	0	-	+	+
SA-0194-DUD	0	-	-	0	+	-	-	0	-	+	0	-	+	-
SA-0196-DUD	0	-	-	0	--	-	-	0	-	+	-	-	+	+
SA-0197-DUD	0	-	-	0	+	-	-	0	-	+	-	-	+	+

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SA-0198-DUD	0	-	-	0	-	-	-	0	-	+	0	-	+	+
SA-0199-DUD	0	-	+/-	0	+	-	-	0	-	+	0	-	+	-
SA-0200-DUD	-	-	+/-	0	-	-	-	0	-	+	-	-	+	+
SA-0202-DUD	-	-	+/-	0	+	-	-	0	-	+	-	-	+	+
SA-0204-DUD	-	-	+/-	0	+	-	-	0	-	+	-	-	+	-
SA-0205-DUD	0	-	-	0	--	-	-	0	-	+	0	-	+	+
SA-0206-DUD	-	-	-	-	-	-	--	0	-	++	0	-	+	+
SA-0208-DUD	-	-	-	0	+	-	-	0	-	+	0	-	+	+
SA-0209-DUD	-	-	-	0	+	-	-	0	-	+	0	-	+	+
SA-0210-DUD	-	-	-	0	+	-	-	0	+	+	0	-	+	-
SA-0214-DUD	--	-	--	-	--	-	--	-	+	++	0	-	+	-
SA-0215-DUD	-	0	-	0	-	+	-	0	-	+	0	-	--	+
SA-0222-DUD	0	-	+/-	0	+	-	-	0	-	+	-	-	-	+
SA-0227-DUD	0	-	+/-	0	--	+	-	0	+	+	-	-	--	+
<b>Dudley Employment Sites</b>														
SA-0001-DUD	0	--	-	+/-	+	-	-	+/-	+	0	0	-	++	0
SA-0008-DUD	-	--	+/-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA-0013-DUD	-	--	-	+/-	+	-	-	+/-	+	0	0	-	++	0
SA-0015-DUD	-	--	-	+/-	-	-	--	+/-	-	0	0	-	++	0
SA-0016-DUD	-	--	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0028-DUD	-	--	-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA-0047-DUD	0	-	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0078-DUD	-	-	-	+/-	--	-	-	+/-	-	0	0	-	++	0
SA-0135-DUD	-	--	--	+/-	--	--	--	+/-	-	0	0	-	++	0
SA-0227-DUD	0	-	+/-	+/-	--	+	-	+/-	+	0	-	-	+/-	0
H16.1	-	0	+/-	+/-	--	-	-	+/-	-	0	-	-	++	0
<b>Dudley Carried Forward Residential Sites</b>														
19	-	-	-	0	-	-	-	0	-	+	0	-	+	+
22	-	-	-	-	--	-	--	-	+	++	0	-	+	+
29	-	-	-	-	--	+	--	-	+	++	-	-	--	+
30	0	-	+/-	0	+	-	-	0	+	+	0	-	+	+
31	-	-	+/-	0	+	-	-	0	+	+	0	-	+	+
32	-	-	-	-	--	-	--	-	-	++	-	-	+	+
35	-	-	+/-	0	-	-	-	0	+	+	-	-	+	+
82a	-	-	+/-	0	+	-	-	0	+	+	0	-	+	-
83	-	-	+/-	0	+	-	-	0	+	+	0	-	-	-
85	0	-	-	0	+	-	-	0	+	+	0	-	+	+
87	0	-	+/-	0	+	-	-	0	-	+	0	-	+	+
91	0	-	-	0	--	-	-	0	+	+	0	-	+	+
94	-	-	+/-	0	-	-	-	0	-	+	0	-	+	+

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
101	-	-	-	0	-	+	-	0	-	+	0	-	+/-	-
138	-	0	+/-	0	+	+	-	0	+	+	0	-	-	+
149 (CFH)	-	0	-	0	-	+	-	0	-	+	0	-	-	+
151	-	-	-	0	+	-	-	0	-	+	-	-	--	+
155	0	0	+/-	0	-	+	-	0	+	+	0	-	-	+
157	0	-	-	0	+	-	-	0	+	+	0	-	-	-
158	0	0	+/-	0	--	+	-	0	+	+	0	-	-	+
159	-	0	-	0	--	+	-	0	+	+	0	-	-	-
162	-	0	-	0	-	-	-	0	+	+	0	-	-	+
164	0	-	+/-	-	--	-	--	0	+	++	0	-	--	-
173	0	0	+/-	0	+	+	-	0	+	+	-	-	--	+
177	0	0	+/-	0	+	+	-	0	+	+	-	-	-	+
178	0	0	+/-	0	+	-	-	0	+	+	-	-	-	+
181	0	-	+/-	0	-	-	-	0	-	+	0	-	+	+
182	-	-	-	0	+	-	-	0	-	+	-	-	+	+
188	-	-	+/-	0	+	-	-	0	+	+	0	-	+	+
189	-	-	+/-	0	-	-	-	0	+	+	0	-	-	+
190	0	-	+/-	0	+	-	-	0	-	+	-	-	-	+
200	0	-	+/-	0	+	-	-	0	-	+	0	-	+	-
202	0	-	+/-	0	-	-	-	0	-	+	-	-	+	+
205	-	-	--	-	--	-	--	-	-	++	0	-	+/-	+
302	-	0	-	0	-	+	-	0	+	+	0	-	-	+
304	-	0	+/-	0	-	+	-	0	+	+	0	-	--	-
305	0	0	+/-	0	-	+	-	0	+	+	0	-	-	+
306	0	-	+/-	0	-	+	-	0	+	+	0	-	+	-
308	0	-	-	0	-	-	-	0	+	+	0	-	+	+
312	0	-	+/-	0	--	-	-	0	-	+	0	-	+	-
318	-	0	-	0	-	+	-	0	+	+	0	-	-	+
321	0	-	+/-	0	+	-	-	0	+	+	0	-	+	-
327	-	-	+/-	0	-	-	-	0	-	+	-	-	+	+
330	0	-	+/-	0	+	-	-	0	-	+	0	-	+	+
331	0	0	+/-	0	-	+	-	0	+	+	0	-	-	-
332	-	-	-	0	-	-	-	0	+	+	0	-	+	-
336	-	-	--	0	+	-	-	0	+	+	0	-	+	+
341	0	-	+/-	0	-	-	-	0	-	+	0	-	+	-
346	0	-	+/-	0	+	+	-	0	-	+	0	-	-	+
347	--	-	--	0	-	-	-	0	-	+	-	-	+	-
350	-	0	-	0	+	+	-	0	-	+	-	-	-	-
352	0	0	+/-	0	+	+	-	0	-	+	0	-	-	+
358	0	-	-	0	--	-	-	0	+	+	0	-	+	+



Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
360	-	-	-	0	-	+	-	0	-	+	0	-	--	+
368	-	-	+/-	0	-	+	-	0	+	+	0	-	+	+
370	0	-	+/-	0	+	+	-	0	-	+	0	-	+	+
372	-	-	-	0	--	+	-	0	+	+	0	-	+	+
374	0	-	-	0	+	-	-	0	+	+	0	-	+	-
375	-	-	+/-	0	+	-	-	0	+	+	0	-	+	-
378	-	0	+/-	0	+	+	-	0	-	+	0	-	+	+
382	--	-	-	0	-	-	-	0	-	+	0	-	+	-
383	0	-	-	0	+	-	-	0	-	+	0	-	+	+
384	0	-	-	0	-	-	-	0	-	+	0	-	+	+
H10.4	0	0	-	-	-	-	--	-	-	++	0	-	-	-
H16.1	-	-	-	-	-	-	--	-	+	++	-	-	+/-	-
S9	-	0	-	0	--	+	-	0	+	+	0	-	-	+
SA-0004-DUD	0	-	--	-	--	-	--	-	-	++	0	-	+	+
SA-303	0	-	+/-	0	-	-	-	0	-	+	-	-	--	+
SA-373 (SA-0373-DUD)	-	0	+/-	-	-	+	--	-	-	++	-	-	--	+
<b>Dudley Carried Forward Employment Sites</b>														
104	0	-	+/-	+/-	-	-	-	+/-	+	0	-	-	++	0
122	0	0	+/-	+/-	-	-	-	+/-	-	0	0	-	+/-	0
123a	0	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
123b	0	-	-	+/-	+	-	-	+/-	-	0	0	-	++	0
123c	0	-	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
132	-	0	-	+/-	-	-	-	+/-	-	0	-	-	++	0
135	0	0	+/-	+/-	--	-	-	+/-	-	0	-	-	++	0
136	-	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
137	-	0	-	+/-	-	-	-	+/-	-	0	0	-	++	0
147	0	-	+/-	+/-	-	-	-	+/-	+	0	0	-	++	0
149 (CFE)	-	-	+/-	+/-	-	+	-	+/-	-	0	-	-	++	0
187	0	0	-	+/-	+	-	-	+/-	-	0	0	-	++	0
198	0	0	+/-	+/-	--	-	-	+/-	+	0	0	-	++	0
DY5 Site	-	0	+/-	+/-	--	-	-	+/-	-	0	-	-	++	0

**Table 5.3: Impact matrix of all sites assessed in this report – Sandwell**

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
<b>Sandwell Residential Sites</b>														
SA-0001-SAN	0	-	--	0	-	-	-	0	-	+	0	-	-	+
SA-0002-SAN	0	--	--	+/-	--	-	-	+/-	-	+/-	0	-	+	+
SA-0003-SAN	-	--	--	-	-	--	--	-	-	++	0	-	+	+
SA-0004-SAN	-	--	-	-	-	-	--	-	-	++	0	-	+	-
SA-0006-SAN	0	-	+/-	0	+	+	-	0	+	+	-	-	+	-
SA-0016-SAN	0	-	-	+/-	-	-	-	+/-	-	+/-	0	-	+	-
SA-0020-SAN	-	-	-	0	-	-	--	0	-	++	0	-	+	+
SA-0033-SAN	-	0	-	0	+	+	-	0	-	+	0	-	--	+
SA-0048-SAN	-	0	+/-	0	-	+	-	0	-	+	0	-	-	+
SA-6999	-	-	-	-	--	--	--	-	+	++	0	-	+	+
<b>Sandwell Employment Sites</b>														
SA-0003-SAN	-	--	--	+/-	-	--	--	+/-	-	0	0	-	++	0
SA-0025-SAN	-	0	-	+/-	-	+	-	+/-	+	0	0	-	+/-	0
SA-0026-SAN	-	-	+/-	+/-	-	-	-	+/-	+	0	0	-	++	0
SA-0027-SAN	0	0	+/-	+/-	-	-	-	+/-	+	0	-	-	++	0
SA-0028-SAN	0	-	-	+/-	-	-	-	+/-	+	0	0	-	++	0
SA-0030-SAN-A	-	-	-	+/-	--	+	-	+/-	+	0	-	-	++	0
SA-0030-SAN-B	-	-	-	+/-	-	-	-	+/-	+	0	-	-	++	0
SA-0042-SAN	0	-	+/-	+/-	--	-	-	+/-	-	0	-	-	++	0
SA-0043-SAN	0	0	+/-	+/-	-	-	-	+/-	+	0	0	-	++	0
SA-0044-SAN	0	0	+/-	+/-	-	-	-	+/-	+	0	0	-	++	0
SA-0045-SAN	0	0	+/-	+/-	+	-	-	+/-	+	0	0	-	++	0
223	-	-	+/-	+/-	-	+	-	+/-	+	0	-	-	++	0
<b>Sandwell Carried Forward Residential Sites</b>														
28	0	-	+/-	0	+	+	-	0	+	+	0	-	-	-
744	-	-	-	0	-	-	-	0	-	+	-	-	+	+
764	-	-	+/-	0	+	-	-	0	-	+	0	-	+	+
1170	0	-	-	0	--	-	-	0	+	+	0	-	+	+
1183	0	-	-	0	-	-	-	0	+	+	0	-	-	+
1203	0	-	-	0	--	-	-	0	+	+	-	-	-	+
1376	0	0	+/-	0	-	+	-	0	+	+	0	-	-	+
1449	-	0	+/-	0	-	+	-	0	+	+	-	-	-	+
1451	0	0	+/-	0	-	+	-	0	-	+	-	-	-	+
1459	0	0	+/-	0	+	+	-	0	+	+	0	-	-	+
1463	-	-	+/-	0	-	-	-	0	+	+	0	-	-	+
1546	-	0	+/-	-	--	+	--	-	-	++	-	-	-	+
1994	0	0	+/-	0	--	+	-	0	+	+	0	-	-	+

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
2013	0	-	+/-	0	+	-	-	0	+	+	-	-	+	+
2370	0	0	-	-	--	+	--	-	+	++	-	-	--	+
2371	--	0	-	-	-	-	--	-	+	++	-	-	--	+
2377	0	0	+/-	0	--	+	-	0	+	+	0	-	--	+
2388	0	0	-	-	-	-	--	-	+	++	-	-	--	+
2588	0	0	+/-	-	-	+	--	-	-	++	-	-	--	+
2590	-	0	+/-	0	--	+	-	0	-	+	-	-	--	+
2893	0	-	+/-	0	-	-	-	0	+	+	-	-	+	+
2919	0	0	-	0	-	+	--	0	+	++	0	-	--	+
2940	-	-	-	-	--	-	--	-	-	++	0	-	+	-
2946	0	0	+/-	0	-	+	-	0	+	+	0	-	-	+
2972	0	0	+/-	0	--	+	-	0	+	+	-	-	-	+
2985	0	-	-	-	--	--	--	-	-	++	0	-	-	-
2986	0	0	+/-	0	--	+	-	0	+	+	0	-	--	-
3009	0	0	+/-	0	-	-	-	0	+	+	0	-	--	+
3011	--	0	+/-	0	--	+	-	0	+	+	-	-	--	-
3023	0	0	+/-	0	-	+	-	0	+	+	0	-	-	-
3025	0	-	-	0	-	+	--	0	+	++	0	-	-	-
3041	0	0	+/-	0	+	+	-	0	+	+	0	-	-	+
3049	0	-	-	0	--	-	-	0	-	+	0	-	+	-
3223	-	0	+/-	0	--	-	-	0	-	+	0	-	-	+
6483	0	0	+/-	0	--	+	-	0	-	+	-	-	-	+
6919	0	0	+/-	0	+	+	-	0	-	+	-	-	-	+
6924	0	-	-	0	-	-	-	0	+	+	-	-	+	+
6997	-	0	+/-	0	-	+	-	0	-	+	-	-	-	+
6998	0	0	+/-	0	-	+	-	0	+	+	-	-	--	+
SA-0029-SAN	-	-	-	-	--	-	--	-	-	++	0	-	+	+
<b>Sandwell Carried Forward Employment Sites</b>														
216b	-	-	+/-	+/-	--	-	-	+/-	-	0	0	-	++	0
256	0	0	-	+/-	--	-	-	+/-	-	0	0	-	+/-	0
257a	0	-	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0

**Table 5.4: Impact matrix of all sites assessed in this report – Walsall**

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
<b>Walsall Residential Sites</b>														
SA-0001-WAL	0	0	+/-	0	-	-	-	0	-	+	0	-	+	+
SA-0006-WAL	0	--	-	0	-	-	-	0	-	+	0	-	-	-
SA-0010-WAL	0	--	-	-	--	-	--	-	-	++	-	-	--	-
SA-0012-WAL	-	--	-	-	--	-	--	-	-	++	0	-	+	-
SA-0014-WAL	--	--	-	-	--	--	--	-	-	++	0	-	-	-
SA-0015-WAL	-	--	-	-	--	-	--	-	-	++	0	-	-	-
SA-0016-WAL	0	--	--	0	+	-	-	0	-	+	0	-	+	-
SA-0017-WAL	-	--	-	--	-	--	--	--	-	++	0	-	+	+
SA-0018-WAL	--	--	--	-	-	--	--	-	-	++	0	-	-	-
SA-0019-WAL	-	--	--	-	--	--	--	-	-	++	0	-	+	-
SA-0020-WAL	-	--	-	-	-	-	--	-	-	++	0	-	+	-
SA-0022-WAL	-	--	-	--	--	--	--	--	-	++	0	-	+	-
SA-0029-WAL	-	--	--	-	--	-	--	-	-	++	0	-	+	+
SA-0030-WAL	-	--	-	-	--	-	--	-	-	++	0	-	+	-
SA-0032-WAL	0	--	-	0	-	-	-	0	-	+	0	-	+	+
SA-0034-WAL	0	--	-	-	-	-	--	-	-	++	0	-	+	-
SA-0035-WAL	-	--	-	0	-	-	-	0	-	+	0	-	+	-
SA-0036-WAL	-	--	-	0	--	-	--	-	-	++	0	-	+	-
SA-0037-WAL	-	--	-	-	--	--	--	-	-	++	0	-	+	-
SA-0038-WAL	-	--	-	-	+	-	--	-	-	++	0	-	+	+
SA-0045-WAL	0	--	-	0	--	-	-	0	-	+	0	-	+	+
SA-0047-WAL	-	--	--	--	--	--	--	--	-	++	0	-	+	-
SA-0048-WAL	-	--	-	-	--	--	--	-	-	++	0	-	+	-
SA-0050-WAL	0	--	-	0	-	-	-	0	-	+	0	-	+	-
SA-0051-WAL	-	--	--	0	-	-	-	0	-	+	0	-	+	+
SA-0052-WAL	-	-	-	0	-	-	-	0	-	+	0	-	+	-
SA-0053-WAL	0	--	-	0	-	-	-	0	-	+	0	-	+	-
SA-0054-WAL	-	--	--	-	-	-	--	-	-	++	0	-	+	-
SA-0056-WAL	0	--	-	-	-	-	--	-	-	++	0	-	+	-
SA-0059-WAL	-	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0061-WAL	-	--	--	--	--	--	--	--	-	++	0	-	+	-
SA-0062-WAL	-	--	-	0	+	-	-	0	-	+	0	-	+	+
SA-0064-WAL	-	--	-	0	-	-	-	0	-	+	0	-	-	-
SA-0066-WAL	-	--	--	-	--	--	--	-	-	++	0	-	+	-
SA-0071-WAL	-	--	-	0	--	-	-	0	-	+	0	-	+	-
SA-0078-WAL	-	--	-	-	--	-	--	-	-	++	0	-	-	-
SA-0085-WAL	-	0	-	0	+	+	-	0	+	+	-	-	-	+
SA-0102-WAL	0	--	-	+/-	+	-	-	+/-	-	+/-	0	-	+	-

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SA-0138-WAL	-	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0149-WAL	-	--	-	-	-	-	--	-	-	++	0	-	+	+
SA-0153-WAL	-	--	-	0	+	-	-	0	-	+	0	-	-	-
SA-0163-WAL	0	--	-	0	-	-	-	0	+	+	0	-	+	+
SA-0167-WAL	-	--	-	+/-	+	-	-	+/-	-	+/-	0	-	+	-
SA-0172-WAL	-	-	-	0	-	-	-	0	+	+	0	-	+	+
SA-0174-WAL	0	-	-	0	-	-	-	0	+	+	0	-	+	+
SA-0183-WAL	--	--	+/-	+/-	+	+	-	+/-	-	+/-	0	-	+	-
SA-0186-WAL	-	--	-	-	-	-	--	-	-	++	0	-	+	-
SA-0187-WAL	0	--	+/-	-	--	-	--	-	-	++	0	-	-	-
SA-0188-WAL	-	-	-	0	-	-	-	0	-	+	0	-	+	+
SA-0195-WAL	0	--	--	-	--	-	--	-	-	++	0	-	+	-
SA-0196-WAL	0	--	-	0	+	-	-	0	-	+	0	-	+	+
SA-0197-WAL	0	--	--	-	--	-	--	-	-	++	0	-	+	-
SA-0199-WAL	-	--	-	0	-	-	-	0	-	+	0	-	+	-
SA-0201-WAL	-	--	-	0	-	-	-	0	-	+	0	-	+	-
SA-0202-WAL	-	--	-	--	--	--	--	--	-	++	0	-	+	-
SA-0204-WAL	-	--	-	-	-	--	--	-	-	++	0	-	-	-
SA-0205-WAL	-	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0206-WAL	0	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0207-WAL	0	--	-	0	-	-	-	0	-	+	0	-	+	-
SA-0208-WAL	0	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0211-WAL	-	--	-	-	+	--	--	-	-	++	0	-	+	-
SA-0212-WAL	-	--	-	-	-	--	--	-	-	++	0	-	+	-
SA-0213-WAL	-	--	-	-	+	-	--	-	-	++	0	-	+	+
SA-0215-WAL	-	--	-	-	-	--	--	-	-	++	0	-	+	-
SA-0216-WAL	-	--	-	-	-	-	--	-	-	++	0	-	+	-
SA-0220-WAL	-	--	+/-	0	-	-	-	0	-	+	0	-	+	+
SA-0222-WAL	0	--	-	0	-	-	-	0	-	+	0	-	+	+
SA-0223-WAL	-	--	-	-	-	--	--	-	-	++	0	-	+	-
SA-0224-WAL	0	--	+/-	0	-	-	-	0	-	+	0	-	+	+
SA-0225-WAL	0	--	+/-	0	+	-	-	0	-	+	0	-	+	+
SA-0226-WAL	-	--	-	-	+	-	--	-	-	++	0	-	+	+
SA-0227-WAL	0	--	+/-	0	+	-	-	0	-	+	0	-	+	-
SA-0228-WAL	-	--	--	--	--	--	--	--	-	++	0	-	+	-
SA-0229-WAL	-	--	+/-	-	+	--	--	-	-	++	0	-	+	-
SA-0230-WAL	-	--	+/-	-	+	-	--	-	-	++	0	-	+	-
SA-0231-WAL	-	--	-	-	+	--	--	-	-	++	0	-	+	-
SA-0232-WAL	-	--	-	--	--	--	--	--	-	++	0	-	-	-
SA-0233-WAL	-	--	+/-	0	+	-	-	0	-	+	0	-	+	+

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SA-0235-WAL	-	--	+/-	-	-	-	--	-	-	++	0	-	-	-
SA-0236-WAL	-	--	-	-	+	--	--	-	-	++	0	-	+	-
SA-0237-WAL	-	--	+/-	--	--	--	--	--	-	++	0	-	-	-
SA-0238-WAL	-	--	-	--	--	--	--	--	-	++	0	-	+	-
SA-0239-WAL	-	--	-	-	+	-	--	-	-	++	0	-	+	-
SA-0240-WAL	-	--	-	-	+	-	--	-	-	++	0	-	+	-
SA-0241-WAL	-	--	-	-	-	-	--	-	-	++	0	-	+	-
SA-0244-WAL	0	--	-	-	+	-	--	-	-	++	0	-	+	-
SA-0245-WAL	0	--	-	0	--	-	-	0	-	+	0	-	+	-
SA-0248-WAL	-	--	-	0	-	-	-	0	-	+	0	-	+	-
SA-0250-WAL	0	-	--	0	-	-	-	0	-	+	0	-	+	-
SA-0251-WAL	-	--	+/-	0	-	-	-	0	-	+	0	-	+	-
SA-0252-WAL	-	--	--	0	+	-	-	0	-	+	0	-	+	-
SA-0257-WAL	-	--	-	0	+	-	-	0	-	+	0	-	+	+
SA-0264-WAL	0	--	-	-	-	-	--	-	-	++	0	-	+	-
SA-0265-WAL	-	--	-	0	-	-	-	0	-	+	0	-	+	-
SA-0266-WAL	-	--	-	-	-	-	--	-	-	++	0	-	+	-
SA-0267-WAL	-	--	-	0	--	-	-	0	-	+	0	-	+	-
SA-0269-WAL	-	--	-	0	--	-	--	-	-	++	0	-	+	-
SA-0272-WAL	0	--	-	0	-	-	-	0	-	+	0	-	+	+
SA-0274-WAL	-	--	-	-	--	-	--	-	-	++	0	-	+	+
SA-0278-WAL	0	--	-	0	--	-	-	0	-	+	0	-	+	-
SA-0280-WAL	0	--	-	0	-	-	-	0	-	+	0	-	+	+
SA-0284-WAL	-	--	-	-	--	-	--	-	-	++	0	-	+	-
SA-0288-WAL	-	--	-	-	--	-	--	-	-	++	0	-	+	-
SA-0289-WAL	0	--	--	-	--	-	--	-	-	++	0	-	-	-
SA-0291-WAL	-	--	-	-	--	-	--	-	-	++	0	-	+	-
SA-0292-WAL	0	--	-	0	--	-	-	0	-	+	0	-	+	-
SA-0294-WAL	-	--	--	0	+	-	-	0	-	+	0	-	+	-
SA-0295-WAL	-	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0296-WAL	-	--	+/-	0	+	-	-	0	-	+	0	-	+	-
SA-0297-WAL	-	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0301-WAL	-	--	-	0	-	-	-	0	-	+	0	-	-	-
SA-0302-WAL	-	--	-	-	-	--	--	-	-	++	0	-	-	-
SA-0304-WAL	-	--	-	0	-	-	-	0	-	+	0	-	+	-
SA-0305-WAL	-	--	+/-	0	+	-	-	0	-	+	0	-	+	-
SA-0309-WAL	0	--	-	0	-	-	--	0	-	++	0	-	+	-
SA-0312-WAL	0	--	-	0	--	-	-	0	-	+	0	-	-	-
SA-0313-WAL	0	--	+/-	0	--	-	-	0	-	+	0	-	+	-
SA-0317-WAL	0	--	-	0	--	-	-	0	-	+	0	-	+	+

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
<b>Walsall Employment Sites</b>														
SA-0001-WAL	0	0	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0007-WAL	-	--	-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0008-WAL	0	--	--	+/-	--	-	-	+/-	-	0	0	-	++	0
SA-0015-WAL	-	--	-	+/-	--	-	--	+/-	-	0	0	-	++	0
SA-0020-WAL	-	--	-	+/-	-	-	--	+/-	-	0	0	-	++	0
SA-0030-WAL	-	--	-	+/-	--	-	--	+/-	-	0	0	-	++	0
SA-0045-WAL	0	--	-	+/-	--	-	-	+/-	-	0	0	-	++	0
SA-0047-WAL	-	--	--	+/-	--	--	--	+/-	-	0	0	-	++	0
SA-0054-WAL	-	--	--	+/-	-	-	--	+/-	-	0	0	-	++	0
SA-0057-WAL	0	-	-	+/-	+	-	--	+/-	-	0	0	-	++	0
SA-0061-WAL	-	--	--	+/-	--	--	--	+/-	-	0	0	-	++	0
SA-0167-WAL	-	--	-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA-0183-WAL	--	--	+/-	+/-	+	+	-	+/-	-	0	0	-	++	0
SA-0186-WAL	-	--	-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0195-WAL	0	--	--	+/-	--	-	--	+/-	-	0	0	-	++	0
SA-0196-WAL	0	--	-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA-0197-WAL	0	--	--	+/-	--	-	-	+/-	-	0	0	-	++	0
SA-0200-WAL	-	--	-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0201-WAL	-	--	-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0202-WAL	-	--	-	+/-	--	--	--	+/-	-	0	0	-	++	0
SA-0204-WAL	-	--	-	+/-	-	--	--	+/-	-	0	0	-	++	0
SA-0205-WAL	-	--	-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA-0211-WAL	-	--	-	+/-	+	--	--	+/-	-	0	0	-	++	0
SA-0212-WAL	-	--	-	+/-	-	--	--	+/-	-	0	0	-	++	0
SA-0213-WAL	-	--	-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA-0215-WAL	-	--	-	+/-	-	--	--	+/-	-	0	0	-	++	0
SA-0216-WAL	-	--	-	+/-	-	-	--	+/-	-	0	0	-	++	0
SA-0223-WAL	-	--	-	+/-	-	--	--	+/-	-	0	0	-	++	0
SA-0227-WAL	0	--	+/-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA-0230-WAL	-	--	+/-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA-0231-WAL	-	--	-	+/-	+	--	--	+/-	-	0	0	-	++	0
SA-0232-WAL	-	--	-	+/-	--	--	--	+/-	-	0	0	-	++	0
SA-0235-WAL	-	--	+/-	+/-	-	-	--	+/-	-	0	0	-	++	0
SA-0237-WAL	-	--	+/-	+/-	--	--	--	+/-	-	0	0	-	++	0
SA-0238-WAL	-	--	-	+/-	--	--	--	+/-	-	0	0	-	++	0
SA-0239-WAL	-	--	-	+/-	+	-	--	+/-	-	0	0	-	++	0
SA-0242-WAL	0	-	--	+/-	--	-	-	+/-	-	0	0	-	++	0
SA-0243-WAL	0	-	--	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0244-WAL	0	--	-	+/-	+	-	--	+/-	-	0	0	-	++	0

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SA-0245-WAL	0	--	-	+/-	--	-	-	+/-	-	0	0	-	++	0
SA-0248-WAL	-	--	-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0257-WAL	-	--	-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA-0274-WAL	-	--	-	+/-	--	-	--	+/-	-	0	0	-	++	0
SA-0275-WAL	0	--	--	+/-	--	-	-	+/-	-	0	0	-	++	0
SA-0276-WAL	0	--	-	+/-	-	-	-	+/-	-	0	-	-	++	0
SA-0284-WAL	-	--	-	+/-	--	-	--	+/-	-	0	0	-	++	0
SA-0286-WAL	-	--	-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0288-WAL	-	--	-	+/-	--	-	--	+/-	-	0	0	-	++	0
SA-0301-WAL	-	--	-	+/-	-	-	-	+/-	-	0	0	-	+/-	0
SA-0302-WAL	-	--	-	+/-	-	--	--	+/-	-	0	0	-	++	0
SA-0304-WAL	-	--	-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0308-WAL	0	--	--	+/-	--	-	--	+/-	-	0	0	-	++	0
SA-0315-WAL	0	0	+/-	+/-	-	+	-	+/-	-	0	0	-	+/-	0
<b>Walsall Carried Forward Residential Sites</b>														
HO0016	-	0	+/-	0	-	+	-	0	-	+	-	-	-	+
HO0020	-	-	+/-	0	--	-	-	0	-	+	-	-	-	+
HO0023b	0	-	+/-	0	-	-	-	0	+	+	0	-	+	+
HO0027	-	-	-	-	-	-	--	-	-	++	-	-	+	-
HO0029	0	-	-	-	-	+	--	-	-	++	-	-	+	+
HO0037	-	-	+/-	0	+	-	-	0	-	+	0	-	+	-
HO0039a	0	-	+/-	0	+	-	-	0	+	+	-	-	+	-
HO0039b	0	-	+/-	0	-	-	-	0	+	+	-	-	+	-
HO0040	0	-	-	0	+	-	-	0	-	+	0	-	+	-
HO0041a	0	-	-	0	+	-	-	0	+	+	-	-	+	+
HO0041b	0	-	-	0	+	-	-	0	+	+	-	-	+	+
HO0043	-	-	-	0	-	-	-	0	-	+	0	-	+	+
HO0044	0	-	-	0	+	-	-	0	-	+	0	-	+	+
HO0046	0	-	-	0	-	-	-	0	-	+	-	-	+	-
HO0053	0	0	-	0	-	+	-	0	-	+	0	-	-	-
HO0060a	-	0	-	0	+	+	-	0	+	+	-	-	-	+
HO0060b	-	0	-	0	+	+	-	0	+	+	-	-	-	+
HO0060c	-	0	-	0	-	-	-	0	+	+	-	-	+	+
HO0060d	-	0	+/-	0	--	+	-	0	+	+	-	-	+	+
HO0062	-	-	-	0	-	-	-	0	+	+	-	-	+	+
HO0065	-	0	+/-	0	-	+	-	0	+	+	-	-	-	+
HO0066b	-	-	+/-	0	+	+	-	0	+	+	-	-	+	+
HO0071	0	-	+/-	0	--	-	-	0	+	+	0	-	+	-
HO0072	-	-	+/-	0	-	-	-	0	+	+	0	-	+	-
HO0093	0	-	-	0	-	-	-	0	+	+	-	-	+	+



Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HO0117	0	-	-	0	+	-	-	0	+	+	-	-	+	+
HO0124	0	-	-	0	-	-	-	0	+	+	0	-	+	+
HO0125	0	0	-	0	+	-	-	0	+	+	0	-	-	+
HO0126	0	0	-	0	-	-	-	0	+	+	-	-	-	+
HO0137a	0	0	+/-	0	--	+	-	0	-	+	0	-	+	-
HO0137b	0	0	+/-	0	+	+	-	0	-	+	0	-	+	-
HO0137c	0	0	+/-	0	+	+	-	0	-	+	0	-	+	-
HO0147	0	-	-	0	+	+	-	0	+	+	-	-	+	-
HO0150	0	0	-	0	+	+	-	0	-	+	-	-	+	-
HO0150a	0	0	-	0	+	+	-	0	-	+	-	-	+	-
HO0154	0	0	-	0	+	-	-	0	+	+	-	-	+	-
HO0157a	0	0	-	0	+	-	-	0	-	+	0	-	-	+
HO0157b	0	0	-	0	+	-	-	0	-	+	0	-	-	+
HO0157c	0	-	-	0	+	-	-	0	-	+	0	-	-	+
HO0162a	0	0	+/-	0	+	+	-	0	-	+	-	-	+	+
HO0162b	0	0	+/-	0	+	+	-	0	-	+	-	-	+	+
HO0163	0	0	-	0	+	+	-	0	-	+	0	-	-	+
HO0168a	0	-	-	0	--	-	-	0	-	+	0	-	+	+
HO0168b	0	-	-	0	+	-	-	0	-	+	0	-	+	+
HO0176	0	-	+/-	-	-	-	--	-	-	++	0	-	+	-
HO0180	0	-	-	0	-	-	-	0	-	+	0	-	+	+
HO0181	-	-	-	-	-	-	--	-	+	++	-	-	+	+
HO0185	0	-	+/-	0	-	-	-	0	+	+	0	-	+	+
HO0194	0	0	-	0	+	+	-	0	+	+	0	-	-	+
HO0195	0	0	-	0	-	+	-	0	+	+	-	-	-	+
HO0201	0	-	+/-	0	--	-	-	0	-	+	-	-	+	+
HO0205	0	-	-	0	+	-	-	0	+	+	-	-	+	+
HO0217a	-	0	+/-	0	+	-	-	0	-	+	0	-	+	-
HO0217b	-	-	+/-	0	+	-	-	0	-	+	0	-	+	-
HO0304	-	-	-	0	+	-	-	0	-	+	0	-	+	+
HO0305	0	-	+/-	0	--	-	-	0	-	+	0	-	+	+
HO0307	-	0	-	0	+	-	-	0	+	+	-	-	+	+
HO0308	0	0	+/-	0	-	+	-	0	+	+	0	-	-	+
HO0310	0	-	+/-	0	--	-	-	0	+	+	-	-	+	+
HO0312	0	-	+/-	0	-	+	-	0	+	+	-	-	+	+
HO0313	0	-	-	0	-	-	-	0	+	+	0	-	+	+
HO0316	-	-	+/-	0	+	+	-	0	-	+	0	-	+	+
HO0317	0	-	-	0	+	-	-	0	-	+	-	-	-	+
HO0318	0	-	-	0	-	-	-	0	-	+	0	-	-	+
HO0320	-	0	+/-	0	+	+	-	0	-	+	-	-	-	+

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HO0321	0	0	+/-	0	-	-	-	0	-	+	0	-	-	+
HO0322a	0	-	+/-	0	-	-	-	0	+	+	0	-	+	+
HO0322b	0	-	+/-	0	-	+	-	0	+	+	0	-	+	-
HO1314	0	-	-	0	-	-	-	0	-	+	0	-	-	+
LC02B	-	0	-	0	-	-	-	0	-	+	0	-	+	+
LC08A	0	0	-	0	+	-	-	0	+	+	-	-	+	-
LC14A	0	-	+/-	0	-	-	-	0	-	+	0	-	-	+
LC18A	0	-	-	0	+	-	-	0	-	+	0	-	-	+
LC30A	-	0	+/-	0	+	+	-	0	+	+	-	-	+	+
LC30C	-	0	+/-	0	+	+	-	0	+	+	-	-	+	+
LC31A	0	-	-	0	--	-	-	0	+	+	-	-	+	+
<b>Walsall Carried Forward Employment Sites</b>														
IN0002.1	0	-	-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0005.1	-	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
IN0009.12	0	0	-	+/-	-	-	-	+/-	-	0	0	-	++	0
IN0009.13	0	0	-	+/-	+	-	-	+/-	-	0	0	-	++	0
IN0009.14	0	0	-	+/-	+	-	-	+/-	-	0	0	-	++	0
IN0010.2	0	-	-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0012.5	0	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
IN0012.6	0	0	-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0012.8	0	0	-	+/-	--	-	-	+/-	-	0	0	-	+/-	0
IN0017.1	0	-	-	+/-	--	+	-	+/-	+	0	-	-	++	0
IN0017.2	0	0	-	+/-	-	-	-	+/-	+	0	-	-	++	0
IN0018.2	0	0	-	+/-	+	+	-	+/-	-	0	-	-	++	0
IN0027.1	0	0	-	+/-	-	-	-	+/-	+	0	-	-	++	0
IN0027.2	0	-	-	+/-	-	-	-	+/-	-	0	-	-	++	0
IN0032.2	-	0	-	+/-	-	-	-	+/-	+	0	-	-	++	0
IN0052.2	0	-	-	+/-	+	-	-	+/-	+	0	-	-	++	0
IN0056.2	0	0	+/-	+/-	--	-	-	+/-	+	0	0	-	++	0
IN0058	0	-	-	+/-	-	-	-	+/-	+	0	0	-	++	0
IN0063	0	0	-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0064	0	0	-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0068.1	0	-	-	+/-	--	-	-	+/-	-	0	-	-	+/-	0
IN0069.3	0	-	-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0069.42	0	0	-	+/-	--	+	-	+/-	-	0	0	-	++	0
IN0070.2	0	-	+/-	+/-	-	+	-	+/-	-	0	0	-	++	0
IN0070.4	0	0	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
IN0071.2	-	-	--	+/-	--	-	-	+/-	-	0	-	-	++	0
IN0072.2	0	-	+/-	+/-	--	-	-	+/-	+	0	-	-	++	0
IN0078.12	0	-	+/-	+/-	+	-	-	+/-	-	0	-	-	++	0

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
IN0078.2	0	0	-	+/-	--	-	-	+/-	+	0	-	-	++	0
IN0084	0	0	-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0093.2	-	0	-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0099.2	0	-	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
IN0103.2	0	0	-	+/-	-	+	-	+/-	-	0	-	-	++	0
IN0104.1	0	0	-	+/-	--	+	-	+/-	-	0	-	-	++	0
IN0104.4	-	0	-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0105	-	-	-	+/-	--	-	-	+/-	-	0	-	-	++	0
IN0109	-	-	+/-	+/-	--	-	-	+/-	-	0	-	-	++	0
IN0110	-	-	-	+/-	--	-	-	+/-	-	0	-	-	++	0
IN0118.2	0	-	+/-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0120.5	-	0	+/-	+/-	+	-	-	+/-	+	0	0	-	+/-	0
IN0122	0	-	-	+/-	-	-	--	+/-	+	0	0	-	++	0
IN0205	-	0	-	+/-	--	-	-	+/-	-	0	-	-	++	0
IN0315	-	0	-	+/-	--	-	-	+/-	-	0	0	-	+/-	0
IN0317	-	0	+/-	+/-	--	+	-	+/-	-	0	0	-	+/-	0
IN0328	0	-	-	+/-	-	-	-	+/-	+	0	-	-	++	0
IN0333	0	-	-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0341	0	-	-	+/-	--	-	-	+/-	+	0	0	-	++	0

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**Table 5.5: Impact matrix of all sites assessed in this report – Wolverhampton**

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
<b>Wolverhampton Residential Sites</b>														
SA-0001-WOL	-	--	-	-	+	-	--	-	-	++	0	-	+	-
SA-0002-WOL	-	--	-	-	+	-	--	-	-	++	0	-	+	-
SA-0003-WOL	-	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0005-WOL	-	--	-	-	+	-	--	-	-	++	0	-	+	-
SA-0007-WOL	-	--	-	+/-	+	-	-	+/-	-	+/-	0	-	+	+
SA-0008-WOL	0	-	+/-	0	-	-	-	0	-	+	0	-	+	+
SA-0009-WOL	0	-	-	0	-	-	-	0	-	+	0	-	+	+
SA-0010-WOL	0	-	-	0	--	-	-	0	-	+	0	-	+	+
SA-0011-WOL	-	--	--	-	-	-	--	-	-	++	0	-	+	+
SA-0012-WOL	0	-	-	0	-	-	-	0	-	+	0	-	+	-
SA-0014-WOL	-	--	+/-	+/-	+	-	-	+/-	-	+/-	0	-	+	+
SA-0015-WOL	0	-	-	0	--	-	-	0	-	+	0	-	+	+
SA-0016-WOL	-	--	+/-	+/-	+	-	-	+/-	-	+/-	0	-	-	+
SA-0018-WOL	0	-	+/-	0	-	-	-	0	-	+	0	-	-	-
SA-0019-WOL	-	--	-	+/-	--	-	-	+/-	-	+/-	0	-	-	-
SA-0020-WOL	-	--	-	+/-	--	-	-	+/-	-	+/-	0	-	-	+
SA-0021-WOL	-	-	+/-	-	+	-	--	-	-	++	0	-	--	+
SA-0024-WOL	0	--	+/-	0	-	-	-	0	-	+	0	-	+	-
SA-0025-WOL	0	-	+/-	0	+	-	-	0	-	+	0	-	+	-
SA-0026-WOL	-	--	-	+/-	+	-	-	+/-	-	+/-	0	-	-	+
SA-0027-WOL	0	-	-	0	+	-	-	0	-	+	0	-	+	+
SA-0028-WOL	0	-	-	0	--	-	-	0	-	+	0	-	+	+
SA-0030-WOL	0	-	-	0	-	-	-	0	-	+	0	-	+	+
SA-0032-WOL	-	0	-	0	-	+	-	0	-	+	-	-	--	+
SA-0040-WOL	0	-	+/-	0	+	-	-	0	-	+	0	-	+	+
SA-0049-WOL	-	--	+/-	+/-	+	-	-	+/-	-	+/-	0	-	-	+
SA-0053-WOL	-	-	-	0	+	+	-	0	-	+	0	-	+	+
SA-0054-WOL	0	0	--	+/-	-	+	-	+/-	-	+/-	0	-	--	-
<b>Wolverhampton Employment Sites</b>														
SA-0034-WOL	-	-	--	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0035-WOL	0	0	+/-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA-0036-WOL	0	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0037-WOL	0	0	+/-	+/-	--	+	-	+/-	-	0	0	-	++	0
SA-0039-WOL	-	0	-	+/-	--	+	-	+/-	-	0	0	-	++	0
SA-0041-WOL	0	-	+/-	+/-	--	+	-	+/-	-	0	0	-	++	0
SA-0044-WOL	-	0	-	+/-	-	+	-	+/-	-	0	-	-	++	0
SA-0045-WOL	0	-	+/-	+/-	+	-	-	+/-	-	0	-	-	++	0
SA-0047-WOL	0	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SA-0051-WOL	0	0	+/-	+/-	+	+	-	+/-	+	0	-	-	++	0
SA-0052-WOL	0	-	+/-	+/-	+	-	-	+/-	+	0	0	-	++	0
<b>Wolverhampton Carried Forward Residential Sites</b>														
27372	--	-	+/-	-	-	+	--	-	+	++	-	-	+	+
34400	0	-	-	0	-	-	-	0	+	+	-	-	+	+
36440	0	-	+/-	0	-	-	-	0	-	+	0	-	+	-
36490	0	-	+/-	0	-	-	-	0	-	+	-	-	+	+
36610	-	-	-	0	-	-	--	0	+	++	-	-	+	+
36620	-	0	-	-	-	+	--	-	+	++	-	-	--	+
36630	-	0	-	0	-	+	-	0	+	+	-	-	--	+
36640	-	0	-	0	+	+	-	0	-	+	0	-	--	-
36680	-	0	-	-	-	+	--	-	+	++	-	-	--	+
36690	0	0	+/-	0	-	-	-	0	+	+	0	-	+/-	+
36870	0	0	+/-	0	+	+	--	0	+	++	-	-	+	+
36891/36892	-	-	+/-	0	-	-	-	0	+	+	0	-	+	+
40530	-	-	+/-	0	+	-	-	0	+	+	-	-	+	+
41900	-	0	+/-	-	-	+	--	-	+	++	-	-	-	+
41910	--	0	+/-	0	+	+	-	0	+	+	-	-	+	+
D5a/D5b	0	-	-	-	-	-	--	-	-	++	-	-	+	+
D20	--	-	+/-	0	+	-	-	0	-	+	0	-	+/-	+
D74	0	-	-	0	--	-	-	0	-	+	0	-	+	+
D78	0	-	+/-	0	--	-	-	0	-	+	0	-	-	+
D79	0	-	+/-	0	-	-	-	0	-	+	0	-	+	+
<b>Wolverhampton Carried Forward Employment Sites</b>														
677	-	0	-	+/-	-	-	-	+/-	+	0	0	-	++	0
684	-	0	-	+/-	--	-	-	+/-	-	0	0	-	++	0
690	0	0	+/-	+/-	+	+	-	+/-	-	0	-	-	+/-	0
723/WOL34	-	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
725/WOL5	0	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
726/WOL7	-	0	-	+/-	--	-	-	+/-	+	0	0	-	++	0
727/WOL8	-	0	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
734/WOL22	0	-	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
735/WOL24	0	-	-	+/-	--	-	-	+/-	+	0	-	-	++	0
737/WOL47	-	-	-	+/-	--	-	-	+/-	+	0	-	-	++	0
WOL18a(EDO4)/WOL17	-	0	+/-	+/-	+	-	-	+/-	-	0	-	-	++	0
WOL18b	0	-	+/-	+/-	+	-	-	+/-	-	0	0	-	++	0
WOL19	0	0	+/-	+/-	+	+	-	+/-	-	0	0	-	+/-	0
WOL21	0	0	-	+/-	-	+	-	+/-	-	0	0	-	++	0
WOL23	0	-	+/-	+/-	--	-	-	+/-	-	0	-	-	++	0
WOL39	-	0	-	+/-	-	+	-	+/-	+	0	-	-	+/-	0

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
WOL40	0	0	-	+/-	--	-	-	+/-	-	0	0	-	++	0
WOL42	0	-	+/-	+/-	-	-	-	+/-	-	0	-	-	++	0
WOL43	0	0	+/-	+/-	+	+	-	+/-	-	0	-	-	+/-	0

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**Table 5.6: Impact matrix of all sites assessed in this report – Gypsies, Travellers & Travelling Showpeople**

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
<b>GTTTS Sites</b>														
GT01	0	0	-	+/-	-	-	-	+/-	-	+	0	-	+	-
GT02	-	--	-	+/-	--	+	-	+/-	-	+	0	-	+	-
GT03	-	0	--	+/-	--	-	-	+/-	-	+	0	-	+	-
GT04	-	0	-	+/-	--	-	-	+/-	+	+	-	-	+	+
GT05	0	0	+/-	+/-	+	+	-	+/-	+	+	0	-	+	+
SA-11	-	0	-	+/-	--	+	-	+/-	+	+	0	-	+	-
GT1	-	--	-	+/-	--	+	-	+/-	+	+	-	-	+	+
GT50	0	0	-	+/-	+	-	-	+/-	+	+	-	-	+	+
H028	0	-	-	+/-	-	-	-	+/-	-	+	-	-	+	-
36510	0	-	+/-	+/-	--	-	-	+/-	-	+	-	-	+	+
SA-0049-WAL	0	--	-	+/-	-	+	-	+/-	-	+	0	-	+	+
SA-0310-WAL	0	--	-	+/-	+	-	-	+/-	-	+	0	-	+	-
2583	0	-	+/-	+/-	--	+	-	+/-	-	+	0	-	+	+

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## 5.18 Preferred Options – Sites

- 5.18.1 The proposed draft allocations are described in Chapter 13 of the Draft BCP and shown on the accompanying policies map. These will be subject to consultation as part of the Regulation 18 process.
- 5.18.2 **Chapter 6** gives an overview summary of the BCA reasons for selection and rejection for each of the proposed allocations at this stage (excluding carried forward sites).

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## 6 Selected / Rejected Sites

### 6.1 Overview

- 6.1.1 As outlined in **Section 1.12**, Planning Practice Guidance (PPG) on SEA states that the SA process should outline the reasons why alternatives were selected and the reasons the rejected options were not taken forward. An overview of the reasons for site selection and rejection have been provided by the BCA, as summarised in **Tables 6.1-6.7** for each administrative authority. Reasons for selection and rejection of the sites proposed at this stage in the plan making process have been informed by the detailed site assessment process undertaken by the BCA.
- 6.1.2 **Tables 6.1-6.7** include reasonable alternatives assessed in the SA process. They do not include sites which did not pass the 'gateway' test undertaken by the BCA (see para 5.1.4 in **Chapter 5**).
- 6.1.3 **Tables 6.1-6.7** are intended to provide an overview only. The decision making of the BCA in relation to the sites taken forward, reflects the findings of the evidence base documents prepared to support the preparation of the Local Plan, including the findings of the SA, and have been accompanied by detailed site assessment proformas.

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## 6.2 Wolverhampton

**Table 6.1:** *Wolverhampton Selected / Rejected Sites - Housing*

Site Reference	Site Name	Selected/ Rejected	Reason for Selection / Rejection provided by BCA
SA-0001-WOL	Northycote Lane, Bushbury, Wolverhampton	Selected	<p>Agricultural land in the green belt. Whole hedgerow to east, and hedgerow / tree belt running along track within site are proposed for designation as SLINCs (following recent ecological survey), with some TPOs. Track belt would need to be breached to provide an access road to open up the north east part of the site. Beyond the site boundary, there are significant existing / proposed SINC areas to the north and east. Buffers required to all site boundaries and along track belt to preserve value and mitigate potential impacts. Net biodiversity gain, green belt mitigation and open space provision could be secured through improvements to the adjoining Northycote Farm Country Park SINC and improved links from the development to this site, including Council adoption /management of c. 10.4 ha of land along the brook / fish pond, to extend Northycote Farm Country Park.</p> <p>The site falls within an area with very high green belt harm, however it demonstrates moderate landscape sensitivity and forms one of a limited number of larger development opportunities in the Wolverhampton Green Belt.</p> <p>There is a shortage of primary and secondary school places locally, requiring off-site contributions to increase capacity. Access to residential services is satisfactory subject to provision of a potential new primary school on land at Bushbury Lane / Legs Lane immediately to the south and local bus service improvements to secondary schools. Site has access to a wide range of types of open space, therefore on-site open space is not required, subject to investment in and access improvements to adjoining Northycote Farm Country Park.</p> <p>Off-site highways works required to address potential highways impactsSite is suitable for development for 182 homes, subject to retention of existing habitats of value and securing investment for off-site highways works, to increase school place capacity and to significantly improve and extend facilities at the neighbouring Northycote Farm Country Park to address green belt mitigation, net biodiversity gain and open space requirements (see Policy CSA1 for further detail).</p>
SA-0002-WOL	South of Moseley Road, Bushbury, Wolverhampton	Selected	<p>Agricultural land in the green belt. Hedgerow to boundaries, some proposed for SLINC designation following recent ecological survey and including TPO trees. Buffers required to all site boundaries to preserve value and mitigate potential impacts. Net biodiversity gain, green belt mitigation and open space provision could be secured through improvements to the adjoining Northycote Farm Country Park SINC and improved links from the development to this site, including Council adoption /management of c. 10.4 ha of land along the brook / fish pond, to extend Northycote Farm Country Park.</p> <p>The site falls within an area with very high green belt harm, however it demonstrates moderate landscape sensitivity and forms one of a limited number of larger development opportunities in the Wolverhampton Green Belt.</p> <p>There is a shortage of primary and secondary school places locally, requiring off-site contributions to increase capacity. Access to residential services is satisfactory subject to provision of a potential new primary school on land at Bushbury Lane / Legs Lane immediately to the south and local bus service improvements to secondary schools. Site has access to a wide range of types of open space, therefore on-site open space is not required, subject to investment in and access improvements to adjoining Northycote Farm Country Park.</p> <p>Off-site highways works required to address potential highways impacts.</p>

Site Reference	Site Name	Selected/ Rejected	Reason for Selection / Rejection provided by BCA
			Site is suitable for development for 124 homes, subject to retention of existing habitats of value and securing investment for off-site highways works, to increase school place capacity and to significantly improve and extend facilities at the neighbouring Northcote Farm Country Park to address green belt mitigation, net biodiversity gain and open space requirements (see Policy CSA1 for further detail).
SA-0003-WOL	North of Moseley Road, Bushbury, Wolverhampton	Selected	<p>Strip of agricultural land in the green belt, on the edge of Wolverhampton. Small woodland proposed SLINC to east of site and SLINC hedgerow to southern boundary, following recent ecological survey. Net biodiversity gain, green belt mitigation and open space provision could be secured through improvements to the nearby Northcote Farm Country Park SINC and improved links from the development to this site, including Council adoption /management of c. 10.4 ha of land along the brook / fish pond, to extend Northcote Farm Country Park.</p> <p>The site falls within an area with very high green belt harm, however it demonstrates moderate landscape sensitivity and forms one of a limited number of larger development opportunities in the Wolverhampton Green Belt.</p> <p>There is a shortage of primary and secondary school places locally, requiring off-site contributions to increase capacity. Access to residential services is satisfactory subject to provision of a potential new primary school on land at Bushbury Lane / Legs Lane immediately to the south and local bus service improvements to secondary schools. Site has access to a wide range of types of open space, therefore on-site open space is not required, subject to investment in and access improvements to adjoining Northcote Farm Country Park.</p> <p>Upgrading of Moseley Road and other off-site highways works required to address potential highways impacts.</p> <p>The City boundary cuts through the middle of farmland therefore developing this strip in isolation from the larger site could create a less defensible green belt boundary and affect the viability of remaining farmland.</p> <p>Site is suitable for development for 78 homes, subject to: providing a defensible green belt boundary in the form of a landscaped buffer; retention of existing habitats of value; and securing investment for off-site highways works, to increase school place capacity and to significantly improve and extend facilities at the neighbouring Northcote Farm Country Park to address green belt mitigation, net biodiversity gain and open space requirements (see Policy CSA1 for further detail).</p>
SA-0005-WOL	Land at Bushbury Lane/ Legs Lane, Bushbury, Wolverhampton	Selected	<p>Agricultural land in the green belt. Limited areas of small trees/ bushes along road boundaries. Net biodiversity gain could be secured through improvements to the nearby Northcote Farm Country Park SINC and improved links from the development to this site, including Council adoption /management of c. 10.4 ha of land along the brook / fish pond, to extend Northcote Farm Country Park.</p> <p>There is a shortage of primary and secondary school places locally, requiring off-site contributions to increase capacity. Access to residential services is satisfactory subject to provision of a potential new primary school on land at Bushbury Lane / Legs Lane immediately to the south and local bus service improvements to secondary schools. Site has access to a wide range of types of open space, therefore on-site open space is not required, subject to investment in and access improvements to adjoining Northcote Farm Country Park.</p> <p>Off-site highways works required to address potential highways impacts.</p> <p>Site is suitable for development for minimum 148 homes and a potential new primary school, subject to retention of existing habitats of value and securing investment for off-site highways works, to increase school place capacity and to significantly improve and extend facilities at the neighbouring Northcote Farm Country Park to address green belt mitigation, net biodiversity gain and open space requirements (see Policy CSA1 for further detail).</p>

Site Reference	Site Name	Selected/ Rejected	Reason for Selection / Rejection provided by BCA
SA-0009-WOL	Open Space at Grassy Lane, Fallings Park, Wolverhampton	Selected	<p>Public open space in the green belt, within an area demonstrating low-moderate green belt harm and low-moderate landscape sensitivity. There is a shortage of primary and secondary school places locally, requiring off-site contributions to increase capacity. Off-site highways works required to address potential highways impacts.</p> <p>The replacement of this low quality, maintained grassland open space with a 1 ha high quality open space including play facilities to serve new residents (of this site and surrounding sites) is supported by the 2018 Wolverhampton Open Space Strategy and Action Plan. The remaining land is suitable for development for 88 homes, subject to securing investment for off-site highways works, to increase school place capacity and to carry out accessibility, biodiversity and environmental quality improvements to recreational open space at nearby Bushbury Hill green belt area to address green belt mitigation, net biodiversity gain and open space requirements (see Policy CSA2 for further detail).</p>
SA-0010-WOL	Land North of Grassy Lane, Fallings Park, Wolverhampton	Selected	<p>Agricultural land in the green belt, on the edge of Wolverhampton, within an area demonstrating low-moderate green belt harm and low-moderate landscape sensitivity. Trees / hedges along south and north west site boundary and a few mature trees in the centre of the site which could be retained as part of development. The City boundary cuts through the middle of farmland, along a brook/culvert, therefore developing this strip in isolation from the larger site could create a less defensible green belt boundary. There is a shortage of primary and secondary school places locally, requiring off-site contributions to increase capacity. Off-site highways works required to address potential highways impacts. Open space requirements of residents to be met through contributions towards provision of new high quality open space on Open Space at Grassy Lane site.</p> <p>Site is suitable for development for 80 homes, subject to providing a defensible green belt boundary in the form of a landscaped buffer along the brook/culvert and securing investment for off-site highways works, to increase school place capacity and to carry out accessibility, biodiversity and environmental quality improvements to Open Space at Grassy Lane and recreational open space at nearby Bushbury Hill green belt area to address green belt mitigation, net biodiversity gain and open space requirements (see Policy CSA2 for further detail).</p>
SA-0015-WOL	Land at Grassy Lane, Fallings Park, Wolverhampton	Selected	<p>Grazing land with stabling in the green belt on the edge of Wolverhampton, within an area demonstrating low-moderate green belt harm and low-moderate landscape sensitivity. SLINC covering boundary hedgerows is proposed for deletion following recent ecological survey. There is a shortage of primary and secondary school places locally, requiring off-site contributions to increase capacity. Off-site highways works required to address potential highways impacts. Open space requirements of residents to be met through contributions towards provision of new high quality open space on Open Space at Grassy Lane site.</p> <p>Site is suitable for development for 95 homes, subject to securing investment for off-site highways works, to increase school place capacity and to carry out accessibility, biodiversity and environmental quality improvements to Open Space at Grassy Lane and recreational open space at nearby Bushbury Hill green belt area to address green belt mitigation, net biodiversity gain and open space requirements (see Policy CSA2 for further detail).</p>
SA-0030-WOL	Land East of Wood Hayes Road, Wolverhampton	Selected	<p>Agricultural land in the green belt, on the edge of Wolverhampton, within an area demonstrating low-moderate green belt harm and low-moderate landscape sensitivity. Established hedgerow along west boundary and trees to the north and east boundaries could be retained as part of development. The City boundary cuts through the middle of farmland, therefore developing this strip in isolation from the larger site could create a less defensible green belt boundary. The tree line could be strengthened to form a defensible green belt boundary. Given the linear shape of the site, the rural local character and the need to create a defensible green belt boundary, a ribbon development with a density of no more than 25 dph is appropriate, in line with the density of the short ribbon of housing south of the site.</p>

Site Reference	Site Name	Selected/ Rejected	Reason for Selection / Rejection provided by BCA
			<p>There is a shortage of primary and secondary school places locally, requiring off-site contributions to increase capacity. Off-site highways works required to address potential highways impacts. Open space requirements of residents to be met through contributions towards provision of new high quality open space on Open Space at Grassy Lane site.</p> <p>Site is suitable for development for 40 homes at a low density of a design reflecting local character, subject to providing a defensible green belt boundary in the form of a strengthened tree line/landscaped buffer, and securing investment for off-site highways works, to increase school place capacity and to carry out accessibility, biodiversity and environmental quality improvements to Open Space at Grassy Lane and recreational open space at nearby Bushbury Hill green belt area to address green belt mitigation, net biodiversity gain and open space requirements (see Policy CSA2 for further detail).</p>
SA-0018-WOL	Land West of 74 Perton Road, Wightwick, Wolverhampton	Selected	<p>Garden land associated with 74 Perton Road and adjoining paddock located in the green belt. Two willing land owners. The site is located on the edge of Wolverhampton's urban and administrative area, in an area of moderate landscape sensitivity and green belt harm. The site has no significant planning constraints. The scale and location of the site would be a modest and logical extension to the urban area up to the track to the north-west. The track provides a natural boundary to adjoining open farmland and would provide a defensible new green belt boundary, in line with the boundaries of properties to the rear of Perton Grove.</p> <p>Adjacent residential uses are low density large dwellings and large plot sizes. Tettenhall Neighbourhood Plan Policy 12 requires new buildings to respect local character. Therefore site is suitable for 4 homes.</p>
SA-0021-WOL	City of Wolverhampton College (buildings), Paget Road, Compton Park, Wolverhampton	Selected	<p>Operational Wolverhampton College buildings, Activity Centre, hardstanding and landscaping located in the green belt, on the edge of the urban area. Development would fund relocation of the college to a more sustainable location within the City. The majority of the site was identified as a Major Developed Site in the Wolverhampton UDP (2011). National guidance prioritises the release of previously developed sites within the green belt. No environmental constraints affect the site.</p> <p>Development would provide visual enhancement to the area and increase the openness of remaining green belt by removing existing, large-scale, functional education buildings and replacement with a well-designed residential area.</p> <p>Site suitable for a development of 140 homes, subject to green belt mitigation at Smestow Valley LNR, relocation of College and Activity Centre to appropriate sites, appropriate highways access and off-site improvements to local open space.</p>
SA-0024-WOL	South Staffordshire Golf Course Land at Codsall Road, Wolverhampton	Selected	<p>Small part of golf course including mature trees located in the green belt. Reconfiguration of the golf course would be required to retain 18 holes, in accordance with Wolverhampton Playing Pitch Strategy. Low density ribbon development fronting Codsall Road of no more than 8 houses would not harm local character and could be designed to protect any mature trees of value. The new green belt boundary would continue to follow the edge of South Staffordshire Golf Course. Mitigation for green belt loss could be provided through accessibility, biodiversity and environmental quality improvements to South Staffordshire Golf Course.</p> <p>Mature trees cover half of the site, reducing the net developable area. Adjoining housing is of very low density with large rear gardens and new development should reflect this open character and ribbon development with a net density of no more than 20 dph. Therefore site is suitable for development for no more than 8 houses, subject to reconfiguration of golf course to replace hole lost to development and retain high standard of South Staffordshire Golf Course as defined in current Playing Pitch evidence.</p>

Site Reference	Site Name	Selected/ Rejected	Reason for Selection / Rejection provided by BCA
SA-0008-WOL	Oxley Park Golf Club land adjacent to 139 Oxley Moor Road	Selected	<p>Small part of golf course grounds located in green belt, in an area of low-moderate green belt harm and low-moderate landscape sensitivity. Development would fund improvements to golf course. The site falls within an area proposed for designation as a SLINC following recent ecological survey. Mitigation for loss of SLINC, green belt mitigation and net biodiversity gain could be provided through improvements to remaining SLINC.</p> <p>Site suitable for development for 3 homes, subject to accessibility, biodiversity and environmental quality improvements to Oxley Park Golf Course.</p>
SA-0025-WOL	Oxley Park Golf Club land adjacent to 1A Ribbesford Avenue	Selected	<p>Small part of golf course grounds located in green belt, in an area of low-moderate green belt harm and low-moderate landscape sensitivity. Development would fund improvements to golf course. The site falls within an area proposed for designation as a SLINC following recent ecological survey. Mitigation for loss of SLINC, green belt mitigation and net biodiversity gain could be provided through improvements to remaining SLINC.</p> <p>Site suitable for development for 3 homes, subject to accessibility, biodiversity and environmental quality improvements to Oxley Park Golf Course.</p>
SA-0027-WOL	Oxley Park Golf Club land adjacent to 21 Oxley Links Road	Selected	<p>Small part of golf course grounds located in green belt, in an area of low-moderate green belt harm and low-moderate landscape sensitivity. Development would fund improvements to golf course. The site falls within an area proposed for designation as a SLINC following recent ecological survey. Mitigation for loss of SLINC, green belt mitigation and net biodiversity gain could be provided through improvements to remaining SLINC.</p> <p>Site suitable for development for 3 homes, subject to accessibility, biodiversity and environmental quality improvements to Oxley Park Golf Course.</p>
SA-0028-WOL	Oxley Park Golf Club land adjacent to 10 Oxley Links Road	Selected	<p>Small part of golf course grounds located in green belt, in an area of low-moderate green belt harm and low-moderate landscape sensitivity. Development would fund improvements to golf course. The site falls within an area proposed for designation as a SLINC following recent ecological survey. Mitigation for loss of SLINC, green belt mitigation and net biodiversity gain could be provided through improvements to remaining SLINC.</p> <p>Site suitable for development for 4 homes, subject to accessibility, biodiversity and environmental quality improvements to Oxley Park Golf Course.</p>
SA-0032-WOL	Lane Street / Highfields Road, Bradley, Wolverhampton	Selected	<p>Operational industrial site adjoining residential and employment, promoted for housing through the call for sites. The employment land evidence indicates that this site is surplus to employment needs and could be released for housing, subject to re-location of the current land owners who occupy the site and operate a steel stockholding company. The sites falls within an Area of High Historic Townscape Value (AHHTV) in the HLC Study due to the cluster of late 19th and early 20th century industrial buildings surrounding the locally listed Highfield Works building, which also falls within the Bilston Canal Corridor Conservation Area. This building could be suitable for conversion, subject to viability. Carefully designed housing development on adjoining land would not necessarily harm the setting of the Conservation Area.</p> <p>The site is suitable for development for 72 homes, subject to subject to a design which: protects the operation of employment land to the east; retains the locally listed Highfield</p>

Site Reference	Site Name	Selected/ Rejected	Reason for Selection / Rejection provided by BCA
			Works building; respects the setting of this building and the Bilston Canal Corridor Conservation Area within which it falls; and respects the Area of High Historic Townscape Value designation covering the whole site; provision of off-site improvements to local open space to meet recreational open space needs of new residents.
SA-0040-WOL	Moseley Road Open Space (part), Langdale Drive, Bilston	Selected	Part of larger public open space which is majority maintained grassland, with hedge/tree belt buffer to adjoining school playing fields. There is a surplus in quantity of open space in this part of Wolverhampton, as set out in the 2018 Wolverhampton Open Space Strategy and Action Plan, which can support the combined loss of open space at this site and at Dean's Road / Neachells Lane, subject to investment in local open space to improve quality.  Site suitable for development for 85 homes, subject to mitigation and enhancement for loss of open space.
SA-0053-WOL	Former Wolverhampton Environment Centre (buildings), Westacre Crescent, Finchfield	Selected	Previously developed site comprising remains of demolished greenhouses, bungalow and hardstanding associated with former Environment Centre, located in the green belt. Surrounding grounds of Environment Centre have been improved through ERDF funding and are proposed for incorporation into adjoining Smestow Valley Local Nature Reserve (LNR). Site has a recently expired planning permission for 14 houses, subject to securing funding to maintain the area of proposed LNR. National guidance prioritises the release of previously developed sites within the green belt.  The site is suitable for 14 houses, as per the planning permission.
SA-0007-WOL	Former Bushbury Swimming Baths, Sandy Lane	Rejected	Maintained grassland with public access via adjoining public open space located in the green belt. The site is in an area of very high green belt harm and moderate-high landscape sensitivity – the highest level for both ratings. Development of the site would produce a pocket of urban development in a large open space which contributes to the rural character of the area, bounded with roads and removal of the site from the green belt would produce a weak green belt boundary which would not be defensible. The site is located within the existing Bushbury Hill Conservation Area (CA) boundary and is proposed for retention in a reduced CA boundary following consultation on a new CA Appraisal and revised boundary in summer 2021. The CA appraisal highlights the importance of the openness of the area within which this site falls therefore development of the site would have a significant negative effect on the CA.  Development of the site would cause significant harm to the integrity of the remaining green belt, historic value and local character.
SA-0011-WOL	Land at Pennwood Farm, Goldthorn Park (north)	Rejected	Agricultural land and woodland including some areas of SINC and SLINC located in the green belt. The site is in an area of very high green belt harm and moderate-high landscape sensitivity – the highest level for both ratings. The area also forms a key part of the Former Sedgley Park Area of High Historic Landscape Value (AHHLV), as defined in the HLC Study. The AHHLV centres on the Grade II Listed Park Hall Hotel, to the north of the site, and the Park and Ashen Coppice Ancient Woodlands to the south, and includes historic field boundaries and hedgerows and archaeological interest within the SLINC. The site is characterised by historic field boundaries and provides a visual link between the Park Hall Hotel and its setting to the north and the ancient woodland coppices to the south. The site is also on an area of high ground and is visible from a considerable distance.  Therefore, development of the site would cause significant combined harm to the historic value of the AHHLV, to the integrity of remaining green belt and to landscape character, which could not be mitigated.

Site Reference	Site Name	Selected/ Rejected	Reason for Selection / Rejection provided by BCA
SA-0012-WOL	Colton Hills Community School	Rejected	The site forms part of school playing fields located in the green belt. The majority of the site (southern part) has highway constraints which cannot be overcome and would result in the loss of playing fields contrary to the current Wolverhampton Playing Pitch Strategy, which could not be adequately mitigated. The northern part of the site could be suitable for a small housing development, subject to mitigation. However, the site has subsequently been withdrawn by the site promoter.
SA-0014-WOL	Mount Farm, Pennwood Lane	Rejected	Green belt parcel not promoted through the Call for Sites and with no land owner identified. Agricultural land associated with Mount Farm. St Bartholomew's Church Grade II* Listed building is to the west of the site and the site falls within the existing Vicarage Road (Penn) Conservation Area boundary and is likely to be retained within the boundary following consultation on a revised CA boundary in summer 2021. Development of the site would significantly affect the setting of this early village centre, particularly along Pennwood Lane, characterised by low density, rural fringe development. The site also falls within the Penn Historic Settlement Archaeological Priority Area. Development of the site would be harmful to rural character and the setting of the Vicarage Road (Penn) Conservation Area and the setting of the St Bartholomew's Church Grade II* Listed building. Therefore, development would cause significant harm to historic value and local character, which could not be mitigated.
SA-0016-WOL	Land South of Vicarage Road, Penn	Rejected	Agricultural land, currently used for grazing, located in the green belt. Penn Hall Grade II Listed building is opposite the site and the site falls within the existing Vicarage Road (Penn) Conservation Area boundary. Although the site is likely to be removed from the boundary and instead adjoin the CA, following consultation on a revised CA boundary in summer 2021, development of the site would still significantly affect the setting of this early village centre, characterised by low density, rural fringe development and a gap in development west of Penn Hall providing views of the open countryside. A mature hedgerow fronting Vicarage Road would need to be removed to provide access. The transition between the built up urban area to the low density rural fringe is an important characteristic that needs to be maintained. Development of the site would extend the historic Penn Village south-west of Penn Hall, towards Penn Cemetery to the west, in a manner harmful to rural character and the setting of the Vicarage Road (Penn) Conservation Area and the Penn Hall Grade II Listed building. Therefore, development would cause significant harm to historic value and local character, which could not be mitigated.
SA-0019-WOL	Land between 301 and 302 Bridgnorth Road	Rejected	Former agricultural land located in the green belt, comprising neutral semi-improved grassland with strong rural hedgerow to frontage and Smestow Brook along south-east boundary. Site forms part of Smestow Valley SLINC (boundary confirmed in 2018 survey), forms part of an important ecological network connecting urban SINC (inc Wightwick Manor and Smestow Valley LNR) and watercourses (Smestow Brook, Staffs & Worcs Canal) with the South Staffordshire countryside. One third of site at risk of surface water flooding. Site designated as Natural Area in Tettenhall Neighbourhood Plan - Policy TNP14 requires protection and retention. Site lies between two Conservation Areas - Wightwick Bank and Staffs/ Worcs & Shropshire Union Canal. Rural setting with sparse / low density housing pattern south of Bridgnorth Road. Development would cause significant harm to local wildlife value and local character, which could not be adequately mitigated.
SA-0020-WOL	Wightwick Mill Field, Bridgnorth Road, Compton	Rejected	Formerly grazed grassland located in the green belt, with Smestow Brook to southern boundary and SLINC value hedgerow to northern road frontage, providing a key ecological corridor. Smestow Brook forms part of wider SINC. SLINC hedgerow restricts access. Around one third of



Site Reference	Site Name	Selected/ Rejected	Reason for Selection / Rejection provided by BCA
			<p>site is in flood zone 3 and one third in flood zone 2, leaving a thin strip of land of varying width not affected by flood risk. Rural fringe character on southern side of Bridgnorth Road would limit to low density development.</p> <p>Development would cause significant harm to flood risk, local wildlife value and local character, which could not be adequately mitigated.</p>
SA-0026-WOL	Land off 385 Penn Road and Vicarage Road	Rejected	<p>Grazing paddock associated with 385 Penn Road surrounded by hedgerows and mature trees, located in the green belt. The southern two thirds of the site is proposed for designation as a SLINC following recent survey work and land at Penn Hall to the east is a SINC, therefore development would have a strong negative impact on wildlife value in this location. There are TPO trees in the centre of the site and along Vicarage Road which make a strong positive contribution to the character of the area. Penn Hall Grade II* Listed building lies immediately east of the site and the site falls within the existing Vicarage Road (Penn) Conservation Area boundary. Although the site is likely to be removed from the boundary and instead adjoin the CA (following consultation on a revised CA boundary in summer 2021) development of the site would still significantly affect the setting of this early village centre. The transition between the built-up urban area to the low density rural fringe is an important characteristic that needs to be maintained. This setting is characterised by low density, rural fringe development which ends at Penn Hall, and a significant open countryside gap between Penn Village, Penn Cemetery and Penn Road, which this site forms a part of. Part of a mature hedgerow fronting Vicarage Road would need to be removed to provide access, which would harm wildlife value and the rural character of Vicarage Road in this location.</p> <p>Development of the site is significantly constrained by the proposed SLINC designation, as access would need to be provided through the SLINC, removing part of an important hedgerow. Development would also extend Penn Village west of Penn Hall, towards Penn Cemetery to the west, in a manner harmful to rural character and the setting of the Vicarage Road (Penn) Conservation Area and the Penn Hall Grade II* Listed building. Therefore, development would cause significant harm to wildlife value, historic value and local character, which could not be mitigated.</p>
SA-0049-WOL	Land South of Vicarage Road Cemetery, Penn	Rejected	<p>Green belt parcel not promoted through the Call for Sites and with no land owner identified.</p> <p>Agricultural land in grazing use with hedgerows and mature trees (some TPOs) defining boundaries. Penn Hall Grade II Listed building lies to the east of the site and the site falls within the existing Vicarage Road (Penn) Conservation Area boundary. Although the site is likely to be removed from the boundary and instead adjoin the CA, following consultation on a revised CA boundary in summer 2021, development of the site would still significantly affect the setting of this early village centre, characterised by low density, rural fringe development and a gap in development west of Penn Hall providing views of the open countryside. Site tapers to front of site, so very limited opportunity to reflect ribbon development character.</p> <p>Development of the site would represent an intrusion into the open countryside gap between Penn Village to the east and Penn Cemetery to the west, in a manner harmful to rural character and the setting of the Vicarage Road (Penn) Conservation Area and the Penn Hall Grade II* Listed building. Therefore, development would cause significant harm to historic value and local character, which could not be mitigated.</p>
SA-0054-WOL	Sites at Sutherland Avenue / Cooper Street	Rejected	<p>Sites in employment use within an established industrial area, promoted for housing through the call for sites. The sites are unsuitable for residential development as they are surrounded by unregulated employment uses which are important to protect for employment in line with draft BCP evidence and policies. Development of the sites would cause significant harm to the residential amenity of new residents and prejudice the operational capacity of adjoining employment uses to operate.</p>

**Table 6.2: Wolverhampton Selected / Rejected Sites - Employment**

Site Reference	Site Name	Selected / Rejected <sup>173</sup>	Reason for Selection / Rejection provided by BCA
SA-0034-WOL	Major Street Dixon Street	Selected	Vacant land within industrial area, suitable for employment use, subject to remediation as appropriate to address known ground condition issues.
SA-0035-WOL	Wednesfield 9 (Phoenix Road)	Selected	Vacant land within industrial area, suitable for employment use, with no known constraints.
SA-0036-WOL	Wednesfield 12 (Bentley Bridge Business Park, Well Lane)	Selected	Vacant land within industrial area, suitable for employment use, with no known constraints.
SA-0037-WOL	Glynweds (Pantheon Park - fmr Prime 10, Bentley Bridge)	Selected	Vacant land within industrial area, suitable for employment use, with no known constraints.
SA-0039-WOL	Tata Steel	Selected	Vacant land within industrial area, suitable for employment use, with no known constraints.
SA-0041-WOL	Bowmans Harbour, Planetary Road	Selected	Vacant land within industrial area, suitable for employment use, with no known constraints.
SA-0044-WOL	Millfield Road EDNA	Selected	Vacant land within industrial area, suitable for employment use, with no known constraints.
SA-0045-WOL	Shaw Road (Strykers)	Selected	Vacant land within industrial area, suitable for employment use, with no known constraints.
SA-0047-WOL	Dean's Road/ Neachells Lane	Selected	Part of public open space with a SLINC designation. Site located adjoining high quality employment area with good access to the highways network, subject to junction improvements. There is a surplus in quantity of open space in this part of Wolverhampton, as set out in the 2018 Wolverhampton Open Space Strategy and Action Plan, which can support the combined loss of open space at this site and Moseley Road Open Space (part), subject to investment in local open space to improve quality.  Site suitable for development subject to mitigation and enhancement for loss of open space and SLINC / nature conservation value. Capacity may be constrained by highways access onto Neachells Lane. Further assessment work is underway which will be reflected in the Publication Plan

<sup>173</sup> Please note Wolverhampton have no rejected employment sites.

Site Reference	Site Name	Selected / Rejected <sup>173</sup>	Reason for Selection / Rejection provided by BCA
SA-0051-WOL	Former Starr Road Transport Depot, Dale Street	Selected	Vacant land within industrial area, suitable for employment use, with no known constraints.
SA-0052-WOL	Land behind Keyline Builders Merchants, Willenhall Road	Selected	Vacant land within industrial area, suitable for employment use, with no known constraints.

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## 6.3 Walsall

**Table 6.3: Walsall Selected Sites - Employment**

Site Reference	Site Name	Reason for Selection provided by BCA
SA-0007-WAL	237 Watling Street, WS8 6JR, Brownhills, Walsall & 235 Watling Street, Walsall, WS8 6JR	<p>Any development here would be seen in the context of existing development to the South and West. Although the views from the A5 would be prominent due to the topography the green belt study has not identified the most significant harm and in particular development to the West would have less impact. Transport and noise assessments are required with suitable mitigation to protect adjacent residential uses.</p> <p>The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. There are no significant impacts other than whether the site can be delivered within the plan period, on the basis that this question is currently inconclusive the issue is considered to be less than significant, but must be resolved.</p> <p>No access to a primary school, local health centre or food centre, mitigation is required.</p> <p>The site is considered more suitable for employment uses than residential uses and is one of only a few sites identified by EDNA as being suitable for employment.</p>
SA-0200-WAL	Johnsons Farm & Meadow Farm, Lichfield Road and Barracks Lane	<p>Development would alter the character of the area but there are limited if any significant impacts. Footpaths are required along The sustainability of the site and access to services may present issues of viability and deliverability and highway infrastructure improvements would be required, however these improvement can be achieved using land within the parcel and would not be extensive.</p> <p>The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for Bedrock Sand and Gravel take place. There are no significant impacts other than whether the site can be delivered within the plan period, on the basis that this question is currently inconclusive the issue is considered to be less than significant, but must be resolved.</p> <p>No access to a primary school, local health centre or food centre would require mitigation.</p> <p>The site is considered more suitable for employment uses than residential uses and is one of only a few sites identified by EDNA as being suitable for employment.</p>
SA-0286-WAL	Land to the South East of Longwood Bridge	<p>Highest green belt and landscape harm. Much is previously developed and it is possible that sympathetic landscaping could minimise any impact of new development, however housing is not part of the character of this area and in isolation would be incongruous with little opportunity to resolve limited access to a primary school, local health centre or food centre.</p> <p>The site is in the highest green belt harm and landscape categories but in all of respects has no other constraints that cannot be mitigation for and is in a sustainable location near to existing employment uses. On balance the site is considered suitable for employment uses and is one of only a few sites identified by EDNA as being suitable for employment.</p>
SA-0308-WAL	Sandown Quarry, Stubbers Green Road, Aldridge, Walsall, WS9 8BL	<p>Taking account of the proximity of existing employment uses, the character of the area and the lack of accessibility for services to residential development the site is best suited for Employment uses having no significant issues which cannot be mitigated for.</p> <p>The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel and brick clay shall take place.</p> <p>The site is considered suitable for employment uses and is one of only a few sites identified by EDNA as being suitable for employment.</p>
SA-0057-WAL	Land to the South of Bentley Lane, Willenhall, Walsall, WS2 7LU - Land to the South of Bentley Lane, Willenhall, Walsall	<p>The constraints of the site in particular the past contamination and adjacent motorway would present significant issues to developing the site for housing, an employment uses raises fewer issues. Contamination surveys required and mitigation for ground gas.</p> <p>For these reasons the site is considered more suitable for employment uses than residential uses and is one of only a few sites identified by EDNA as being suitable for employment.</p>

**Table 6.4: Walsall Selected Sites - Housing**

Site Reference	Site Name	Reason for Selection provided by BCA
SA-0006-WAL	Land opposite The Coach House with metal gate, WS9 OPU, Chester Rd, Aldridge, Walsall	On balance it is considered that the impact on visual amenity and the character of Streetly would be less than significant if this site was developed in conjunction with land to the South, there are established trees and ecology constraints which could reduce the developable area by up to half. Speed restrictions may be required on Chester Road. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place. No access to a primary school, local health centre or food centre which requires mitigation.
SA-0012-WAL	Longwood Lane, Walsall - Land off Sutton Road	Some constraints could impact on the developable area, the existing pattern of development and arboricultural features could be used to mitigate any significant harm. A strategy for impact on the SLINC would need to consider mitigation and or compensation. No access to a primary school, local health centre or food centre and mitigation would be required.
SA-0014-WAL	Stafford Road (A3), To the north of Bloxwich, WS3 3PJ - Land at Yieldsfield Farm (sometimes recorded as Yieldfields)	Part of the farm scores a 3a for agricultural land quality and there is a grade 2 listed building within the site. Although significant issues much of the site could still be developed so these issues are not significant in the context of the whole site. Further survey work is required in respect of ground contamination. Development would have some impact on local visual amenity which could be in part mitigated through sensitive landscaping and design which could also limit some wider impacts seen from the North due to the open landscape between Great Wyrley and Bloxwich. New crossing points on the A34 as well as a new vehicular junction would be required. No significant highway barriers, works required to create signal junction would have a bearing on viability. No access to a primary school, secondary school, local health centre or food centre. The issues identified are not considered significant to prevent residential development at this site and can be mitigated for. The SLINC occupies 2.5ha of the site and would reduce the developable area.
SA-0016-WAL	Land at junction of Middlemore Lane West and Bosty Lane, Aldridge - Middlemore Lane West, Aldridge	Likely that mitigation will be required to protect trees and ecology, mitigation also required for potential houses due to noise. Employment uses raised significant issues on the grounds of character and impact on neighbouring amenity. EDNA 2 market attractive assessment deems the site unsuitable for employment. No access to a primary school, local health centre or food centre, mitigation required. Footpath improvements required on Middlemore Lane.
SA-0017-WAL	Land at Queslett Road/ Aldridge Road, Walsall, B74 2DT - Columba Park	The site scores highest green belt and landscape harm, however this is balanced against the other assessment criteria, which raise no significant issues (subject to the recommendations of the conservation area review being implemented) and which demonstrates the site is sustainable, viable and deliverable. The site is prominent from road users and neighbours which directly face the site however the topography and relationship to adjoining land would limit wider impact, the revised plan is considered a significant reduction to the potential visual amenity harm. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. No access to local food store or local health centre which requires mitigation.
SA-0022-WAL	Home Farm, Sandhills, Walsall Wood, Walsall, West Midlands, WS9 9DJ - Home Farm, Sandhills	The site capacity, existing infrastructure and sustainable location would achieve a large housing scheme. Use as employment land would also benefit from this infrastructure but would require noise mitigation measures to safeguard amenities of neighbouring residential buildings. Any development here would have an impact on the character of the area which would be amplified by the topography and could be unacceptable in particular regarding employment uses. SLINC's should be incorporated into any development of the site. There are no obvious significant highway issues, there is scope for mitigation and potential for housing and or employment. No access to a primary school, local health centre or food centre requires mitigation.
SA-0030-WAL	Land at Yorks Bridge, Lichfield Road, Pelsall, Walsall	The submission identifies a number of constraints but proposes mitigation. Retention and enhancement of the SLINC is possible. Potential impact on visual amenity locally and in a wider context, significant access issues, to the East is common land preventing access onto Lime Lane, to the South is the Canal leaving a single point of access onto Pelsall Road. Road widening and junction improvements are required here.

Site Reference	Site Name	Reason for Selection provided by BCA
	- Land at Yorks Bridge	No access to local food store or local health centre which requires mitigation. The potential need to provide an access in another borough could cause issues for deliverability of this site, however it has now been demonstrated that with highway improvements access can be attained in Walsall on Pelsall Lane. It is estimated that approximately 2.8 hectares would not be developable due to constraints, trees, SLINC and common land. Although the Colliers assessment for employment uses concludes there is potential, taking account of the highway infrastructure restrictions for access and proximity to residential, mitigation is not feasible to support employment here.
SA-0034-WAL	Land North of Stonnall Road, Aldridge, Walsall, WS9 8JY - Land north of Stonnall Road, Aldridge	The site has few constraints and limited visual impact due to surrounding uses and topography. Stonnall Road for the extent of the development may need to be widened and further infrastructure works may be required including drainage improvements and or mitigation, however these are not considered to be significant. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. The site is not served by a primary school or health centre and mitigation is required.
SA-0048-WAL	Land at Vicarage Road / Coronation Road, High Heath, Walsall	The flood, tree and public rights of way constraints can be mitigated for. Highway impact cannot be fully assessed especially in a wider context, traffic impact assessment required. Improvements would be required to Mob Lane and Green Lane. If highway capacity is at its limit there is no clear highway solution which would not cross a gateway constraints and for this reason the site may score a 6 after this work is completed. High Heath Common SLINC covers approximately 3.3ha. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel, shall take place. No access to a primary school or local health centre
SA-0052-WAL	Land North of Northfields Way, Clayhanger, Brownhills, Walsall, WS8 7DT (nearest post code) - Land North of Northfields Way	Although the constraints identified by themselves do not appear insurmountable collectively the site could be significantly reduced in capacity to deliver units. Prior to the phase one ecological survey site clearance works took place which prevented any assessment taking place. Since this time the Council has attempted through engagement to restore the site and has requested at the very least proposal for restoration. An ecology report has now been submitted but requires further work to be undertaken which may not be available for review until later in 2021. Because positive progress has been made it is considered that the site should be included in the draft plan for further review. Ecology constraints and improvements could reduce the developable area by up to 0.5ha.
SA-0056-WAL	Land at Mob Lane, Pelsall, Walsall, West Midlands - Mob Lane	The tree constraints can be mitigated for. Highway impact cannot be fully assessed especially in a wider context, traffic impact assessment required. Improvements would be required to Mob Lane and Green Lane, limited number of units could unviable. Because of the limited size of this site compared with adjacent large sites the housing score can be lower as local highway upgrades may be achievable to provide suitable access here. Highway works require further assessment and there is scope for this to be rescored a 6. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place. No access to a primary school or local health centre
SA-0064-WAL	Former NHS site, Land east of Nether Hall Avenue, Great Barr Walsall	The site is previously developed in the green belt, however an employment use is likely to have a detrimental impact on the amenities of adjoining occupiers. A residential use is limited by the established trees which are required to limit wider visual impact on the surrounding area due to the elevated position of this site. It is estimated that a reduction in developable area by half could provide some development and retain established trees and the SLINC. The access road to the South is not considered accessible by Highways Officers and access should be from the North, however the submission only indicates that access is possible from the South which would need significant enhancement and is lined with TPO trees and by the SLINC designation which would limit any potential to widen the road so that footpaths could be included which represent significant issues. Amended site location plan has been agreed to demonstrate access to the North. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. No access to a primary school

Site Reference	Site Name	Reason for Selection provided by BCA
SA-0078-WAL	Aldridge Road, Walsall - Land at Aldridge Road	Site area may need to be reduced to minimise impact on existing trees, protected species and users of the park. However development can be achieved on this site without causing any significant issues. Employment uses would not be compatible with adjacent uses. No access to a primary school, local health centre or food centre.
SA-0163-WAL	Cartbridge Lane South Open Space	Employment uses are not compatible with the character of the area which is residential and it the topography and relation of the site with the main strategic highway into Walsall means any development here is prominent. There are no significant constraints here to residential development. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. No access to a health centre which requires mitigation.
SA-0172-WAL	Former Reedswood Golf Course, Rayboulds Bridge, Walsall.	Approximately half of the site is not developable due to tree constraints and there are significant access issues which would make mean the site is not selected for allocation, however more survey work is expected and if these issues are resolved there are no other significant issues which would prevent residential uses. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place.
SA-0174-WAL	Former Allens Centre and Hilton Road Amenity Greenspace	There are significant remediation considerations and consultation required about a possible sports pitch, however mitigation is possible and these issues until concluded do not represent significant issues preventing housing development. Employment uses would have significant issues in respect of residential amenity.
SA-0187-WAL	Land to the East of Chester Road, Hardwick, Walsall, WS9 OPH	On balance it is considered that the impact on visual amenity and the character of Streetly would be less than significant if this site was developed, there are no other significant issues which are a barrier to developing this site. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and Superficial Sand and Gravel shall take place. No access to a primary school, local health centre or food centre which requires mitigation.
SA-0199-WAL	Sandfield Farm, Lichfield Road, Brownhills	Only residential is considered acceptable here due to the topography and relationship to the mobile home park adjoining so development could be significantly constrained in design terms, for instance bungalows may be more acceptable than two storey housing to ensure no unacceptable adverse impact in relation to neighbouring uses. Could form an extension to Sandfields. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for Bedrock Sand and Gravel take place. There are no significant impacts other than whether the site can be delivered within the plan period, on the basis that this question is currently inconclusive the issue is considered to be less than significant, but must be resolved. No access to a primary school, local health centre or food centre which needs mitigation.
SA-0207-WAL	Land to the North East of Shire Oak, Lichfield Road	There are no significant barriers to supporting residential here and the site could form part of a comprehensive scheme for housing. In respect of employment uses this would be incompatible with the adjacent nursing home use. Any mitigation would be significant and would severely reduce the viable employment uses. The 2 score for housing is based on this site being combined with the larger adjacent site, assessed in isolation this site would be unsustainable. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel shall take place. No access to a primary school, local health centre or food centre require mitigation.
SA-0208-WAL	Land to the South West of Shire Oak, Lichfield Road	There are no significant barriers to supporting residential here and the site could form part of a comprehensive scheme for housing. In respect of employment use there is little potential support due to the adjacent nursing home. Any mitigation would be significant and would severely reduce the viable employment uses. The 2 score for housing is based on this site being combined with the larger adjacent site, assessed in isolation this site would have significant local visual amenity issues. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place.

Site Reference	Site Name	Reason for Selection provided by BCA
SA-0233-WAL	Former Star Service Station, Queslett Road East, Streetly.	No access to a primary school, local health centre or food centre require mitigation. The parcel is very sensitive in terms of green belt harm and landscape sensitivity. If the site was considered for release there would be constraints on design, density and a requirement for soft landscaping. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to local food store or local health centre and requires mitigation.
SA-0264-WAL	Barns Farm	Constraints identified would not be barriers to development but could impact on viability, ground investigation surveys and mitigation for gas likely. Should development come forward further survey work should inform the development to mitigate for and enhance ecology. Employment uses not suitable due to proximity to houses but residential uses raise few concerns. In addition the site is within 250m of the access to a permitted minerals working site Atlas Quarry. The main effects of mineral extraction are noise, dust, vibration and quarry traffic and mitigation is required in respect of housing. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sands and gravel and brick clay shall take place. No access to local food store or local health centre which also requires mitigation.
SA-0295-WAL	The Three Crowns	Although in the highest harm categories for both green belt harm and landscape sensitivity the parcel is previously developed and there is now a planning permission for houses on this parcel. No access to a primary school, local health centre or food centre would require mitigation if use was intensified.
SA-0309-WAL	Land at (South of) Stonnall Road, Aldridge, WS9 8JZ	There are no significant impacts here, would benefit from coming forward with adjacent sites due to highway requirements and shared services due to the small size of the site. Footway provision required on development side of the road to improve accessibility. A controlled/uncontrolled pedestrian crossing on Stonnall Road will be required to cross pedestrians onto to NW side of the road. Employment uses would have significant noise impacts on adjoining and adjacent residents. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. Mitigation required for Primary School, Secondary School and Health Centre Access.
SA-0312-WAL	409 Chester Road, Streetly - Pacific Nurseries, WS9 OPH	Employment uses would require significant mitigation and restriction on uses to protect visual and noise amenities to occupiers of houses to the South. Trees to the East should be retained which would reduce the developable area. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel shall take place. No access to primary school, secondary school, local health centre and food centres would require mitigation.
SA-0313-WAL	Land Rear of 91 Wood Lane	The site in relation to residential development has no significant constraints, an employment use would be harmful to existing residential uses, would be out of context with existing surrounding development and constraints of heights and site capacity would limit employment uses. There are established trees which are worthy of retention and would minimise any visual impact from land to the North and West (reduction of at least 0.2ha). The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel shall take place.
SA-0317-WAL	Land to the rear of 114-130 Green Lane	0.5ha of the site would not be developable due to the presence of established trees many of which are worthy of retention due to their quality, visual amenity and ecological value. The site has no significant constraints which would prohibit development. An employment use would have a significant impact on the character and amenities of residents and is not supported. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. No access to local health centre which requires mitigation.



**Table 6.5: Walsall Rejected Sites (Housing/Employment)**

Site Reference	Site Name	Reason for Rejection provided by BCA
SA-0015-WAL	Land to the West of Chester Road, Hardwick, WS9 0PH	Potential to deliver a high number of houses, but would result in significant harm to the mixed urban, rural character of Streetly. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place. No access to a primary school, local health centre or food centre, mitigation is required.
SA-0018-WAL	College Farm, Bosty Lane, Aldridge, Walsall, WS9 0LF. - Land at Bosty Lane, Aldridge, Walsall.	The site covers a large area and the character is considered to change across the site with the Southern section being more rural with residential to the North. Housing could be possible to the North part however there would be a significant impact on the character of this part of Bosty Lane causing high harm to the landscape character and visual amenity. Due to the topography and relationship to existing houses the potential mitigation and restrictions on employment buildings would be unviable these issues combines with the impact on green belt and landscape are significant. No access to a primary school, local health centre or food centre which requires mitigation.
SA-0037-WAL	Land at Chester Road, Streetly, Walsall - Land at Chester Road, Streetly, Walsall	The site is part of a larger area which is characterised by its openness and helps to define Streetly's semi-rural character. Although it is recognised that wider visual amenity impacts are limited due to the development to the South and East, this land forms part of the transition between the urban and the rural so any development here would erode that having a significant visual amenity impact. Although it is recognised that the impact on development here increases from East to West the difference is not significant enough to add additional concern. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. No access to a primary school, local health centre or food centre which would require mitigation.
SA-0038-WAL	Little Aston Road, Aldridge, Walsall, WS9 0NU - Land at Little Aston Road, Aldridge. 168 Little Aston Road. Land Adjacent 170 Little Aston Road	The site scores the highest greenbelt and landscape harm its close proximity to the Conservation Area and its impact on character and visual amenity are significant issues. In addition the site is within 250m of the access to a permitted minerals working site Branton Hill Quarry. The main effects of mineral extraction are noise, dust, vibration and quarry traffic which is a significant barrier to housing development. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. Mitigation required for road noise, road widening, access, pylon and in respect for access to local food store or local health centre.
SA-0045-WAL	Land adjacent to Barr Common Road, Aldridge - Land adjacent to Barr Common Road, Aldridge	The visual impact of the development by virtue of its relationship to the surrounding uses and proximity to public access routes is likely to have significant harm. The Northern boundary to Barr Common Road is the obvious point of access, however this is a busy road and there is a difficult junction opposite, the junction works required may not be viable, a better solution would be for a wider site with access elsewhere. They are significant issues. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. The whole site is a SLINC and mitigation and or compensation would be significant barriers to development. No access to local food store or local health centre.
SA-0047-WAL	Land south of Bosty Lane, Aldridge, Walsall - Land south of Bosty Lane, Aldridge.	Highest Greenbelt and Landscape harm. Significant impact on the visual character of the area which could also have a wider impact. Small area of employment possible to extend the existing employment area. No access to a primary school, local health centre or food centre The whole site is a SLINC and mitigation and or compensation would be significant barriers to development.
SA-0050-WAL	Land east of Longwood Lane, Daisy Bank, Walsall,	The local highway upgrade requirements, the history of untreated limestone, importance for the retention of trees and hedges and the impact on ecology if lost are significant issues. Its green belt harm is recorded in the green belt study as high harm. No access to a primary school, local health centre or food centre which would require mitigation.

Site Reference	Site Name	Reason for Rejection provided by BCA
	WS5 3AT - Land east of Longwood Lane	
SA-0053-WAL	118 Little Hardwick Road, Streetly, WS9 OAF - Land to the rear of 118 Little Hardwick Road	<p>Significant tree planting exists and a tree survey and ecology survey is required recommendations of which could significantly reduce the developable area as remaining trees could have an impact on future occupiers. Any loss of trees could be mitigated in part through replanting as part of a landscaping scheme but all of the issues and solutions are significant and any additional information is unlikely to resolve this.</p> <p>The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place.</p> <p>No access to a primary school, local health centre or food centre which would require mitigation.</p>
SA-0061-WAL	Bosty Lane, Aldridge, Walsall - Land to the South of Aldridge School	<p>Further assessments in respect of trees, ecology and loss of public open space required. Significant impact on the visual character of the area which could also have a wider impact. Relocation of school here would also have implications, however there could be more scope for mitigation and sympathetic design than for Housing or Employment development.</p> <p>The landscape sensitivity assessment makes the distinction that "Employment Development as large-scale built form" has a moderate-high sensitivity and later explains that sensitivity is reduced by the presence of large-scale commercial buildings and agricultural sheds. A school here would only require a small portion of the site for buildings as there is a need for playing fields so would not be large-scale so can be scored moderate landscape sensitivity in relation to a school with playing fields. For this reason only it is considered that the development of a school here would score a 4 (i). However the need for housing to facilitate the school or any mixed use is a significant barrier to bringing forward this site and it score a 5 for this reason.</p> <p>No access to a primary school, local health centre or food centre which would also require mitigation.</p>
SA-0102-WAL	Sunny Bank Quarry	Open space which the draft open space study did not consider to be surplus
SA-0149-WAL	South of Daniels Lane and east of Erdington Road, Aldridge	<p>Housing development would have significant harm to the purposes of the green belt, and the excessive projection of the parcel into an area of green belt characterised by open fields is significant in terms of visual amenity due to the relationship to adjacent land and prominence because of the topography here. Employment uses do not form any local character and would have greater harm.</p> <p>The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place.</p> <p>In addition the site is within 250m of the access to a permitted minerals working site Branton Hill Quarry. The main effects of mineral extraction are noise, dust, vibration and quarry traffic which is a significant barrier to housing development.</p>
SA-0167-WAL	Land East of Bosty Lane Farm, Land to the rear of 414 Bosty Lane, Aldridge	Withdrawn, unwilling land owner
SA-0183-WAL	Bosty Lane Farm	Withdrawn, unwilling land owner
SA-0188-WAL	Aldridge School, Tynings Lane, Walsall	The suitability of developing this site hinges on a land swap in relation to land subject to a site assessment SA-0061-WAL and on housing development being supported to the South which are significant issues. The on-site constraints for this are limited provided open space can be mitigated for. No access to local food store or local health centre which would require mitigation.
SA-0211-WAL	Fairview Nurseries, Land between Birch Lane, Chester Road and Back Lane.	<p>The harm to greenbelt purposes, landscape and visual amenity would be significant and detrimental to the existing character of the area, in terms of the parcel and in terms of the adjoining land.</p> <p>The existing highway would need to be upgraded and it would need to be determined what extent this would need to take which could have a significant impact on the viability of development.</p> <p>The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel shall take place.</p> <p>No access to a primary school, secondary school, local health centre or food centre would also raise significant issues.</p>
SA-0212-WAL	Nuttalls Farm, Land Between Stonnal	The harm to greenbelt purposes, landscape and visual amenity would be significant and detrimental to the existing character of the area, in terms of the parcel and in terms of the adjoining land. The topography which is higher to the West would have significant visual amenity impacts.

Site Reference	Site Name	Reason for Rejection provided by BCA
	Road & Hobs Hole Lane.	The existing highway would need to be upgraded and it would need to be determined what extent this would need to take which could have a significant impact on the viability of development. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to local food store or local health centre also requires mitigation.
SA-0213-WAL	South of Hobs Hole Lane	The existing topography helps to define the urban areas from the countryside, the loss of this site to development would lose this defined line and represents encroachment which if allowed may be difficult to justify resisting further encroachment, having significant detrimental impacts on the visual amenity. The existing highway would need to be upgraded and it would need to be determined what extent this would need to take which could have a significant impact on the viability of development. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to local food store or local health centre which would also require mitigation.
SA-0215-WAL	South of Druid's Heath Farm & West of Back Lane	The site if developed in isolation would have a significant impact on the green belt, landscape and visual amenities of the area due to the existing semi-rural character and topography of the parcel. Noise from the motocross track is likely to be unacceptable to residential occupiers of potential housing. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to a primary school, local health centre or food centre.
SA-0216-WAL	Land West of Gould Firm Lane	High green belt and landscape harm in combination with residential uses being out of character have significant impacts. The parcel would also require upgraded highway infrastructure and additional land to provide footpaths. In particular employment uses would need significant wider highway upgrades. Residential and employment uses could have a detrimental impact on the existing neighbouring leisure uses. Some limited leisure use here might have more potential. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to a primary school, local health centre or food centre would also require mitigation.
SA-0220-WAL	Land East of Erdington Road, adjacent Knights Hill	High green belt harm combined with significant visual amenity impacts due to topography and which would result in the loss of its existing semi-rural character for which there is no mitigation. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to local food store or local health centre requires mitigation. Employment uses would have a greater impact on character in terms of visual amenity due to the character context and its prominent position due to topography.
SA-0222-WAL	Land rear of houses on Knights Hill West of Erdington Road	The combination of constraints such as tree retention and relationship to any development impacts significantly on the developable area, this combined with the lack of footpaths and the context and character of this part of Erdington Road which forms part of the transition between the urban and the rural are all significant issues. In addition employment uses have significant noise and visual amenity impacts. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to local food store or local health centre would also require mitigation.
SA-0223-WAL	Land South and South West of Shrubbery Cottage	The character of the area and size of the parcel means that development of the parcel would have significant detrimental impacts on the landscape character which cannot be mitigated for and which could impact on the character of Streetly as well as this part of Aldridge. In addition the pylons are a significant constraint which would limit any proposed layout for development. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to a primary school, local health centre or food centre would also need mitigation.
SA-0224-WAL	Valley Nurseries Between Erdington Road & Barr Common Road	High green belt and landscape harm and the location is not sustainable, additional footpaths required to link the parcel to the urban area amount to significant issues which cannot be mitigated for or are unviable. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No nearby Health Centre or Food Centre would also require mitigation.
SA-0225-WAL	Land South of Alder Tree Grove, Between	Significant harm to the purposes of the green belt and would be a prominent development out of character with its surroundings, employment use could be detrimental to neighbouring houses and houses would not be sustainably located requiring new footpaths which could be subject to gateway constraints and are at least significant issues. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place.

Site Reference	Site Name	Reason for Rejection provided by BCA
	Erdington Road and Barr Common Road	No access to local food store or local health centre also requires mitigation.
SA-0226-WAL	Land Between Longwood Road & Erdington Road, South of Barr Common Road	The combination of the high greenbelt and landscape harm and the impact on visual amenity due to its steep topography would be very significant and would have wider impacts significantly detrimental to adjacent land. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to local food store or local health centre also requires mitigation.
SA-0227-WAL	Corner of Little Hardwick Road & Erdington Road	Built development would be out of character and have significant visual impact harm, however they may be an opportunity to expand the adjoining cemetery/crematorium uses without leading to significant unacceptable impacts. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to a primary school, local health centre or food centre would require mitigation for some types of development.
SA-0228-WAL	Birch Wood, Potters Wood, Land South of the Dingle	The parcel has protected trees and ecological and amenity value which cannot be mitigated for and which if developed the remaining area would result in high harm green belt and landscape harm combined with significant visual amenity impacts which cannot be mitigated for. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place. No access to a primary school, local health centre or food centre would also require mitigation.
SA-0229-WAL	Land South of Streetly Cemetary and between Little Hardwick Road and Foley Road West	The topography, high green belt and landscape harm combined with significant harm to visual amenity are significant constraints to any development here for which mitigation is not possible. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place.
SA-0230-WAL	Land North of Beacon Hill	The combination of the green belt and landscape harm and significant detrimental harm to visual amenity due to the topography from houses, the highway and Barr Beacon would have significant detrimental consequences for the character of the area and would likely result in little justification for retaining adjoining parcels. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. No access to a primary school, local health centre or food centre would also require mitigation.
SA-0244-WAL	Land Between Back Lane & Chester Road	The land has a high agricultural rating and its topography ensures that there would be significant local and wider visual harm at significantly at odds with the parcels surroundings and existing character in addition the highway works to achieve a safe access are extensive and could be a significant cost barrier. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No nearby bus route and no access to a primary school, secondary school, local health centre or food centre all would require mitigation which may not be viable.
SA-0245-WAL	Land South of Hobs Hole Lane corner of Chester Road	High green belt and landscape harm. Small plot, mainly a pond, mitigation required outside of the parcel, scope to be included with CFS 317 could provide visual and drainage mitigation. On the basis that additional land is required the parcel this is a significant constraint in addition to the high green belt and landscape harm. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to a primary school, local health centre or food centre, mitigation not viable.
SA-0248-WAL	Land adjacent Irish Harp, North of Little Aston Road	The parcel is in a high green belt and landscape harm area and development would cause significant visual amenity harm due to the character of the area and topography, in addition highway constraints are likely to be a financial barrier. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel shall take place. No access to a primary school, local health centre or food centre also requires mitigation.

Site Reference	Site Name	Reason for Rejection provided by BCA
SA-0251-WAL	Between Little Aston Road & Chester Road	High green belt and landscape harm and significant local visual harm to the semi-rural character of the area in respect of residential and a greater impact from employment uses which are also not compatible with adjacent land uses likely to require mitigation and restrictions which make such uses unviable. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel shall take place. No access to a primary school, local health centre or food centre.
SA-0266-WAL	Land South of Little Aston Road and East of Green Lane	Highest green belt harm and landscape sensitivity additional significant constraints include visual harm due to unfavourable topography and lack of suitable highway infrastructure in particular to support employment uses. Residential would be more in character with existing uses, which is why the score is lower. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel shall take place. No access to a primary school, local health centre or food centre also requires mitigation.
SA-0284-WAL	Berryfields Farm	Highest greenbelt harm and landscape sensitivity, in addition it would have significant local and wider visual amenity impacts due to the topography. No access to a primary school, local health centre or food centre also requires mitigation.
SA-0289-WAL	Hay Head Farm North	Highest green belt and landscape harm, untreated limestone reduces the developable area but still some potential for development especially if combined with adjacent sites to form a more comprehensive scheme. However these parcels are further North from Sutton Road and introduce more significant visual amenity harm. No access to a primary school, local health centre or food centre which requires mitigation.
SA-0292-WAL	Land adjacent and to the East of 15 - 17 Longwood Lane	Highest green belt and landscape harm, visual amenity impact and impact on character would be significant. Highway improvement requirements could be considered less than significant if combined with adjacent sites however these too have similar significant issues. No access to a primary school, local health centre or food centre also requires mitigation.
SA-0294-WAL	North of Sutton Road Between Front of Three Crowns	Highest green belt and landscape harm and the parcel is a strong part of the character and transition of the urban to the semi-rural, the narrow strip would prevent the type of housing which defines the character of the area and is a significant constraint. No access to a primary school, local health centre or food centre.
SA-0296-WAL	Corner of Longwood Road and Beacon Hill	Significant constraints including trees and no obvious options to achieve safe access, the shape of the parcel also limits opportunity to accommodate more than a couple of small houses which would not be in keeping with existing residential development here, in a prominent location. Employment use would likely be unviable due to the close proximity of houses. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. No access to a primary school, local health centre or food centre also required mitigation.
SA-0008-WAL	Land off Walsall Road, Walsall Wood, Walsall, Highfields North.	Highest green belt and landscape harm. Impact on Ecology and Trees cannot be mitigated, development likely to lead to increased flooding issues or require significant mitigation. In isolation of other call for site submissions this site would be better suited to employment uses, however constraints are significant. Significant noise mitigation may be required to take account of neighbouring employment uses. In addition the site is within 250m of the access to a permitted minerals working site Highfields North. The main effects of mineral extraction are noise, dust, vibration and quarry traffic which is a significant barrier to housing development. The ecology constraints are considered to amount to a gateway constraint to developing the site for housing. The site is believed to be in agricultural use and is graded 2 which is very good quality. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel, shall take place.
SA-0029-WAL	Off Walsall Wood Road - Land at King Hays Farm	The combination of constraints are significant and considered to severely limit potential redevelopment of the site. A scheme which takes account of the SINC, existing significant trees/hedges, existing flooding issues, impact on visual would severely limit the capacity for the site to deliver housing or employment. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place.

Site Reference	Site Name	Reason for Rejection provided by BCA
SA-0032-WAL	Green Lane, WS9 9BE - Walsall Wood	No access to local food store or local health centre which would require mitigation. Ecology impact is a significant barrier to development, whole site is a SLINC and adjacent sites are SLINC's. Also character of development defined by existing houses on Green Lane, part of the site could be delivered for housing subject to Ecology considerations. Employment uses could be limited due to existing local road infrastructure. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel and brick clay shall take place. No access to local food store or local health centre which requires mitigation.
SA-0054-WAL	Land at Castle Hill Road, Walsall, WS9 9DR - Land at Castle Hill Road	The proposal is not comprehensive and if developed on its own would be an incongruous and prominent protrusion into the greenbelt and would have considerable harm the character and visual amenity of the remaining surrounding greenfield parcels. The protected trees, potential flooding implications to adjacent sites and the harm which could arise to the visual amenities of the area would be significant. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel and brick clay shall take place. No access to a primary school, local health centre or food centre would also require mitigation.
SA-0059-WAL	Land at Greenwood Road and Lazy Hill Road, Aldridge, Walsall - Land at Greenwood Road and Lazy Hill Road	Development here could cause significant harm to the visual amenities of the wider area due to the topography surrounding the site which the adjacent bungalows have been designed to take account of. In addition the site scores high green belt and landscape harm. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel shall take place. No access to a primary school or local health centre would also require mitigation.
SA-0062-WAL	Land R/O 10 - 30 Castle Road, WS9 9BY, Walsall Wood - Land R/O 10 - 30 Castle Road	Housing would be subject to noise mitigation and placement of houses to take account of the SINC and protected trees, could impact on the number of units and are significant issues. SUDS required to ensure to increase in flooding to adjacent site. Employment uses would be out of character and could have unacceptable amenity impacts on existing neighbouring residents. The site is to the South of the VIGO Fault and information has been requested to determine whether this issue is a gateway constraint, significant issue or if the site falls outside of the scope of the fault. In the absence of clarification this is also a significant issue. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place.
SA-0186-WAL	Greenwood Road - 1, 2, and 3 Greenwood Road.	The combination of constraints is considered to limit potential redevelopment of the site and are significant issues. A scheme which takes account of the SINC, existing significant trees/hedges, existing flooding issues, impact on visual amenity would impact on the capacity fo the site to deliver housing or employment. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place. No access to a primary school or local health centre
SA-0195-WAL	Jockey Fields West of Hall Lane	The parcel has high green belt and landscape harm. If the SLINC was retained and only the remaining 10% of the parcel was developed this area would be to the North. The Western part of this parcel is not large enough to provide an acceptable residential scheme and the area that could be developed too small to allocate in the plan. The ecological context and site designation are significant barriers to developing this parcel. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for Brick Clay shall take place. Existing road capacity is also a significant issue. No access to a primary school or local health centre would also require mitigation.
SA-0197-WAL	Jockey Fields East of Green Lane	The harm to the green belt in particular due to the shape of the parcel and its protrusion into the countryside would be significant and would compromise retention of adjoining land within the greenbelt. The Ecological issues are also likely to be significant and could be a barrier to development if not reason to reduce the developable area. Green Lane is narrow and has no footpaths, Black Cock bridge is single lane and existing junctions already have capacity issues, no clear highway solution due to existing constraints are all significant issues. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for Superficial Sand and Gravel and Brick Clay take place.

Site Reference	Site Name	Reason for Rejection provided by BCA
		No access to a primary school or local health centre would also require mitigation.
SA-0202-WAL	Grange Farm & Railswood Farm, land between Pelsall, Clayhanger and Maybrook Industrial Estate.	Smaller parcels within the site may be achievable tagging onto Clayhanger without having a significant impact on the highway network, however capacity needs to be confirmed and a reliance on adjacent land are significant issues and its proximity to the sewage works is a constraint. Highway Officers consider that to develop the whole site would require significant highway modifications which are considered by the site assessment officer prohibited by gateway constraints outside of the parcel. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for Bedrock Sand and Gravel and Brick Clay take place. No access to local food store or local health centre requires mitigation.
SA-0204-WAL	Gorse Farm, Lazy Hill	In green belt, landscape and especially in terms of visual amenity development of this parcel would have a significant detrimental impact on the character of the area. Much of the site is unsustainable, there is no public transport on Chester Road or nearby food centre and a comprehensive scheme would be required to deliver residential. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel shall take place. Also in addition no access to a primary school or local health centre.
SA-0205-WAL	Land South of Lazy Hill Wood, King's Hayes Fields	There would be significant green belt and landscape sensitivity harm from developing this site. In addition significant impact on the local visual amenities of the area. An employment use in particular would be out of character and have a significant impact on neighbouring residents. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel and brick clay shall take place. No access to a primary school or local health centre would also need mitigation.
SA-0206-WAL	Land North of 154 Lazy Hill Road	The combination of the topography and intrusion into the greenbelt to the North having wide visual impacts is considered significant and unfavourable to releasing the parcel for residential development. Employment here is likely to have additional unacceptable impacts. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel shall take place. No access to a primary school or local health centre
SA-0257-WAL	Land South of 17a The Barn, Northgate, King's Hayes Field.	Highest green belt and landscape harm. Tree retention and ecological mitigation would have a significant impact on site capacity and is likely to be a barrier to development and would not meet the minimum allocation size for inclusion in the Black Country Plan. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place.
SA-0272-WAL	Land North of 3 Ashton Drive	Would provide very limited development and could be to the detriment of high quality agricultural land. Trees are likely to be required to be retained which would be a significant issue to developing this site. Employment use would be incompatible with residential houses here. No access to local health centre which requires mitigation.
SA-0275-WAL	Jockey Fields Rear of Horse and Jockey	The lack of access represent significant insurmountable issues in this assessment, although potential to combine with adjacent sites is considered, these site score poorly for other gateway reasons so are unlikely to be acceptable sites for development. In addition the site is within 250m of the access to a permitted minerals working site Highfields North. The main effects of mineral extraction are noise, dust, vibration and quarry traffic which is a significant barrier to housing development. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel and brick clay shall take place. No access to a primary school also requires mitigation.
SA-0001-WAL	Land At Site Of Former 273 Walsall Road, Darlaston	In this instance acquiring additional land to unlock the potential of a very small site, which would in any case still have a difficult access and could result in a contrived development. No access to local food store. Limited housing development potential. Flats may be possible if additional land is acquired for access off Heath Road.

Site Reference	Site Name	Reason for Rejection provided by BCA
		Proximity to residential houses, the school, the small size of this plot and the difficult access is considered to limit potential of site to be used for employment land. The above issues are significant. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel, shall take place.
SA-0315-WAL	Land at Kendricks Road, Heath Road and Station Street	Already developed employment site with no vacant units, significant constraints for residential development in terms of noise. Loss of employment use a significant constraint and most appropriate use. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place.
SA-0010-WAL	Land at Former Goscote Hospital Site, Goscote Lane, Walsall, WS3 1SJ	Tree constraints are a significant issue to delivering the numbers of residential units proposed. The SLINC could reduce the developable area by 1.4ha. Employment use with the retention of the residential care facility would not be compatible with the surrounding area and restrictions/mitigation unviable amounting to a gateway constraint for such uses.
SA-0276-WAL	Field House Farm	The combination of constraints, trees, ecology, flood risk, noise access, required highway improvements are significant issues especially considering the small size of the parcel and mitigation for all issues unlikely to be achievable. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. No access to local food store also requires mitigation.
SA-0274-WAL	Land adjacent Goscote House Farm	High green belt and landscape harm, significant impact on visual amenity and significant reduction to the developable area due to flood risk which would also be a barrier to the highway infrastructure upgrades required. These are significant constraints which would be difficult to overcome. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. No access to local food store or local health centre also requires mitigation.
SA-0085-WAL	Bloxwich Hospital Reeves Street, Walsall -Bloxwich Hospital	It needs to be determined if a residential use can be accommodated in terms of noise mitigation without harm to the conservation asset. Further information is required. Aside from this outstanding matter the site is already developed and in a sustainable area. However the submission has been submitted on the basis that another location is required for the hospital and this is a significant constraint.
SA-0051-WAL	Chester Road North, WS8 7JR, Brownhills, Walsall - The Rising Sun	Although the opportunities highlight the benefits to redeveloping this site, the extent of the proposed boundary is considered would result in significant harm to the character of the open space and visual amenity. Residential is considered to be more suitable than employment due to the proximity to existing housing and the public open space, however a safe access onto the A5 has not been demonstrated and is also a significant issue. In addition the site is within 250m of the access to a permitted minerals working site Brownhills Common. The main effects of mineral extraction are noise, dust, vibration and quarry traffic which is a significant barrier to housing development. No access to local food store or local health centre
SA-0138-WAL	Watling Street, Land off Hannay Hay Road	In isolation this site if developed would have a significant detrimental impact on local visual amenity, would relate poorly with adjacent undeveloped land and be isolated. Safe access cannot be achieved due to the proximity of the railway bridge and the narrowness of Hannay Hay Road. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for Bedrock sand and gravel shall take place. No access to a primary school, local health centre or food centre
SA-0200-WAL	Johnsons Farm & Meadow Farm, Lichfield Road and Barracks Lane	Development would alter the character of the area but there are limited if any significant impacts. Footpaths are required along The sustainability of the site and access to services may present issues of viability and deliverability and highway infrastructure improvements would be required, however these improvement can be achieved using land within the parcel and would not be extensive. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for Bedrock Sand and Gravel take place.



Site Reference	Site Name	Reason for Rejection provided by BCA
		There are no significant impacts other than whether the site can be delivered within the plan period, on the basis that this question is currently inconclusive the issue is considered to be less than significant, but must be resolved. No access to a primary school, local health centre or food centre would require mitigation.
SA-0201-WAL	Land adj 92, Land off Hanney Hay Road, Land to the rear of 116, Land to the East of 116.	The site is not sustainable developed in isolation and would require highway upgrades, the railway bridge is also a significant constraint for pedestrian access to Chasetown. Speed reduction and island improvements are also significant highways constraints. Significant amenity mitigation may also be required from the railway and the A5. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for Bedrock Sand and Gravel take place. No access to a primary school, local health centre or food centre require mitigation.
SA-0242-WAL	Stevies Stables, Pelsall Road, Brownhills, WS8 7DL	Residential would be out of character and offer a poor environment for any occupants due to the neighbouring uses. An employment use could be acceptable subject to mitigation in relation to ground contamination, however the parcel is too limited to justify allocation in the plan. No access to a primary school, local health centre or food centre.
SA-0243-WAL	Land South of Stevies Stables, Pelsall Road.	Residential would be out of character and offer an unacceptable environment for any occupants due to the neighbouring employment uses. An employment use could be acceptable subject to mitigation in relation to ground contamination. No access to a primary school, local health centre or food centre which require mitigation in relation to residential. The site is below the threshold for allocation in the Black Country Plan.
SA-0020-WAL	Land north of Park Hall Road, Walsall - Land north of Park Hall Road, Walsall	There are the following significant constraints: Potential loss of established trees, impact of the development on the conservation area, loss of ecology, Visual amenity impact, the site provides a visual buffer between Bar Beacon and the urban area, potential the loss of best and most versatile (BMV) agricultural land. In addition potential highway work would be significant and could have capacity restrictions for number of units on site and viability. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place. No access to a primary school or local health centre which requires mitigation.
SA-0035-WAL	Skip Lane Walsall	Loss of protected trees and ecology SLINC status are significant constraints to developing this site, in addition the site is within the conservation area. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place. No access to a primary school or local health centre
SA-0304-WAL	The Skip	There are established trees the loss of which would be a significant issue and the retention of any would likely result in the developable area being reduced below the threshold required for the Black Country Plan. The site is therefore reliant on adjacent sites being acceptable but which have other additional significant issues. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay take place. No access to local food store or local health centre which requires mitigation.
SA-0305-WAL	Land to the East of 113 Park Hall Road	High green belt and landscape harm combined with high ecological value and a number of established trees worthy of retention are all significant issues. The parcel is not suitable for employment uses due to the proximity to houses. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay take place. No access to local health centre would also require mitigation. Adjacent sites also have significant issues if the site was combined to make a more comprehensive site.
SA-0071-WAL	Land off Allen's Lane, Pelsall - Land off Allen's Lane, Pelsall, West Midlands.	The site area which could be developed is significantly reduced by gateway constraints. The impact of development on the visual amenities of the area in a local or wider context would be significant due to the existing openness and unfavourable topography which offer views of the site from a wide area. There would be a high greenbelt harm and moderate high harm in relation to landscape sensitivity. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel, shall take place. No access to local food store which would require mitigation.

Site Reference	Site Name	Reason for Rejection provided by BCA
SA-0196-WAL	Leyland's Farm North of Wolverhampton Road	The combination of issues including high green belt and landscape harm, including in particular the merging of Pelsall and Goscote/Little Bloxwich, and taking account of the impact development would have on the character of the area and visual amenity, all raise significant issues. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for Superficial Sand and Gravel take place. No access to local food store or local health centre would also require mitigation.
SA-0250-WAL	Land Rear of 76 to 84, Fairburn Crescent	The loss of public amenity would require significant mitigation which is likely to reduce the developable are or require additional land, the impact on visual amenities of adjacent residents and users of rights of way and the canal would be significant. Employment use access cannot be achieved. No access to local food store or local health centre would need mitigation.
SA-0278-WAL	Goscote Wedge	The combination of flood risk, loss of trees and habitat in an area of high ecological value, ground contamination constraints and impact on visual amenity when taking account of the small size of the parcel are significant constraints to residential development, an employment use would have an unacceptable impact on residents. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place.
SA-0036-WAL	Skip Lane, WS5 3NB	The SLINC status, requirement for extra land to provide access, existing tree planting and potential Ecology considerations are significant constraints to developing the site for which not all could be mitigated. The relationship of the site to existing residential combined with the potential highway requirements here are barrier to employment uses. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place. No access to a primary school, local health centre or food centre which would require mitigation.
SA-0153-WAL	Former Queslett School	The site would likely be constrained due to the retention of trees, protection of Ecology and unfavourable topography to the South which are significant issues for housing. Its position near to housing are a barrier to employment uses. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. No access to a primary school which requires mitigation.
SA-0232-WAL	North of Barr Lakes Lane	The scale of the development may justify a road linking Sutton Road to Birmingham Road which is a significant constraint taking account that there are gateway constraints which would prevent this. No access to a primary school, local health centre or food centre. Subdivision of the parcel is considered however any development within the parcel contributes to the erosion of the distinct semi-rural character part of the Barr Beacon landscape which is a significant issue which cannot be mitigated. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place.
SA-0235-WAL	Beacon Farm	The impact on green belt and landscape harm, significant impact on visual amenity due to proximity with Barr Beacon combined with the highway constraints and character constraints cannot be completely mitigated for and could all have wider issues which would also cause significant harm. Road infrastructure requires significant upgrades. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel and brick clay shall take place. No access to a primary school, local health centre or food centre.
SA-0237-WAL	Land associated with Beacon Farm and Crook Cottage	High green belt and landscape harm, significant visual amenity harm from local and wider context especially taking account of the views from Barr Beacon. Road infrastructure requires significant upgrades. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place. No access to a primary school, local health centre or food centre requires mitigation.
SA-0238-WAL	Pastures South of Barr Lakes Lane to Chapel Lane.	High green belt and landscape harm and significant visual amenity harm in wider context especially taking account of the views from the Beacon. Road infrastructure requires significant upgrades. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place. No access to a primary school, local health centre or food centre which would also require mitigation.
SA-0239-WAL	Beacon Dairy Farm	High greenbelt and landscape harm and significant visual amenity harm in local and wider context. Road infrastructure requires significant upgrades.

Site Reference	Site Name	Reason for Rejection provided by BCA
		The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. No access to a primary school, local health centre or food centre also requires mitigation.
SA-0240-WAL	Foxhills Farm	High green belt and landscape harm and significant visual amenity harm in local and wider context. Road infrastructure requires significant upgrades. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. No access to a primary school or local health centre which would require mitigation.
SA-0241-WAL	Old Hall Farm	High green belt and landscape harm and significant visual amenity harm in local and wider context. Road infrastructure requires significant upgrades. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place. No access to a primary school or local health centre which would require mitigation.
SA-0291-WAL	Brookside Farm, Longwood Lane	Highest green belt and landscape harm, visual amenity impact and impact on character would be significant. Highway improvement requirements could be considered less than significant if combined with adjacent sites however these too have similar significant issues. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. No access to a primary school, local health centre or food centre also requires mitigation.
SA-0297-WAL	Amenity Land Between Sutton Road adjacent The Three Crowns	Highest Green Belt harm and high landscape harm and significant impact on visual amenity which cannot be mitigated for, due to the small size of the parcel. Employment uses in addition would have significant noise and disturbance impacts which also cannot be fully mitigated for. No access to a primary school, local health centre or food centre.
SA-0301-WAL	Orchard Hills, Daisy Bank & other houses	Green belt and landscape harm are in the highest categories. There is no suitable access without acquiring additional land and any residential use would require design which accommodates the existing case use which would be a significant issue. No access to a primary school or local health centre also requires mitigation.
SA-0302-WAL	Beacon Farm Land to the West	The parcel is in the highest green belt and landscape harm, in addition there would be a significant detrimental impact on the visual amenities of users of Barr Beacon and the lack of suitable highway infrastructure and its remoteness to services are all significant constraints to development here. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place. No access to a primary school, local health centre or food centre also requires mitigation.
SA-0252-WAL	Linley Farm South of 34 Bosty Lane.	Highest green belt and high landscape harm combined with significant noise and ground stability issues mean that this parcel has some significant constraints for residential development and employment uses are not considered compatible with adjacent uses.
SA-0265-WAL	Land South of Manor Farm Buildings	Very high green belt harm and landscape sensitivity combined with limestone issues, access and noise mitigation and restrictions. Residential would be more in character with existing uses, which is why the score is lower than employment however the impact on the character of the open space would be significant too. No access to a primary school, local health centre or food centre also requires mitigation.
SA-0267-WAL	Land South of Lady Pool	It is high harm green belt and landscape sensitivity and the land level difference and access restrictions are significant, especially for commercial which are insurmountable. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. No access to a primary school or local health centre.
SA-0280-WAL	Land rear of houses on Barns Lane and Lichfield Road	Although residential in some form could be achieved with mitigation there is no access and potential is limited due to existing development and gateway constraints around the parcel, if houses on Barns Lane were removed to facilitate development it is likely that only the same number as those lost can be achieved. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place.
SA-0019-WAL	Land at Stencils Farm, Aldridge Road	The site has a number of constraints which would need to be incorporated into any housing scheme. There would be a significant visual impact if the site was developed.

Site Reference	Site Name	Reason for Rejection provided by BCA
	(A454), Walsall, WS4 2JW - Land at Stencils Farm, Walsall	No access to a primary school, local health centre or food centre which requires mitigation. The assessments referred to in the submission would also be relevant, however the significant impacts already raise significant issues.
SA-0066-WAL	Land at Stencil's Farm, Aldridge Road, Walsall, WS4 2JW	The site has a number of constraints which would need to be incorporated into any housing scheme. However there would be a significant visual impact due to the topography and proximity of the site near to areas of space which are accessible to the public. In addition there is no mitigation for these significant impacts. The assessments referred to in the submission would also be relevant. No access to a primary school, local health centre or food centre.
SA-0269-WAL	Land North of Harpur Close, Rushall Hall Farm	Highest green belt harm and high landscape sensitivity harm, flood risk mitigation would reduce the developable area, air quality and ground contamination mitigation likely required, significant visual amenity impact and no obvious access. A combination of high harm and significant constraints, employment use would have further amenity and character impacts which are insurmountable. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. No access to a primary school or local health centre also need mitigation.
SA-0288-WAL	Land East of Longwood Cottage, Calderfields.	Highest green belt and landscape harm, potential to overcome some or all of these especially if combined with adjacent sites to form a more comprehensive scheme however both have significant visual amenity harm due to the existing semi-rural character. No access to a primary school, local health centre or food centre also requires mitigation.
SA-0231-WAL	Land West of Aldridge Road	Although development on this lower parcel has less visual amenity impact than the higher Western portion its prominence and impact in combination with the high greenbelt and landscape harm would still be significant. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. No access to a primary school, local health centre or food centre also requires mitigation.
SA-0236-WAL	Blue House Farm	The site scores highest green belt and landscape harm in addition it is considered that the topography is unfavourable compared to land to the South making the site significantly more prominent and resulting in development closer to Barr Beacon than the Pheasey estate. This relationship would result in significant visual amenity harm. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to a primary school, local health centre or food centre would also need mitigation.

## 6.4 Sandwell

**Table 6.6:** Sandwell Selected / Rejected Sites

Site Ref	Site	Selected/ Rejected	Reason for Selection/Rejection provided by BCA
SA-0045-SAN	Legacy 43, Ryder Street, West Bromwich	Selected for employment	<p>Site was identified as having potential for employment land through the EDNA review. It concluded that the site would be suitable for employment uses.</p> <p>The site assessment assessed the site for employment use and found that the area is mainly industrial and the introduction of further employment land into the area would be acceptable. Given the existing industrial uses in the area, I do not foresee how the site could come forward for redevelopment other than employment land</p>
SA-0025-SAN	Land off Overend Road, Cradley Heath Business Park	Selected for employment	<p>The site was put forward through the Call for Site process for employment use and was assessed as part of the BEAR and has been allocated as a EMP3 - Local employment site.</p> <p>The site assessment assessed the site for employment use and found that the site has permission for industrial uses the most recent in 2017 which is now almost complete. The site is 80% occupied by industrial uses with the River Stour acting as a buffer between residential to south. The site is allocated for local employment and given the nature of the northside of Overend Road (i.e. predominantly industrial) residential use of this land is not appropriate and should be safeguarded for employment</p>
SA-0026-SAN	Land at Conegre, Newcomen Drive, Sandwell	Selected for employment	<p>The site was submitted through the Call for Sites process for employment use. The EDNA found that although the site is currently allocated for residential use it has potential for B2/B8 use due to residential viability issues.</p> <p>The site assessment assessed the site for employment use and identified the site as being vacant land within an industrial estate. It had constraints due to mining legacy but was suitable for employment use.</p>
SA-0027-SAN	Land at Birchley Island, Junction 2 of M5, Oldbury, Sandwell	Selected for employment	<p>The site was submitted through the Call for Sites process for employment use and assessed through the EDNA, this found that it is potentially suitable for high quality employment space and is a site that should be prioritised for development due to the location, size and potential massing opportunity on site.</p> <p>The site assessment assessed the site for employment use and found that the site is allocated for high quality employment and has historically benefited from permission for office uses/casino/hotel uses the most recent in 2015 for a restaurant/public house use expired in October 2018. The proximity of the M5 junction 2 which is known to be a high air quality area, pollution and noise are key environmental considerations.</p> <p>The site is allocated for high quality employment and given the constraints regarding pollution should be safeguarded for employment use.</p>
SA-0030-SAN	Whitehall Road, Tipton	Selected for employment	<p>The site was identified through the EDNA process and was assessed for employment use only. The EDNA found the site was potentially suitable for development in the light of market interest.</p> <p>The site assessment assessed the site for employment use and found that the site lies within Tennants Distribution inner zone, making it unsuitable for residential development.</p>
SA-0044-SAN	British Gas, Land off Dudley Rd, Oldbury	Selected for employment	<p>Site was assessed as part of the EDNA process for employment use. THE EDNA found that the site would suit a smaller scale local business/ operator. The area is well linked to the wider motorway network and envisage it will be attractive to the market. It concluded that it was suitable for B1 light industrial use.</p> <p>The site assessment assessed the site for employment use and found mineshfts and pipelines are considerable obstacles to development. The ecological condition of the site is unknown, but the presence of many semi-mature trees indicates that the site</p>

Site Ref	Site	Selected/Rejected	Reason for Selection/Rejection provided by BCA
			has been untouched for many years and may well now contain protected species. The immediate road network is not suitable for safe cycling. The surrounding uses would be compatible with this site as employment land.
SA-0042-SAN	Land Adj To Asda Wolverhampton Road Oldbury	Selected for employment	<p>Site was submitted through the Call for Sites process for employment use and assessed through the EDNA process. It found that the site was potentially suitable for B2/B8 use subject to addressing the issues raised through the recent refusal of a planning application for B2, B8 uses.</p> <p>The site was subsequently assessed for both employment and residential use. There are no red ratings associated with an employment use on this site, the site is already allocated for such a use, however the recent refusal of the employment use has indicated that the site has constraints which need to be mitigated to protect residential amenity, provide appropriate access and ensure that a future scheme does not cause severe congestion on an already busy highway network. Potential red ratings associated with a residential use on this site for access and traffic generation, but would depend on the size of the development. As the site owners proposed employment and is therefore available for that use and the site assessment and EDNA both found that use suitable, it was proposed to allocate for employment use.</p>
SA-0043-SAN	Rounds Green Road/Shidas Lane, Oldbury	Selected for employment	<p>The site was identified through ENDA which found that it was potentially suitable for B2/B8 industrial use and as it is currently designated for employment use this should be retained.</p> <p>The site assessment assessed the site for employment use and found that the site currently has no valid planning approval since the previous land use as a lagoon associated with an industrial premise ceased. The lagoon itself has been infilled with inert material and the ground reclaimed in accordance with approvals DC/04/42934 and DC/10/52117. Three mineshafts have been identified near to the centre of the site. Surrounding uses all being commercial in nature would be compatible with an employment land use of the site. The site is allocated as a Potential High Quality Emp Land Allocation within the Black Country Core Strategy. Given the surrounding uses are all commercial in nature and the site has good connectivity to Oldbury Town Centre and junction 2 of the M5, the site would be suitable for an employment development.</p>
SA-0028-SAN	Roway Lane, Oldbury, B69 3AY	Selected for employment	<p>Site identified through Call for Sites for employment use. The EDNA work found that it was potentially suitable for B2/B8 industrial use, subject to a layout being configured to create a scheme that is deliverable and utilises as much of the site as economically possible.</p> <p>The site assessment assessed the site for employment use and found amber ratings for land conditions but was suitable for employment use.</p>
SA-6999	Brandhall Golf Course	Selected for housing	This was not assessed as had been to Cabinet and agreed as surplus to requirement and publicly consulted on for development options which all included a residential element, consultants have also been employed to undertake a masterplan exercise for the site. Site selected for housing.
223	Seven Stars Road, Oldbury	Selected for employment	This site has been selected for employment, it was assessed in the BEAR and its score reflected that it should be an EMP3 site and so selected for employment.

Site Ref	Site	Selected/ Rejected	Reason for Selection/Rejection provided by BCA
SA-0001-SAN	Tanhouse Avenue	Selected for housing	Site submitted through the Call for Sites process for residential use. The site assessment assessed the site for residential use and found there are three red ratings for this site relating to views, loss of accessible greenspace and greenfield. This loss could be outweighed by the public benefits of development. Amber ratings relating to loss of public open space and habitat can be overcome through viable mitigation off site. Amber ratings could be overcome by appropriate mitigation measures and planning conditions. The site is suitable for release from the green belt for residential use.
SA-0006-SAN	Charlemont Community Centre, Beaconview Road, West Bromwich	Selected for housing	Site was submitted through the Call for Sites process for residential use. The site assessment assessed the site for residential use and found there are no red ratings for this site. The only amber ratings relate to possible issues with access arrangements. The site is suitable for release from the green belt for residential use.
SA-0020-SAN	Painswick Close Sub Station (b)	Selected for housing	The site was identified through the assessment of Green Belt parcels and was assessed for both residential and employment use. Site assessed for residential and employment use. Part of site was found suitable for residential development with appropriate mitigation from noise/air quality issues arising from proximity to M5/M6 interchange and flood alleviation. The other part of the parcel – SA-0019-SAN was operational land and discounted. Employment land not considered appropriate due to access issues and proximity to existing housing..
SA-0033-SAN	Dudley Road East /	Selected for housing	Site was identified through the BEAR process, however further investigation found it to be a low value employment site. The site assessment assessed the site for both residential and employment use and found it is adjacent to a site allocated for local employment land and is adjacent to a SLINC and Wildlife corridor which follows the existing canal on two boundaries. The site falls within the major consultation zone for a gas pipeline. Although the site is allocated for local employment land, subject to a new site being found for the relocation of businesses, the site suitable for a residential development subject to a consultation with the Health and Safety Executive.
SA-0048-SAN	Brades Road	Selected for housing	The site was identified through the Call for Sites process for residential use. The site assessment assessed the site for residential use and found that the site has limited constraints that could be resolved with mitigation measures. The site is currently interspersed with residential property and commercial and poor quality vacant land, a comprehensive residential scheme could provide opportunity to address the canal frontage and improve access to the canal. The industrial to the west is severed by the canal and there is an existing robust boundary with established trees adjacent the works on Brades Road which would address amenity issues. The site whilst partially constrained by the presence of a gas pipeline, which may impact on the density but this is unlikely to be overly restrictive given that the site falls within a middle zone.
SA-0029-SAN	Edwin Richards Quarry	Selected or housing	Site was submitted through the Call for Sites process. The site was not assessed as it already has planning permission for residential use and therefore the site has already been found suitable and the land owners submitting it as a call for sites demonstrates that the site is available and deliverable for residential use.
SA-0002-SAN	Wilderness Lane, B43 7TB	Rejected	The site was identified through the assessment of Green Belt parcels and was assessed for both residential and employment use. There are five red ratings for this site including parts of the site being a designated SINC and SLINC. Furthermore, the site is adjoined by an area of land of potential significance for nature conservation. The designated allocations may not be outweighed by the public benefits of residential development. Amber ratings are also identified particularly in relation to the proximity of the site to an elevated section of the motorway, although it is accepted that there are existing residential developments as close to the motorway as the proposed site. The site is unsuitable for release from the green belt for homes due to the SINC. It is not suitable for employment as the area is residential in nature and employment would be wholly out of character with the area.

Site Ref	Site	Selected/ Rejected	Reason for Selection/Rejection provided by BCA
SA-0003-SAN	Land off Birmingham Road, Great Barr	Rejected	Site was submitted through the Call for Sites process for residential and employment use. The site assessment assessed the site for both residential and employment use. Constraints for this site relate to the SINC allocation and highways. The site is not suitable for consideration for release from the green belt for housing due to the gateway constraint of the SINC allocation, it also has high historic landscape value.
SA-0004-SAN	Wilderness Lane - Land surrounding Q3	Rejected	The site was identified through the assessment of Green Belt parcels and was assessed for both residential and employment use. There are hard constraints relating to SINC (south) and other constraints relating to loss of school sports pitches, SLINC (north-east) and other constraints on the land. The whole of site is not considered suitable for release. There are very substantial negative effects and development of the area would prejudice the impact of the visual landscape given that land slopes down towards the north west (Walsall Borough Boundary).
SA-0016-SAN	Tamebridge Parkway Station North of Train Station(a)	Rejected	The site was identified through the assessment of Green Belt parcels and was assessed for both residential and employment use. The site was originally assessed as part of a larger parcel and has been reduced in size to reflect the findings of the assessment. The site has a number of constraints owing to the River Thame, the motorway corridor and existing Rail Station (Tamebridge Parkway). The land to the east is also used for residential amenity. The site has too many constraints given its proximity to the motorway, partial flood zone 2 and the existing Tambridge Parkway to be suitable for residential use, this would be incompatible with station due to 24/7 operation and infrastructure to facilitate the development. The site has too many constraints to the east, namely the existing residential area and the motorway and limited access for employment, however the land to the south west (SA-0018-SAN) adjacent to the canal could form part of a small business park given the adjacent Tamebridge Parkway but this would require access off the roundabout serving existing access to the Parkway and motorway maintenance. A separate parcel was created to reflect the part that was suitable for employment SA-0018-SAN. The remaining parts of the parcel not suitable for residential or employment.

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## 6.5 Dudley

**Table 6.7: Dudley Selected / Rejected Sites**

Site Reference	Site Name	Selected/Rejected	Reason for Selection/Rejection provided by BCA
SA-0001-DUD	Gorge Road	Rejected	Suitability – Bounded by a SLINC, HET assets and trees.
SA-0005-DUD	Himley Road	Rejected	Suitability – Impact to the sites Biodiversity and Geodiversity due to the sites location within both a SINC and SLINC. Concerns relating to impact on Heritage Assets, Air Quality, Noise, Infrastructure and Highway Access.
SA-0008-DUD	Lye Close Lane	Rejected	Suitability – Green Belt and greenfield site used as agricultural grazing land (sheep) that has SLINC status. The site has considerable rural character despite being adjacent to the M5 and a dual carriageway (Manor Way) as it is set at a high level than both and it is also, in the main, shielded visually tree belts. The site is located within an Area of High Historic Landscape Value, it is therefore sensitive in landscape terms.
SA-0009-DUD	Norton Road	Rejected	Suitability – Garden land surrounded by four trees with TPOs. Isolated site.
SA-0010-DUD(A)	Worcester Lane North	Selected	Suitability- The Green Belt and Landscape Sensitivity Assessment considers this land to provide a moderate contribution to preventing encroachment on the countryside as it is open land contiguous with the wider countryside. The railway line along its western edge and Worcester Lane to the east provide distinct boundaries with the neighbouring housing developments. However, the release of land here would not weaken the integrity of the broader Green Belt to the south.
SA-0010-DUD(B)	Worcester Lane Central	Selected	Suitability - The site would be capable of development in association with the adjacent site to the north (SA-0010-DUD-A) there is housing on either side and the southern hedgerow could provide a defensible boundary. Its removal from the Green Belt would have limited impact on the openness of the wider Green Belt. The Green Belt and Landscape Sensitivity Assessment considers it to be moderately sensitive.
SA-0013-DUD	Tipton Road/Setton Drive	Rejected	Suitability – Located within the Bat Migration Corridor
SA-0015-DUD	Lapal Lane South	Rejected	Suitability – Green Belt and greenfield site used as agricultural grazing land (sheep) that has SLINC status. The site has considerable rural character despite being adjacent to the M5 and a dual carriageway (Manor Way) as it is set at a high level than both and it is also, in the main, shielded visually tree belts. The site is located within an Area of High Historic Landscape Value, it is therefore sensitive in landscape terms.
SA-0016-DUD	Land off Bromwich Lane	Rejected	Suitability – Within Landscape Heritage Area and it is Grade 1 agricultural land. Access issue.
SA-0017-DUD	Holbeache	Selected	Suitability- It is considered that Holbeache Lane would form a more permanent and logical boundary to the northern extent of residential development at this point. At the moment it is marked only by the rear/side of houses.
SA-0018-DUD	Land off Racecourse Lane	Rejected	Suitability/Deliverability – Existing golf course comprises roughly half SINC and half SLINC status. Landscape Heritage Area. Heavily treed with some group and individual TPO's and a couple of possible veteran trees.
SA-0019-DUD	Land East of Ounty John Lane	Rejected	Suitability – Within a Landscape Heritage Area. No defensible GB boundary. No direct vehicular access to adjacent road.
SA-0021-DUD	Viewfield Crescent	Selected	Suitability - some development whilst not weakening the wider Green Belt. The Green Belt and Landscape Sensitivity Assessment judged the area to be of moderate landscape sensitivity to residential development.
SA-0025-DUD	The Triangle	Selected	Suitability - some development whilst not not weakening the wider Green Belt. The Green Belt and Landscape Sensitivity Assessment judged the area to be of moderate landscape sensitivity to residential development.

Site Reference	Site Name	Selected/Rejected	Reason for Selection/Rejection provided by BCA
SA-0026-DUD	Bilston Street/Whites Drive	Rejected	Suitability - Limited development possible without harm to relevant trees or to habitat of SINC/SLINC value.
SA-0027-DUD	West of Foxcote Farm	Rejected	Suitability
SA-0028-DUD	Turls Hill Road	Rejected	Suitability - Located within the Bat Migration Corridor
SA-0031-DUD	Land off Pedmore Lane	Rejected	Suitability - Within Landscape Heritage Area and it is Grade 1 agricultural land. Access issue.
SA-0033-DUD	Land adjacent Holbeache House	Rejected	Suitability - Concern over access and impact on Holbeache House.
SA-0039-DUD	Lewis Road	Selected	Suitability - Greenfield Land surrounded by residential.
SA-0040-DUD	South of Cradley Town FC	Rejected	Suitability - Site is mostly within Green Belt. The site occupies a prominent elevated location when viewed from open countryside to the south. Loss of trees. Current access arrangement would not work without acquiring additional land or demolishing DMBC stock or coming through the allotment, football access. Loss of small area of allotments. Potential conflict with football ground use.
SA-0041-DUD	High Farm Road	Rejected	Suitability - Site is currently POS and appears to be used. A number of mature trees. Potential ransom strip to one access. There would be a shortfall of Amenity Greenspace within this part of the borough if this site were to be developed as there are no other such sites within a 400m straight line walking distance.
SA-0042-DUD	Lapwood Avenue	Selected	Suitability - Greenfield Land surrounded by residential.
SA-0043-DUD	Playing Field off Cradley Road	Rejected	Suitability - Potential loss of playing field. The access to the site is considered inadequate.
SA-0044-DUD	Bowling Green Road	Rejected	Suitability - significant constraints regarding access, trees, badgers and potential loss of playing fields.
SA-0045-DUD	Seymour Road	Selected	Suitability - Greenfield site surrounded by residential
SA-0046-DUD	Bent Street	Selected	Suitability - Amenity greenspace surrounded by residential
SA-0047-DUD	Balfour Road	Rejected	Suitability - Noise issues from the industrial area from residential occupants further away than the area in question. Contrived site.
SA-0050-DUD	Bryce Road	Selected	Suitability - It occupies a position between the existing built up area.
SA-0051-DUD	Enville Street	Rejected	Suitability - Loss of playing fields
SA-0052-DUD	Kingswinford Youth Centre	Rejected	Suitability - Loss of Public Open space, Playing Pitch and impacts on ecology including SLINC. Very difficult to mitigate against either on or offsite.
SA-0058-DUD	Wollaston Farm	Selected	Suitability - This is a narrow wedge of Green Belt land that is currently used for horse grazing. It occupies a position on the extreme edge of the conurbation with the whole of the western boundary also forming the borough boundary.
SA-0059-DUD	Lower Gornal Sewage Works	Rejected	Achievability - concerns over viability and deliverability.
SA-0060-DUD	Guys Lane	Selected	Suitability - It occupies a position between the existing built up area and the adjacent sewage works.
SA-0078-DUD	Eve Lane	Rejected	Suitability - Located within the Bat Migration Corridor
SA-0079-DUD	Wynall Lane	Rejected	Suitability - Green Belt land within a Landscape Heritage Area and situated in a prominent, elevated location, which would be severely affected, particularly the setting of Clent and Wychbury Hill (part of the Black Country Geo Park) and views from them. The site is a SLINC and therefore development has the potential to adversely affect its ecological value.
SA-0081-DUD	Foxcote Farm	Rejected	Suitability - High quality landscape (Area of High Historic Landscape Value) on a prominent elevated site which would be severely affected, particularly the setting of Clent and Wychbury Hill and views from them. Views from PROWs would be adversely affected.

Site Reference	Site Name	Selected/Rejected	Reason for Selection/Rejection provided by BCA
			Forms important green wedge which can be seen from the north that runs between the built-up area of Cradley southwards to the open countryside. Parts of site affected by nature conservation designations including a SINC and three separate SLINCs (one of which are hedgerows). these designations have the potential to be adversely affected by development.
SA-0105-DUD	Clent View Road	Rejected	Suitability - Site is long and narrow and, if developed in isolation to the land in South Staffordshire, would not have a defensible boundary as it cuts through the centre of the grazed fields. There is a high-pressure gas pipeline running north south along Sandy Lane the zone of influence of which effectively covers the majority of the site.
SA-0114-DUD	Greater Holbeache	Rejected	Suitability - Grade Agricultural land. Concern over access and impact on Holbeache House.
SA-0126-DUD	Roman Road	Rejected	Suitability - The site already has an existing defensible eastern boundary. If developed a defensible boundary would not exist. A high-pressure gas main cuts diagonally through the site which would affect the layout and the density of the site would be reduced as there is an undevelopable area.
SA-0132-DUD	Marriott Road	Selected	Viability - It scored 19 in the BEAR survey which is below the required level for retention as a Local Employment Area. It is therefore considered to be suitable for housing.
SA-0134-DUD	VB at Old Wharf Road	Selected	Viability - The site forms part of the larger mixed-use development allocation ref H11B.16 within the Dudley Borough Development Strategy. BEAR confirms that it can be released from its current employment use to housing.
SA-0135-DUD	Uffmoor	Rejected	Suitability - This area contains the head waters of the River Stour and is predominantly in agricultural use. Very sensitive site in visual terms. Site is located within an Area of High Historic Landscape Value containing large areas of surviving ridge and furrow earthworks. In terms of ecology there are three linear SLINC's which cross the site/ Uffmoor Wood, an area of Ancient Woodland, forms the boundary with a significant section of the south and western boundaries of the site. There is also a small area of Ancient Woodland in the south eastern part of the site.
SA-0139-DUD	74, Cinder Road	Rejected	Suitability - Would represent back land development, resulting in the sub-division of an existing plot not in keeping with the settlement plan and the character of the area. Inappropriate form of development within a residential garden, out of character with its immediate surroundings.
SA-0198-DUD	Standhills	Selected	Suitability - Greenfield surrounded by residential
SA-0199-DUD	Corbyns Hall	Selected	Suitability - Greenfield surrounded by residential
SA-0214-DUD	New Hawne Colliery	Rejected	Suitability - With the exception of the buildings and their immediate environs the site has SINC status and the extensive woodland is covered by an All Inclusive Tree Preservation Order.
SA-0215-DUD	Brockmoor Foundry	Selected	Suitability: An industrial site with adjacent to two existing housing allocations.
SA-0222-DUD	Dawson Brothers Timber	Rejected	Suitability - access issues.
SA-0373-DUD	Nuttalls	Selected	Suitability - Urban area with no longer employment use
SA-0061-DUD	Land off Tenacre Lane, Lower Gornal, DY3 1XH	Rejected	Site withdrawn
SA-0064-DUD-A	Pensnett Road, Pensnett	Rejected	Site withdrawn
SA-0064-DUD-B	Pensnett Road	Rejected	Suitability - Located within a high quality employment area

Site Reference	Site Name	Selected/Rejected	Reason for Selection/Rejection provided by BCA
SA-0068-DUD	Brierley Hill Road/Cooper Avenue, Brierley Hill, BHU	Rejected	Site withdrawn
SA-0076-DUD	Three Fields, Dunsley Road, Norton, DY8 3LR	Rejected	Site withdrawn
SA-0080-DUD	Land off Timmis Road, Lye	Rejected	Site withdrawn
SA-0084-DUD	Land off Cradley Road, DY2 9SW	Rejected	Site withdrawn
SA-0091-DUD	Hayley Green Farm	Rejected	Suitability - The release of the green belt in this location would enable built development to encroach further into this area of land which is readily visible to open countryside to the east and south east.
SA-0109-DUD	Land adj to Ashwood Park Primary	Rejected	Suitability - A primary school and its playing fields occupy part of the site. The river Stour and its wooded banks are located in the southern part of the site
SA-0145-DUD	Land South of Racecourse Lane	Rejected	Suitability - Geological and woodland SINC
SA-0173-DUD	Dobbins Oak Flats	Rejected	Suitability - The site provides amenity greenspace for the residents of the flatted development and should therefore be retained.
SA-0174-DUD	Merrick Close Playing Fields	Rejected	Suitability - As the site is within a Community Forum Area that falls below the quantity standard of public open space the site should be retained and improved with perhaps the provision of a children's play area and some tree planting
SA-0175-DUD	Sensal Road Bank	Rejected	Suitability - The steep topography of the site and the mature tree cover/ecology are the key considerations for this site. If
SA-0176-DUD	Highfields Park, Highfields Lane, Halesowen	Rejected	Suitability - This is a Community Park that is located in close proximity to Halesowen Town Centre and to high density residential estates
SA-0181-DUD	Shavers End Road Open Space	Rejected	Suitability - This is an area of Amenity Greenspace. The topography of the majority of the site is very challenging and may make development very difficult.
SA-0182-DUD	Central Drive Open Space	Rejected	Suitability - This site represents a significant area of useable Amenity Greenspace within a Community Forum Area that has a deficiency of open space. If removed it is considered that there would be insufficient coverage for this typology within the vicinity of the site as the other areas nearby are much smaller and are less useable due to topography and access constraints.
SA-0185-DUD	Porlock Road Open Space	Rejected	Suitability - This site is a narrow green parcel of land that forms a buffer of linear open space between industry off Mill Race Lane and housing to the east. The southern section is in close proximity to the River Stour and both share SLINC status. In conjunction, they are likely to be used by wildlife as a north-south corridor.
SA-0186-DUD	Land of Coombs Road	Rejected	Suitability - The site is not suitable for housing given its location within a High Quality Employment Area (HQEA) where there is potential for conflict, noise nuisance and air quality issues. The site is very challenging in topographical terms.
SA-0187-DUD	High St Wordsley Open Space	Rejected	Suitability - This is an elongated piece of attractive Amenity Greenspace that occupies a prominent location at the junction of High Street/Brierley Hill Road. The eastern section is too narrow to develop. The central section provides pedestrian access and outlook for Nos 24 to 40 Brierley Hill Road. The western section is heavily wooded and the trees are protected by a Woodland Order.

Site Reference	Site Name	Selected/Rejected	Reason for Selection/Rejection provided by BCA
SA-0188-DUD	Bristol Road open Space	Rejected	Suitability – The topography of this site is challenging. It is the site of a former coal pit, containing areas of coal mining high risk related to two mineshafts located on the western elevated part of the site. There is significant tree cover on the site. The site is in close proximity to the Mousesweet Brook SLINC and acts as a green corridor between the brook, via residential gardens and the school playing fields to the north. Footpaths cross the site which provide off-road routes to school between houses to the south and Netherbrook Primary School to the north of the site.
SA-0189-DUD	Hawbush Road Open Space	Rejected	Suitability – The site is mostly wooded and forms part of a valuable green corridor between the Stourbridge Canal to the east and land to the north. In the main, the site has an elevated position with steep slopes with respect to Hawbush Road and the tree lined bank forms a prominent feature for surrounding housing to the west. The Hawbush Road frontage is the only reasonably level part of the site. The loss of this elevated small area woodland would be visually detrimental to the surrounding area
SA-0191-DUD	Magpie Close Open Space	Rejected	Suitability – If this area were to be cleared of trees, motorists would overlook the houses which are at a much lower level and the existing residents would be more exposed to road noise and traffic fumes. If the site were to be developed for housing, due to the elevated nature of the site it would be difficult to prevent overlooking and for the new development not to look overbearing with respect to existing houses. The restricted width of the site and limited options for new access points would likely result in new development facing the road junction and thereby exposing the new residents to elevated noise levels and air pollution.
SA-0192-DUD	Brooksbank Drive Open Space	Rejected	Suitability – It is heavily wooded and forms a buffer between the residential estate and industrial buildings to the south.
SA-0193-DUD	Halesowen Open Space	Rejected	Suitability – The whole site is located within an area of Linear Open Space and forms part of the Dudley Canal wildlife corridor which widens at this point
SA-0194-DUD	Orchard St Island	Rejected	Suitability – The site is located within an established residential area and forms an area of open Amenity Greenspace within the estate.
SA-0196-DUD	Fullwood Crescent	Rejected	Suitability – Topography presents significant access difficulties and developable area of site and access. Capacity is further reduced by linear nature of site, trees, mineshafts and the PROW.
SA-0197-DUD	Mullett Park	Rejected	Suitability – The site contains goal posts and therefore if the pitch were to be lost from the site it is a requirement that Sport England is consulted.
SA-0200-DUD	Waverley Open Space	Rejected	Suitability – appears to be a playing field.
SA-0202-DUD	Grey Stone St Dudley	Rejected	Suitability – Partly with conservation area – impact on key views to conservation area
SA-0204-DUD	Alton Grove Dudley	Rejected	Suitability – Adjoining NSNG has no apparent public access. Access to land is not possible without third party land.
SA-0205-DUD	The Spinney B'Hill	Rejected	Suitability – Site is very steep and wooded and part SLINC
SA-0206-DUD	Abbey St, Gornal	Rejected	Suitability – Part of site is a SLINC Trees to SLINC/southern boundary Gornal Stone Wall to southern boundary
SA-0208-DUD	Bramble Green Dudley	Rejected	Suitability – Within a AHHTV – greens are characteristic of estate Layout allows for supervised play
SA-0209-DUD	Hazelwood Road	Rejected	The wider estate is designated an Area of High Historic landscape value due to the distinctive greens which are characteristic of the 1950s estate. The loss of the green(s) would have harmful impact on character.

Site Reference	Site Name	Selected/Rejected	Reason for Selection/Rejection provided by BCA
SA-0210-DUD	Wellsbourne Drive Coseley	Rejected	Suitability - Adjoins conservation area Trees reduce available capacity Lane to north has a rural character.
SA-0227-DUD	Bott Lane Lye	Rejected	Suitability - The site lies within the DY5 Enterprise Zone. The DY5 Enterprise Zone was designated to promote employment land use within the proposed designated Enterprise Zone boundary, and incentives are aimed at attracting business with reduced business rates and skills training etc.
H16.1	Bean Road, Coseley	Selected	Suitability - Located in build up residential area.

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# 7 Policy Assessments

## 7.1 Preface

7.1.1 The Draft BCP aims to achieve a balance between conserving the Black Country’s landscapes, heritage and environmental assets whilst securing the necessary infrastructure to support development and housing and employment needs.

7.1.2 The Draft Plan sets out a series of strategic and development management policies, that aim to support the delivery of the vision for the Black Country.

7.1.3 The policies that form the Draft BCP have been individually assessed against each of the 14 SA Objectives contained within the SA Framework. This chapter contains the results of these assessments.

## 7.2 Methodology

7.2.1 **Appendix J** sets out the detailed appraisal of each policy proposed within the Draft BCP. The appraisal evaluates the likely significant effects of each policy against the 14 SA Objectives.

*Table 7.1: Presenting likely impacts*

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

7.2.2 Strategic housing allocations have been proposed by the BCA through the following policies WSA1-WSA9, DSA1-3 CSA1-2.

7.2.3 The sites which comprise the strategic housing allocations have been assessed in **Appendices F-I** (pre mitigation) and in **Appendix J** (taking into account the details specified in these strategic site allocation policies and any mitigation proposed).

### 7.3 Overview of Policies Assessment

7.3.1 The impact matrices for all policy assessments are presented in **Table 7.2**. These impacts should be read in conjunction with the assessment text narratives in **Appendix J**, as well as the topic-specific methodologies and assumptions presented in **Chapter 1**.

*Table 7.2 Summary of policy assessments*

Policy Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP1	0	+/-	+/-	+	0	+	-	--	+	+	+	+	+	+
CSP2	0	+	+	+	0	+	0	0	+	+	+	+	+	0
CSP3	0	-	+/-	0	0	-	0	0	+	+	+	+	+	0
CSP4	+	+	+	+	+	0	+	0	+	0	+	+	0	0
CSP5	+	+	0	+	0	0	0	0	+	0	+	+	+	0
GB1	+/-	-	-	+/-	+/-	-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
GB2	0	0	0	0	0	0	0	0	0	0	+	0	+	0
DEL1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DEL2	0	0	0	0	0	+	0	0	+	+	0	0	+	0
DEL3	0	0	0	+	0	0	0	0	+	0	+	0	+	0
HW1	0	+	+	+	+	0	+	0	+	+	+	++	+	+
HW2	0	0	0	+	0	0	+	0	+	0	+	++	0	0
HW3	0	0	0	+	0	0	+	0	+	0	+	++	0	0
HOU1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-
HOU2	0	0	0	+	0	0	+	0	+	+	+	+	0	0
HOU3	0	0	0	0	0	0	0	0	0	+	+	+	0	0
HOU4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+	+	+	+/-	+
HOU5	0	0	0	+	0	0	+	0	+	0	0	+	+	++
HOU6	0	0	0	0	0	0	0	0	+	+	+	+	0	0
EMP1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-
EMP2	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-
EMP3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-
EMP4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+	+/-
EMP5	0	0	0	0	0	0	0	0	0	0	+	+	+	+
CEN1	+/-	+/-	+/-	+	+/-	+	+/-	+/-	+	+/-	+	+	+	+/-
CEN2	0	0	0	0	0	0	0	0	+	0	+	+	+	+
CEN3	0	0	0	0	0	+	0	0	+	0	+	+	+	0
CEN4	0	0	0	0	0	0	0	0	+	0	+	0	+	0
CEN5	0	0	0	0	0	0	+	0	+	0	+	+	+	0
CEN6	0	0	0	+	0	0	+	0	+	0	0	+	+	0
TRAN1	0	0	0	+	0	0	+	0	++	0	0	+	0	0
TRAN2	0	0	0	0	0	0	0	0	+	0	0	0	0	0
TRAN3	0	0	0	+	0	0	0	0	+	0	0	0	0	0
TRAN4	0	0	-	0	0	0	0	0	+	0	0	0	+	0



Policy Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN5	0	0	0	0	0	0	0	0	++	0	+	+	0	0
TRAN6	0	0	0	+	0	0	+	0	+	0	0	0	0	0
TRAN7	0	0	0	0	0	0	0	0	+	0	0	0	+	0
TRAN8	0	0	0	+	0	0	+	0	+	0	0	0	0	0
ENV1	0	+	++	+	+	0	+	0	0	0	0	+	0	0
ENV2	0	0	++	+	0	0	+	0	0	0	0	+	+	0
ENV3	0	+	++	+	+	0	+	0	0	0	0	+	0	0
ENV4	+	+	+	+	+	+	+	0	0	0	0	+	0	0
ENV5	++	+	+	0	0	0	0	0	0	0	+	0	+	0
ENV6	+	+	+	0	0	0	0	0	0	0	0	0	+	+
ENV7	+	+	+	0	0	0	+	0	+	+	0	+	+	0
ENV8	+	+	+	+	+	0	+	0	+	0	+	++	0	0
ENV9	+	+	+	+	+	+	+	0	+	0	+	+	0	0
CC1	+	+	+	++	+	+	+	0	+	0	0	+	0	0
CC2	0	0	0	+	+	0	+	0	0	0	0	+	0	0
CC3	0	0	+	+	+	0	+	0	0	0	0	0	0	0
CC4	0	0	+	+	0	0	++	0	+	0	0	+	+	0
CC5	0	0	+	0	++	0	+	0	0	0	0	+	0	0
CC6	0	0	0	0	+	0	0	0	0	0	0	0	0	0
CC7	0	0	0	+	0	0	+	0	0	0	0	0	0	0
W1	0	0	0	0	0	0	0	++	0	0	0	0	0	0
W2	0	0	0	0	0	0	0	+	0	0	0	0	0	0
W3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0
W4	0	0	0	0	0	0	0	+	0	0	0	0	0	0
W5	0	0	0	0	0	+	0	++	0	0	0	0	0	0
MIN1	0	0	0	0	0	+	0	0	0	0	0	0	+	0
MIN2	0	0	0	0	0	+	0	0	0	0	0	0	0	0
MIN3	0	+/-	+/-	0	0	+	+/-	0	0	0	0	0	+	0
MIN4	0	0	0	0	0	+	0	+	0	0	0	0	0	0
DSA1	0	-	+/-	+	0	-	-	-	+	++	0	+	+	+
DSA2	-	-	0	+	0	--	-	-	+	++	0	+	+	+
DSA3	0	-	+/-	+	0	-	-	-	+	++	0	+	+	+
CSA1	-	-	+/-	+	0	-	-	-	+	++	0	+	+	++
CSA2	0	-	+/-	+	0	-	-	-	+	++	0	+	+	+
WSA1	-	--	+/-	+	0	--	0	-	+	++	0	++	+	++
WSA2	-	--	+/-	+/-	0	--	0	-	+/-	++	0	++	+	++
WSA3	0	--	+/-	+/-	0	-	0	-	+/-	++	0	+	+	+
WSA4	-	--	+/-	+/-	0	--	0	-	+/-	++	0	++	+	++
WSA5	-	--	+/-	+/-	0	--	0	-	+/-	++	0	++	+	++
WSA6	-	--	+/-	+	0	-	0	-	+	++	0	+	+	+
WSA7	-	--	+/-	+	0	-	0	-	+	++	0	++	+	++

Policy Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
WSA8	-	--	+/-	+/-	0	-	0	-	+/-	++	0	++	+	++
WSA9	0	--	+/-	+/-	0	-	0	-	+/-	++	0	++	+	++

7.3.2 The policies contained within the BCP are anticipated to optimise sustainability performance and minimise adverse sustainability impacts. The policies help to avoid, reduce or compensate adverse effects wherever possible. Opportunities for enhancement may also be secured through policies in the BCP. Where there are opportunities to improve the sustainability performance of draft policies these have been identified in **Appendix J**.

7.3.3 Any further mitigation will be identified as part of a next stage of the assessment process and following the Regulation 18 consultation process. A summary of mitigating effects of these policies on proposed allocations will be provided in the Regulation 19 report.

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## 8 Next steps

### 8.1 Summary

- 8.1.1 This Regulation 18 SA Report is subject to consultation alongside the Draft BCP.
- 8.1.2 This report represents the latest stage of the SA process. The SA process will take on-board any comments on this report and use them to furnish the next report with greater detail and accuracy.
- 8.1.3 Once the BCA have consulted on the Regulation 18 Draft Plan, preparation of an Environmental Report will begin, also known as a full SA report. This Environmental Report will include all of the legal requirements set out in Annex 1 of the SEA Directive and accompany the Pre-Submission Plan at the Regulation 19 stage of the plan making process.

### 8.2 Consultation of the Regulation 18 SA Report

- 8.2.1 This Regulation 18 SA Report will be published by the BCA for consultation. Consultation findings will be used to inform subsequent stages of the SA process.
- 8.2.2 All responses on this consultation exercise should be sent to:

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

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

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

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

# Glossary

Term	Definition
Accessibility	This is the ability for people to travel around an area and reach facilities or locations. This includes the elderly, young, disabled or those carrying luggage.
Adoption	The official confirmation of a Development Plan or Local Development Document as having statutory status by a Local Planning Authority.
Agricultural Land Classification (ALC)	The Department for Environment, Food and Rural Affairs (DEFRA's) system of classifying agricultural land quality. Soil is graded from best to worst, numbered 1 to 5, with Grade 3 divided into two sub-grades (3a and 3b).
Air Quality Management Area (AQMA)	An area which is declared by a Local Authority where it is unlikely that Air Quality Objectives will be achieved.
Amenity	Positive elements that contribute to the character and sense of place of a location.
Ancient Woodland	Woodland that has existed in a consistent state since 1600 or earlier in England, Wales and Northern Ireland (1750 in Scotland).
Area of Outstanding Natural Beauty (AONB)	Sites in England, Wales and Northern Ireland designated to conserve and enhance the natural beauty of the area which comprises the area's distinctive landscape character, biodiversity, geodiversity, historic and cultural environment.
Best and Most Versatile Land (BMV)	Land in Grades 1, 2 and 3a of the Agricultural Land Classification.
Biodiversity	The variability among living organisms from all sources, including terrestrial, marine and other aquatic ecosystems, and the ecological complexes of which they are part. It includes diversity within and between species, and between ecosystems.
Buffer Zone	An area or zone that helps to protect a habitat from damage, disturbance or pollution.
Carbon Sink	A natural or artificial reservoir viewed in terms of its ability to absorb carbon-containing compounds, such as carbon dioxide.
Change of Use	A change in the way the building or land is currently managed or used. Planning permission is usually required in order to change from one use to another.
Character	Relating to the appurtenance of a location in terms of its landscape, layout of streets or open spaces, or historic environment.
Climate Change	A change in the climate of a region over time due to natural forces or human activity. In the context of the UN Framework Convention on Climate Change, it is the change in climate caused by higher levels of greenhouse gases in the atmosphere due to human activities as well as natural climate changes.
Climate Change Adaptation	Changes to natural or human systems in response to actual or estimated climatic factors or their effects, such as increased rainfall and temperatures.
Climate Change Mitigation	Actions used to reduce the impact of human activity on the climate, such as reducing greenhouse gas emissions.
Coalescence	The merging of separate towns or villages due to development.

Term	Definition
Community Infrastructure Levy	A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.
Connectivity	Term to express how a landscape is configured and how it allows species to move through its different elements. A high degree of connectivity is generally linked to low fragmentation.
Conservation Area	Areas of special architectural or historic interest, the character of which should be preserved. These are designated by the local planning authority.
Contaminated Land	Land that has been polluted and is therefore unsafe for development unless the contamination is removed.
Corridor	A strip of land of a particular type that differs from the adjacent land on both sides (corridors have several important functions, including conduit, barrier and habitat).
Country Park	Country Parks are statutorily declared and managed by local authorities in England and Wales under the Countryside Act. They are primarily intended for recreation and leisure opportunities close to population centres and do not necessarily have any nature conservation importance.
Cycle Network	A network located both on and off roads to facilitate safer travel by bicycle.
Density	In terms of residential development, the number of dwellings (or rooms) per hectare.
Design Statement	Made at the pre-planning application stage by developers to indicate the design principles upon which a proposal is to be based.
Development Plan Document (DPD)	Development Plan Documents are prepared by local planning authorities and outline the key development goals of the local development framework.
Duty to Cooperate	The Duty to Cooperate was created in the Localism Act 2011 and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.
Ecological Network	Linkages between biodiversity features and habitats.
Ecosystem	A community of living organisms (biotic components), including plants, animals and microorganisms, and their physical environment (abiotic components) that interact as a functional unit.
Ecosystem Services	Benefits that people obtain from ecosystems or their direct and indirect contributions to human well-being.
Emissions	In the context of the atmosphere, gases or particles released into the air that can contribute to global warming or poor air quality.
Energy Efficiency	Actions to save fuels, for example better building design, changing production processes, developing better transport policies, using better road vehicles and improving insulation and double glazing in homes.
Environmental Report (ER)	A document prepared as part of the Strategic Environmental Assessment process that presents findings, identifies options for mitigating adverse effects and opportunities for enhancing or improving the overall sustainability of the environment assessed.
Flood Plain	Where water flows in times of flood, or would flow but for the presence of flood defences.
Fragmentation	The breaking up of a habitat or ecosystem into smaller parcels with a consequent impairment of functioning.

Term	Definition
Geodiversity	The range of rocks, minerals, fossils, soils and landforms.
Green Belt	An area of land, largely rural in character, which is adjacent to the main urban areas and which is protected from development by permanent restrictions on building.
Green Infrastructure (GI)	A strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services.
Green Network	The linking together of natural, semi-natural and man-made open spaces to create an interconnected network. This may include (but is not limited to) designated biodiversity sites, Local Green Spaces, waterways, and public greenspaces.
Green Space	A patch of vegetated land within the urban fabric for predominantly recreational use.
Greenfield	Land on which no development has previously taken place unless the previous development was for agriculture or forestry purpose or, the remains of any structure or activity have blended into the landscape.
Greenhouse Gas (GHG)	A gas in an atmosphere that absorbs and emits radiation within the thermal infrared range, usually water vapour, carbon dioxide, methane, nitrous oxide, ozone chlorophluorocarbons and hydrophluorocarbons.
Groundwater	Water which is below the surface of the ground and in direct contact with the ground or subsoil.
Habitat Regulations Assessment (HRA)	A Habitats Regulations Assessment (HRA) refers to the several distinct stages of Assessment which must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it.
Heritage Asset	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).
Historic Environment	All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.
Infrastructure	Basic services necessary for development, such as, roads, electricity, sewerage, water, education and healthcare facilities.
Land Use	Describes the social and economic purposes for which land is managed.
Landscape	The traits, patterns and structure of a specific geographic area, including its biological composition, its physical environment and its anthropogenic or social patterns. An area where interacting ecosystems are grouped and repeated in a similar form.
Landscape Character	The recognisable and consistent pattern of features in a certain landscape, distinguishing one landscape from another, giving a locality its sense of place.
Landscape Sensitivity	A combination of landscape character sensitivity and landscape visual sensitivity.
Landscape Value	Calculated through the combination of importance, rarity and potential for substitution of landscape features.
Listed Building	A protected structure recorded on the Statutory List of Buildings of Special Architectural or Historic Interest. Graded I (highest quality), II* or II, which are listed in a national register.

Term	Definition
Local Development Framework	The Local Development Framework (LDF) is a non-statutory term used to describe a folder of documents, which includes all the local planning authority's local development documents.
Local Development Scheme	The local planning authority's scheduled plan for the preparation of Local Development Documents.
Local Nature Reserve (LNR)	Local Nature Reserves (LNRs) are a statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949 by principal local authorities. Parish and Town Councils can also declare LNRs, but they must have the powers to do so delegated to them by a principal local authority.
Local Plan	Local plans are prepared by the Local Planning Authority (LPA), usually the Council or the national park authority for the area. The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.
Local Planning Authority (LPA)	The body responsible for carrying out statutory planning functions.
Local Wildlife Site (LWS)	Sites which have a local designation for their nature conservation value.
Mineral Safeguarding Area (MSA)	Areas designated by Minerals Planning Authorities which cover known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development.
Mitigation	Measures taken to reduce adverse impacts, e.g. the provision of suitable planting to screen a development.
National Character Area (NCA)	An area of England characterised by distinctive natural features, based on a combination of landscape, biodiversity, geodiversity and economic activity. Refers to the broad landscape character areas described by the former Countryside Agency's Character Map of England.
National Nature Reserve (NNR)	A National Nature Reserve (NNR) is the land declared under the National Parks and Access to the Countryside Act 1949 or Wildlife and Countryside Act (1981) as amended. These are protected and managed areas which are nationally designated as key places for wildlife and natural features.
National Park	Areas of relatively undeveloped and scenic landscape that are designated under the National Parks and Access to the Countryside Act (2016).
National Planning Policy Statement (NPPF)	Updated in June 2019, this document sets out the government's planning policy guidance on various topics that can constitute a material consideration in determining planning applications.
National Trail	Long distance routes for walking, cycling and horse riding.
Natural Capital	The extension of the economic notion of capital (manufactured means of production) to environmental goods and services. Natural capital is the stock of natural ecosystems that yields a flow of valuable ecosystem goods or services into the future.
Open Space	An area of undeveloped land or water that may offer important opportunities for sport and recreation and can act as a visual amenity.

Term	Definition
Plan area	The geographic area covered by the plan. This generally covers local government jurisdictional boundaries.
Planning Practice Guidance (PPG)	The National Planning Practice Guidance adds further context to NPPF, and it is intended that the two documents should be read together.
Pollution	The introduction of contaminants into the natural environment that cause adverse change.
Precautionary Principle	Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.
Previously Developed Land (PDL)	Land which is, or has been, occupied by a permanent (non-agricultural) structure and associated infrastructure, including the area of land attached to a structure as well as the structure itself.
Public Greenspace	Areas of undeveloped landscape within a settlement, that are partially or wholly covered with grass, trees, shrubs or other vegetation.
Public Rights of Way (PRoW)	Paths within England and Wales on which the public have a legally protected right to pass and re-pass.
Ramsar Sites	Ramsar sites are designated under the Convention on Wetlands of International Importance, agreed in Ramsar, Iran, in 1971. Originally intended to protect sites of importance especially as waterfowl habitat, the Convention has broadened its scope over the years to cover all aspects of wetland conservation and wise use, recognising wetlands as ecosystems that are extremely important for biodiversity conservation in general and for the well-being of human communities.
Receptor	Any ecological or other defined feature (e.g. human beings) that is sensitive to, or has the potential to be affected by, an impact.
Registered Parks and Gardens	A national designation by Historic England of a park or garden of special historic interest. Graded I (highest quality), II* or II, which are listed in a national register.
Ribbon Development	Development which extends along one or both sides of a road but is not extended in depth.
Ridge and Furrow	Fields which still exhibit remnant ridges and furrows created by a Saxon or Medieval form of ploughing in shared open fields.
Rural Exception Site	Small sites for affordable residential development in perpetuity, where sites would not normally be allocated for housing. The sites seeks to address the housing needs of the local community.
Scheduled Monument (SM)	Archaeological remains of national importance which are legally protected by the Ancient Monuments and Archaeological Areas Act 1979 and listed on a schedule.
Secondary Impacts	Impacts that could potentially occur indirectly following the implementation of the Local Plan.
Sequential Test	A planning principle that seeks to identify, allocate or develop certain types or locations of land before others.
Setting	The place in which something is set, particularly in terms of the surroundings of a Listed Building.
Site of Special Scientific Interest (SSSI)	A conservation designation denoting a protected area of land in the UK. Sites can be protected for their biological/ecological interest (Biological SSSIs) and/or their geological interest (Geological SSSIs).



Term	Definition
Source Protection Zone (SPZ)	The Environment Agency identifies Source Protection Zones to protect groundwater (especially public water supply) from developments that may damage its quality.
Special Area of Conservation (SAC)	SACs are designated under the EC Habitats Directive. SACs are areas which have been identified as best representing the range and variety within the European Union of habitats and (non-bird) species listed on Annexes I and II to the Directive.
Special Protected Area (SPA)	SPAs are classified by the UK Government under the EC Birds Directive. SPAs are areas of the most important habitat for rare (listed on Annex I to the Directive) and migratory birds within the European Union.
Stakeholder or Interested Party	Any person, group or business that has an interest or will potentially be affected by a particular activity, plan or project.
Statutory Body	A government-appointed body set up to give advice and be consulted for comment upon development plans and planning applications affecting matters of public interest. This includes Historic England, Environment Agency and Natural England.
Strategic Environmental Assessment (SEA)	A process that is a requirement under certain plans and programmes under the SEA Directive and associated Environmental Assessment of Plans and Programmes Regulations 2004. The Directive seeks to ensure that environmental considerations are taken into account alongside economic and social considerations in the development of a plan / programme.
Submission	When a Development Plan Document, such as a Local Plan, is submitted to the Secretary of State for independent examination.
Supplementary Planning Document (SPD)	This document defines the standards that local authorities seek to achieve when involving and consulting local communities in the preparation of Local Development Documents and development control decisions. These often add further detail to policies within the Local Plan.
Surface Water (Pluvial) Flooding	Flooding caused by rainfall which occurs due to water ponding on, or flowing over, the surface before it reaches a drain or watercourse
Sustainability Appraisal (SA)	A systematic process required by the Planning and Compulsory Purchase Act 2004 and incorporating the requirements of the SEA Directive, aimed at appraising the social, environmental and economic effects of plan strategies and policies and ensuring that they accord with the objectives of sustainable development.
Sustainable Development	One of the core principles underpinning planning. It can be described as development which meets the needs of the present without compromising the ability of future generations to meet their own needs.
Sustainable Drainage Systems (SuDS)	A sequence of management practices and control measures designed to mimic natural drainage processes by allowing rainfall to infiltrate, and by attenuating and conveying surface water runoff slowly at peak times.
Synergistic impacts	When two separate impacts combine to form a third impact. These may be greater than the sum of the individual impacts.
Tranquillity	Remote from the visual or audible intrusion of development and/or traffic and unspoilt by urban surroundings.
Urban Fringe	The area located on the periphery of a city. It represents the transition zone between the built-up area and the countryside.
Urban Heat Island Effect	An urban area being significantly warmer than the surrounding rural areas caused by human activity.

Term	Definition
Urban Sprawl	The unplanned and uncontrolled growth of urban areas into the surrounding countryside.
Windfall Site	Sites that have unexpectedly become available for development and have therefore not be included within the Local Plan.
World Heritage Site (WHS)	A place that is listed by the United Nations Educational, Scientific and Cultural Organization (UNESCO) as of special cultural or physical significance.

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Habitat Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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# Sustainability Appraisal of the Black Country Plan

## Volume 2 of 2: Appendices

June 2021



**LEPUS** CONSULTING  
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# Sustainability Appraisal of the Black Country Plan

## Volume 2 of 2: Appendices

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- Appendix C** Housing Number Options Assessments
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- Appendix F** Dudley Reasonable Alternative Site Assessments
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- Appendix J** Policy Assessments
- Appendix K** Gypsy, Traveller and Travelling Showpeople Site Assessments

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## Appendix A: SA Framework

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



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

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

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

# Appendix B: Consultation Responses

**Table B.1:** Consultation comments in regard to the SA Scoping Report

Responder	Received	Comment
Natural England	09/03/17	<i>“Natural England accepts both the key issues that have been identified and objectives that have been outlined for the Scoping Report.”</i>
		<i>“We have no comment regarding the SA indicators and would regard these as being a satisfactory way to monitor significant effects of the Plan.”</i>
		<p><i>“Natural England advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area;</i></p> <ul style="list-style-type: none"> <li>• <i>Green infrastructure strategies</i></li> <li>• <i>Biodiversity plans</i></li> <li>• <i>Rights of Way Improvement Plans</i></li> <li>• <i>Shoreline management plans</i></li> <li>• <i>Coastal access plans</i></li> <li>• <i>River basin management plans</i></li> <li>• <i>AONB and National Park management plans.</i></li> <li>• <i>Relevant landscape plans and strategies.”</i></li> </ul>
Historic England	09/03/17	<i>“We recommend that the assessment also looks at what possible positive benefits there could be for the historic environment and to look for ways to enhance the historic environment.”</i>
		<i>“We welcome the inclusion of Chapter 9 on the Historic Environment. We would recommend that the introduction discusses the role of significance and the importance of assessing the implications/harm to the significance of heritage assets, including their setting. We would also encourage the use of the term ‘heritage assets’ to reflect terminology in the National Planning Policy Framework, this will ensure that all types of heritage assets are covered by the assessment.”</i>
		<i>“We would recommend consulting the Historic Environment Record (HER) for all four authorities and engaging with local conservation and archaeology staff.”</i>
		<i>“We would also recommend that the assessment considers the harm to heritage assets and how this can be overcome.”</i>
		<i>“We would also recommend the inclusion of the four Historic Environment Records for the authorities and any Local Lists that may be available.”</i>

Responder	Received	Comment
Environment Agency	28/03/17	<p>Biodiversity:</p> <p><i>“Where the protected sites include watercourses, the Environment Agency would be statutory consultees and would seek to implement improvements. The Water Framework Directive and the associated RBMP’s include measures to improve riverine habitat and networks to improve Biodiversity.”</i></p> <p>Climate Change:</p> <p><i>“With reference to Climate Change and flooding, the Environment Agency published updated guidance in February 2016 that is referred to and linked in the Planning Practice Guide that should be reviewed. We also recommend the SFRA also needs to be referenced in the Water and Soil section and should be revised, given that the present one will be well out of date This is not only in terms of climate change, but also to include new modelling undertaken in the interim, and because of the identification of new sites for development since the last review.”</i></p> <p>Water and Soil:</p> <p><i>“We also note that you have referenced the Thames River Basin Management Plan which we assume is an oversight not amended from a previous document. For the Black Country, both the River Severn RBMP and the Humber RBMP are relevant as the Black Country drains into both catchments. They have both been revised relatively recently; the Humber in 2016 and the Severn in 2015. We also feel that the Water Framework Directive and their associated RBMP’s should be reflected more prominently in the chapters and not just on the list of documents in the Appendices. WFD is the key driver for cross-cutting environmental improvements, not only for Water Quality but it also for Biodiversity and generally returning watercourses to a more natural state.”</i></p> <p><i>“In terms of Groundwater Quality, we also recommend that you make reference to Groundwater Protection: Policy and Practice (GP3 Guidance). This is the main document that our Groundwater and Contaminated Land use to guide their responses to planning applications. There has been a very recent revised publication of it that appears on GOV.UK that was published on the 14 March this year.”</i></p>

**Table B.2:** Consultation comments in regard to the Issues and Options SA Report

Respondent	Question	Representation ID	Received	Comment
Natural England	N/a	1829	24/08/17	No comment was made on the SA.  See full response here: <a href="https://blackcountry.oc2.uk/download/attachment/741">https://blackcountry.oc2.uk/download/attachment/741</a>
Historic England	N/a	694	08/09/17	No comment was made on the SA. See full response:  <i>“Our primary concern is ensuring that the Local Plan is informed by appropriate evidence and that where higher levels of growth are identified and policies and sites proposed, that these are informed by up to date and proportionate evidence. Table 1 on page 18 details the range of evidence base and which areas may need updating. Unfortunately, there is no reference to any historic environment evidence base within this table. What evidence base do the Council's have? Does it need updating? Are there areas missing? If sites are proposed through the Black Country Core Strategy review then we would expect a heritage impact assessment to be undertaken, or similar.</i>  <i>Page 29 looks at the issue of a Green Belt Review and we would want to ensure that the historic towns purpose of the Green Belt is fully considered.</i>  <i>We would support the inclusion of a specific spatial objective for the historic environment.</i>  <i>Where growth is considered and there are options for amending boundaries to regeneration corridors, creating new sustainable urban extensions, allocating development sites, we would need to ensure that appropriate assessment has been undertaken on how this growth will impact the significance of heritage assets, including their setting. Please see advice notes above and also access Historic England's website for further information.</i>  <i>Question 16 raises the idea of what criteria to consider when choosing sites for development - we would request that the Council's consider what the impacts are for the historic environment and consider sites where there is no negative impact or impacts can be mitigated. There are also opportunities for development to positively enhance and better reveal the significance of heritage assets and we would also request that these opportunities are considered. This point is relevant for all types of development.</i>

Respondent	Question	Representation ID	Received	Comment
				<p><i>We would be happy to offer advice and comment on any proposals to amend Policy ENV2 on the historic environment and we are supportive of the policy being updated in line with national policy and guidance.</i></p> <p><i>Page 66 raises the issue of building density and the need to look at increased density. As a result we would be keen to ensure that the Council's have appropriate design and building heights policies to ensure that there are specific policies to deal with issues that may arise because of increased density of sites.</i></p> <p><i>Where sites are identified for Gypsy, Traveller and Travelling Showpeople, alongside other forms of development, we would expect these to be fully assessed against the potential negative impacts for the historic environment.</i></p> <p><i>Where transport initiatives are proposed we would recommend that these are considered against the impact to the historic environment and that relevant avoidance, mitigation and enhancement measures are included within the Core Strategy.</i></p> <p><i>We are content with the proposed amendment to Policy ENV2. We would recommend that a section is included on Heritage Statements and when they are required.</i></p> <p><i>Historic England is currently preparing some additional advice on preparing minerals plans and the historic environment. We would recommend that the Council's consider all appropriate evidence base to ensure that the proposals are appropriate and compliant with the National Planning Policy Framework. Historic England does also have access to a number of studies that have looked at archaeology and aggregate minerals and we would be happy to share the relevant evidence with you".</i></p>
Environment Agency	N/a	1516	08/09/17	<p>No comment was made on the SA.          See full response here: <a href="https://blackcountry.oc2.uk/download/attachment/453">https://blackcountry.oc2.uk/download/attachment/453</a></p>
South Staffs DC	Q15c	1175	06/09/17	<p>Q15c Response - "Whether development is delivered within the Black Country or is exported elsewhere it will need to comprise sustainable development that meets the needs of the people who live there. If housing is exported, it will be for the LPA(s) in question to allocate sites through their Local Plan alongside appropriate infrastructure having undertaken a Sustainability Appraisal to ensure that sustainable development is being achieved."</p>

Respondent	Question	Representation ID	Received	Comment
	Q34a	1175	06/09/17	Q34a Response – <i>“Undertaking a Health Impact Assessment for large developments in addition to considering their impact through the Sustainability Appraisal (SA) is supported.”</i>
Campaign to Protect Rural England	Q32	1932	17/11/2017	Q32 Response – <i>“We are less convinced of the reliance on sustainability appraisals for new sites, particularly large scale Green Belt incursions. SAs are likely to assume some sort of development will go ahead at the site and then seek the best option. SAs are useful in terms of how individual sites are developed but are not designed to answer the question: is releasing the site at all necessary or desirable?”</i>

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# Appendix C: Housing Number Options

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# C.1 Housing Number Options

## C.1.1 Preface

C.1.1.1 The BCA have identified five options for the quanta of housing provision across the Plan area. The five options identified are presented in **Table C.1.1** below.

*Table C.1.1: The five housing options identified*

Option	Description of Option
Option 1	'Do nothing'. Stick with the existing strategy 'brownfield first' and only focus development within the urban area. <ul style="list-style-type: none"><li>• 43,600 homes in urban area.</li></ul>
Option 2	Stick with the existing strategy 'brownfield first' plus some Black Country Green Belt release, totalling 54,100. <ul style="list-style-type: none"><li>• 43,600 homes in urban area.</li><li>• 10,500 within Black Country Green Belt.</li></ul>
Option 3	Housing requirement of 71,500 all located within the Black Country. <ul style="list-style-type: none"><li>• 43,600 homes in urban area.</li><li>• 27,900 homes in the Green Belt.</li></ul>
Option 4	Housing requirement plus Birmingham's housing shortfall, totalling 74,500 all located within the Black Country. <ul style="list-style-type: none"><li>• 43,600 homes in urban area.</li><li>• 30,900 homes in the Green Belt.</li></ul>
Option 5	Housing requirement 71,500 within the Black Country and neighbouring authorities <ul style="list-style-type: none"><li>• 43,600 within urban area.</li><li>• 10,500 within Black Country Green Belt.</li><li>• 17,400 exported through Duty to Cooperate.</li></ul>

C.1.1.2 The appraisal evaluates the likely significant effects of each option against the 14 SA Objectives.

### C.1.2 SA Objective 1: Cultural Heritage

Option Number	1	2	3	4	5
SA Objective 1	+/-	+/-	+/-	+/-	+/-

C.1.2.1 There are 13 Registered Parks and Gardens, 27 Scheduled Monuments, ten Grade I Listed Buildings, 57 Grade II\* Listed Buildings and 944 Grade II Listed Buildings located within the Plan area. The nature of development will determine the extent to which heritage assets would be affected by future proposals.

C.1.2.2 Location based appraisals in regard to the historic environment have not been undertaken at this stage of the process as the exact location of development is uncertain. This will be considered in more detail through the appraisal of spatial distribution and reasonable alternative sites once more detail is known regarding locations. As such, the potential impacts on cultural heritage across the five housing options are uncertain. As Housing Option 1 proposes the lowest quantity of development and does not direct development to the Green Belt, it would be likely that this option would result in the least risk of substantial harm to designated heritage assets as there is greater scope for mitigation. As Housing Option 4 proposes the largest quantity of development and the largest quantity of development in the Green Belt, it would be likely that this option would result in the greatest risk of substantial harm to designated heritage assets.

### C.1.3 SA Objective 2: Landscape

Option Number	1	2	3	4	5
SA Objective 2	+/-	+/-	+/-	+/-	+/-

C.1.3.1 Cannock Chase Area of Outstanding Natural Beauty (AONB) is located approximately 3.7km to the north of the Plan area. Although the majority of the Black Country is highly urbanised, parts of all four local authorities lie within the West Midlands Green Belt.

C.1.3.2 Location based appraisals in regard to the local landscape have not been undertaken at this stage of the process as the exact location of development is uncertain. This will be considered in more detail through the appraisal of spatial distribution and reasonable alternative sites once more detail is known regarding locations. As such, the potential landscape impacts as a result of the five housing options are uncertain. As Housing Option 1 proposes the lowest quantity of development and does not direct development to the Green Belt, it would be likely that this option would result in the lowest risk of adverse impacts on the local landscape. As Housing Option 4 proposes the largest quantity of development and the largest quantity of development on Green Belt land, it would be likely that this option would result in the greatest risk of adverse impacts on the local landscape.

**C.1.4 SA Objective 3: Biodiversity**

Option Number	1	2	3	4	5
SA Objective 3	+/-	+/-	+/-	+/-	+/-

C.1.4.1 There are two Special Areas of Conservation (SACs) located within the Plan area; ‘Fens Pools’ and ‘Cannock Extension Canal’. Threats and pressures which could potentially be exacerbated by the development set out in the BCP at Fens Pools SAC include habitat fragmentation and water pollution. Some of the threats and pressures to Cannock Extension Canal SAC include water pollution and air pollution. There are 20 Sites of Special Scientific Interest (SSSIs) located within the Plan area. These include The Leasowes SSSI, Clayhanger SSSI and Jockey Fields SSSI, all of which are located within Dudley and Walsall district boundaries. There are two National Nature Reserves (NNRs) located in close proximity to the Plan area; Wren’s Nest NNR, located to the north of Dudley, and Sutton Park NNR, located adjacent to Walsall’s district boundary.

C.1.4.2 Location based appraisals in regard to biodiversity features have not been undertaken at this stage of the process as the exact location of development is uncertain. This will be considered in more detail through the appraisal of spatial distribution and reasonable alternative sites once more detail is known regarding locations. As such, the potential impacts on biodiversity as a result of the five housing options are uncertain. As Housing Option 1 proposes the lowest quantity of development and does not direct development to the Green Belt, it would be likely that this option would result in the lowest risk of adverse impacts on biodiversity assets. As Housing Option 4 proposes the largest quantity of development and the largest quantity of development on Green Belt land, it would be likely that this option would result in the greatest risk of adverse impacts on biodiversity assets.

### C.1.5 SA Objective 4: Climate Change Mitigation

Option Number	1	2	3	4	5
SA Objective 4	--	--	--	--	--

C.1.5.1 The estimated CO<sub>2</sub> emissions in the four authorities in 2017 are presented in **Table C.1.1** below.

*Table C.1.1: Estimated CO<sub>2</sub> emissions per authority in 2017<sup>1</sup>*

	Total CO <sub>2</sub> emissions estimates (tonnes)	Per Capita CO <sub>2</sub> emissions estimates (tonnes)
Dudley	1,188,200	3.7
Sandwell	1,485,900	4.6
Walsall	1,118,700	4.0
Wolverhampton	972,700	3.7
Black Country Authorities Average	4,765,500	4.0

C.1.5.2 For the appraisal of the housing options, a total of the estimated carbon emissions for the four authorities has been used. The increase in population which would be expected to arise through each option has been calculated using the average number of people per dwelling<sup>2</sup> across the four authorities. The likely total carbon emissions per option has then been calculated using the total per capita emissions for the Black Country (see **Table C.1.1**).

C.1.5.3 Housing Option 1 proposes the lowest number of dwellings for development (43,600). It would be expected that this option would increase CO<sub>2</sub> emissions across the Plan area by approximately 418,560 tonnes. This would result in an 8.8% increase in CO<sub>2</sub> emissions in comparison to existing levels. Housing Option 4 proposes the highest number of dwellings for development (74,500). It would be expected that this option would increase CO<sub>2</sub> emissions across the Plan area by approximately 715,200 tonnes. This would result in a 15.0% increase in CO<sub>2</sub> emissions in comparison to existing levels.

C.1.5.4 Overall, all of the housing options would be likely to result in a significant increase in CO<sub>2</sub> emissions across the Plan area. As Housing Option 1 would result in the lowest number of dwellings and would direct new residents towards urban areas, which have good access to sustainable transport options, this option would be likely to have the smallest adverse impact on climate change. As Housing Option 4 would direct the largest number of new dwellings

<sup>1</sup> DBEI (2019) 2005 to 2017 UK local and regional CO<sub>2</sub> emissions – data tables. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/812142/2005-17\\_UK\\_local\\_and\\_regional\\_CO2\\_emissions\\_tables.xlsx](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812142/2005-17_UK_local_and_regional_CO2_emissions_tables.xlsx) [Date Accessed: 12/12/19]

<sup>2</sup> People per Dwellings has been calculated using the population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalescotlandandnorthernireland>) and dwellings stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

to the Green Belt, which would be likely to have poor access to existing sustainable transport options, this option would be likely to result in the greatest adverse impact on climate change.

**C.1.6 SA Objective 5: Climate Change Adaptation**

Option Number	1	2	3	4	5
SA Objective 5	+/-	+/-	+/-	+/-	+/-

- C.1.6.1 The Black Country is a predominantly urban area. There are a few watercourses that pass through the four districts, including the River Tame, River Stour and Ford Brook. Fluvial flood risk across the four districts is primarily located around these rivers, in particular along the River Tame in Sandwell and Walsall. Areas at risk of surface water flooding are located across much of the Plan area. Surface water flood risk typically follows roads and the many canals located within the Black Country, including the Birmingham Canal, Walsall Canal and Dudley Canal.
- C.1.6.2 Location based appraisals in regard to flood risk have not been undertaken at this stage of the process as the exact location of development is uncertain. This will be considered in more detail through the appraisal of spatial distribution and reasonable alternative sites once more detail is known regarding locations. As such, the potential impact of development on flood risk as a result of the four housing options are uncertain.
- C.1.6.3 Housing Option 1 proposes the lowest quantity of development and does not direct development to the Green Belt. This option would be likely to have the lowest impact on food risk, as it would be expected to result in the lowest quantity of greenfield land lost to development, and as such, would be likely to exacerbate flood risk and impact flood storage capacity the least. Housing Option 4 proposes the largest quantity of development and would result in the largest quantity of development in the Green Belt, and therefore, on greenfield land. This option would be expected to result in the largest impact on flood risk due to the loss of greenfield land and increase the risk of flooding across the Plan area.

### C.1.7 SA Objective 6: Natural Resources

Option Number	1	2	3	4	5
SA Objective 6	+	-	-	-	-

C.1.7.1 The majority of the Black Country districts are located on land classified as ‘urban’ in accordance with the Agricultural Land Classification (ALC). As such, it can be assumed that all development located within the urban area would not result in the loss of best and most versatile (BMV) land. Housing Option 1 directs all development to urban areas and as such, would be expected to have a minor positive impact in regard to natural resources.

C.1.7.2 All other housing options would direct some development towards the Green Belt, and therefore, previously undeveloped land. As a result, these options would result in the loss of ecologically important soils, and to some extent, agriculturally important land. Therefore, Housing Options 2, 3, 4 and 5 would be likely to result in a minor negative impact on natural resources.

### C.1.8 SA Objective 7: Pollution

Option Number	1	2	3	4	5
SA Objective 7	-	-	-	-	-

C.1.8.1 The entirety of the four districts are designated as Air Quality Management Areas (AQMAs); ‘Dudley AQMA’, ‘Sandwell AQMA’, ‘Walsall AQMA’ and ‘Wolverhampton AQMA’. ‘Chuckery AQMA’ is located in the centre of Walsall. AQMAs located adjacent to the Plan area include; ‘Birmingham AQMA’, ‘Hagley AQMA’ and ‘CCDC AQMA 2’. In addition, there are a large number of motorways and A-roads which cross the Plan area, each of which represent traffic-related sources of air pollution. All of the housing options would place new residents within AQMAs, and therefore, would be expected to have a minor negative impact on pollution.

C.1.8.2 As Housing Option 1 proposes the lowest quantity of development and does not direct development to the Green Belt, it would be likely that the development proposed under this option would result in the least adverse impacts in regard to the worsening of air, soil and water quality. As Housing Option 4 proposes the largest quantity of development and the largest quantity of development on Green Belt land, it would be likely that this option would result in the greatest adverse impacts in regard to the worsening air, soil and water quality.



### C.1.9 SA Objective 8: Waste

Option Number	1	2	3	4	5
SA Objective 8	--	--	--	--	--

C.1.9.1 The household waste generation in the four authorities between 2018 and 2019 are presented in **Table C.1.2** below.

**Table C.1.2: Total household waste collected per authority in 2018/2019<sup>3</sup>**

	Total household waste (tonnes)
Dudley	122,929
Sandwell	129,019
Walsall	107,005
Wolverhampton	106,305
Black Country Authorities Total	465,258

C.1.9.2 For the appraisal of the housing options, the total household waste of the four authorities has been calculated. The likely household waste generated per option has then been calculated using the average waste per person for England (409.3kg per person)<sup>4</sup>. The increase in population which would be expected to arise through each option has been calculated using the average people per dwelling<sup>5</sup> across the four authorities.

C.1.9.3 Housing Option 1 proposes the lowest number of dwellings for development (43,600). It would be expected that this option would increase household waste generation across the Plan area by approximately 42,829.2 tonnes. This would result in a 9.2% increase in household waste generation in comparison to existing levels. Housing Option 4 proposes the highest number of dwellings for development (74,500). It would be expected that this option would increase household waste generation across the Plan area by approximately 73,182.8 tonnes. This would result in a 15.7% increase in household waste generation in comparison to existing levels.

C.1.9.4 Overall, all of the housing options would be likely to result in a significant increase in household waste generation across the Plan area. As Housing Option 1 would result in the

<sup>3</sup> DEFRA (2019) Local authority collected waste generation from April 2000 to March 2019 (England and regions) and local authority data April 2018 to March 2019. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/849136/LA\\_and\\_Regional\\_Spreadsheet\\_1819.xlsx](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/849136/LA_and_Regional_Spreadsheet_1819.xlsx) [Date Accessed: 12/12/19]

<sup>4</sup> Ibid

<sup>5</sup> People per Dwellings has been calculated using the population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalescotlandandnorthernireland>) and dwellings stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

fewest number of new dwellings and residents, this option would be likely to adversely impact household waste generation the least. As Housing Option 4 would result in the greatest number of new dwellings and residents, this option would be likely to result in the greatest adverse impacts in regard to waste.

C.1.9.5 In addition, adverse impacts would be expected for waste due to the construction and demolition phases of development.

**C.1.10 SA Objective 9: Transport**

Option Number	1	2	3	4	5
SA Objective 9	-	-	-	-	-

C.1.10.1 There are vast road and rail networks across the Black Country, with good rail links to Birmingham and Stafford, and motorway links to the south west, south east and north west of England. Nevertheless, road congestion, in particular following road incidents on the M5 and M6, is an existing problem in the Black Country. In addition, there is an extensive Public Right of Way (PRoW) and cycle path network.

C.1.10.2 All of the housing options aim to direct 43,600 new dwellings to the urban area of the Black Country. It would be likely that, by directing development towards the urban area, new residents would be located in areas with good access to sustainable transport options, such as rail and bus services. However, additional development in the urban area could also exacerbate existing issues with congestion and increase pressures on the road network. As a result, it would be likely that all of the housing options would have a minor negative impact on transport across the Plan area.

C.1.10.3 Housing Option 1 focuses all development within the urban area and as such, would be likely to have the least adverse impacts on transport and accessibility, as new residents in these areas would be expected to have good access to sustainable transport options. Housing Option 4 proposes the greatest quantity of development and proposes the greatest quantity of development on Green Belt land. Development within the Green Belt would be likely to have more limited access than the urban area due to reduced bus services and lack of nearby facilities and as such, residents would be likely to rely on personal car use and increase pressures on the road network. Therefore, this option would be likely to have largest adverse impacts in relation to transport and accessibility.

### C.1.11 SA Objective 10: Housing

Option Number	1	2	3	4	5
SA Objective 10	+	+	++	++	++

C.1.11.1 There is a requirement for the development of 71,459 dwellings<sup>6</sup> over the Plan period in the Black Country.

C.1.11.2 Housing Options 1 and 2 would not meet the identified 71,459 dwellings requirement over the Plan period. As such, a minor positive impact would be expected. The proposed quantity of development under Housing Options 3, 4 and 5 would be expected to meet this requirement, and as a result, have a major positive impact on housing provision. Housing Option 5 would direct a proportion of the housing requirement to neighbouring authorities. Although this option would aim to meet the total housing requirement, a proportion of development would be located outside of the Plan area.

### C.1.12 SA Objective 11: Equality

Option Number	1	2	3	4	5
SA Objective 11	-	-	-	-	-

C.1.12.1 The Index of Multiple Deprivation (IMD)<sup>7</sup> is the official measure of relative deprivation for Lower Super Output Areas (LSOAs)<sup>8</sup> in England. Out of 317 Local Authorities in England, Dudley is ranked as the 91<sup>st</sup> most deprived, Sandwell 12<sup>th</sup>, Walsall 25<sup>th</sup> and Wolverhampton 24<sup>th</sup><sup>9</sup>. Overall, deprivation is high across the Black Country, with 21 of the LSOAs in Dudley, 36 in Sandwell, 42 in Walsall and 33 in Wolverhampton ranked among the 10% most deprived in England.

C.1.12.2 Location based equality appraisals have not been undertaken at this stage of the process as the exact location of development is uncertain. This will be considered in more detail

<sup>6</sup> Black Country Plan (2019) Black Country Urban Capacity Review December 2019 <https://blackcountryplan.dudley.gov.uk/media/13807/bc-urban-capacity-review-update-final-december-2019.pdf> [Date Accessed: 21/01/20]

<sup>7</sup> MHCLG (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date Accessed: 17/12/19]

<sup>8</sup> DCLG (2016) The English Indices of Deprivation 2015 – Frequently Asked Questions (see question 11. What is a Lower-layer Super Output Area/Neighbourhood/small area?). Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/579151/English\\_Indices\\_of\\_Deprivation\\_2015\\_-\\_Frequently\\_Asked\\_Questions\\_Dec\\_2016.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/579151/English_Indices_of_Deprivation_2015_-_Frequently_Asked_Questions_Dec_2016.pdf) [Date Accessed: 19/12/19]

<sup>9</sup> Black Country Consortium (2019) The English Indices of Deprivation 2019. Available at: <https://www.the-blackcountry.com/upload/BC%20IMD%202019.pdf> [Date Accessed: 17/12/19]

through the appraisal of spatial distribution and reasonable alternative sites once more detail is known regarding locations.

C.1.12.3 By directing 43,600 dwellings towards the urban areas of the Black Country, all of the housing options would be likely to help facilitate social inclusion by increasing accessibility to key services and employment. Housing Options 2, 3, 4 and 5 would direct a proportion of dwellings to the Green Belt, where new residents could potentially have limited access to employment opportunities and other key services. As such, these four housing options could potentially result in a minor adverse impact on equality.

C.1.12.4 Housing Options 3, 4 and 5 would be expected to meet the housing requirements of the Plan area. By meeting the required need, it would be likely that these three options would be able to ensure the provision of appropriate housing types and tenures across the Plan area, and therefore, would be likely to have benefits to local communities. As Housing Options 1 and 2 would not meet the housing needs of local residents, these two options may not result in the adequate supply of an appropriate mix of housing. Therefore, a minor negative impact would also be expected.

**C.1.13 SA Objective 12: Health**

Option Number	1	2	3	4	5
SA Objective 12	+	-	-	-	-

C.1.13.1 There are four NHS hospitals with A&E departments located within the Black Country; Russells Hall Hospital in Dudley, Sandwell General Hospital in Sandwell, Manor Hospital in Walsall and New Cross Hospital in Wolverhampton. In addition, there are a number of GP surgeries and leisure centres located across the Plan area, as well as good access to an extensive network of PRow and cycle paths to encourage physical exercise and boost mental wellbeing.

C.1.13.2 By directing 43,600 dwellings to the urban area, all housing options would be likely to locate residents in areas with good access to essential healthcare facilities. Housing Options 2, 3, 4 and 5 would direct some development towards the Green Belt, where residents would be expected to have good access to natural open space but could potentially have limited access to existing healthcare services. Furthermore, the development of previously undeveloped land in the Green Belt would be likely to result in the loss of open space and natural habitats which are known to have positive effects in regard to health and wellbeing.

C.1.13.3 At 2.4 people per dwelling<sup>10</sup>, it would be likely that Housing Option 1 would result in an increase in population of 104,640 people and Housing Option 4 would result in the increase in population of 178,800 people. These two options represent the lowest and highest population increases of the five options. At this stage of assessment, it is uncertain the extent to which an increase in population would result in capacity issues at key services, including GP surgeries and leisure centres.

C.1.13.4 Overall, Housing Option 1 would direct all new residents to the urban area which currently has good access to healthcare facilities and open space with opportunities to exercise. As a result, it would be likely to have a minor positive impact on human health. Housing Options 2, 3, 4 and 5 would locate some residents towards the Green Belt, where access to some healthcare facilities is currently restricted. Therefore, these four options would be likely to have a minor negative impact on human health. As Housing Option 4 proposes the largest quantity of development, this option could potentially result in the greatest risk of adverse impact on human health including overcapacity issues at key services.

**C.1.14 SA Objective 13: Economy**

Option Number	1	2	3	4	5
SA Objective 13	+/-	+/-	+/-	+/-	+/-

C.1.14.1 The five housing options would not be expected to increase employment floorspace across the Plan area. It is assumed that the future housing development would not result in the loss of employment floorspace.

C.1.14.2 Approximately 74.1% of residents in the Black Country are economically active, lower than the West Midlands and Great Britain<sup>11</sup>. Some of the strategic centres of the four districts include Walsall Town Centre, West Bromwich, Wolverhampton Town Centre and Brierley Hill. These four areas provide retail, office and leisure floorspace. The majority of new residents across the Plan area would be expected to be located within a sustainable distance to employment opportunities. Development proposals located in urban areas would be expected to have good sustainable transport connections to nearby employment opportunities. As Housing Options 2, 3, 4 and 5 would direct a proportion of development

<sup>10</sup> People per Dwellings has been calculated using the population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalescotlandandnorthernireland>) and dwellings stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

<sup>11</sup> nomis (2019) Labour Market Profile - Black Country. Available at: <https://www.nomisweb.co.uk/reports/lmp/lep/1925185537/report.aspx> [Date Accessed: 17/12/19]

to the Green Belt, new residents in these areas would be likely to have limited sustainable transport connections to town centres and key employment areas.

C.1.14.3 Location based appraisals in regard to access to employment opportunities have not been undertaken at this stage of the process as the exact location of development is uncertain. This will be considered in more detail through the appraisal of spatial distribution and reasonable alternative sites once more detail is known regarding locations. As such, the potential impacts on the economy as a result of the five housing options are uncertain. As Housing Option 1 solely focuses development towards the urban area, it would be likely that this option would result in the lowest risk of adverse impacts in regard to access to employment opportunities. As Housing Option 4 proposes the greatest overall quantity of development and the largest quantity of development on Green Belt land, it would be likely that this option would result in the largest risk of adverse impacts on access to employment opportunities.

**C.1.15 SA Objective 14: Education**

Option Number	1	2	3	4	5
SA Objective 14	+	-	-	-	-

C.1.15.1 There are a number of primary and secondary schools located across the Plan area. By directing 43,600 dwellings to the urban area, all housing options would be likely to locate these residents in areas with good access to schools. As Housing Options 2, 3, 4 and 5 direct a proportion of development towards the Green Belt, development in these areas would be likely to have limited access to schools.

C.1.15.2 At 2.4 people per dwelling<sup>12</sup>, it would be likely that Housing Option 1 would result in an increase in population of 104,640 people and Housing Option 4 would result in the increase in population of 178,800 people. These two options represent the lowest and highest population increases of the five options. At this stage of assessment, it is uncertain the extent to which an increase in population would result in capacity issues at primary and secondary schools.

C.1.15.3 Overall, Housing Option 1 would direct all new residents to the urban area with good access to primary and secondary schools, and as a result, would be likely to have a minor positive impact on education. Housing Options 2, 3, 4 and 5 would locate some residents toward the

<sup>12</sup> People per Dwellings has been calculated using the population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalescotlandandnorthernireland>) and dwellings stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

Green Belt where access to some schools is currently poor. Therefore, these four options would be likely to have a minor negative impact on education. As Housing Option 4 proposes the largest quantity of development, this option could potentially result in the largest risk of adverse impacts on education including capacity issues at schools.

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# Appendix D: Employment Number Options

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# D.1 Employment Number Options

## D.1.1 Preface

D.1.1.1 The Black Country Authorities have identified five options for the quanta of employment floorspace across the Plan area. The five options identified are presented in **Table D.1.1** below.

*Table D.1.1: The five employment options identified*

Option	Description of Option
Option 1	242ha <ul style="list-style-type: none"><li>• 242ha urban sites in the Black Country</li></ul>
Option 2	462ha <ul style="list-style-type: none"><li>• 242ha urban sites in the Black Country</li><li>• 220ha Black Country Green Belt release</li></ul>
Option 3	612ha <ul style="list-style-type: none"><li>• 242ha urban sites in the Black Country</li><li>• 370ha in neighbouring areas</li></ul>
Option 4	672ha <ul style="list-style-type: none"><li>• 242ha urban sites in the Black Country</li><li>• 370ha in neighbouring areas</li><li>• 60ha Black Country Green Belt release</li></ul>
Option 5	832ha <ul style="list-style-type: none"><li>• 242ha urban sites in the Black Country</li><li>• 370ha in neighbouring areas</li><li>• 220ha Black Country Green Belt release</li></ul>

D.1.1.2 The appraisal evaluates the likely significant effects of each option against the 14 SA Objectives.

### D.1.2 SA Objective 1: Cultural Heritage

Option Number	1	2	3	4	5
SA Objective 1	+/-	+/-	+/-	+/-	+/-

D.1.2.1 There are 13 Registered Parks and Gardens, 29 Scheduled Monuments, ten Grade I Listed Buildings, 57 Grade II\* Listed Buildings and 944 Grade II Listed Buildings located within the Plan area. The nature and location of development will determine the extent to which heritage assets would be affected by future proposals.

D.1.2.2 Location based appraisals in regard to the historic environment have not been undertaken at this stage of the process as the exact location of development is uncertain. This will be considered in more detail through the appraisal of spatial distribution and reasonable alternative sites once more detail is known regarding locations. As such, the potential impacts on cultural heritage across the five employment options are uncertain. As Employment Option 1 proposes the lowest quantity of development and does not direct development to the Green Belt, it would be likely that this option would result in the least risk of substantial harm to designated heritage assets. As Employment Option 5 proposes the largest quantity of development overall, and the largest quantity of development in the Green Belt, it would be likely that this option would result in the greatest risk of substantial harm to designated heritage assets.

### D.1.3 SA Objective 2: Landscape

Option Number	1	2	3	4	5
SA Objective 2	+/-	+/-	+/-	+/-	+/-

D.1.3.1 Cannock Chase Area of Outstanding Natural Beauty (AONB) is located approximately 3.7km to the north of the Plan area. Although the majority of the Black Country is highly urbanised, parts of all four local authorities lie within the West Midlands Green Belt.

D.1.3.2 Location based appraisals in regard to the landscape have not been undertaken at this stage of the process as the exact location of development is uncertain. This will be considered in more detail through the appraisal of spatial distribution and reasonable alternative sites once more detail is known regarding locations. As such, the potential landscape impacts as a result of the five employment options are uncertain. As Employment Option 1 proposes the lowest quantity of development and does not direct development to the Green Belt, it would be likely that this option would result in the lowest risk of adverse impacts on the local landscape. As Employment Option 5 proposes the largest quantity of development and the largest quantity of development on Green Belt land, it would be likely that this option would result in the greatest risk of adverse impacts on the local landscape.

### D.1.4 SA Objective 3: Biodiversity

Option Number	1	2	3	4	5
SA Objective 3	+/-	+/-	+/-	+/-	+/-

D.1.4.1 There are two Special Areas of Conservation (SACs) located within the Plan area; ‘Fens Pool’s’ and ‘Cannock Extension Canal’. Threats and pressures which could potentially be exacerbated by the development set out the BCP at Fens Pools SAC include habitat fragmentation and water pollution. Threats and pressures to Cannock Extension Canal SAC include water pollution and air pollution. There are 20 Sites of Special Scientific Interest (SSSIs) located within the Plan area. These include The Leasowes SSSI, Clayhanger SSSI and Jockey Fields SSSI, all of which are located within Dudley and Walsall district boundaries. There are two National Nature Reserves (NNRs) located in close proximity to the Plan area; Wren’s Nest NNR, located to the north of Dudley, and Sutton Park NNR, located adjacent to Walsall’s district boundary.

D.1.4.2 Location based appraisals in regard to biodiversity features have not been undertaken at this stage of the process as the exact location of development is uncertain. This will be considered in more detail through the appraisal of spatial distribution and reasonable alternative sites once more detail is known regarding locations. As such, the potential impacts on biodiversity as a result of the five employment options are uncertain. As Employment Option 1 proposes the lowest quantity of development and does not direct development to the Green Belt, it would be likely that this option would result in the lowest risk of adverse impacts on biodiversity assets. As Employment Option 5 proposes the largest quantity of development and the largest quantity of development on Green Belt land, it would be likely that this option would result in the greatest risk of adverse impacts on biodiversity assets.

### D.1.5 SA Objective 4: Climate Change Mitigation

Option Number	1	2	3	4	5
SA Objective 4	+/-	+/-	+/-	+/-	+/-

D.1.5.1 At this stage of assessment, the type and nature of future employment development is unknown. As a result, the impact each employment option may have on greenhouse gas emissions, including carbon dioxide, is uncertain. As Employment Option 1 proposes the lowest quantity of development, it would be likely that this option would result in the lowest risk of adverse impacts on climate change. In addition, this option would direct all development to the urban area, where it is expected there would be good access to sustainable transport options. As Employment Option 5 proposes the largest quantity of development and the largest quantity of development in the Green Belt with reduced access

to sustainable transport options, it would be likely that this option would result in the largest risk of adverse impacts on climate change.

### D.1.6 SA Objective 5: Climate Change Adaptation

Option Number	1	2	3	4	5
SA Objective 5	+/-	+/-	+/-	+/-	+/-

D.1.6.1 The Black Country is a predominantly urban area. There are a few watercourses that pass through the four districts, including the River Tame, River Stour and Ford Brook. Fluvial flood risk across the four districts are primarily associated with these rivers, in particular along the River Tame in Sandwell and Walsall. Areas at risk of surface water flooding are located across much of the Plan area. Surface water flood risk typically follows roads and the many canals located within the Black Country, including the Birmingham Canal, Walsall Canal and Dudley Canal.

D.1.6.2 Location based appraisals in regard to flood risk have not been undertaken at this stage of the process as the exact location of development is uncertain. This will be considered in more detail through the appraisal of spatial distribution and reasonable alternative sites once more detail is known regarding locations. As such, the potential impact of development on flood risk as a result of the five employment options are uncertain.

D.1.6.3 Employment Option 1 proposes the lowest quantity of development and does not direct development to the Green Belt. This option would be likely to have the lowest impact on flood risk, as it would be expected to result in the lowest quantity of greenfield land lost to development, and as such, would be likely to exacerbate flood risk and impact flood storage capacity the least. Employment Option 5 proposes the largest quantity of development, including the largest quantity of development in the Green Belt, and therefore, on greenfield land. This option would be expected to result in the greatest impact on flood risk due to the loss of greenfield land and increased risk of flooding across the Plan area.

### D.1.7 SA Objective 6: Natural Resources

Option Number	1	2	3	4	5
SA Objective 6	+	-	-	-	-

D.1.7.1 The majority of the Black Country districts are located on land classified as ‘urban’ in accordance with the Agricultural Land Classification (ALC). As such, it can be assumed that all development located within the urban area would not result in the loss of best and most versatile (BMV) land.

D.1.7.2 Employment Option 1 directs all employment floorspace in the Black Country to urban land. This would be likely to help prevent the loss of ecologically important soil resources, and therefore, a minor positive impact on natural resources would be expected. Employment Options 2, 3, 4 and 5 would direct some development towards the Green Belt, and therefore, previously undeveloped land. As such, these options would be likely to result in the loss of ecologically important soils and agriculturally important land, with Employment Option 2 having a lesser impact than Employment Option 5. Therefore, Employment Options 2, 3, 4 and 5 would be likely to result in a minor negative impact on natural resources.

**D.1.8 SA Objective 7: Pollution**

Option Number	1	2	3	4	5
SA Objective 7	-	-	-	-	-

D.1.8.1 The four districts that form the Plan area are designated as Air Quality Management Areas (AQMAs); ‘Dudley AQMA’, ‘Sandwell AQMA’, ‘Walsall AQMA’ and ‘Wolverhampton AQMA’. ‘Chuckery AQMA’ is located in the centre of Walsall. AQMAs located adjacent to the Plan area include; ‘Birmingham AQMA’, ‘Hagley AQMA’ and ‘CCDC AQMA 2’. In addition, there are a large number of motorways and A-roads which cross the Plan area, each of which represent traffic-related sources of air pollution. All of the employment options would place new site users within AQMAs, and therefore, would be expected to have a minor negative impact on pollution.

D.1.8.2 As Employment Option 1 proposes the lowest quantity of development and does not direct development to the Green Belt, it would be likely that the development proposed under this option would result in the least adverse impacts in regard to the worsening of air, soil and water quality. As Employment Option 5 proposes the largest quantity of development and the largest quantity of development on Green Belt land, it would be likely that this option would result in the greatest adverse impacts in regard to the worsening air, soil and water quality.

**D.1.9 SA Objective 8: Waste**

Option Number	1	2	3	4	5
SA Objective 8	+/-	+/-	+/-	+/-	+/-

D.1.9.1 The non-household waste generation in the four authorities between 2018 and 2019 are presented in **Table D.1.3** below.

**Table D.1.1: Total non-household waste collected per authority in 2018/2019<sup>1</sup>**

	Total non-household waste (tonnes)
Dudley	14,634
Sandwell	12,729
Walsall	10,279
Wolverhampton	20,100
Black Country Authorities Total	57,742

D.1.9.2 At this stage of assessment, the type and nature of employment development is unknown. As a result, the impact each employment option may have on waste generation is uncertain. As Employment Option 1 proposes the lowest quantity of development, it would be likely that this option would result in the lowest risk of adverse impacts on waste generation. As Employment Option 5 proposes the largest quantity of development, it would be likely that this option would result in the largest risk of adverse impacts on waste generation.

D.1.9.3 In addition, adverse impacts would be expected for waste due to the construction and demolition phases of development.

### D.1.10 SA Objective 9: Transport

Option Number	1	2	3	4	5
SA Objective 9	-	-	-	-	-

D.1.10.1 There is a vast road and rail network across the Black Country, with good rail links to Birmingham and Stafford, and motorway links to the south west, south east and north west of England. Nevertheless, road congestion, in particular following road incidents on the M5 and M6, is an existing problem in the Black Country. In addition, there is an extensive Public Right of Way (PRoW) and cycle path network.

D.1.10.2 All of the employment options propose the development of 242ha of employment floorspace in the urban area of the Black Country. It would be likely that, by directing development towards the urban area, new site users would be located in areas with good access to sustainable transport options, such as rail and bus services. However, additional development in the urban area could also exacerbate existing issues with congestion and increase pressures on the road network. As a result, it would be likely that all of the employment options would have a minor negative impact on transport across the Plan area.

<sup>1</sup> DEFRA (2019) Local authority collected waste generation from April 2000 to March 2019 (England and regions) and local authority data April 2018 to March 2019. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/849136/LA\\_and\\_Regional\\_Spreadsheet\\_1819.xlsx](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/849136/LA_and_Regional_Spreadsheet_1819.xlsx) [Date Accessed: 12/12/19]

D.1.10.3 Employment Option 1 focuses all development within the urban area of the Black Country, and as such, would be likely to have the least adverse impacts on transport and accessibility, as new residents in these areas would be expected to have good access to sustainable transport options. Employment Option 5 proposes the greatest quantity of development on Green Belt land. Development within the Green Belt would be likely to have more limited access than development within the urban area due to reduced bus services and lack of nearby facilities. As such, residents would be likely to rely more heavily on personal car use. This would result in increased pressures on the existing road network. Therefore, this option would be likely to have largest adverse impacts in relation to transport and accessibility.

**D.1.11 SA Objective 10: Housing**

Option Number	1	2	3	4	5
SA Objective 10	0	0	0	0	0

D.1.11.1 The five employment options would not be expected to increase housing provision across the Plan area. It is also assumed that future employment development would not result in the net loss of housing. As a result, all options would be likely to have a negligible impact in regard to housing.

**D.1.12 SA Objective 11: Equality**

Option Number	1	2	3	4	5
SA Objective 11	+	+	+	+	+

D.1.12.1 The Index of Multiple Deprivation (IMD)<sup>2</sup> is the official measure of relative deprivation for Lower Super Output Areas (LSOAs)<sup>3</sup> in England. Out of 317 Local Authorities in England, Dudley is ranked as the 91<sup>st</sup> most deprived, Sandwell 12<sup>th</sup>, Walsall 25<sup>th</sup> and Wolverhampton 24<sup>th</sup>. Overall, deprivation is high across the Black Country, with 21 of the LSOAs in Dudley, 36 in Sandwell, 42 in Walsall and 33 in Wolverhampton ranked among the 10% most deprived in England.

<sup>2</sup> MHCLG (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date Accessed: 17/12/19]

<sup>3</sup> DCLG (2016) The English Indices of Deprivation 2015 – Frequently Asked Questions (see question 11. What is a Lower-layer Super Output Area/neighbourhood/small area?). Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/579151/English\\_Indices\\_of\\_Deprivation\\_2015\\_-\\_Frequently\\_Asked\\_Questions\\_Dec\\_2016.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/579151/English_Indices_of_Deprivation_2015_-_Frequently_Asked_Questions_Dec_2016.pdf) [Date Accessed: 19/12/19]

<sup>4</sup> Black Country Consortium (2019) The English Indices of Deprivation 2019. Available at: <https://www.the-blackcountry.com/upload/BC%20IMD%202019.pdf> [Date Accessed: 17/12/19]



D.1.12.2 Location based equality appraisals have not been undertaken at this stage of the process as the exact location of development is uncertain. This will be considered in more detail through the appraisal of spatial distribution and reasonable alternative sites once more detail is known regarding locations.

D.1.12.3 All five of the employment options would be likely to increase the provision of employment floorspace across the Plan area. This would be likely to result in the provision of a variety of employment opportunities for residents in the Black Country. Therefore, the five employment options would be likely to have a minor positive impact on equality. Employment Option 5 proposes the largest quantity of employment floorspace across the Plan area, and as such, would be likely to provide the largest variety of employment opportunities. As a result, this option could potentially result in the largest positive impact on equality.

**D.1.13 SA Objective 12: Health**

Option Number	1	2	3	4	5
SA Objective 12	0	0	0	0	0

D.1.13.1 There are four NHS hospitals with A&E departments located within the Black Country; Russells Hall Hospital in Dudley, Sandwell General Hospital in Sandwell, Manor Hospital in Walsall and New Cross Hospital in Wolverhampton. In addition, there are a number of GP surgeries and leisure centres located across the Plan area, as well as good access to an extensive network of PRow and cycle paths, which encourage physical exercise and boost mental wellbeing.

D.1.13.2 The five employment options would not be expected to increase the provision of healthcare facilities across the Plan area. It is also assumed that future employment development would not result in the loss of healthcare facilities. As a result, all options would be likely to have a negligible impact in regard to human health.

**D.1.14 SA Objective 13: Economy**

Option Number	1	2	3	4	5
SA Objective 13	+	+	++	++	++

D.1.14.1 There is a requirement for the development of 537ha of employment floorspace<sup>5</sup> over the Plan period in the Black County.

D.1.14.2 Employment Options 1 and 2 would not be expected to meet the identified need for employment floorspace over the Plan period. As such, a minor positive impact would be anticipated. The proposed quantity of development under Employment Options 3, 4 and 5 would be expected to meet this requirement, and as a result, have a major positive impact on employment floorspace provision.

**D.1.15 SA Objective 14: Education**

Option Number	1	2	3	4	5
SA Objective 14	0	0	0	0	0

D.1.15.1 There are a number of primary and secondary schools located across the Plan area. The five employment options would not be expected to increase the provision of educational facilities across the Plan area. It is also assumed that future employment development would not result in the loss of primary or secondary schools. As a result, all options would be likely to have a negligible impact in regard to education.

<sup>5</sup> Economic Development Needs Assessment Stage 1 (May 2017). Available at <https://blackcountryplan.dudlev.gov.uk/media/11530/black-country-edna-stage-1-report.pdf>

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# Appendix E: Spatial Option Assessments

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# E.1 Overview

## E.1.1 Introduction

E.1.1.1 **Table E.1.1** below outlines the eleven spatial options considered by the Councils. Each option has been assessed for its likely sustainability impacts, a summary of which is presented in **Table E.1.2**. Full explanations and reasonings behind each overall ‘score’ outlined in **Table E.1.2** are set out per SA Objective in the following sections of this appendix.

E.1.1.2 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by the BCA, as well as expert judgement.

E.1.1.3 In order to identify the best performing spatial option, a ranking exercise has been carried out to determine the most sustainable options under each SA Objective. The ranking exercise considered the findings of the SA as presented below, as well as applying local knowledge and expert judgement. This is therefore a subjective exercise and should not be relied upon alone in determining likely sustainability impacts.

E.1.1.4 **Tables E.2.1 – E.2.14** present the likely overall SA impacts (as per **Table E.1.2**), alongside the identified rank, with 1 being the best performing and 11 being the least suitable for delivering sustainable development compared to the other options, with respect to that particular objective. The accompanying narrative explains how these ranks have been determined.

E.1.1.5 An overview of the spatial options assessments and methodology is presented in **Chapter 4** of the main SA report.

**Table E.1.1: Black Country Spatial Options**

Spatial Option	Description of Spatial Option
<b>Option A</b>	Business as Usual – Retain current housing and employment allocations
<b>Option A1</b>	Employment-led growth - Business as Usual plus employment-led green belt releases
<b>Option B</b>	Reconfigure uses in the Urban Area to Promote Mixed Use and Local Employment – Retain more local employment land, intensify existing employment areas and explore potential to changes uses in Strategic and Town Centres
<b>Option C</b>	Maximise Densities and Invest in Services to reduce climate change impacts – Increase densities to 50 dph / 200 dph in Centres and invest to fill gaps in residential services (schools, GPs, fresh food, employment)
<b>Option D</b>	Market-Led – Allocate housing in high demand areas and employment land in most attractive commercial locations
<b>Option E</b>	Open Space Protection / Health Promotion - Protect publicly accessible open space within the urban area and create new open space to serve developments, as this is more functional for local communities than Green Belt
<b>Option F1</b>	Green Belt and Landscape Character Protection - Protect all areas of highest Green Belt harm and landscape sensitivity, regardless of potential positive sustainability impact of development in these locations
<b>Option F2</b>	Green Belt Protection – Protect all areas of highest Green Belt harm
<b>Option G</b>	Garden Village / urban greening to adapt to climate change - Lower density, mixed use development on larger sites (Key Large Sites?) with more open space which supports the Nature Recovery Strategy (funded by Biodiversity Net Gain) and flood risk mitigation and more on-site residential services
<b>Option H</b>	Maximise Sustainable Access to reduce climate change impacts - Only build housing in locations with highest levels of sustainable transport access to residential services (schools, GPs, fresh food, employment) and only locate new employment land where good public transport access
<b>Option J</b>	Balanced Growth

**Table E.1.2:** Impact matrix of all spatial option assessments

Spatial Option	A	A1	B	C	D	E	F1	F2	G	H	J
Description	Business as Usual	Employment-led growth	Reconfigure uses in the Urban Area	Maximise Densities and Invest in Services	Market-Led	Open Space Protection / Health Promotion	Green Belt and Landscape Character Protection	Green Belt Protection	Garden Village / urban greening	Maximise Sustainable Access	Balanced Growth
SA Objective 1 Cultural Heritage	O	-	O	-	-	O	-	-	O	-	O
Objective 2 Landscape	O	-	+	-	-	+	+	+	-	-	+
Objective 3 Biodiversity & Geodiversity	+	-	+	+	+	+	-	-	+	+	+
Objective 4 Climate Change Mitigation	+	-	+	+	+	+	-	-	+	+	+
Objective 5 Climate Change Adaptation	+	-	+	+	+	+	-	-	O	+	O
Objective 6 Natural Resources	+	-	+	+	+	O	-	-	-	+	O
Objective 7 Pollution	-	-	-	-	-	+	O	O	+	-	O
Objective 8 Waste	+/-	+/-	-	-	-	-	-	-	-	-	-
Objective 9 Transport	-	-	+	+	-	+	-	-	O	+	+
Objective 10 Housing	-	-	-	+	-	-	-	-	+	+	+
Objective 11 Equality	-	-	+	-	-	+	-	-	+	+	+
Objective 12 Health	+	+	-	-	+	+	O	O	+	-	O
Objective 13 Economy	--	-	+	+	+	-	-	-	-	+	+
Objective 14 Education	-	-	-	+	-	-	-	-	+	+	+

## E.2 SA Objective 1: Cultural Heritage

### E.2.1 Assessment

- E.2.1.1 There are eleven Registered Parks and Gardens (RPG), 27 Scheduled Monuments (SM), ten Grade I Listed Buildings, 57 Grade II\* Listed Buildings and 944 Grade II Listed Buildings located within the Plan area. The Black Country Historic Landscape Characterisation Study<sup>1</sup> identifies 103 Historic Environment Area designations within, or partially within the Black Country Green Belt. The nature of development will determine the extent to which heritage assets would be affected by future proposals.
- E.2.1.2 The Black Country was awarded UNESCO Global Geopark status on the 10<sup>th</sup> July 2020, the UK's eighth Geopark<sup>2</sup>. This is the world's first designated industrial landscape and emphasises the importance of the area's cultural heritage. The Black Country was the centre of the Industrial Revolution and contains many historic features and colourful stories.
- E.2.1.3 **Spatial Option C** aims to maximise housing density in areas with high accessibility, up to 200 dwellings per hectare in town centres. Similarly, under **Spatial Option H**, development would be directed towards centres where the Accessibility Modelling<sup>3</sup> has identified good access to public transport links. The majority of heritage assets in the Black Country are located within the town centres of Wolverhampton, Walsall, Dudley, Stourbridge, Oldbury and West Bromwich. Many heritage assets can be found in areas with high accessibility, including town centres. They often make an important contribution to the sense of place and can play an important role when considering sustainable development proposals through the BCP. For example, Willenhall has an intact historic village centre with potential to be revived to form the vibrant core of a compact urban quarter<sup>4</sup>.
- E.2.1.4 Without careful consideration of design principles in such areas, development associated with **Spatial Options C** and **H** could cause adverse impacts on urban heritage assets. Good design principles and appropriate masterplanning that captures local distinctiveness and identifies historic features that are valued by local people can help to shape development so

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<sup>1</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study Final Report. Available at: [https://blackcountryplan.dudley.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf) [Date Accessed: 05/02/21]

<sup>2</sup> Black Country Geopark (2020) Black Country Geopark. Available at: <https://blackcountrygeopark.dudley.gov.uk/about/> [Date Accessed: 05/02/21]

<sup>3</sup> Unpublished data provided to Lepus by the BCA

<sup>4</sup> Black Country Local Economic Partnership (2015) Black Country Garden City: Prospectus for house builders and investors. Available at: [https://www.blackcountrylep.co.uk/upload/files/GardenCity/bcgc\\_brochure\\_FINAL.pdf](https://www.blackcountrylep.co.uk/upload/files/GardenCity/bcgc_brochure_FINAL.pdf) [Date Accessed: 27/08/20]



that it is sustainable. The ‘Building Better, Building Beautiful’ principles<sup>5</sup> as well as the Black Country Garden City principles<sup>6</sup> are both useful in this respect.

- E.2.1.5 Development at higher density may include taller buildings in some locations. The development of tall buildings can significantly alter the image, character and identity of towns and cities<sup>7</sup>. In appropriate locations the development of tall buildings can have a positive contribution to the urban landscape; however, if not in the right place, by virtue of the size of the building, taller developments could potentially harm key aspects of the historic environment that are valued. There would be opportunities to ensure development under **Spatial Options C** and **H** are considerate of the surrounding built form, and to ensure tall buildings make a contribution to the overall vision of a place. However, as the location and type of development is currently unknown, a minor adverse impact on cultural heritage cannot be ruled out under these two options. These two options would be likely to direct development to the urban centre where there is the greatest risk of resulting in significant harm to a nearby heritage asset. As **Spatial Option C** would be likely to result in the greatest increase in density, this has been identified as the least sustainable option.
- E.2.1.6 **Spatial Option D** seeks to allocate development towards high-demand areas as indicated by the emerging Viability and Deliverability Study. Similarly to **Options C** and **H** discussed above, it is likely that this would result in higher density development in certain areas within the Black Country. This option could potentially result in development being directed towards areas where high density development may be unsympathetic to surrounding heritage assets and result in localised negative impacts on the historic environment. However, by directing development towards desirable market areas it is anticipated that **Spatial Option D** would perform slightly better in comparison to **Options C** and **H**, because it is likely that development would be in keeping with the current land uses in these areas.
- E.2.1.7 Green Belt within the Plan area is generally located around the edges of the urban areas of the four authorities, with Walsall having the greatest proportion of Green Belt land. There are some heritage assets located within the Green Belt, but these are primarily located close to the urban edge. Parcels of Green Belt which have been identified as resulting in the highest Green Belt or landscape harm, should they be developed, are most often located away from the urban edge. As such, the proposed development under **Spatial Options F1** and **F2** is likely to be directed towards the urban edge and associated heritage assets, and

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<sup>5</sup> MHCLG (2020) Living with Beauty: Promoting health, well-being and sustainable growth: The report of the Building Better, Building Beautiful Commission. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/861832/Living\\_with\\_beauty\\_BBBC\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/861832/Living_with_beauty_BBBC_report.pdf) [Date Accessed: 05/02/21]

<sup>6</sup> Black Country Local Economic Partnership (2015) Black Country Garden City: Prospectus for house builders and investors. Available at: [https://www.blackcountrylep.co.uk/upload/files/GardenCity/bcac\\_brochure\\_FINAL.pdf](https://www.blackcountrylep.co.uk/upload/files/GardenCity/bcac_brochure_FINAL.pdf) [Date Accessed: 05/02/21]

<sup>7</sup> Historic England (2015) Tall Buildings: Historic England Advice Note 4. Available at: <https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/hea037-tall-buildings/> [Date Accessed: 05/02/21]

therefore, these two options could potentially have a minor negative impact on cultural heritage. As **Spatial Option F2** seeks to protect more land from development than **Option F1**, this would be likely to have more positive impacts on cultural heritage assets.

- E.2.1.8 **Spatial Option A1** seeks to convert existing employment sites into residential development but would also replace the lost employment land within the Green Belt. Redevelopment of urban employment sites into residential use would not be expected to significantly alter the existing built environment or significantly impact heritage assets. However, development on greenfield land within the Green Belt could potentially result in adverse impacts on surrounding heritage assets by altering the existing setting. Overall, a minor negative impact would be expected under this option and is ranked sixth.
- E.2.1.9 **Spatial Option J** combines various aspects of the other ten spatial options. The option aims to release surplus open space within the urban area for development. The development of previously undeveloped land within urban centres could potentially result in adverse impacts on surrounding heritage assets, as development would be likely to alter the setting of the area. Another key aim of **Spatial Option J** is to avoid the release of land identified as high Green Belt harm and high landscape sensitivity. By protecting sensitive landscape areas, this spatial option is likely to protect associated heritage assets within the Green Belt. The option also supports increased dwelling densities where the “*local character allows*”, ensuring development takes into consideration the surrounding historic environment. On balance, this option would be expected to have a negligible impact on cultural heritage. Growth under this option still presents a risk of adverse impacts to some extent, and therefore, is ranked fifth.
- E.2.1.10 **Spatial Option B** seeks to intensify under-utilised and vacant space within town centres. Utilising vacant space would introduce new built form. Any proposals for development at these locations will need to carefully consider how new development will best fit with the existing built form or if development is inappropriate due to irreversible impacts on cultural heritage. In considering design aspirations, the principles of the 2020 ‘Building Better, Building Beautiful’ report<sup>8</sup> should be embraced. There are three pillars to the approach advocated in this report: “*ask for beauty, refuse ugliness and promote stewardship*”. It is not possible to determine specific impacts on cultural heritage at each location until these are properly understood and potential allocations have been identified. If the ‘Building Better, Building Beautiful’ principles can be followed, **Spatial Option B** could potentially result in a negligible impact on cultural heritage. Similarly, there could be opportunities to facilitate positive effects, especially if cultural heritage features are carefully factored into the public realm to emulate a sense of civic pride and raise awareness of the feature in question. As

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<sup>8</sup> MHCLG (2020) Living with Beauty: Promoting health, well-being and sustainable growth: The report of the Building Better, Building Beautiful Commission. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/861832/Living\\_with\\_beauty\\_BBBBC\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/861832/Living_with_beauty_BBBBC_report.pdf) [Date Accessed: 05/02/21]

this option could potentially result in the redevelopment of under-utilised spaces and lead to an increased density in urban centres, this has been identified as the next best performing option.

- E.2.1.11 **Spatial Option A** would require changing the use of existing employment land into residential development. This option would promote the development of previously developed sites. Development on brownfield land would be expected to result in reduced adverse impacts on cultural heritage features in comparison to development on greenfield land, as the development would be likely to be in-keeping with the existing built environment. The Urban Capacity Review<sup>9</sup> identifies that following a review of the housing allocations on occupied employment land in the adopted Core Strategy, of 145 site allocations, 56 are now suitable for housing development, covering 165ha and totalling 5,224 homes. The development of 5,224 homes on previously developed land would help to reduce the impact on surrounding heritage assets, and therefore, a negligible impact could be likely as a result of **Spatial Option A**. There is likely to be some opportunity to improve the character of the built form during the redevelopment of employment land to residential use, and therefore, this option has been identified as the next best performing.
- E.2.1.12 **Spatial Option G** aims to deliver 20% biodiversity net gain on Green Belt land released for development and would direct some development towards a Garden Village. A new Garden Village would be expected to require a large area of land and would include residential development as well as other services such as schools, shops and GP surgeries. To ensure effective design and layout of this development, detailed masterplanning would be required. This process would be expected to have benefits to the local environment by directing development away from designated features of the historic environment and ensuring development does not adversely impact surrounding heritage assets or their setting. Overall, a negligible impact on cultural heritage under **Spatial Option G** would be expected and has been identified as the second-best performing option.
- E.2.1.13 Open spaces are defined as *“all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity”* within the NPPF<sup>10</sup>. Under **Spatial Option E**, open spaces would be protected from future development. Several open spaces coincide with RPGs or SMs within the Black Country. This includes ‘Dartmouth Park’ RPG in Sandwell, ‘West Park’ RPG in Wolverhampton, ‘Walsall Arboretum’ RPG in Walsall and ‘Lime working remains in Dudley’ SM. Development within current open spaces

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<sup>9</sup> Black Country Authorities (2019) Black Country Urban Capacity Review, December 2019. Available at: <https://blackcountryplan.dudley.gov.uk/media/13807/bc-urban-capacity-review-update-final-december-2019.pdf> [Date Accessed: 06/01/21]

<sup>10</sup> MHCLG (2019) National Planning Policy Framework. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf) [Date Accessed: 05/02/21]

could potentially adversely impact the setting of nearby heritage assets, as well as the wider green infrastructure network which can sometime provide opportunities to conserve elements of the historic landscape. Under this option it is uncertain if future development would result in adverse impacts on heritage assets situated near to open spaces as the scale and type of development is unknown. Overall, a negligible impact could be expected under this option. **Spatial Option E** has been identified as the best performing option as it seeks to protect open spaces, some of which are associated with heritage assets.

**E.2.2 Rank**

- E.2.2.1 Adverse impacts are predicted in association with **Spatial Options A1, C, D, F1, F2** and **H**, largely due to the likelihood of impacts on the character and setting of the historic environment as a result of development in these broad locations.
- E.2.2.2 **Spatial Options A, B, E, G** and **J** are unlikely to result in significant adverse effects on the cultural heritage of the Black Country as they present more opportunities to avoid or mitigate harm to the historic environment.
- E.2.2.3 Overall, **Spatial Option C** is considered to be the worst performing option for cultural heritage whilst **Option E** is the best performing spatial option (see **Table E.2.1**).

*Table E.2.1: Ranking of Spatial Options under SA Objective 1 – Cultural Heritage*

SA Objective 1 – Cultural Heritage	Spatial Option										
	A	A1	B	C	D	E	F1	F2	G	H	J
SA Score	0	-	0	-	-	0	-	-	0	-	0
Rank	3	6	4	11	9	1	8	7	2	10	5

## E.3 SA Objective 2: Landscape

### E.3.1 Assessment

- E.3.1.1 Although the Black Country is primarily thought of as an urban landscape, approximately 20% of the Black Country is Green Belt<sup>11</sup>, which in some areas provides important green spaces that serve to protect the character and setting of towns and supports landscape-scale biodiversity networks. Within the urban areas there is also a number of notable landscape features such as the Barr Beacon, Iron Age hillforts and the network of canals and waterways<sup>12</sup>.
- E.3.1.2 The extent to which landscape impacts are likely to emerge will depend on the size, nature and location of the proposed development. Some parts of the Black Country would benefit from gentrification, especially if the proposals are designed through engagement and support of local communities. Some parts of the Black Country have begun to lose distinctiveness, for example in areas where an assortment of fast-food stores line streets that lack trees and are dominated by cars.
- E.3.1.3 Other parts of the Black Country have outstanding industrial architecture that provides a very specific and distinctive post-19<sup>th</sup> and 20<sup>th</sup> century industrial aesthetic that is associated with the very name of the Black Country. In places, the industrial heritage has been transformed by a process of land reclamation and suburbanisation. Large residential neighbourhoods (many council-built) have been laid out over old mines, collieries and farms<sup>13</sup>.
- E.3.1.4 Although both **Spatial Options A** and **A1** seek to convert existing employment sites into residential development, **Option A1** aims to transfer the lost employment land to locations in the Green Belt. Redevelopment of the urban employment sites into residential sites under both options would not be expected to significantly alter the existing townscape. However, employment development directed towards the Green Belt under **Option A1** would be likely to have an adverse impact on the landscape and alter existing views of the surrounding countryside and open spaces. It is not possible to forecast the full and precise extent of these impacts until more detail is available for the potential allocations in the Green Belt such as their size, nature and location. It is likely that a range of minor and possibly major adverse landscape impacts might arise from new development located in the Green Belt. **Spatial**

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<sup>11</sup> Land Use Consulting (2019) Black Country Green Belt Study – Stage 1 and 2 Report. Available at: [https://blackcountryplan.dudley.gov.uk/media/13882/bcqb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13882/bcqb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced_redacted.pdf) [Date Accessed: 08/02/21]

<sup>12</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: [https://archaeologydataservice.ac.uk/catalogue/adsdata/arch-939-1/dissemination/pdf/BCHLC\\_FullRpt.pdf](https://archaeologydataservice.ac.uk/catalogue/adsdata/arch-939-1/dissemination/pdf/BCHLC_FullRpt.pdf) [Date Accessed: 08/02/21]

<sup>13</sup> Distinctly Black Country (2011) A network for understanding yesterday's landscape today. Available at: <https://distinctlyblackcountry.wordpress.com/landscape/> [Date Accessed: 05/02/21]

**Option A1** has therefore been identified as the least sustainable option in relation to landscape.

E.3.1.5 Under **Spatial Option G**, some development would be directed towards a Garden Village, and biodiversity net gain of 20% would be required on all Green Belt sites. A Garden Village would be likely to be directed towards the edge of the Black Country in a predominantly rural location. The construction of a Garden Village could potentially significantly change existing landscape features and lead to adverse effects in areas of the landscape with lower carrying capacities and higher sensitivity to change. Such areas have been identified through the Landscape Sensitivity Study<sup>14</sup>. It is possible that distinctive and long-distance countryside views would be altered, including views experienced by local residents and users of the PRow network. Although there may be some scope within larger developments to reduce the impact on the local landscape and important views, **Spatial Option G** could potentially have a minor negative impact on the local landscape. This has therefore been identified as the second least sustainable option in relation to landscape.

E.3.1.6 **Spatial Options C** and **H** propose to direct high density development towards urban areas across the Black Country in order to reduce the number of locations at which development takes place. Higher density developments, especially those which include taller buildings, are more likely to alter views of, or from, sensitive and important landscape features. A strong and carefully planned design approach, potentially on a strategic scale, would be required to help overcome identified adverse effects on landscapes, their distinctive features and the impacts on the people who benefit from these views. Overall, a minor negative impact would be expected for these two options. **Spatial Option H** would be expected to perform slightly better out of the two, as **Option C** seeks to direct all development to high densities, whereas **Option H** is likely to deliver a smaller proportion, although this is not certain.

E.3.1.7 **Spatial Option D** seeks to allocate development towards high-demand areas as indicated by the emerging Viability and Deliverability Study. By focusing development only towards the most desirable market areas, this option would not necessarily take into consideration the potential for adverse impacts on important landscape features and may result in higher density development in these areas. Therefore, this option could potentially result in a minor negative impact on the landscape by putting increased pressure on local landscapes and resulting in development of inappropriate scale or density. Conversely, **Option D** could also help to ensure that development is in keeping with the current appearance of an area, by delivering development of a similar land use to the existing development (i.e. housing development in popular residential areas, and employment development within desirable

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<sup>14</sup> Land Use Consultants (2019) Black Country Landscape Sensitivity Assessment. Available at: [https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf) [Date Accessed: 05/02/21]

employment sites). Therefore, overall **Spatial Option D** is considered to perform slightly better than **Options C** or **H**.

- E.3.1.8 The key aim of **Spatial Option A** is to convert existing employment land into residential development. Changing land use from employment to residential can have minimal landscape impacts so long as the design of the residential realm, architecture, shape and overall feel for the location embraces existing employment fabric when that fabric represents iconic post-industrial landmarks and neighbourhood distinctiveness. Development on brownfield land would be expected to result in lesser adverse impacts than those that might be expected on greenfield land because greenfield locations, overall, tend to be more sensitive to change. Modifying built form where houses or offices already occupy the immediate landscape tends to accommodate change better than new houses in a field with diverse natural features, for example hedges, mature trees, wildflowers, ponds and watercourses. **Spatial Option A** is therefore not expected to significantly alter the local townscape or landscape. So long as design components are carefully factored into the transition, a negligible impact could be expected.
- E.3.1.9 **Spatial Options F1** and **F2** would direct some development towards the Green Belt. **Option F1** protects Green Belt land of both highest Green Belt harm and highest landscape sensitivity, whereas **Option F2** protects all land of highest Green Belt harm. As **Option F1** aims to protect land identified as being of highest landscape sensitivity and **Option F2** protects the greatest quantity of Green Belt land, both options would be likely to protect some areas of the local landscape but would also direct a proportion of development toward Green Belt parcels at the urban edge, which could potentially alter views of the open countryside from some locations. Despite this, the protection of landscape in this way is a positive means of helping to deliver sustainable development as it would safeguard the most sensitive parcels of land. Overall, **Spatial Options F1** and **F2** could potentially have positive impacts in regard to landscape. As **Spatial Option F2** seeks to protect more land in the Green Belt, this option would be likely to result in more positive effects out of the two.
- E.3.1.10 **Spatial Option J** combines aspects of the other ten spatial options. The option aims to release surplus open space for development, avoid the release of Green Belt land identified as high landscape sensitivity and increase dwelling densities where the “*local character allows*”. The development of surplus open space within the urban area may have an adverse impact on the local townscape. However, the spatial option would be expected to help protect the wider landscape of the Black Country and surrounding countryside views by protecting Green Belt of high landscape sensitivity and by ensuring development takes into consideration the surrounding landscape character. Overall, **Spatial Option J** would be likely to have a minor positive impact in relation to landscape. This option has been identified as the next best performing option as it seeks to avoid development on high sensitivity Green Belt land and seeks to ensure development proposals take into consideration the surrounding landscape character.

E.3.1.11 **Spatial Option E** seeks to protect open spaces from future development. Open space is beneficial to the local landscape by providing distinctive views of green space and natural features such as trees and lakes, which help to define local character whilst also delivering benefits to mental health and wellbeing. The provision of new open and green spaces can also help create attractive places to live and strengthen sense of place. Protecting these spaces under **Option E** would be expected to have a positive impact on the landscape. This option has been identified as the second-best performing option.

E.3.1.12 **Spatial Option B** seeks to intensify under-utilised and vacant space within town centres. Under **Option B**, there could be potential for small-scale transformations of local neighbourhoods in the Black Country that currently lack identity. Overall, this option would be likely to have a minor positive impact in regard to landscape. **Spatial Option B** has been identified as the best performing option as it would be expected to provide the greatest opportunity to improve the landscape.

### E.3.2 Rank

E.3.2.1 The assessment above has identified adverse impacts on the landscape as a result of **Spatial Options A1, C, D, G and H**. This is largely due to the potential for adverse impacts on sensitive landscapes and features within the Black Country associated with development in these broad locations.

E.3.2.2 Development under **Spatial Option A** would be unlikely to significantly affect the landscape as this option involves changing uses of existing development.

E.3.2.3 **Spatial Options B, E, F1, F2 and J** are considered to contribute towards sustainable development in a positive way, through directing development towards areas of lower sensitivity and promoting open spaces.

E.3.2.4 **Spatial Option A1** is the worst performing option for landscape whilst **Option B** is the best performing spatial option (see **Table E.2.2**).

**Table E.3.1: Ranking of Spatial Options under SA Objective 2 – Landscape**

SA Objective 2 – Landscape	Spatial Option										
	A	A1	B	C	D	E	F1	F2	G	H	J
SA Score	0	-	+	-	-	+	+	+	-	-	+
Rank	6	11	1	9	7	2	5	4	10	8	3



## E.4 SA Objective 3: Biodiversity & Geodiversity

### E.4.1 Assessment

- E.4.1.1 Approximately 7.4km north of Walsall is Cannock Chase Special Area of Conservation (SAC), a large, diverse area of semi-natural vegetation comprising the most extensive area of lowland heathland in the midlands. The SAC is vulnerable to the effects of excessive atmospheric nitrogen deposition, a form of air pollution that arises from road transport.
- E.4.1.2 There are two SACs located within the Plan area: ‘Fens Pools’ and ‘Cannock Extension Canal’. Threats and pressures which could potentially be exacerbated by development set out in the BCP at Fens Pools SAC include habitat fragmentation and water pollution. Some threats and pressures to Cannock Extension Canal SAC include water pollution and air pollution.
- E.4.1.3 Potential adverse impacts on European sites following the development proposed under the eleven spatial options will be considered in a Habitats Regulations Assessment (HRA) in the context of the Birds and Habitats Directives. Some development proposals could potentially increase threats and pressures which could result in detrimental impacts at these sites and their qualifying features.
- E.4.1.4 There are 18 Sites of Special Scientific Interest (SSSIs) within the Plan area, all of which are located within Dudley and Walsall district boundaries. These include the Leasowes SSSI, Clayhanger SSSI and Jockey Fields SSSI. There are two National Nature Reserves (NNRs) located in close proximity to the Plan area; Wren’s Nest NNR, located to the north of Dudley, and Sutton Park NNR, located adjacent to Walsall’s district boundary with Birmingham.
- E.4.1.5 The Black Country became a UNESCO Global Geopark 10<sup>th</sup> July 2020<sup>15</sup>. A number of SSSIs and SINCs across the Plan area have been designated for their geological importance. In addition, there are numerous Geosites, such as Wren’s Nest National Nature Reserve containing fossils and other rare geodiversity features<sup>16</sup>.
- E.4.1.6 An ecological evaluation of the Green Belt within the Black Country has been undertaken<sup>17</sup> and highlights the ecological value of the Green Belt. Approximately 2,362ha of Green Belt

<sup>15</sup> Black Country Geopark (2020) Black Country Geopark. Available at: <https://blackcountrygeopark.dudley.gov.uk/about/> [Date Accessed: 09/02/21]

<sup>16</sup> Black Country Geopark (no date) The Black Country’s Unique Landscapes at a Glance. Available at: <https://www.dudley.gov.uk/media/5107/leaflet-web-version-final.pdf> [Date Accessed: 09/02/21]

<sup>17</sup> EcoRecord (2019) An Ecological Evaluation of the Black Country Green Belt (2019). Available at: <https://blackcountryplan.dudley.gov.uk/media/13896/an-ecological-evaluation-of-the-black-country-green-belt-final-report-2019-redacted.pdf> [Date Accessed: 09/02/21]

land has been identified as being of ‘very high’ ecological value. The Black Country Green Belt also forms a core component of the wider ecological network within the Plan area.

- E.4.1.7 **Spatial Options F1 and F2** both aim to protect some areas of the Green Belt from development. **Spatial Option F1** protects Green Belt land of both highest Green Belt harm and landscape sensitivity, whereas **Spatial Option F2** protects all land of highest Green Belt harm. Green Belt land is typically previously undeveloped land with several important biodiversity features. The Green Belt forms a significant part of the Birmingham and Black Country Nature Recovery Network<sup>18</sup> and any loss of this biodiversity resource needs to be avoided to facilitate sustainable development. The aim of the recovery network is to reverse the decline in wildlife and biodiversity and to move the focus from individual sites and ‘biodiversity hotspots’ to a more comprehensive landscape-scale approach.
- E.4.1.8 As a minimum, there should be no net loss to the biodiversity network, the species diversity or habitat diversity. Emerging government policy on net gain is likely to see a commitment to at least a 10% gain in biodiversity, measured using the biodiversity metric<sup>19</sup>. Both of these options are likely to lead to adverse effects on biodiversity and a carefully planned strategic approach to mitigation will be essential to meet the requirement of no net loss as well as demonstrating a net gain for biodiversity. As **Spatial Option F2** seeks to protect more Green Belt land than **Option F1**, **Spatial Option F1** would be likely to be the least sustainable option.
- E.4.1.9 **Spatial Option A1** seeks to convert existing employment land into residential development and transfer existing employment land towards the Green Belt. Redevelopment of the urban employment sites into residential use would not be expected to significantly alter the existing ecological network within the Black County. However, by directing some employment development to the Green Belt, this option would be likely to result in the loss of some biodiversity features and ecologically important soil. A minor negative impact would therefore be expected in relation to biodiversity.
- E.4.1.10 **Spatial Option G** seeks to direct some development towards a Garden Village and ensure biodiversity net gain of 20% on all Green Belt sites. A Garden Village would be likely to be directed towards the edge of the Black County on predominantly previously undeveloped land. The construction of a Garden Village would be expected to result in the loss of some biodiversity features, however, the 20% biodiversity net gain principle and the commitment to supporting the Nature Recovery Network are likely to deliver positive effects in the long term. By promoting lower density development and protecting open space in urban areas,

<sup>18</sup> Wildlife Trust for Birmingham and Black Country (2017) Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017 – 2022. Available at: <https://www.bbcwildlife.org.uk/sites/default/files/2018-10/NIA%20Ecological%20Strategy%202017-22%20Summary.pdf> [Date Accessed: 08/02/21]

<sup>19</sup> Defra (2020) Environment Bill 2019-21: Bill 220 2019-21 (as amended in Committee). Available at: <https://services.parliament.uk/bills/2019-21/environment.html> [Date Accessed: 08/02/21]

this option would indirectly result in the loss of larger quantities of greenfield land, and therefore, has been ranked eighth.

- E.4.1.11 **Spatial Option B** seeks to intensify under-utilised and vacant space within town centres. This option would be likely to reduce the quantity of new land for development required in order to meet the identified housing and employment needs. Therefore, this option would be likely to help protect previously undeveloped land and have a minor positive impact on local biodiversity, so long as the ecological network is structured to provide habitat connectivity, food sources and conditions for successful breeding. Species that rely on so-called ‘vacant space’ such as the aptly named house sparrow have almost become extinct from former urban areas where they can no longer rely on grain spillages and small-scale vegetation patches that provide shelter and food<sup>20</sup>. The house sparrow is a Bird of Conservation Concern on the RSPB’s red list.
- E.4.1.12 Similarly, **Spatial Option A** would require converting existing employment land into residential development. This option would promote the development of previously developed sites and as such, would be likely to protect biodiversity features on greenfield land. The redevelopment of existing employment land to residential use would be unlikely to result in direct loss of habitats, however, if these sites are located nearby to sensitive habitats, the introduction of residents to these areas could potentially increase recreation and disturbance pressures on biodiversity sites. Nevertheless, this option would be likely to help protect previously undeveloped land and have a minor positive impact on local biodiversity. **Option A** is considered to perform slightly better than **Option B**, as it would be expected to protect more biodiversity features within under-utilised urban spaces.
- E.4.1.13 **Spatial Options C and H** both seek to deliver development at higher densities. Higher density developments would help to reduce the amount of land lost to development in the Plan area. This would also help to reduce the amount of vegetation cover lost and, in that sense, both spatial options would be likely to have a positive impact on local biodiversity.
- E.4.1.14 **Spatial Option D** seeks to allocate development towards high-demand areas as indicated by the emerging Viability and Deliverability Study. Although the precise locations of development under this option are uncertain at the time of writing, it is anticipated that this would result in higher density development in existing urban areas. **Option D** could potentially lead to some localised impacts on biodiversity but reduce the overall amount of land lost to development. Assuming this option would result in the protection of greenfield land and biodiversity networks in the Green Belt, overall a minor positive impact would be expected.

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<sup>20</sup> De Laet & Summers-Smith (2007) The status of the urban house sparrow *Passer domesticus* in north-western Europe: a review. *Journal of Ornithology* volume 148, pages 275–278 (2007)

- E.4.1.15 **Options C, H and D** would therefore all be expected to put increased pressure on open spaces within urban areas, with **Option C** considered to perform best of the three in terms of biodiversity by promoting the highest densities and subsequently resulting in the least amount of land lost to development, followed by **Option H** and **Option D**, where the impacts are potentially more widespread
- E.4.1.16 **Spatial Option J** combines various aspects of the other ten spatial options. The option aims to release surplus open space for development. The development of previously undeveloped land would be expected to result in the loss of some biodiversity features within open spaces and could potentially have adverse impacts on the wider ecological network. However, the option also seeks to ensure new development provides open space in order to support the Black Country's Nature Recovery Network. Another key aim of **Spatial Option J** is to avoid the release of Green Belt land of the highest Green Belt harm and landscape sensitivity. This option also supports an increase in dwelling densities, which would be likely to reduce the amount of land required in order to meet the identified housing and employment need. Overall, this option would be likely to result in a complex series of impacts, some of which are negative and short term, whilst commitment to the nature recovery network and biodiversity net gain should yield positive long-term effects. On balance, **Option J** is ranked second-best, as the option seeks to take account of important environmental constraints when determining locations for development.
- E.4.1.17 **Spatial Option E** seeks to protect open spaces from future development. Open space is beneficial to the local biodiversity network by providing an increased number of semi-natural habitats and green corridors in an otherwise highly urbanised area. The provision of open and green spaces would be expected to help maintain and enhance natural habitats and support ecosystem services. Protecting these spaces under **Spatial Option E** would be expected to have a minor positive impact on local biodiversity. By promoting the integration of open spaces within development and protection of existing open spaces, this option is considered to perform the best under this objective as it would be expected to provide the most opportunity for maintenance and enhancement of the ecological network, alongside development.
- E.4.2 Rank**
- E.4.2.1 Adverse impacts have been identified under **Spatial Options A1, F1 and F2**, largely associated with the promotion of development in the Green Belt resulting in likely losses and fragmentation of the ecological network.
- E.4.2.2 On the whole, **Spatial Options A, B, C, D, E, G, H and J** are likely to provide more opportunities to benefit biodiversity and geodiversity due to the protection of sensitive features, and delivery of development at higher densities in the existing urban area. There is very little difference identified between the performance of these options.

E.4.2.3 Overall, **Spatial Option F1** is considered to be the worst performing option for biodiversity and geodiversity whilst **Option E** is the best performing spatial option (see **Table E.2.3**).

**Table E.4.1:** Ranking of Spatial Options under SA Objective 3 – Biodiversity & Geodiversity

SA Objective 3 – Biodiversity & Geodiversity	Spatial Option										
	A	A1	B	C	D	E	F1	F2	G	H	J
SA Score	+	-	+	+	+	+	-	-	+	+	+
Rank	6	9	7	3	5	1	11	10	8	4	2

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

### E.5.1 Assessment

- E.5.1.1 The proposed development of up to 76,076 new dwellings identified as the local housing need for the plan area<sup>21</sup> would be expected to result in the loss of greenfield land and vegetation cover which have carbon storage capabilities. It would also be expected to result in an increase in carbon emissions due to the construction and occupation of development, including through an increase in the number of vehicles on the road which is a major source of greenhouse gases (GHGs).
- E.5.1.2 **Spatial Option A1** aims to convert existing employment land into housing, promoting an efficient use of land within the Black Country, in accordance with the NPPF. However, this option also directs replacement employment development towards the Green Belt. **Spatial Options F1** and **F2** would also direct some development to the Green Belt areas identified as having low Green Belt harm and low landscape sensitivity. Development in the Green Belt surrounding the urban areas would be likely to be situated away from existing bus routes and train stations, reducing employees' access to sustainable transport options and resulting in reliance on personal car use and longer travel times. Therefore, **Spatial Options A1, F1** and **F2** be likely to result in an overall negative impact in relation to climate change mitigation. As **Spatial Option F2** seeks to protect more land in the Green Belt, this option would be likely to result in lesser impacts than **Option F1** or **A1**.
- E.5.1.3 **Spatial Option E** aims to protect open space within the urban area and **Spatial Option G** seeks to deliver more open space. Open and green spaces can help urban areas adapt to the impacts of climate change, for example through the providing protection from extreme weather such as hotter summers<sup>22</sup>. Trees are important for shade provision and filtration of air pollution whilst water surfaces provide evaporative cooling. Open spaces and green infrastructure can thereby help to alleviate the 'urban heat island' effect. Therefore, **Spatial Options E** and **G** would be expected to have a positive impact on climate change. However, under these options, development may not be in the most sustainable locations. Spatial Option G would potentially deliver a proportion of development to a Garden Village, where it is assumed new facilities and employment opportunities would be provided alongside development, reducing the need to travel. Therefore, **Option G** is considered to perform slightly better than **Option E** overall.

<sup>21</sup> Black Country Plan Housing Evidence Base. Available at <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4c/>

<sup>22</sup> Environment Agency (2018) Climate change impacts and adaptation. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/758983/Climate\\_change\\_impacts\\_and\\_adaptation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/758983/Climate_change_impacts_and_adaptation.pdf) [Date Accessed: 09/02/21]

- E.5.1.4 **Spatial Option A** aims to change the use of existing employment land into residential development, and unlike **Option A1**, does not propose release of Green Belt. This option would promote the development of previously developed sites and be classed as an effective use of land. The Urban Capacity Review identifies that approximately 165ha of existing employment land could be developed into residential use, and therefore, a minor positive impact in relation to climate change mitigation would be likely.
- E.5.1.5 **Spatial Option B** seeks to intensify under-utilised and vacant space within town centres. This option would be likely to result in an efficient use of land, by reducing the quantity of land developed. The development of vacant or under-utilised employment land would also be expected to be within the town centres, where new residents would be likely to have good access to a range of public transport options rather than requiring personal car use. **Spatial Option B** would be likely to have a minor positive impact in relation to climate change mitigation, and would be expected to perform slightly better than **Option A**.
- E.5.1.6 **Spatial Options C and H** would include development at higher densities and seek to ensure that new residents are located in areas with sustainable access to services. Higher densities could potentially allow for more sustainable communities with more residents living in close proximity to services, facilities and public transport options, assuming there is sufficient capacity. New residents would be directed towards locations with excellent access to a wide variety of frequent and affordable public transport links. This will help to reduce their reliance on personal car use and thereby limit increases in road transport associated GHG emissions. Therefore, these two options would be expected to have a minor positive impact on carbon emissions.
- E.5.1.7 **Spatial Option D** seeks to allocate development towards high-demand areas as indicated by the emerging Viability and Deliverability Study. This could potentially result in higher density development in some areas, similarly to **Options C and H**, although under this option it is uncertain whether all development would be situated in areas with sustainable access to employment and facilities. Overall, a minor positive impact would be expected, however this option has more uncertainties in comparison to **Options C and H**, and therefore, is ranked fourth. **Spatial Option H** is ranked second as it seeks to “*maximise sustainable access to reduce climate change impacts*” and **Spatial Option C** is third as it would be expected to achieve this to a lesser extent.
- E.5.1.8 **Spatial Option J** takes into consideration some of the aspects of the other ten spatial options. The option aims to “*mitigate climate change impacts*”, however, further details are not provided at this stage. The option also seeks to ensure housing is of a high-quality design, which could potentially include ensuring energy efficient homes are provided. This option directs the majority of development towards the urban areas, and development within the Green Belt would only be located in areas with good sustainable access. This would be likely to help reduce reliance on personal car use. Therefore, this option could potentially have a minor positive impact in regard to climate change mitigation. Overall, this option is

considered to perform the best, as it strikes a balance between retaining valuable open spaces whilst also prioritising development in the most sustainable locations.

### E.5.2 Rank

- E.5.2.1 It is likely that the development proposed under all spatial options would result in mixed effects with regard to climate change mitigation.
- E.5.2.2 In general, options which would direct a large proportion of development to the Green Belt (**Spatial Options A1, F1 and F2**) are considered to have a minor negative impact under this objective overall, due to the loss of natural resources and likely reliance on less sustainable travel modes in these areas.
- E.5.2.3 In comparison, **Spatial Options A, B, C, D, E, G, H and J** could potentially result in positive impacts on climate change mitigation overall, as these options would seek to protect open spaces, limit the loss of greenfield land and/or ensure services and facilities are accessible via sustainable means.
- E.5.2.4 **Spatial Option A1** is the worst performing option for climate change mitigation whilst **Option J** is the best performing spatial option (see **Table E.2.4**).

**Table E.5.1: Ranking of Spatial Options under SA Objective 4 - Climate Change Mitigation**

SA Objective 4 – Climate Change Mitigation	Spatial Option										
	A	A1	B	C	D	E	F1	F2	G	H	J
SA Score	+	-	+	+	+	+	-	-	+	+	+
Rank	6	11	5	3	4	8	10	9	7	2	1



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

### E.6.1 Assessment

E.6.1.1 The Black Country is a predominantly urban area, and as such, many of the watercourses which pass through the area have been heavily modified. Watercourses that pass through the four districts include the River Tame, River Stour and Ford Brook. Fluvial flood risk in the Black Country is primarily located around these rivers, in particular along the River Tame in Sandwell and Walsall. Areas at risk of surface water flooding are located across much of the Plan area. Surface water flood risk typically follows roads and the network of canals located within the Black Country, including the Birmingham Canal, Walsall Canal and Dudley Canal.

E.6.1.2 This SA Objective primarily considers the impact that each spatial option could have in relation to flood risk, as well as green infrastructure coverage across the Plan area. Soils and vegetation play vital roles in attenuating flood risk, by intercepting surface water and storing water that could otherwise lead to flooding, causing harm to people and property within urban areas.

E.6.1.3 **Spatial Option A1** aims to convert existing employment land to housing, and direct replacement employment land to the Green Belt. **Spatial Options F1** and **F2** both aim to protect areas of highest Green Belt harm and subsequently direct some development to lower harm Green Belt land. **Spatial Options F1** and **F2** would protect some areas of the Green Belt from development, and as such, reduce the proportion of development situated on previously undeveloped land. Nevertheless, the three options would also direct some development to previously undeveloped land in the Green Belt, leading to a loss in vegetation coverage and permeable soils. Overall, these three options would be likely to result in minor negative impacts in relation to flood risk. Under **Spatial Option A1** it is uncertain where development would be directed in the Green Belt. However, the redevelopment of existing employment land would be seen as an efficient use of land and would help to reduce the quantity of soil lost to development. Therefore, overall **Option A1** is considered to perform slightly better in terms of climate change adaptation compared to **F2** and **F1**.

E.6.1.4 **Spatial Option G** aims to promote biodiversity net gain, protect open spaces and support Nature Recovery Networks. Development proposals which seek to create new and enhance existing open and green spaces and other natural features would be anticipated to positively impact the ability of the Plan area to adapt to the impacts of climate change. However, this option would be likely to result in the loss of previously undeveloped land and flood alleviating soils. Overall, development under **Spatial Option G** would be expected to have a neutral impact in relation climate change adaptation and is considered to be the next best performing option.

- E.6.1.5 **Spatial Option J** combines aspects of the other ten spatial options. The option aims to release surplus open space for development. Open spaces can play a vital role in helping to alleviate flood risk within the built environment and many open spaces contain SUDS to help manage local surface water. The loss of some of these open spaces could potentially result in adverse impacts on flood risk. The option also seeks to support the Nature Recovery Network, which would be likely to include enhancements to surrounding natural habitats and a potential increase in vegetation cover. This would be likely to have benefits to soil stability and increase the interception of rainfall. Another key aim of **Spatial Option J** is to avoid the release of high harm Green Belt land identified as high landscape sensitivity. In addition, the option would direct some development within town centres at higher densities. Both of these factors would likely help to reduce the quantity of development situated on previously undeveloped land. On balance, **Spatial Option J** would be likely to have a negligible impact on climate change adaptation and overall would perform slightly better than **Option G**.
- E.6.1.6 **Spatial Option D** seeks to allocate development towards high-demand areas as indicated by the emerging Viability and Deliverability Study. This option could potentially see increased pressure on open spaces and green infrastructure within the most popular areas, although it is likely that these impacts would be more localised. Development at higher density would be expected under this option, which may result in a minor positive impact overall by reducing the area of land required to deliver growth.
- E.6.1.7 Similarly, the approaches of utilising vacant employment space for development under **Spatial Option B** and adopting higher development densities under **Spatial Options C** and **H** could potentially mean that a higher proportion of new residents would be situated within existing urban areas, at low fluvial flood risk. All three options would also reduce the proportion of previously undeveloped land required to meet the identified housing and employment needs, which would be less likely to exacerbate local flood risk. By helping to retain green infrastructure features, these three options could potentially provide an opportunity to increase the number of trees within the Black Country, with benefits by reducing surface water run-off, increasing infiltration in the soil and leaves slowing water flow. This approach could also complement and continue existing projects such as the Black Country Urban Forest which aimed to plant and sustainably manage 900ha of woodland in the Black Country<sup>23</sup>. Overall, a minor positive impact on flood risk would be expected under **Spatial Options B, C** and **H**. However, these options could still place pressure on open spaces within urban areas and result in localised losses of green infrastructure; **Option B** would be likely to perform slightly better than **Options C** and **H** in this regard.
- E.6.1.8 **Spatial Option E** aims to protect open space within the Black Country. By protecting these spaces, this option would help to reduce the quantity of previously undeveloped land within the urban areas which is lost to development. These natural spaces within urban

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<sup>23</sup> Black Country Urban Forest Millennium Programme. Available at: <https://www.dudley.gov.uk/residents/environment/countryside-in-dudley/tree-maintenance/black-country-urban-forest-millennium-programme/> [Date Accessed: 09/02/21]

environments are important to help alleviate flood risk, and many open spaces contain Sustainable Urban Drainage Systems (SUDS) to help manage local surface water flood risk. **Spatial Option E** would therefore be expected to have a minor positive impact on flood risk.

E.6.1.9 Under **Spatial Option A**, existing employment land would be converted to residential development. This would be likely to result in an efficient use of land and help reduce the quantity of vegetation (which intercepts surface water) and permeable soils (within which rain and surface water infiltrates) lost to development. Development under **Spatial Option A** could potentially see 165ha of occupied employment land change to residential use, which would be unlikely to result in loss of green infrastructure for development, and as such, a minor positive impact could be expected. Therefore, this option is considered to perform best overall in terms of climate change adaptation, although it is uncertain whether the identified development needs could be met through this option alone.

**E.6.2 Rank**

E.6.2.1 Adverse impacts have been identified under **Spatial Options A1, F1 and F2**, primarily due to the promotion of development in the Green Belt resulting in larger-scale losses of green infrastructure compared to the other options.

E.6.2.2 Overall, **Spatial Options G and J** are considered to result in a neutral impact on this objective, associated with a mixture of positive and negative sustainability impacts.

E.6.2.3 The development under **Spatial Options A, B, C, D, E and H** could potentially result in a minor positive impact on climate change adaptation overall, associated with the protection of open spaces and promotion of higher density development to limit losses of green infrastructure.

E.6.2.4 **Spatial Option F1** is the worst performing option for climate change adaptation whilst **Option A** is the best performing spatial option (see **Table E.2.5**).

*Table E.6.1: Ranking of Spatial Options under SA Objective 5 - Climate Change Adaptation*

SA Objective 5 – Climate Change Adaptation	Spatial Option										
	A	A1	B	C	D	E	F1	F2	G	H	J
SA Score	+	-	+	+	+	+	-	-	0	+	0
Rank	1	9	3	5	6	2	11	10	8	4	7

## E.7 SA Objective 6: Natural Resources

### E.7.1 Assessment

- E.7.1.1 The majority of the Black Country districts are located on land classified as ‘urban’ in accordance with the Agricultural Land Classification (ALC). As such, it can be assumed that all development located within the urban area would not result in the loss of best and most versatile (BMV) land. The use of the ALC system aims to provide advice on agricultural land and other greenfield land that could potentially be used to grow crops<sup>24</sup>. The ALC grade determined is based on a range of factors including temperature, rainfall, gradient, flood risk, texture and structure.
- E.7.1.2 It is assumed that the development of up to 76,076 dwellings and 565ha of employment floorspace<sup>25</sup> would result in the loss of some previously undeveloped land and result in a negative impact on natural resources to some extent, under any of the eleven spatial options. For purposes of this assessment, these anticipated negative impacts have not been taken into account and instead options have been assessed relative to each other.
- E.7.1.3 Under **Spatial Option F1**, approximately 2,897ha of Green Belt land would be protected from development due to being identified as highest Green Belt harm and highest landscape sensitivity. Under **Spatial Option F2**, approximately 4,116ha of Green Belt land would be protected from development due to being identified as highest Green Belt harm. However, these two options would subsequently direct development towards areas of low Green Belt harm in the Black Country and result in the loss of previously undeveloped land. Therefore, **Spatial Options F1** and **F2** would be likely to have minor negative impact on natural resources. Although both options seek to protect some resources, overall, **Option F2** is considered to be the better performing of the two, due to protecting more land from development.
- E.7.1.4 **Spatial Option G** aims to promote the development of a Garden Village if sufficient land is available. The development of a Garden Village would be likely to result in the significant loss of greenfield land. In addition, this option seeks to develop housing at lower densities. This would mean that more land is required to meet the identified housing need, which would likely be greenfield land. Overall, **Spatial Option G** could potentially have a minor negative impact on natural resources.
- E.7.1.5 **Spatial Option A1** aims to redevelop existing employment land to residential development, but also seeks to development replacement employment land in the Green Belt. The redevelopment of previously developed employment land would be classed as an efficient

<sup>24</sup> Natural England (2009) Agricultural Land Classification: protecting the best and most versatile agricultural land. Available at: <http://publications.naturalengland.org.uk/publication/35012> [Date Accessed: 09/02/21]

<sup>25</sup> Black Country Economic Development Needs Assessment 2017 and 2021

use of land, however, development in the Green Belt would be likely to result in the loss of greenfield land and associated soil resource. As this option would result in the net loss of soil, a minor negative impact would be expected. However, this option would be expected to perform better than **Spatial Option G**, because it promotes efficient land use as well as some Green Belt development.

- E.7.1.6 **Spatial Option E** seeks to create new and protect existing open space. By preventing development on existing open space, this option would help to prevent the loss of soil within the urban area and make best use of natural resources in the Green Belt by creating functional open space to serve communities, alongside residential development. Therefore, this option could potentially result in neither positive nor negative impact on soil resources.
- E.7.1.7 **Spatial Option J** combines aspects of the other ten spatial options. The option aims to release surplus open space for development. Although many of these spaces within the Black Country are small, cumulatively this would result in a loss of previously undeveloped land. Another key aim of this option is to avoid the release of high harm Green Belt land identified as high landscape sensitivity. In addition, the option aims to direct some development within town centres at higher densities. Both of these factors would be likely to help reduce the quantity of development situated on previously undeveloped land. On balance, **Spatial Option J** would be likely to have a neutral impact in relation to the Black Country's natural resources. The promotion of higher density development under this option would be expected to yield more benefits to natural resources than **Option E**, overall.
- E.7.1.8 **Spatial Option D** seeks to allocate development towards high-demand areas as indicated by the emerging Viability and Deliverability Study. Although the exact locations of development under this option are uncertain at the time of writing, it is assumed that this would involve higher density development in the most popular areas. **Spatial Options C** and **H** both promote high density development. A key benefit of higher development densities is that less land would be required to be built on to satisfy the local development needs. This would help to limit the permanent and irreversible losses of agriculturally and ecologically valuable soils caused by development delivered through the BCP. Therefore, these three options would be likely to have a minor positive impact on natural resources. However, **Spatial Option D** could potentially put more pressure on open spaces and important natural resources within urban areas, compared to the other two. As such, **Option D** could potentially result in more adverse impacts in comparison. **Option C** seeks to maximise densities and as such would be expected to perform slightly better than **Option H**.
- E.7.1.9 **Spatial Option B** focuses on using vacant or under-utilised space within centres for development. This would be likely to result in the development of previously developed land, and overall, reduce the volume of land that is required in order to meet the identified housing and employment floorspace need. Therefore, this option would be expected to have a minor positive impact in regard to natural resources and is ranked second.

E.7.1.10 **Spatial Option A** is in accordance with the adopted spatial strategy, which aims to convert existing employment land to housing. This would represent an efficient use of land and would help to reduce the volume of previously undeveloped land lost to development, and therefore, would protect the Black Country’s natural resources. Overall, this option would be likely to have a minor positive impact in relation to this objective. **Spatial Option A** is considered to perform best overall with the greatest benefit to natural resources, although it is uncertain whether the identified development needs could be met through this option alone.

**E.7.2 Rank**

E.7.2.1 Adverse impacts have been identified under **Spatial Options A1, F1, F2, and G**, primarily due to the promotion of development in the Green Belt resulting in larger-scale losses of soil and natural resources compared to the other options.

E.7.2.2 Neutral impacts have been identified under **Spatial Options E and J** overall, balancing the mixture of positive and negative sustainability impacts that could be expected from the protection of open spaces alongside development.

E.7.2.3 Positive impacts have been identified under **Spatial Options A, B, C, D and H**. These options would be likely to present the most opportunities out of the eleven to make the best use of natural resources through delivering higher density development and ensuring under-utilised urban spaces are prioritised for development.

E.7.2.4 **Spatial Option F1** is the worst performing option for natural resources whilst **Option A** is the best performing spatial option (see **Table E.2.6**).

*Table E.7.1: Ranking of Spatial Options under SA Objective 6 – Natural Resources*

SA Objective 6 – Natural Resources	Spatial Option										
	A	A1	B	C	D	E	F1	F2	G	H	J
SA Score	+	-	+	+	+	0	-	-	-	+	0
Rank	1	8	2	3	5	7	11	10	9	4	6

## E.8 SA Objective 7: Pollution

### E.8.1 Assessment

- E.8.1.1 The Black Country gained its name during the industrial revolution due to the black smoke emitted, particularly from the iron and coal industries<sup>26</sup>. Air pollution remains an issue in the Black Country. The entirety of the four districts are designated as Air Quality Management Areas (AQMAs): ‘Dudley AQMA’, ‘Sandwell AQMA’, ‘Walsall AQMA’ and ‘Wolverhampton AQMA’. Furthermore, ‘Chuckery AQMA’ is located in the centre of Walsall. AQMAs located adjacent to the Plan area include ‘Birmingham AQMA’, ‘Hagley AQMA’ and ‘CCDC AQMA 2’. In addition, there are a large number of motorways and A-roads which cross the Plan area, each of which represent major sources of traffic-related sources of air pollution as well as noise pollution.
- E.8.1.2 Some areas of the Black Country coincide with groundwater Source Protection Zones (SPZs) to the east of Walsall, south east of Sandwell, west of Dudley and west of Wolverhampton. SPZs indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants, and development within these locations could increase the risk of contaminating groundwater.
- E.8.1.3 **Spatial Option D** seeks to direct development to areas of high demand. This would be expected to result in higher density development in popular areas. Similarly, **Spatial Options C** and **H** would both promote high density development. Higher densities of development may help to reduce the quantity of land being built on in the Plan area, which would be likely to help minimise the risks of soil, air or water contamination caused by development proposed in the BCP. However, there is a general trend of air pollution in higher density urban areas having more adverse impacts on human health than in air pollution in lower density urban areas<sup>27</sup>. This is a result of higher pollution emissions due to human activities in densely populated street canyons in-combination with taller buildings stagnating the air flow. Therefore, these three options would be expected to result in a minor adverse impact on pollution. Under **Spatial Option D**, the location of development is uncertain and has the greatest potential for focusing development in areas without consideration of their sustainability. **Spatial Options C** and **H** are therefore considered to perform slightly better than **Option D**, although the differences between the three options are likely to be minimal.
- E.8.1.4 **Spatial Options A** and **A1** both seek to redevelop existing employment land into residential units. **Spatial Option B** seeks to redevelop under-utilised and vacant employment land. The

<sup>26</sup> BBC (2014) What and where is the Black Country? Available at:  
[http://www.bbc.co.uk/blackcountry/uncovered/what\\_is.shtml#:~:text=The%20Black%20Country%20gained%20its,and%2030ft%20thick%20coal%20seams](http://www.bbc.co.uk/blackcountry/uncovered/what_is.shtml#:~:text=The%20Black%20Country%20gained%20its,and%2030ft%20thick%20coal%20seams). [Date Accessed: 09/02/21]

<sup>27</sup> Yuan, C, Ng, Edwards, Norford, Leslie, K. (2014) Improving air quality in high-density cities by understanding the relationship between air pollution dispersion and urban morphologies, Building and Environment, V71, pp245-258, January 2014

redevelopment of existing buildings would be likely to help reduce the volume of materials needed for development and consequently could help to reduce pollution created during construction. All three options could potentially direct some new residents towards town centres, where residents would have good access to sustainable transport, but would potentially increase congestion and thereby, increase local air pollution. Congestion within Wolverhampton City Centre, Walsall Town Centre and Dudley is expected to worsen if current trends continue<sup>28</sup>. Overall, as the three options would result in increased development in already congested and polluted urban areas, a minor negative impact would be expected. **Spatial Option A1** would also direct some employment development to previously undeveloped land, likely to be in the outskirts of urban areas; therefore, this option could potentially provide more opportunities to avoid adverse impacts on pollution compared to **Options A and B**.

E.8.1.5 Both **Spatial Options F1 and F2** would direct some development towards parcels identified as low Green Belt harm and low landscape sensitivity. These parcels are generally located at the urban edge, likely to be situated away from roads and other sources of pollution. On the other hand, both of these options would direct development to areas where there is currently limited development and would therefore be expected to increase pollution in these areas. The retention of Green Belt can have benefits to pollution such as by mitigating air and noise pollution, due to the quantity of trees and vegetation typically found in the Green Belt in comparison to the urban centres<sup>29</sup>. On balance, a neutral impact on pollution would be expected for **Spatial Options F1 and F2**, with **Option F2** performing slightly better of the two by protecting a greater proportion of Green Belt land.

E.8.1.6 **Spatial Option J** aims to release open space and areas of low Green Belt harm, as well as support the Nature Recovery Network. Although development on previously undeveloped land could potentially result in the loss of vegetation, biodiversity net gain and the enhancement of the Nature Recovery Network could help to mitigate this loss. The option also seeks to direct development towards the most sustainable locations, in particular those with good public transport links, and ensure new residents have sustainable access to essential services. This would be likely to help reduce the need to travel, reliance on personal car use and reduce transport-associated air pollution. On the other hand, this option also seeks to direct the majority of development towards urban centres which could potentially lead to an increase in congestion and worsen existing air quality issues. Overall, this option would a neutral impact on relation to pollution but would be expected to perform slightly better than **Options F1 and F2**.

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<sup>28</sup> West Midlands Combined Authority (no date) Movement for Growth: The West Midlands Strategic Transport Plan. Available at: [https://blackcountryplan.dudley.gov.uk/media/11700/wm\\_movement-for-growth.pdf](https://blackcountryplan.dudley.gov.uk/media/11700/wm_movement-for-growth.pdf) [Date Accessed: 09/02/21]

<sup>29</sup> Natural England (2010) Green Belts: a greener future. Available at: <http://publications.naturalengland.org.uk/file/93018> [Date Accessed: 09/02/21]



E.8.1.7 Under **Spatial Option G**, some development would be directed towards a new Garden Village. The location of a Garden Village would likely be towards the urban edge where air quality is generally better than within the urban centres. The construction and occupation of homes outside of the existing urban areas would provide an opportunity to incorporate efficient designs, as well as avoid the exacerbation of air pollution arising from GHG emissions and particulate matter. A Garden Village would also provide the opportunity for services to be integrated into the development, reducing residents' need to travel and reducing transport-associated air pollution. Overall, this option could potentially have a minor positive impact in regard to pollution and for these reasons is considered to perform second-best out of the eleven options.

E.8.1.8 **Spatial Option E** seeks to protect open space and create new spaces where possible, alongside development. Open spaces often include habitats and vegetation that provide several ecosystem services, such as carbon storage and filtration of air pollutants. Trees and plants have a varying capacity to capture and/or filter air pollution, improve air circulation and decrease ambient temperatures<sup>30</sup>. By protecting, enhancing and creating these spaces, and potentially increasing vegetation in these space, **Spatial Option E** could potentially help to reduce air pollution, and therefore, have a minor positive impact in relation to pollution. This option is considered to be the best performing, because it is expected that under this option the most residents would be situated in areas with green buffers offering protection from pollution with the greatest benefit to health and wellbeing.

## E.8.2 Rank

E.8.2.1 The ranking under SA Objective 7 is highly subjective. All spatial options would be expected to deliver a large quantity of development, with potential to exacerbate existing pollution issues and/or generate further pollution.

E.8.2.2 Overall, adverse impacts are likely to be associated with **Spatial Options A, A1, B, C, D** and **H**. This is primarily due to these options leading to a larger proportion of development directed to areas with existing pollution issues.

E.8.2.3 Neutral impacts are identified for **Spatial Options F1, F2** and **J** because these three options would lead to mixed effects when considering the balance between Green Belt releases and development in existing urban areas.

E.8.2.4 The spatial options with the greatest potential for positive impacts in terms of pollution are considered to be **Options E** and **G**, as these two options would be likely to provide the most opportunities to protect people from adverse impacts associated with pollution.

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<sup>30</sup> David Suzuki Foundation (2015) The impact of green space on heat and air pollution in urban communities: A meta-narrative systematic review. Available at: <https://david Suzuki.org/wp-content/uploads/2017/09/impact-green-space-heat-air-pollution-urban-communities.pdf> [Date Accessed: 09/02/21]

E.8.2.5 **Spatial Option D** is the worst performing option for pollution whilst **Option E** is the best performing spatial option (see **Table E.2.7**).

**Table E.8.1:** Ranking of Spatial Options under SA Objective 7 - Pollution

SA Objective 7 – Pollution	Spatial Option										
	A	A1	B	C	D	E	F1	F2	G	H	J
SA Score	-	-	-	-	-	+	0	0	+	-	0
Rank	7	6	8	10	11	1	5	4	2	9	3

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## E.9 SA Objective 8: Waste

### E.9.1 Assessment

- E.9.1.1 The Black Country is currently short of capacity for some waste types, including landfill sites for construction waste and household waste recycling sites, and much of this waste is sent outside of the Plan area<sup>31</sup>. However, evidence suggests that developmental growth within the Black Country would not significantly increase waste generation, as the quantity of waste produced by each household and business is generally reducing.
- E.9.1.2 At the time of writing, there is not sufficient information available to accurately predict the effect that each spatial option would have in terms of minimising waste generation, promoting the sustainable management of waste, or encouraging recycling and re-use of waste. It is likely that all options would increase waste generation and place pressure on existing waste management systems, to some extent.
- E.9.1.3 **Spatial Options C and H** both promote high density development. **Spatial Option B** seeks to develop under-utilised and vacant employment space, which would be likely to increase the density of current development. **Spatial Option D** seeks to direct development to desirable market areas, which has the potential to increase density in certain locations. Higher densities of development also typically place increased demand on the local waste management system due to larger quantities and more diverse waste being generated in smaller areas<sup>32</sup>, potentially leading to sanitation problems. Therefore, these four options would be likely to have a minor negative impact on waste. Based on this, **Option C** is ranked eleventh, followed by **Option H, B and D**.
- E.9.1.4 **Spatial Options F1 and F2** seek to protect areas of high Green Belt harm but would release areas of low Green Belt harm for development. These areas of low Green Belt harm are generally located close to the urban edge of the Black Country. **Spatial Option G** seeks to direct a proportion of development towards a new Garden Village. These three options would be likely to result in a large number of new residents located away from existing waste management systems. Therefore, these options could potentially result in a minor negative impact in regard to waste.
- E.9.1.5 **Spatial Option E** seeks to protect and create new open spaces. This option could potentially result in more development being directed to the urban edge and Green Belt sites, and therefore, result in similar impacts to **Options F1, F2 and G** discussed above. A minor

<sup>31</sup> Wood Environment & Infrastructure Solutions UK Limited (2020) Black Country Waste Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/15811/black-country-waste-study-final-report\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/15811/black-country-waste-study-final-report_redacted.pdf) [Date Accessed: 09/02/21]

<sup>32</sup> Njoku, N., Lamond, J., Everett, G. and Manu, P. (2015) An overview of municipal solid waste management in developing and developed economies: Analysis of practices and contributions to urban flooding in Sub-Saharan Africa. In: 12th International Postgraduate Research Conference Proceedings, Manchester, UK, 10-12 June 2015., pp. 200- 212

negative impact cannot be ruled out, however, the likely lower density growth under **Option E** compared to the other options could potentially result in lesser adverse impacts.

E.9.1.6 **Spatial Option J** seeks to direct development to a range of locations across the Black Country. As a result, a number of allocations would be likely to be located in close proximity to existing waste management systems, but equally a number of allocations would be located further away from these systems. A minor negative impact in regard to waste generation cannot be ruled out. The likely distribution of growth across the Plan area under this option could potentially create more manageable growth compared to some of the other options, and therefore, **Option J** has been ranked third.

E.9.1.7 **Spatial Option A1** seeks to replace existing employment land with residential development, but also seeks to replace the employment land in the Green Belt. This would be expected to result in an increase in waste generation from new buildings, however, as the type and scale of employment sites to be delivered under this option are unknown at present, the impact that this would have on waste is uncertain. Likewise, the impact **Option A** would have on waste generation is uncertain, as further studies will be required to predict the change in waste generation associated with converting employment land into residential use. **Spatial Option A** could be identified as the best performing option, as this option seeks to redevelop existing employment land to residential use and therefore, the net increase in waste generation could be minimal, although further studies would be required to confirm this.

## E.9.2 Rank

E.9.2.1 There is some uncertainty regarding the likely sustainability impacts associated with all spatial options when considering waste generation. Overall, **Options B, C, D, E, F1, F2, G, H** and **J** are considered likely to result in more adverse impacts on waste generation associated with the large scale of new development and would place pressure on existing waste management systems.

E.9.2.2 Uncertain scores have been identified for **Spatial Options A** and **A1**, primarily due to the unknown impact on waste associated with the conversion of employment land to residential use. However, overall, these two options are likely to result in less generation of waste compared to the other nine options.

E.9.2.3 **Spatial Option C** is the worst performing option for waste whilst **Option A** is the best performing spatial option.

**Table E.9.1: Ranking of Spatial Options under SA Objective 8 - Waste**

SA Objective 8 - Waste	Spatial Option										
	A	A1	B	C	D	E	F1	F2	G	H	J
SA Score	+/-	+/-	-	-	-	-	-	-	-	-	-
Rank	1	2	9	11	8	4	7	6	5	10	3

## E.10 SA Objective 9: Transport & Accessibility

### E.10.1 Assessment

- E.10.1.1 There are many complex road and rail networks across the Black Country, with good rail links to Birmingham and Stafford, and motorway links to the south west, south east and north west of England. In addition, there is an extensive Public Right of Way (PRoW) and cycle path network. Nevertheless, road congestion, in particular following road incidents on the M5 and M6, is an existing problem in the Black Country.
- E.10.1.2 The West Midlands Strategic Transport Plan<sup>33</sup> states there are five challenges with transport in the West Midlands: economic growth; population growth; environment; public health; and social well-being. It is predicted that 81% of the population in West Midlands will own cars by 2035. This is expected to have knock-on effects on congestion and the safety of roads.
- E.10.1.3 **Spatial Options F1 and F2** would direct some development to the Green Belt areas identified as having low Green Belt harm and low landscape sensitivity. This development would be likely to be situated away from sustainable transport options, and further away from employment sites and local services, reducing access to sustainable transport options and likely resulting in reliance on personal car use. Site end users located in the Green Belt would, however, be expected to have good access to the surrounding countryside. Overall, **Spatial Options F1 and F2** be likely to result in a minor negative impact in relation to transport and accessibility.
- E.10.1.4 **Spatial Option D** seeks to allocate development towards high demand areas as indicated by the emerging Viability and Deliverability Study. This could potentially promote high density development in some areas that are not necessarily the most sustainable locations or have transport networks capable of supporting this level of growth. Overall a minor negative impact could be expected, but this option would be likely to perform better than **Option F1** or **F2**.
- E.10.1.5 **Spatial Options A and A1** aim to convert existing employment land into housing. These residential sites could potentially be located within urban areas and have good access to services and facilities as well as sustainable transport options. On the other hand, under **Spatial Option A** it is likely there would be a net loss of employment land, and **Spatial Option A1** would direct replacement employment development towards the Green Belt, where some new residents could potentially have more limited sustainable travel options to employment opportunities. If residents in urban centres would still require cars to access employment, there could potentially be congestion issues under these two options and an increased need

<sup>33</sup> West Midlands Combined Authority (no date) Movement for Growth: The West Midlands Strategic Transport Plan. Available at: [https://blackcountryplan.dudley.gov.uk/media/11700/wm\\_movement-for-growth.pdf](https://blackcountryplan.dudley.gov.uk/media/11700/wm_movement-for-growth.pdf) [Date Accessed: 09/02/21]

to travel. Therefore, both options would be likely to have a minor negative impact in relation to transport but would be expected to provide more development in accessible urban areas than **Option D**, with **Option A** performing slightly better than **Option A1**.

- E.10.1.6 **Spatial Option G** seeks to direct some development towards a Garden Village where available. Within a Garden Village, it is likely that infrastructure and services such as GP surgeries and employment opportunities would be provided alongside residential development. The option also requires all strategic sites to include 25% employment land. This would help to ensure all new residents have good access to a range of amenities and employment opportunities. However, new residents within a Garden Village may have reduced access to public transport services and longer travel times to town centres. On balance, **Spatial Option G** could potentially result in a neutral impact in relation to transport.
- E.10.1.7 **Spatial Option E** seeks to protect and create more open space within the Black Country. Open space often includes footpath links and can provide attractive places for active travel, and the Black Country's network of open spaces and parks have been identified as ideal locations to encourage less experienced cyclists<sup>34</sup>. By protecting and creating these spaces, this option could potentially encourage residents to walk or cycle to local facilities and help reduce reliance on personal car use. Reducing car use would help ease issues with congestion and transport-associated emissions. However, this option could potentially lead to lower density development and result in longer travel times to some facilities. Overall, **Spatial Option E** could potentially have a minor positive impact on transport and would be expected to have more scope to provide sustainable accessibility in the local area than **Option G**.
- E.10.1.8 **Spatial Option B** aims to direct some new residents to vacant and under-utilised employment space. This strategy would be likely to situate residents towards centres and in close proximity to employment opportunities and essential services, reducing the need to need to travel via personal car as identified within the Accessibility Modelling. These residents would also be expected to be located near a variety of sustainable transport options. Overall, a minor positive impact on transport would be expected.
- E.10.1.9 **Spatial Option C** seeks to maximise densities and fill in gaps in service provision, whereas **Spatial Option H** seeks to direct development only towards urban areas with the highest sustainable transport access as identified by the Accessibility Modelling. Higher density developments could potentially help to ensure new residents have good access to services and amenities by placing more residents in closer proximity to them. However, there could potentially be over-capacity issues at facilities in some locations depending on the scale of development. The impact on local congestion is likely to be more severe from higher density

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<sup>34</sup> Aecom (2016) Black Country Walking and Cycling Strategy and Implementation Plan. Available at: [https://go.walsall.gov.uk/Portals/0/images/importedddocuments/black\\_country\\_walking\\_and\\_cycling\\_document-2.pdf](https://go.walsall.gov.uk/Portals/0/images/importedddocuments/black_country_walking_and_cycling_document-2.pdf) [Date Accessed: 09/02/21]

developments in urban centres, with larger numbers of new residents accessing the site from the same roads and access points.

E.10.1.10 Under **Spatial Option H**, new development would be likely to have excellent access to a range of facilities, however, this option does not seek to improve service provision in other areas of the Black Country. In comparison, **Option C** would be expected to deliver most growth in areas of existing good access as well as filling in gaps in service provision elsewhere alongside development. Overall, **Spatial Option C** is ranked second-best, with **Option H** third and **Option B** fourth.

E.10.1.11 **Spatial Option J** aims to release surplus open space for development. These open spaces are likely to be located within town centres near some local services. This option directs the majority of development towards the urban areas, within a variety of market areas and at a range of densities. Development in the urban areas would provide new residents with good access to some facilities. However, at this stage it is uncertain if development under this option would lead to over-capacity issues at some local services or if further development within the town centres would increase congestion issues. This option does direct some development towards the Green Belt, but states that this would only be in “*the most sustainable locations*”. New residents in these locations would therefore be expected to have good access to public transport options and essential services. The option also seeks to “*promote healthy lifestyles*”. Further detail has not been provided at present, but this could potentially include encouraging active travel such as walking and cycling. Overall, **Spatial Option J** could potentially have a minor positive impact on transport and accessibility and is considered to be the best performing option.

## E.10.2 Rank

E.10.2.1 Overall, **Spatial Options A, A1, D, F1 and F2** would be expected to result in a minor negative impact on transport and accessibility, primarily due to the potential for development to be directed towards unsustainable areas or these options increasing the need to travel.

E.10.2.2 A neutral impact has been identified under **Spatial Option G**, associated with the combination of positive and negative impacts from directing some development to a garden village.

E.10.2.3 Positive impacts have been identified in association with **Spatial Options B, C, E, H and J** because these five options would promote the highest proportion of developments to areas with sustainable access to services and employment.

E.10.2.4 **Spatial Option F1** is the worst performing option for transport and accessibility whilst **Option J** is the best performing spatial option (see **Table E.2.9**).

**Table E.10.1: Ranking of Spatial Options under SA Objective 9 – Transport & Accessibility**

SA Objective 9 – Transport & Accessibility	Spatial Option										
	A	A1	B	C	D	E	F1	F2	G	H	J
SA Score	-	-	+	+	-	+	-	-	0	+	+
Rank	8	7	4	2	9	5	11	10	6	3	1

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## E.11 SA Objective 10: Housing

### E.11.1 Assessment

- E.11.1.1 The NPPF defines local housing need as “*the number of homes identified as being needed through the application of the standard method set out in national planning guidance*”<sup>35</sup>. Local authorities must consider the identified needs of specific groups within the Local Plan. The current housing need across the Black Country is for 76,076 dwellings for the Plan period<sup>36</sup>. This development would be expected to accommodate the growing population and seeks to provide a range of homes to meet the diverse needs of residents.
- E.11.1.2 Affordable housing is defined as “*housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)*” in the NPPF. Affordable housing can include affordable homes for rent, starter homes and discounted market sales homes. The Dudley Homeless Prevention Strategy<sup>37</sup>, Sandwell Homelessness and Rough Sleeper Strategy<sup>38</sup>, Walsall Homelessness Strategy<sup>39</sup> and Wolverhampton Homelessness Prevention Strategy<sup>40</sup> all seek to reduce homelessness and the number of rough sleepers in the Black Country. All four authorities have seen a decrease in homelessness over recent years, but the coronavirus pandemic could potentially threaten the stability of homes for many individuals. Ensuring a variety of homes are built, including affordable homes, is essential to help combat homelessness.
- E.11.1.3 Both **Spatial Options F1 and F2** direct some development towards the Green Belt and protect areas of highest Green Belt harm from development. The ‘Black Country Green Belt Study’ study identified 2,965.1ha of sub-parcels across the Black Country resulting in very high Green Belt harm if the parcels were released and 1,155ha of sub-parcels of high Green Belt harm, equating to 52.9% and 20.6% respectively of the Black Country’s Green Belt. By protecting some of this land under **Spatial Options F1 and F2**, and as such limiting the

<sup>35</sup> MHCLG (2019) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 09/02/21]

<sup>36</sup> Black Country Plan Housing Evidence Base. Available at <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4c/>

<sup>37</sup> Dudley Metropolitan Borough Council ( ) Dudley MBC Homeless Prevention Strategy 2019 – 2021. Available at: <https://www.dudley.gov.uk/media/10955/dmbc-homeless-prevention-strategy-2019-2021.pdf> [Date Accessed: 09/02/21]

<sup>38</sup> Sandwell Metropolitan Borough Council (2018) 2018 – 21 Homelessness and Rough Sleeper Strategy. Available at: [https://www.sandwell.gov.uk/downloads/file/28975/2018-21\\_prevention\\_of\\_homelessness\\_strategy](https://www.sandwell.gov.uk/downloads/file/28975/2018-21_prevention_of_homelessness_strategy) [Date Accessed: 09/02/21]

<sup>39</sup> Walsall Metropolitan Borough Council (2018) Walsall Homelessness Strategy 2018 – 2022. Available at: <https://go.walsall.gov.uk/Portals/0/Uploads/Housing/Walsall%20Homeless%20Strategy%20January%202018.pdf> [Date Accessed: 09/02/21]

<sup>40</sup> City of Wolverhampton Council (2018) Wolverhampton Homelessness Prevention Strategy 2018 – 2022. Available at: <https://wolverhampton.moderngov.co.uk/documents/s84069/Appendix%201%20for%20Homelessness%20Prevention%20Strategy%202018-2022.pdf> [Date Accessed: 09/02/21]

availability of land for residential development, it would be anticipated that these options alone would not meet the identified housing needs across the Black Country. Both options therefore would be likely to have a minor negative impact in relation to housing. **Spatial Option F2** aims to protect greater quantities Green Belt land than **Spatial Option F1**, and therefore, would be likely to result in greater adverse impact in relation to housing delivery. **Spatial Option F2** would be likely to be the least sustainable in relation to housing, followed by **Spatial Option F1**.

- E.11.1.4 **Spatial Option E** seeks to protect and create open space within the urban centres. This option could potentially reduce the proportion of land available for future development. Overall, this option would not meet the identified housing need of the Black Country and a minor negative impact would be expected in relation to housing.
- E.11.1.5 **Spatial Option B** aims to develop under-utilised and vacant employment land. This is primarily located towards town centres and would be classed as an efficient use of land, and as a result, the option would reduce the overall quantity of land required in order to meet the identified housing need. However, this option alone would not deliver enough housing, and therefore, a minor negative impact could be likely.
- E.11.1.6 **Spatial Options A** and **A1** seek to retain the strategy set out in the adopted Black Country Core Strategy in which existing employment land would be converted to residential use in order to help meet the identified housing need. It would be likely to be difficult to deliver the associated infrastructure required at these sites, and therefore, the deliverability of such sites for residential use is uncertain. Overall, these two options could potentially result in a minor negative impact on housing provision. **Spatial Option A1** is likely to perform better than **Option A** as it seeks to replace employment land in the Green Belt which will have benefits to infrastructure accessibility for residents in the Black Country.
- E.11.1.7 **Spatial Option D** focuses development towards the most attractive and desirable locations where residential demand is high. The emerging Viability and Deliverability Study will identify the areas of highest demand for housing. However, this option alone would not be able to meet the identified housing need. Overall, a minor negative impact on housing provision would be expected. **Spatial Option D** has been identified as the next best performing option as it seeks to direct development to desirable locations with benefits to the housing market, but would not be expected to meet the identified need.
- E.11.1.8 **Spatial Option C** seeks to maximise housing density and invest in order to maximise capacity at residential services. **Spatial Option H** aims to direct development towards the most sustainable locations in accordance with the Accessibility Modelling. Both of these options would be likely to direct residents to the urban area at increased densities. An increased density for residential development would be likely to increase the number of dwellings delivered across the Plan area and also reduce the total quantity of land required for development, and as such, these options would be likely to help meet the identified housing

need. However, by primarily directing development towards centres, these options may not result in development being situated in areas where there is greatest need, and it is uncertain if these two options would deliver an appropriate housing mix. Despite these uncertainties, overall, a minor positive impact on housing provision would be expected for these two spatial options. **Option H** has been identified as performing better than **Option C** because **Option H** also seeks to take into account the Accessibility Modelling, helping to direct homes to the most suitable locations.

E.11.1.9 **Spatial Option J** aims to ensure residential development is of high quality, and that a range of housing mixes are delivered across the Black Country. Development would also be directed to a variety of market areas and densities to maximise market deliverability. All of these aspects would be expected to have benefits to meeting the Black Country's housing need, and an overall minor positive impact would be anticipated. **Option J** would be likely to be the second-best performing option, as this option seeks to deliver homes in a variety of locations in desirable locations and maximise deliverability, helping the authorities meet the locally identified housing need.

E.11.1.10 **Spatial Option G** would seek to direct some development towards a new Garden Village. This would help to ensure a mix of housing, including affordable housing, is delivered. On strategic sites within the Black Country, this option would aim to ensure 25% of the site is allocated for employment use, and that there is 20% biodiversity net gain on all Green Belt sites released for development. Overall, this option is likely to have a minor positive impact in relation to housing. **Spatial Option G** could be identified as the best performing option as the development of a new Garden Village would provide the opportunity to provide a large number of new dwellings of a range of types and tenures to meet the local need.

## E.11.2 Rank

E.11.2.1 Negative impacts have been identified for **Spatial Options A, A1, B, D, E, F1** and **F2** as these options would be unlikely to deliver enough housing to meet identified needs.

E.11.2.2 Positive impacts have been identified for **Spatial Options C, G, H** and **J**, as these four options would be expected to make the greatest contributions towards delivering sustainable housing to meet needs, although there remains some uncertainty as to the housing mix under several options.

E.11.2.3 **Spatial Option F2** has been identified as the worst performing option for housing whilst **Option G** is the best performing spatial option (see **Table E.2.10**).

**Table E.11.1:** Ranking of Spatial Options under SA Objective 10 – Housing

SA Objective 10 - Housing	Spatial Option										
	A	A1	B	C	D	E	F1	F2	G	H	J
SA Score	-	-	-	+	-	-	-	-	+	+	+
Rank	7	6	8	4	5	9	10	11	1	3	2

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## E.12 SA Objective 11: Equality

### E.12.1 Assessment

- E.12.1.1 The Index of Multiple Deprivation (IMD)<sup>41</sup> is the official measure of relative deprivation for Lower Super Output Areas (LSOAs)<sup>42</sup> in England. Out of 317 Local Authorities in England, Dudley is ranked as the 91<sup>st</sup> most deprived, Sandwell 12<sup>th</sup>, Walsall 25<sup>th</sup> and Wolverhampton 24<sup>th</sup><sup>43</sup>. Overall, deprivation is high across the Black Country, with 21 of the LSOAs in Dudley, 36 in Sandwell, 42 in Walsall and 33 in Wolverhampton ranked among the 10% most deprived in England.
- E.12.1.2 The most deprived places within each of the authorities include neighbourhoods near Summer Hill, Ocker Hill, Low Hill, Bloxwich, West Bromwich, Lunt, Kates Hill, Blakenhall Heath, Swan Village and Wren's Nest.
- E.12.1.3 The IMD was last updated in September 2019, with the previous version published in 2015<sup>44</sup>. Income, employment, education and crime deprivation are better than 2015, but health, living environment and overall deprivation are worse<sup>45</sup>. Between 2015 and 2019, Dudley's rank decreased by 19 places, Sandwell decreased by one, Walsall by eight but Wolverhampton's ranked increased by seven. Overall, the Black Country area increased in rank by one.
- E.12.1.4 **Spatial Option A** aims to redevelop existing employment sites into residential development. However, the spatial option would result in the net loss of employment floorspace. This option would not be expected to deliver enough housing or employment land to meet the identified need. Although **Spatial Option A1** aims to build upon **Spatial Option A** by directing replacement employment land to the Green Belt, this option would also not deliver enough residential development and thereby could potentially result in homelessness and overcrowding. In addition, new employment land would be directed to the urban edge and may result in reduced accessibility compared to current residents within urban centres.

<sup>41</sup> MHCLG (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date Accessed: 09/02/21]

<sup>42</sup> DCLG (2016) The English Indices of Deprivation 2015 – Frequently Asked Questions (see question 11. What is a Lower-layer Super Output Area/neighbourhood/small area?). Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/579151/English\\_Indices\\_of\\_Deprivation\\_2015\\_-\\_Frequently\\_Asked\\_Questions\\_Dec\\_2016.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/579151/English_Indices_of_Deprivation_2015_-_Frequently_Asked_Questions_Dec_2016.pdf) [Date Accessed: 09/02/21]

<sup>43</sup> Black Country Consortium (2019) The English Indices of Deprivation 2019. Available at: <https://www.the-blackcountry.com/upload/BC%20IMD%202019.pdf> [Date Accessed: 09/02/21]

<sup>44</sup> MHCLG (2019) English indices of deprivation. Available at: <https://www.gov.uk/government/collections/english-indices-of-deprivation> [Date Accessed: 09/02/21]

<sup>45</sup> Black Country Consortium (2019) Black Country Indices of Deprivation. Available at: <https://www.the-blackcountry.com/upload/EIU/Intelligence%20Briefings/Black%20Country%20IMD%202019%20Barometer.pdf> [Date Accessed: 09/02/21]

Therefore, both **Spatial Options A** and **A1** would be expected to have a minor negative impact on local equality.

- E.12.1.5 **Spatial Options F1** and **F2** both aim to protect some Green Belt land of high harm and release some parcels of low Green Belt harm. The Green Belt that would be released under these two options are situated within a range of LSOAs with a range of deprivation levels. The Green Belt parcels that would be developed under these two options are generally located at the urban edge, and therefore could potentially be located away from essential services and employment opportunities. This may adversely impact those residents who would struggle to travel to these services. Therefore, these two options could potentially have a minor negative impact on equality but would be likely to provide a greater range of housing in comparison to **Options A** and **A1**.
- E.12.1.6 **Spatial Option C** primarily aims to deliver development at higher densities, up to 200 dwellings per hectare in urban centres. Higher rates of crime and anti-social behaviour are associated with high density development, and residents can often feel less safe. Crime deprivation in the Black Country has improved since 2015<sup>46</sup>. Developing at higher densities could potentially back-track on the improvements made to these areas and see crime and deprivation increase. Therefore, this option could have a minor negative impact on equality.
- E.12.1.7 **Spatial Option D** aims to be market-driven and would direct new housing and employment development towards areas of highest demand. Under this option, it is likely that the majority of residential development would be focused in areas with the highest house prices, and as such, this option could potentially result in greater inequality and lack of affordable homes. A minor negative impact would be expected. Although, **Option D** could present more opportunities for incorporating design and layout of development that seeks to reduce crime and deprivation, compared to **Option C**.
- E.12.1.8 **Spatial Option B** seeks to develop vacant and under-utilised employment space for residential use. This would be likely to direct new residents towards town centres and in close proximity to employment opportunities and other services. This would have a minor positive impact on equality by ensuring all new residents have good access to essential services. Building upon this, **Spatial Option H** aims to direct all development to sustainable locations with good access to services and public transport options. Ensuring all residents have good access to a wide range of essential services and facilities as well as employment opportunities would be likely to have benefits to local communities and result in a minor positive impact on local equality. **Option H** would be likely to achieve this to a greater extent than **Option B**.

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<sup>46</sup> Black Country Consortium (2019) Black Country Indices of Deprivation. Available at: <https://www.the-blackcountry.com/upload/EIU/Intelligence%20Briefings/Black%20Country%20IMD%202019%20Barometer.pdf> [Date Accessed: 09/02/21]

- E.12.1.9 Under **Spatial Option G**, some development would be directed towards a Garden Village. Within a Garden Village it is likely that infrastructure and services, such as GP surgeries and employment opportunities, would be provided alongside residential development. The option also requires all strategic sites to include 25% employment land. This would help to ensure all new residents have good access to employment and a range of amenities, and overall have a minor positive impact on equality.
- E.12.1.10 **Spatial Option J** seeks to deliver balanced growth across the Black Country considering aspects of the other ten spatial options. The option aims to release surplus open space for development, which would be expected to have a negative impact in some local areas, by reducing the amount of space available for community cohesion. In addition, the option aims to direct some development within town centres at higher densities. Higher densities could potentially place pressure on local services and resources, and potentially increase the fear of crime within local communities. However, this option would seek to deliver enough housing and employment land to meet locally identified needs, would only situate development in areas with sustainable access to services, and would support Nature Recovery Networks, with benefits to mental wellbeing. As this option seeks to distribute growth across the different areas of the Black Country, overall, a minor positive impact has been identified.
- E.12.1.11 The Living Environment deprivation has decreased in the Black Country between 2015 and 2019, with 32% of the LSOAs of the Black Country now in the 20% most deprived in England<sup>47</sup>. **Spatial Option E** seeks to protect existing open space in the urban areas and deliver new, functional open space alongside developments. This would be likely to help encourage community engagement and ensure all residents have access to open space, with associated benefits for physical and mental wellbeing. This could potentially help to improve living environment deprivation across the Black Country. Therefore, **Spatial Option E** would be expected to have a minor positive impact on equality. Out of the eleven options, this places the most emphasis on creating healthy and happy communities and as such is considered to be the best performing option.

## E.12.2 Rank

- E.12.2.1 Adverse impacts have been identified, associated with **Spatial Options A, A1, C, D, F1 and F2**, largely due to these options directing growth towards potentially unsustainable locations with reduced access to services, facilities and open space and/or promoting higher density development which could increase the risk of crime and the fear of crime.

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<sup>47</sup> Black Country Consortium (2019) Black Country Indices of Deprivation. Available at: <https://www.the-blackcountry.com/upload/EIU/Intelligence%20Briefings/Black%20Country%20IMD%202019%20Barometer.pdf> [Date Accessed: 09/02/21]

E.12.2.2 Positive impacts have been identified under **Spatial Options B, E, G, H and J** due to the more balanced approach within these options providing access to services and facilities as well as open spaces for recreation and community cohesion.

E.12.2.3 **Spatial Option A** is the worst performing option for equality whilst **Option E** is the best performing spatial option (see **Table E.2.11**).

**Table E.12.1:** Ranking of Spatial Options under SA Objective 11 - Equality

SA Objective 11 - Equality	Spatial Option										
	A	A1	B	C	D	E	F1	F2	G	H	J
SA Score	-	-	+	-	-	+	-	-	+	+	+
Rank	11	10	5	7	6	1	9	8	3	4	2

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## E.13 SA Objective 12: Health

### E.13.1 Assessment

- E.13.1.1 There are four NHS hospitals with A&E departments located within the Black Country: Russells Hall Hospital in Dudley; Sandwell General Hospital in Sandwell; Manor Hospital in Walsall; and New Cross Hospital in Wolverhampton. In addition, several NHS hospitals with A&E departments are located nearby in Birmingham including Birmingham City Hospital, Birmingham Heartlands Hospital, Queen Elizabeth Hospital and Good Hope Hospital.
- E.13.1.2 Life expectancy for both males and females within the West Midlands is lower than England's average<sup>48</sup>. In addition, mortality rate due to cardiovascular diseases and cancer are higher than average. Average percentage of physically active adults in Dudley in 2019 was 59.5%, Sandwell at 54.7%, Walsall at 55.9% and Wolverhampton at 58.0%.
- E.13.1.3 The four authorities each have a Health and Wellbeing Strategy (Dudley<sup>49</sup>, Sandwell<sup>50</sup>, Walsall<sup>51</sup> and Wolverhampton<sup>52</sup>) which overall seek to ensure individuals in the Black Country live "*longer, safer, healthier lives*". Health and wellbeing are directly affected by the environment in which people live and work, and the surrounding built and natural environment are key aspects of the four authorities health strategies.
- E.13.1.4 **Spatial Options B, C and H** promote high density development, focused towards the urban centres in line with the Accessibility Modelling. Higher density developments can have a variety of adverse impacts on the health and well-being of local residents. Although new residents under these three options would be likely to be located in areas with good access to services, development at higher densities could potentially result in over-capacity issues at some facilities, such as GP surgeries. Access to, and use of, green spaces such as playgrounds and sports fields is also more limited in higher density areas<sup>53</sup>. This is due to more demand on the open spaces coupled with the fact that local residents are often more

<sup>48</sup> Public Health England (2019) Local Authority Health Profiles. Available at: <https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/cid/1938132696/pat/15/par/E92000001/ati/6/are/E12000005/cid/4> [Date Accessed: 09/02/21]

<sup>49</sup> Dudley Health and Wellbeing Board (2017) Dudley Health and Wellbeing Strategy 207 – 2022. Available at: <https://www.dudleyhealthandwellbeing.org.uk/health-wellbeing-strategy> [Date Accessed: 09/02/21]

<sup>50</sup> Sandwell Health and Wellbeing Board (2016) Joint Health and Wellbeing Strategy 2016 – 2020. Available at: [http://www.sandwell.gov.uk/info/200222/healthy\\_sandwell\\_healthy\\_you/2391/sandwell\\_health\\_and\\_wellbeing\\_board](http://www.sandwell.gov.uk/info/200222/healthy_sandwell_healthy_you/2391/sandwell_health_and_wellbeing_board) [Date Accessed: 09/02/21]

<sup>51</sup> Walsall Partnership (2019) The Walsall Plan: Our Health and Wellbeing Strategy 2019 – 2021. Available at: <https://go.walsall.gov.uk/Portals/0/Uploads/PublicHealth/66800%20The%20Walsall%20Plan-%20Our%20Health%20and%20Wellbeing%20Strategy%202019-2021.pdf?ver=2020-01-23-160833-263> [date Accessed: 09/02/21]

<sup>52</sup> City of Wolverhampton Council (2018) Wolverhampton Joint Health and Wellbeing Strategy 2018 – 2023. Available at: <http://wellbeingwolves.co.uk/our-priorities.html> [Date Accessed: 09/02/21]

<sup>53</sup> Dempsey, N., Brown, C. and Bramley, G. (2012) The key to sustainable urban development in UK cities. The influence of density on social sustainability. Progress in Planning 77 (2012) 89-141

likely to perceive open spaces as being unsafe. The density of the urban area also influences the stability of the local community by partially determining the extent to which residents interact with one another. It should be noted that through careful, innovative and high-quality design and layout techniques there is good scope for avoiding or mitigating adverse impacts caused by higher density development, such as by providing well-resourced and high-capacity amenities<sup>54</sup>. Overall, minor negative impacts on human health would be likely under **Spatial Options B, C and H**.

- E.13.1.5 **Spatial Options B, C and H** have been identified as the least sustainable options as they direct growth to high density development, which would be expected to reduce space in homes and lead to overcapacity of nearby services. **Options B and H** are likely to perform slightly better than **Option C** because these two options seek to direct residents to areas where there are some existing services such as GP surgeries.
- E.13.1.6 **Spatial Option J** seeks to deliver balanced growth across the Black Country considering aspects of the other ten spatial options. The option aims to release surplus open space for development, which would be expected to have a negative impact on the human health by reducing spaces available for personal reflection or outdoor exercise. In addition, the option aims to direct some development to town centres at higher densities. These residents would be likely to be located in areas with good access to health facilities, and also within walking distance to many facilities, encouraging active travel and healthy lifestyles. However, higher densities would likely mean smaller residential units, which could potentially result in adverse impacts on wellbeing. This option seeks to protect some areas of Green Belt land, which would help to ensure that residents within the Black Country would have access to some areas of open countryside. On balance, **Spatial Option J** could potentially have a neutral impact in relation to human health and is ranked eighth.
- E.13.1.7 **Spatial Options F1 and F2** both aim to protect some Green Belt land. By protecting this previously undeveloped land, these two options would be likely to protect some natural habitats which may have benefits to local communities, providing natural space for reflection and outdoor exercise. Under both of these options, some development would be directed to parcels identified as low Green Belt harm which are generally located towards the urban edge. New residents situated in these areas would be likely to have more limited access to health care facilities and would result in the loss of some previously undeveloped land and associated natural habitats. On balance, both of these options would be likely to have a neutral impact on human health. It would be anticipated that **Spatial Option F2** would protect the greatest amount of Green Belt land and protect natural spaces with physical and mental health benefits, and therefore, **Spatial Option F2** would be likely to result in more positive impact than **Spatial Option F1**.

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<sup>54</sup> Wong, K. W. (2010). Designing for high-density living: High rise, high amenity and high design. In E. Ng (Ed.), Designing high density cities for social and environmental sustainability. London: Earthscan

- E.13.1.8 **Spatial Option D** aims to direct residential and employment development towards areas of high demand. This would be expected to ensure new residents are located in attractive and desirable areas, which would be likely to have benefits to wellbeing, and could potentially have benefits to community cohesion. A minor positive impact would be expected in relation to human health.
- E.13.1.9 **Spatial Options A** and **A1** seek to redevelop existing employment land into residential use. This would be expected to locate new residents within town centres, and therefore, near to health facilities within the urban areas. As such, these two options would be likely to have a minor positive impact in terms of accessibility to healthcare. **Spatial Option A1** also seeks to direct some employment development to the Green Belt, which would be likely to result in the loss of some previously undeveloped land and reducing the quantity of natural habitats within the Black Country. Therefore, **Spatial Option A** would be likely to have more benefits on human health than **Spatial Option A1**.
- E.13.1.10 **Spatial Option E** seeks to protect open spaces from future development. The presence of open space can have physical and mental health benefits by allowing residents access to a diverse range of natural habitats, alongside providing opportunities for outdoor recreational use and attractive routes for active travel. Protecting these spaces under **Spatial Option E** alongside residential developments would be expected to have a minor positive impact on human health. **Spatial Option E** is therefore considered to be the next best performing option.
- E.13.1.11 **Spatial Option G** aims to deliver residential development at low densities. Lower densities can have benefits to human health, by providing footpaths and cycleways for active travel, space for residential gardens, open spaces for outdoor exercise and adequate indoor residential space. This option also seeks to provide 20% biodiversity net gain on all Green Belt parcels released for development, increase urban greening and support Nature Recovery Networks. All of these factors would be likely to enhance a diverse range of natural habitats in the Black Country, with benefits to human health and wellbeing by ensuring the surrounding natural environment is a vibrant place to allow for personal reflection and encourage outdoor recreation. Therefore, this option would be likely to have minor positive impact in regard to health. **Spatial Option G** has been identified as the best performing option in relation to human health. This option seeks to direct growth to a new Garden Village, at low densities and seeks to improve and enhance the local biodiversity networks, with benefits to physical and mental wellbeing.

## E.13.2 Rank

- E.13.2.1 Negative impacts have been identified for **Spatial Options B, C** and **H**, primarily because these options would be expected to deliver higher density development and reduce accessibility to open space.

- E.13.2.2 Negligible/neutral impacts have been identified under **Spatial Options F1, F2 and J**, when considering the mixed effects anticipated with providing open space and lower density development, alongside potential reduced accessibility to healthcare as a consequence.
- E.13.2.3 Positive impacts have been identified for **Spatial Options A, A1, D, E and G**, as these five options would be likely to deliver the greatest benefits in terms of accessibility to healthcare and open space.
- E.13.2.4 **Spatial Option C** has been identified as the worst performing option for human health whilst **Option G** is the best performing spatial option.

*Table E.13.1: Ranking of Spatial Options under SA Objective 12 – Health*

SA Objective 12 - Health	Spatial Option										
	A	A1	B	C	D	E	F1	F2	G	H	J
SA Score	+	+	-	-	+	+	0	0	+	-	0
Rank	3	4	9	11	5	2	7	6	1	10	8

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## E.14 SA Objective 13: Economy

### E.14.1 Assessment

- E.14.1.1 Approximately 74.1% of residents in the Black Country are economically active, lower than the West Midlands and Great Britain<sup>55</sup>. The percentage of households that were unemployed in 2019 in the Black Country was 19.4%, higher than the UK's average of 13.9%. In addition, gross weekly pay for workers in the Black Country in 2019 was £521.30, compared to £550.80 for the West Midlands and £587.00 for Great Britain.
- E.14.1.2 Some of the strategic centres of the four districts include Walsall Town Centre, West Bromwich, Wolverhampton Town Centre and Brierley Hill. These four areas provide retail, office and leisure floorspace. Development proposals located in urban areas would be expected to provide new residents with good sustainable transport connections to nearby employment opportunities.
- E.14.1.3 The Black Country Economic Development Needs Assessment (EDNA)<sup>56</sup> aims to assess employment land needs across the Black Country for the length of the Plan period. According to the EDNA, there is an estimated requirement for 565ha of employment land up to 2039<sup>57</sup>.
- E.14.1.4 **Spatial Option A** would retain the strategy set out in the adopted BCP in which existing employment land would be converted to residential use in order to help meet the identified housing need. As a result, this option would be expected to result in a net loss of employment floorspace. As the Black Country is already combatting issues with low employment levels, the net loss of employment land would be expected have a detrimental effect on the economy. This option would therefore be expected to result in a major negative impact on the local economy. **Spatial Option A** has been identified as having the lowest rank under this objective as this option would result in the net loss of employment sites, whilst also introducing more residents that would require employment opportunities.
- E.14.1.5 **Spatial Option A1** is similar to **Spatial Option A**, whereby existing employment would be converted to residential development resulting in a loss of employment floorspace across the Plan area, however, under **Spatial Option A1** some additional employment land would be delivered within the Green Belt. Nevertheless, this would still be likely to result in a net loss

<sup>55</sup> nomis (2019) Labour Market Profile - Black Country. Available at: <https://www.nomisweb.co.uk/reports/lmp/lep/1925185537/report.aspx> [Date Accessed: 09/02/21]

<sup>56</sup> Warwick Economics and Development (2017) Black Country Economic Development Needs Assessment May 2017 Stage 1 Report. Available at: <https://blackcountryplan.dudley.gov.uk/media/11530/black-country-edna-stage-1-report.pdf> [Date Accessed: 09/02/21]

<sup>57</sup> Black Country Economic Development Needs Assessment 2017 and 2021. Warwick Economics and Development (2017) Black Country Economic Development Needs Assessment May 2017 Stage 1 Report. Available at: <https://blackcountryplan.dudley.gov.uk/media/11530/black-country-edna-stage-1-report.pdf> [Date Accessed: 09/02/21]. EDNA2 2021 not yet published online.

of employment land and it would not be expected that the development of employment land within the Green Belt would meet the identified need of 565ha of employment land. Furthermore, the Green Belt within the Black Country is located to the edge of the urban areas and may not be the most appropriate or desirable location for employment development. Therefore, a minor negative impact on the local economy would be expected and this option has been ranked as the second lowest under this objective.

- E.14.1.6 **Spatial Options E, F1 and F2** aim to direct development away from open space and/or Green Belt land identified as being of highest harm and landscape sensitivity. Under these three options, it would be likely that there would be less land available for development, and therefore, it is uncertain if these options alone would provide sufficient land to meet the identified employment floorspace need. Overall, minor negative impacts would be likely for these three options in regard to employment and economy. **Spatial Options F2, F1 and E** all aim to protect land, which would subsequently reduce the quantity of land available for development. **Spatial Option F2** would protect the greatest quantity of land, then **Spatial Option F1**, followed by **Spatial Option E**.
- E.14.1.7 **Spatial Option G** seeks to deliver lower density development on residential sites and supports mixed-use development on larger sites. By having a lower housing density across the Black Country, this option would be likely to require more land to deliver the identified housing need. The option also seeks to ensure that 25% of strategic sites contain employment opportunities. Overall, it is uncertain if this option would meet the identified employment floorspace need of 565ha of employment land and a minor negative impact on employment and the economy would be expected. As **Option G** does promote mixed use development, this option would be expected to have greater benefits to the local economy than **Spatial Options F2, F1 and E**.
- E.14.1.8 **Spatial Option C** focuses on delivering residential development. Development under this option would be focused towards centres, primarily at densities of 200dph. By directing residential growth towards centres, this option could potentially locate new residents in close proximity to shops and other services and subsequently have benefits to the local economy. Although this option alone would not satisfy the identified employment floorspace need, a minor positive impact in the local economy would be expected.
- E.14.1.9 Under **Spatial Option H**, employment development would be directed towards areas with good public transport access, such as near train stations or areas with good bus services. The Accessibility Modelling helps to identify areas with good access via public transport to employment. Under **Spatial Option H**, residents would be expected to have good access to employment opportunities which would have benefits to the local economy. However, it is uncertain if there is sufficient land available within these areas to meet the identified employment floorspace need. Overall, a minor positive impact on the economy would be expected.

- E.14.1.10 **Spatial Options C and H** would be expected to result in similar impacts on the economy, however, **Option H** would only direct employment sites towards locations with good public transport access, whereas **Option C** would primarily direct employment land towards town centres but also utilise vacant space.
- E.14.1.11 The focus of **Spatial Option D** is to direct employment land to the most attractive commercial locations. The emerging Viability and Deliverability Study will identify the areas of highest demand for employment use. By directing employment development to desirable areas, it would be likely that sites will provide jobs in areas of highest demand and support economic growth in these areas. However, this option alone would not be able to meet the identified employment floorspace need. Overall, a minor positive impact on the local economy would be expected.
- E.14.1.12 **Spatial Option J** directs employment development in a variety of locations to maximise market deliverability and meet local needs. This would be likely to ensure employment land is situated in desirable locations and meets locally identified needs. This would be likely to have benefits to the local economy and a minor positive impact would be expected.
- E.14.1.13 Both **Spatial Options D and J** seek to direct employment development towards the most attractive locations in line with the market. **Option J** would be expected to have more positive impact on the economy, as this option would also ensure development is located in areas with good access to services and public transport.
- E.14.1.14 One of the main aims of **Spatial Option B** is to promote and retain local employment. The option focuses on using vacant or under-utilised space within centres. This option would not be expected to result in the loss of employment land, and by converting vacant space within centres to residential use, this option would locate new residents in close proximity to local shops and subsequently, would be likely to have benefits for the local economy. This option would also help increase employment opportunities by intensifying low density employment areas and maximising under-utilised space. This option would be expected to result in a minor positive impact on the local economy, although this option alone would not satisfy the identified employment floorspace need.
- E.14.1.15 **Spatial Option B** has been identified as the best performing option in relation to economy and employment as this option aims to retain and intensify existing employment land and focus on utilising vacant and under-utilised space in town centres. This option would be expected to result in the retention of the greatest quantity of employment floorspace of the eleven options. This option would also be beneficial for the economy by utilising vacant spaces and directing some residential development to the town centres, with benefits to the local economy.

**E.14.2 Rank**

E.14.2.1 A major negative impact on the economy has been identified for **Spatial Option A**, because this option would result in a loss of employment land without seeking to replace this elsewhere.

E.14.2.2 Minor negative impacts have been identified for **Spatial Options A1, E, F1, F2 and G**, as these options could lead to employment development in inappropriate locations and would not be expected meet identified needs.

E.14.2.3 Minor positive impacts have been identified for **Spatial Options B, C, D, G and J**, primarily associated with the more considered approaches towards the sustainable location of employment development under these options.

E.14.2.4 **Spatial Option A** is the worst performing option for employment whilst **Option B** is the best performing spatial option (see **Table E.2.13**).

*Table E.14.1: Ranking of Spatial Options under SA Objective 13 – Economy*

SA Objective 13 - Economy	Spatial Option										
	A	A1	B	C	D	E	F1	F2	G	H	J
SA Score	--	-	+	+	+	-	-	-	-	+	+
Rank	11	10	1	4	3	7	8	9	6	5	2



## E.15 SA Objective 14: Education

### E.15.1 Assessment

- E.15.1.1 There are a wide range of schools in the Black Country, including 56 schools with sixth forms, plus 13 special schools with post-16 education provision and one special post-16 institution<sup>58</sup>. There are also a number of further education and higher education opportunities within the Black Country, including the University of Wolverhampton, Dudley College of Technology and Sandwell College. Within the wider West Midlands, there are several universities including the University of Birmingham, Birmingham City University and Aston University.
- E.15.1.2 Between January and December 2018, approximately 15% of the Black Country had no qualifications<sup>59</sup>. One key aim for the Black Country authorities is to increase education and work-based training for residents. In addition, the Black Country has some of the highest rates of child poverty in England which can impact children's qualification attainment; children living in poverty often achieve less than average at every stage of education<sup>60</sup>.
- E.15.1.3 The extent to which all spatial options would facilitate good education for new residents is almost entirely dependent on the specific location of development, which is uncertain at this stage.
- E.15.1.4 **Spatial Options F1** and **F2** both seek to protect areas of highest Green Belt harm, and subsequently, release Green Belt land of lowest harm for development. New residents located in areas of lowest Green Belt harm would be expected to be located in areas with reasonable access to educational facilities according to the Accessibility Modelling, although, compared to the urban areas there is likely to be a reduced choice of educational facilities and the potential for longer travel times. On the other hand, these options would direct residents away from the highly populated town centres, where school capacity could struggle with large numbers of new residents. Overall, these two options could potentially have a minor negative impact on education. As **Spatial Option F2** would direct fewer residents to the Green Belt than **Spatial Option F1**, this could be seen as a better performing option of the two.

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<sup>58</sup> Department for Education (2017) Black Country Areas Review. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/582028/Black\\_Country\\_AR\\_-\\_Report\\_-\\_Final.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/582028/Black_Country_AR_-_Report_-_Final.pdf) [Date Accessed: 09/02/21]

<sup>59</sup> Nomis (2020) Labour Market Profile. Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157188/report.aspx?c1=1946157189&c2=1946157192> [Date Accessed: 09/02/21]

<sup>60</sup> University of Wolverhampton (2019) The Black Country Education Insight Report. Available at: <http://educationobservatory.co.uk/edobs/wp-content/uploads/2019/08/Black-country-Annual-Education-Insight-Report-Final.pdf> [Date Accessed: 09/02/21]

- E.15.1.5 Under **Spatial Option E**, open spaces would be protected, and new open spaces would be provided alongside new development. In light of this, it is expected that development under this option would be of lower density and may not be situated in areas with the most sustainable travel options. Overall, a minor negative impact would be expected, however, the potential for incorporating safe green routes to school within open spaces could lead to possible benefits in that regard.
- E.15.1.6 **Spatial Options A and A1** would replace existing employment land with residential units. **Spatial Option B** seeks to develop under-utilised and vacant space in town centres into residential units. These options may direct a large proportion of development towards urban areas of the Black Country, which are likely to provide a range of local schools. However, there may be capacity issues at some schools in the urban areas. Careful consideration of the impacts of development on the capacity of local schools will be required, and in some locations expansion of schools may be needed to support large scale higher density development proposals. Overall, these three options could potentially have a minor negative impact in relation to education. **Option B** would be expected to perform slightly better than **Options A or A1**, due to the focus on mixed-use development rather than employment-led development under the other two.
- E.15.1.7 **Spatial Option D** seeks to allocate development towards high demand areas as indicated by the emerging Viability and Deliverability Study. Details regarding the location of development under this option is unknown at the time of writing, however, it is expected that access to schools would be a factor in determining an area's popularity. Therefore, **Option D** could potentially result in more development in areas with good access to schools, although this could lead to over-capacity issues and would not benefit all residents across the Plan area. A negative impact on education could be expected, however, this option would be likely to situate more residents in desirable areas compared to **Options A, A1 and B**.
- E.15.1.8 **Spatial Option H** seeks to direct development towards areas with the highest levels of sustainable transport access, such as areas with good bus services or walking routes. **Spatial Option J** aims to release open space and Green Belt land identified at low harm for development and increase housing densities in areas with good sustainable access to services, including schools. Both these options would be expected to have a minor positive impact on education; however, it is likely that by delivering more spread out development, **Option J** would relieve potential issues with capacity to a greater extent than **Option H**.
- E.15.1.9 **Spatial Option G** seeks to direct some development to a new Garden Village if land is available. Under this strategy, it is likely that new schools would be incorporated into the Garden village (depending on the overall size of development), ensuring all new residents would have access to nearby schools and would also help reduce the risk of over-capacity issues at current schools. As a result, this option could potentially have a minor positive impact in relation to education and is ranked as the second-best performing option.

E.15.1.10 **Spatial Option C** aims to maximise densities and invest in services. This would mean that the majority of development is directed towards the centres where access to education is good, in combination with providing new schools and other facilities, which would be expected to resolve potential issues with school capacity in these areas. Overall, this option would be expected to perform best by resulting in the most residents being situated in areas with access to education.

## E.15.2 Rank

E.15.2.1 There is a level of uncertainty with regards to the impact each of the eleven spatial options on education, in terms of accessibility as well as capacity of schools in each area.

E.15.2.2 Overall, adverse impacts would be anticipated under **Spatial Options A, A1, B, D, E, F1 and F2**, due to the reduced access to education, or significant pressure to school capacity, resulting from development in these locations.

E.15.2.3 Positive impacts could be achieved under **Spatial Options C, G, H and J**. This is primarily because these options would be likely to result in the most development being situated in areas with good access to education.

E.15.2.4 **Spatial Option F1** is considered to be the worst performing option for education whilst **Option C** is the best performing spatial option.

*Table E.15.1: Ranking of Spatial Options under SA Objective 14 - Education*

SA Objective 14 - Education	Spatial Option										
	A	A1	B	C	D	E	F1	F2	G	H	J
SA Score	-	-	-	+	-	-	-	-	+	+	+
Rank	7	8	6	1	5	9	11	10	2	4	3

## E.16 Conclusion

### E.16.1 Identifying the Best Performing Option

E.16.1.1 The summed ranks for each spatial option provide one interpretation of the overall best performing option (see **Table E.16.1**). The most sustainable options in this context would be those which have been identified as performing the best across the most objectives, and so have achieved the lowest summed rank.

E.16.1.2 There are many different aspects to sustainability. It should be noted that the following is only an indication and, as has been discussed within each SA Objective chapter above, sustainability performance of the spatial options varies greatly depending on the SA Objective in question.

*Table E.16.1: Overall ranking of each spatial option*

	Spatial Option										
	A	A1	B	C	D	E	F1	F2	G	H	J
Summed Rank	78	107	72	84	88	59	124	114	70	80	48

E.16.1.3 Based on this ranking exercise, the best performing option has been identified as **Spatial Option J**. This option performs the best across SA Objectives 4 and 9, and second-best across SA Objectives 3, 10, 11 and 13 largely due to the balanced approach to growth under this strategy.

E.16.1.4 This is followed by **Spatial Option E**, which performs best across SA Objectives 1, 3, 7 and 11 but performs poorly under several other objectives, primarily as a result of the lower density development likely to be delivered under this option resulting in benefits to human and ecological health, but wider spread environmental impacts in some contexts.

E.16.1.5 There is little difference in the overall ranking between **Spatial Options G, B, A, H, C and D**. These options would be likely to result in a range of sustainability impacts, performing well under some SA Objectives but poorly under others, and so would be expected to perform worse than balanced growth under **Option J** overall.

E.16.1.6 The highest summed ranks, and as such potentially the least sustainable options, would be **Spatial Options A1, F2 and F1**. These options include larger proportions of development within the Green Belt, and **Options F1 and F2** focus on limiting landscape character and sensitivity impacts rather than delivering growth which is necessarily the most sustainable across all topics.

# Appendix F: Dudley Reasonable Alternative Site Assessments

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# F.1 Introduction

## F.1.1 Overview

- F.1.1.1 A total of 185 reasonable alternative sites have been identified within Dudley (see **Table F.1.1**). This includes 160 sites proposed for residential use (69 of which are ‘carried forward’ from existing development plans), and 25 sites proposed for employment use (14 of which are ‘carried forward’ from existing development plans).
- F.1.1.2 Each of the sites appraised within this report have been assessed for likely impacts on each of the 14 SA Objectives, as outlined in the SA Framework (see **Appendix A**). Likely sustainability impacts have been set out in **Tables F.2.1 – F.14.1** within each SA Objective chapter, in accordance with the methodology set out in **Chapter 5** of the main SA Report.
- F.1.1.3 At this stage, only a baseline assessment has been carried out. Baseline assessment is the receptor-only site assessment of the red line boundary. The receptor-only impacts help to identify the potential impacts on site if there were no policy or mitigation.
- F.1.1.4 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by the Black Country Authorities (BCA), as well as expert judgement.

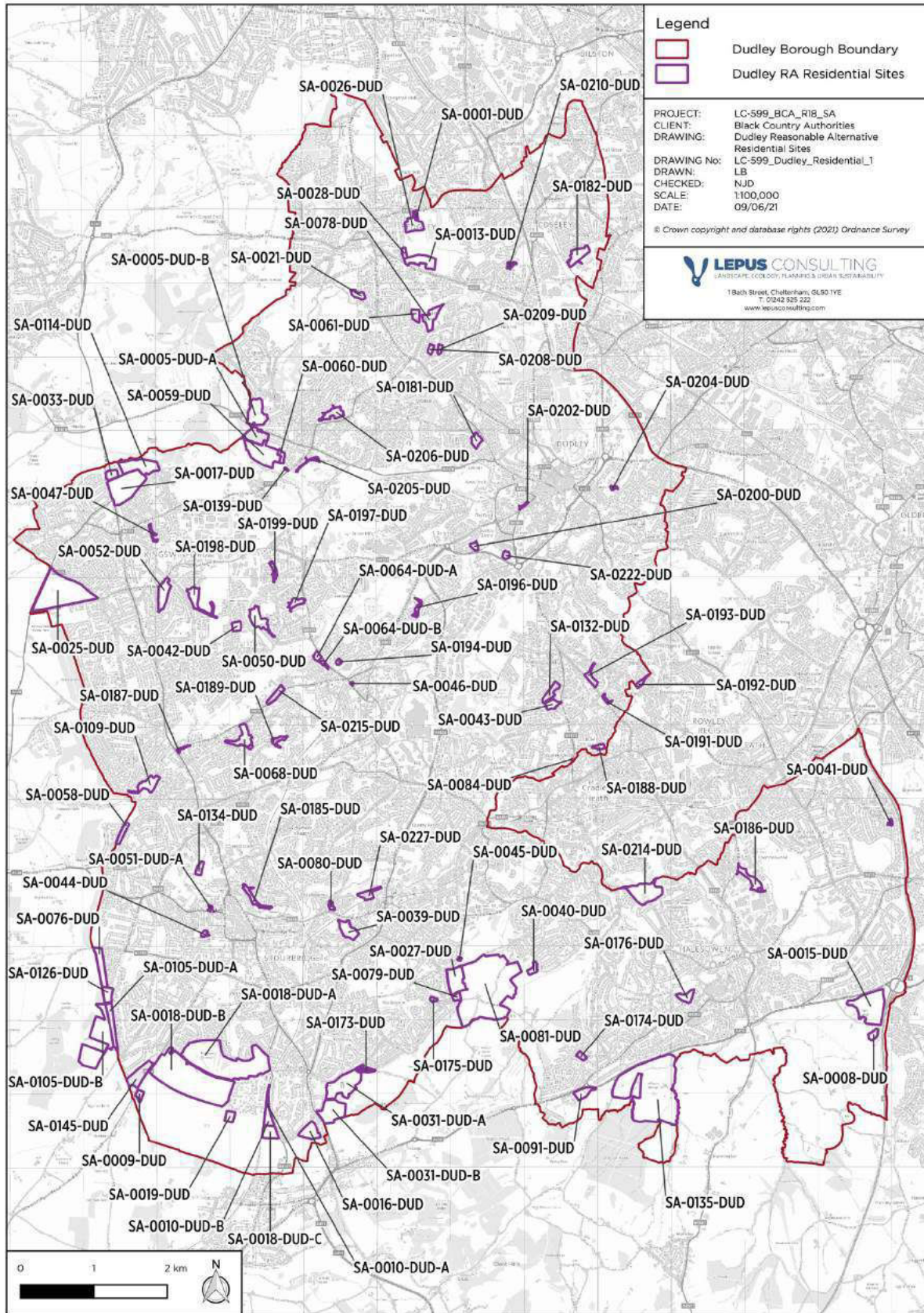


Figure F.1.1: Reasonable alternative sites proposed for residential use in Dudley



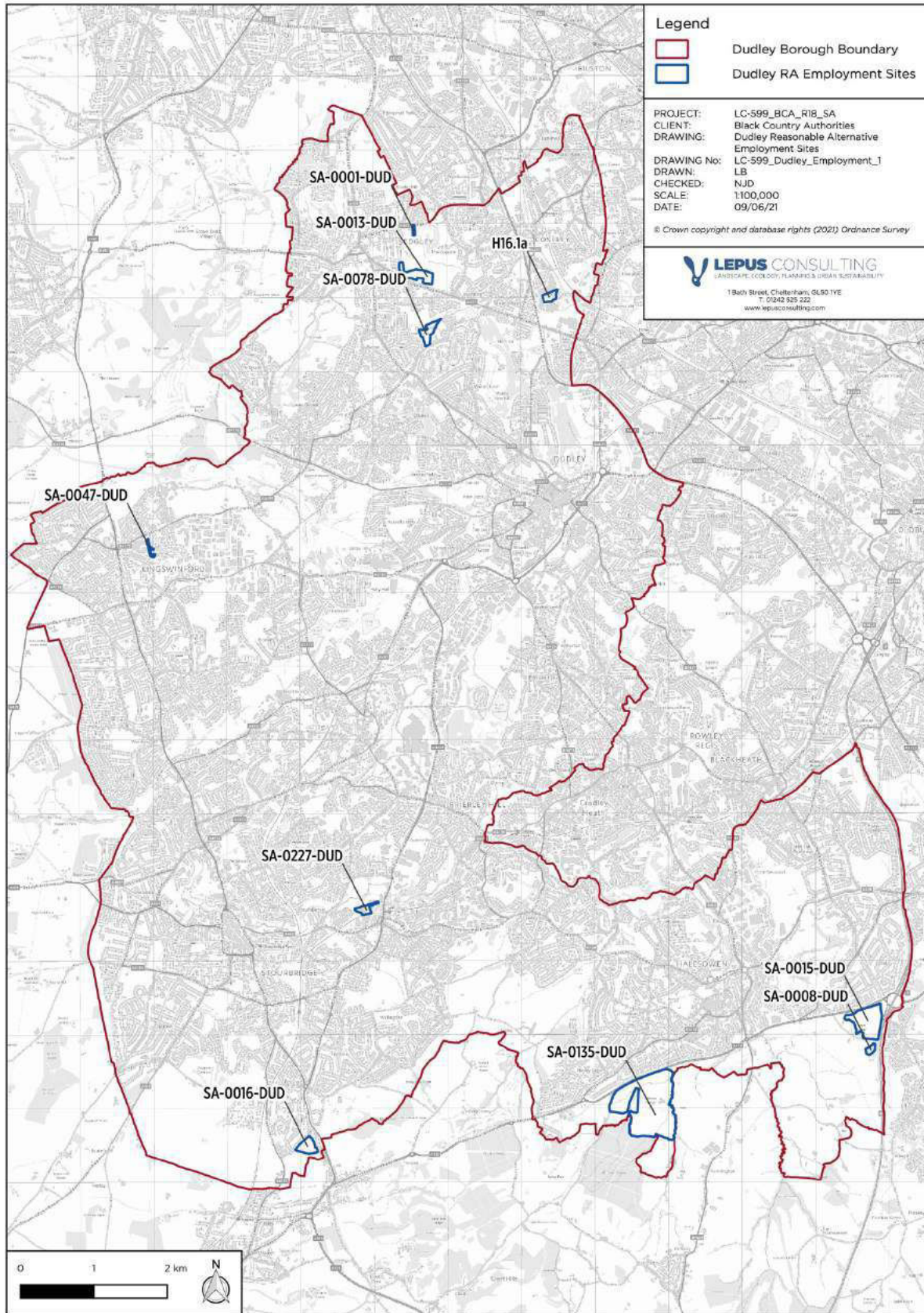


Figure F.1.2: Reasonable alternative sites proposed for employment use in Dudley

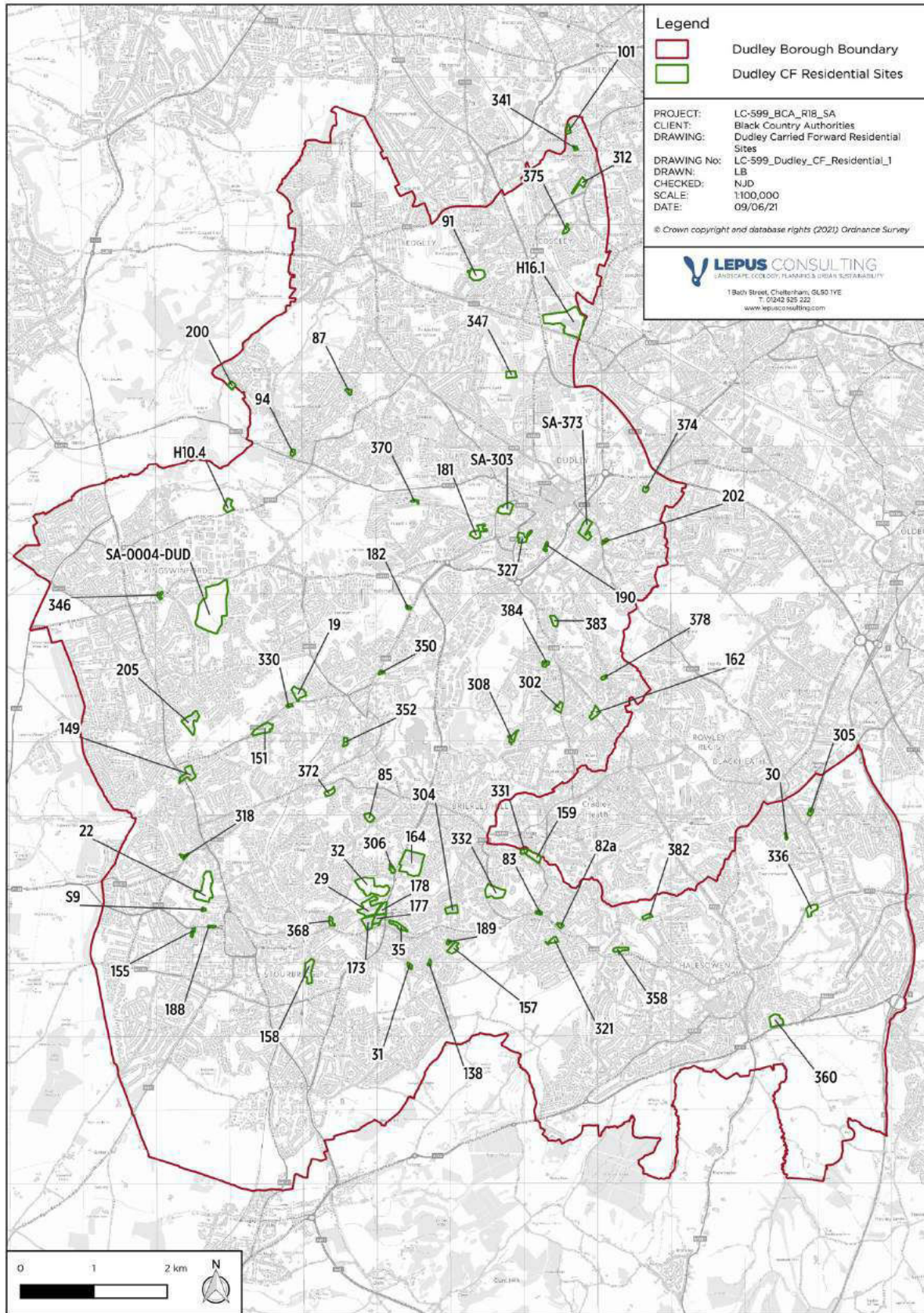


Figure F.1.3: Carried forward sites proposed for residential use in Dudley

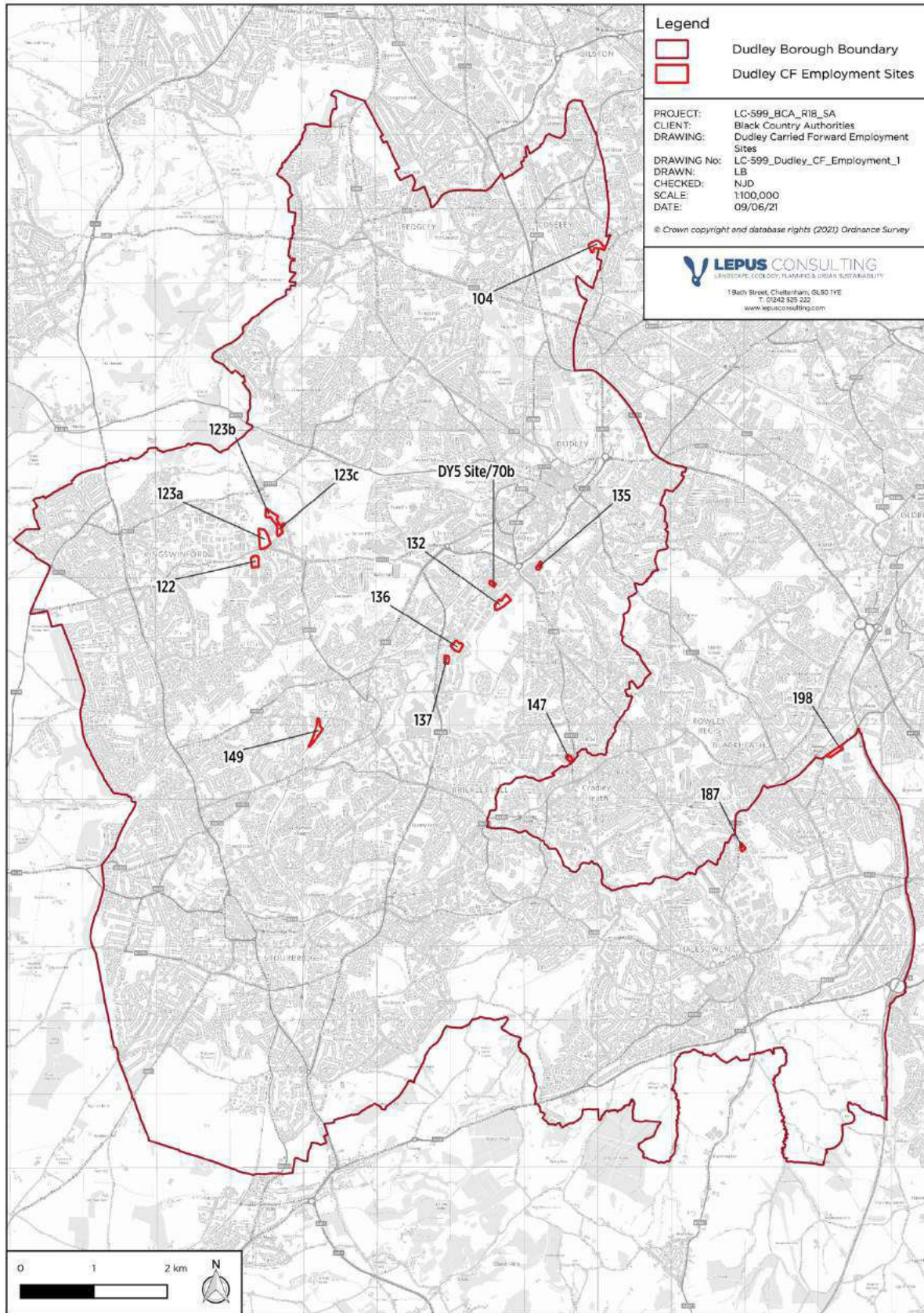


Figure F.1.4: Carried forward sites proposed for employment use in Dudley

*Table F.1.1: Reasonable alternative sites in Dudley*

Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
SA-0001-DUD	30 Gorge Road, Sedgley	Housing	0.37	0.28	7
SA-0005-DUD-A	Land North and South of Himley Road Brierley Hill, Himley, Dudley	Housing	4.85	4.85	170
SA-0005-DUD-B	Land North and South of Himley Road Brierley Hill, Himley, Dudley	Housing	7.03	7.03	210
SA-0008-DUD	Lye Close Lane, Halesowen	Housing	1.24	1.24	44
SA-0009-DUD	Rear Garden Land, Old Farm/Norton Stourbridge, DY8 2SB	Housing	1.19	1.19	41
SA-0010-DUD-A	Site A, Land off Worcester Lane, Stourbridge	Housing	0.61	0.61	10
SA-0010-DUD-B	Site B, Land off Worcester Lane, Stourbridge	Housing	2.29	2.29	45
SA-0013-DUD	Field at Woodsetton, Adj to Tipton Road/Setton Drive, Sedgley	Housing	1.52	1.52	40
SA-0015-DUD	Land to the North of Lapal Lane South Halesowen	Housing	14.70	11.76	350
SA-0016-DUD	Land off Bromwich Lane, Pedmore	Housing	4.20	4.20	150
SA-0017-DUD	Holbeache Lane/Wolverhampton Road, Kingswinford	Housing	14.72	8.24	330
SA-0018-DUD-A	Golf Course north of Racecourse Lane	Housing	38.00	38.00	Unknown
SA-0018-DUD-B	Land south of Racecourse Lane	Housing	43.38	43.38	Unknown
SA-0018-DUD-C	Racecourse Lane, Stourbridge	Housing	3.30	3.00	60
SA-0019-DUD	Land East of Ounty John Lane, Pedmore, Stourbridge, DY8 2RH	Housing	1.37	1.37	20
SA-0021-DUD	Land Off Viewfield Crescent, Dudley	Housing	1.56	0.83	24
SA-0025-DUD	Swindon Road/ Enville Road, Wall Heath, Kingswinford	Housing	25.14	13.30	533
SA-0026-DUD	Land adjoining Bilston Street/ Whites Drive, Dudley	Housing	2.50	2.50	100
SA-0027-DUD	Land west of Foxcote Farm, Oldnall Lane, Wollescote, Stourbridge	Housing	6.87	6.87	170
SA-0028-DUD	Turls Hill Drive, Coseley, Bilston	Housing	0.82	0.62	20
SA-0031-DUD-A	Land south of Pedmore Lane, Pedmore, Stourbridge, DY9 OSX	Housing	19.80	19.80	320
SA-0031-DUD-B	Land south of Pedmore Lane, Pedmore, Stourbridge, DY9 OSX	Housing	19.80	19.80	320
SA-0033-DUD	Land adjacent to Holbeche House Care Home, Wolverhampton Road, Kingswinford	Housing	1.70	1.70	87
SA-0039-DUD	Hay Green / Lewis Rd, Lye	Housing	4.14	1.40	38
SA-0040-DUD	Beeches View Avenue, Halesowen, B63 2HH	Housing	1.26	1.26	56

Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
SA-0041-DUD	High Farm Road, Halesowen	Housing	0.37	0.37	3
SA-0042-DUD	Lapwood Avenue, Kingswinford	Housing	1.38	1.38	45
SA-0043-DUD	Land off Cradley Road Netherton	Housing	1.74	1.74	48
SA-0044-DUD	Land off Bowling Green Road Stourbridge, DY8 3XF	Housing	0.62	0.44	3
SA-0045-DUD	Seymore Rd Wollescote	Housing	0.20	0.19	4
SA-0046-DUD	Bank St / Bent St Brierley Hill	Housing	0.15	0.15	7
SA-0047-DUD	Balfour Road Kingswinford, DY6 7DJ	Housing	0.75	0.75	15
SA-0050-DUD	Bryce Road, Pensnett	Housing	4.00	4.00	115
SA-0051-DUD-A	Enville Street Stourbridge	Housing	0.21	0.21	2
SA-0052-DUD	Kingswinford Youth Centre, High Street, Kingswinford	Housing	4.68	4.68	135
SA-0058-DUD	Grazing Land Wollaston Farm, Wollaston, Stourbridge	Housing	3.77	2.56	90
SA-0059-DUD	Lower Gornal STW, Lower Gornal	Housing	10.68	6.36	210
SA-0060-DUD	Guys Lane, Lower Gornal	Housing	1.05	0.75	25
SA-0061-DUD	Land off Tenacre Lane, Lower Gornal, DY3 1XH	Housing	1.56	1.56	280
SA-0064-DUD-A	Pensnett Road, Pensnett	Housing	0.96	0.96	24
SA-0064-DUD-B	Pensnett Road, Pensnett, DY5 4NE (South)	Housing	0.45	0.45	75
SA-0068-DUD (south)	Brierley Hill Road/ Cooper Avenue, Brierley Hill, DY5 3PB (South)	Housing	0.30	0.30	22
SA-0068-DUD (north)	Brierley Hill Road/ Cooper Avenue, Brierley Hill, BHU	Housing	5.00	5.00	22
SA-0076-DUD	Three Fields, Dunsley Road, Norton, DY8 3LR	Housing	4.50	4.50	190
SA-0078-DUD	Tenacre Lane, Eve lane, Dudley, DY1 2TU	Housing	3.96	2.40	96
SA-0079-DUD	Land off Wynall Lane South, Wollescote, DY9 9AJ	Housing	0.88	0.88	34
SA-0080-DUD	Land off Timmis Road, Lye	Housing	0.63	0.63	28
SA-0081-DUD	Foxcote House Farm, Wynall Lane South, Wollescote Stourbridge, DY9 9AP	Housing	64.20	64.20	Unknown
SA-0084-DUD	Land off Cradley Road, DY2 9SW	Housing	0.39	0.39	7
SA-0091-DUD	Hayley Green Farm, Hagley Road, B63 1DY	Housing	1.20	1.20	35
SA-0105-DUD-A	Clent View Road, Stourbridge	Housing	4.85	4.85	100
SA-0105-DUD-B	Clent View Road, Stourbridge	Housing	17.51	17.51	Unknown
SA-0109-DUD	Land adjacent Ashwood Park Primary School, Wordsley, Stourbridge, DY8 5DJ	Housing	3.30	3.30	60
SA-0114-DUD	Land off Holbeache Lane, Kingswinford, Dudley	Housing	8.28	8.28	170
SA-0126-DUD	Land at Roman Road, Stourbridge	Housing	2.10	2.10	78
SA-0132-DUD	Marriott Road	Housing	14.44	2.60	105
SA-0134-DUD	VB Old Wharf Road	Housing	1.40	1.05	36

Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
SA-0135-DUD	Land on the South Side of Manor Way, Halesowen	Housing	69.50	54.01	1,668
SA-0139-DUD	74 Cinder Road, Lower Gornal, Dudley, West Midlands, DY3 2RP	Housing	0.10	0.10	1
SA-0145-DUD	Land south of Racecourse Lane	Housing	6.00	6.00	155
SA-0173-DUD	Dobbins Oak Flats	Housing	1.14	1.14	38
SA-0174-DUD	Merrick Close Playing Fields	Housing	0.89	0.89	29
SA-0175-DUD	Sensal Road Bank	Housing	0.44	0.44	18
SA-0176-DUD	Highfields Park, Highfields Lane, Halesowen	Housing	2.19	2.19	80
SA-0181-DUD	Shavers End Open Space	Housing	1.80	1.80	42
SA-0182-DUD	Central Drive Open Space/ Budden Road	Housing	4.00	4.00	123
SA-0185-DUD	Porlock Road/ Mill Race Lane	Housing	2.19	2.19	80
SA-0186-DUD	Land off Coombs Road	Housing	3.34	3.34	115
SA-0187-DUD	High Street Wordsley/Brierley Hill Road	Housing	0.42	0.42	15
SA-0188-DUD	Bristol Road, Dudley, DY2 9SE	Housing	0.84	0.84	24
SA-0189-DUD	Hawbush Road Open Space	Housing	1.25	1.25	46
SA-0191-DUD	Magpie Close, Dudley, DY2 9LU	Housing	0.41	0.41	15
SA-0192-DUD	Brooksbank Drive Open Space	Housing	0.76	0.76	20
SA-0193-DUD	Halesowen Open Space	Housing	1.99	1.99	70
SA-0194-DUD	Orchard Street Island	Housing	0.42	0.42	15
SA-0196-DUD	Fullwood Crescent, Dudley, DY2 0SQ	Housing	0.93	0.93	33
SA-0197-DUD	Mullett Park	Housing	1.70	1.70	60
SA-0198-DUD	Standhills Open Space	Housing	3.93	3.93	52
SA-0199-DUD	Corbyns Hall Open Space (Severn Drive)	Housing	1.01	1.01	15
SA-0200-DUD	Waverley Open Space	Housing	0.83	0.83	30
SA-0202-DUD	Greystone Street, Dudley, DY1 1SH	Housing	0.44	0.44	14
SA-0204-DUD	Alton Grove, Dudley, DY2 7JU	Housing	0.32	0.32	10
SA-0205-DUD	The Spinney, Brierley Hill, DY3 2RD	Housing	0.74	0.74	28
SA-0206-DUD	Abbey Street, DY3 2ND	Housing	3.01	3.01	120
SA-0208-DUD	Bramble Green, Dudley, DY1 3TR	Housing	0.77	0.77	27
SA-0209-DUD	Hazlewood Road, DY1 3TL	Housing	0.63	0.63	16
SA-0210-DUD	Wellesbourne Drive, Coseley, WV14 9TH	Housing	0.54	0.54	14
SA-0214-DUD	New Hawne Colliery, Haysech Road, Halesowen	Housing	8.20	8.20	230
SA-0215-DUD	Brockmoor Foundry North	Housing	1.90	1.90	60
SA-0222-DUD	Blower Greens Crescent	Housing	0.97	0.97	35
SA-0227-DUD	Bott Lane, Lye	Housing	2.13	2.13	82
SA-0001-DUD	30 Gorge Road, Sedgley	Employment	0.37	0.28	N/A
SA-0008-DUD	Lye Close Lane, Halesowen	Employment	1.24	1.24	N/A

Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
SA-0013-DUD	Field at Woodsetton, Adj to Tipton Road/Setton Drive, Sedgley	Employment	1.52	1.52	N/A
SA-0015-DUD	Land to the North of Lapal Lane South Halesowen	Employment	14.70	11.76	N/A
SA-0016-DUD	Land off Bromwich Lane, Pedmore	Employment	4.20	4.20	N/A
SA-0028-DUD	Turls Hill Drive, Coseley, Bilston	Employment	0.82	0.62	N/A
SA-0047-DUD	Balfour Road Kingswinford, DY6 7DJ	Employment	0.75	0.75	N/A
SA-0078-DUD	Tenacre Lane, Eve lane, Dudley, DY1 2TU	Employment	3.96	2.40	N/A
SA-0135-DUD	Land on the South Side of Manor Way, Halesowen	Employment	69.50	54.01	N/A
SA-0227-DUD	Bott Lane, Lye	Employment	2.13	2.13	N/A
H16.1	Bean Road, Coseley	Employment	2.16	1.21	N/A
19	Cookley Works, Leys Road, Brockmoor, Brierley Hill	CF Housing	2.16	1.62	70
22	Land at Old Wharf Road, Stourbridge	CF Housing	7.02	4.20	230
29	West of Engine Lane, north of the railway, Lye	CF Housing	6.00	4.25	168
30	Long Lane/Maltmill Lane, Shell Corner	CF Housing	0.36	0.36	13
31	Belmont Road, Lye	CF Housing	0.33	0.33	12
32	Caledonia Sewage Works	CF Housing	6.24	3.97	140
35	Clinic Drive Lye	CF Housing	0.90	0.68	10
82a	Foredraft Street, Cradley (2 sites A and B)	CF Housing	0.53	0.53	18
83	116-120 Colley Gate	CF Housing	0.25	0.25	14
85	Land Off Delph Lane, Brierley Hill	CF Housing	1.28	1.28	45
87	Land off Ruiton St/ Colwall Rd Gornal	CF Housing	0.46	0.46	19
91	Bourne Street, Coseley	CF Housing	2.57	2.57	53
94	Summit Place adj to Limerick PH Gornal Wood	CF Housing	0.43	0.43	15
101	Land adj. To 49 Highfields Road	CF Housing	0.40	0.40	13
138	Springfield Works, Pearson Street, Lye	CF Housing	0.25	0.25	10
149 (CFH)	Land at Plant Street, Mill Street and Bridge Street, Wordsley	CF Housing	1.29	0.97	43
151	Leys Road/Moor Street, Brierley Hill	CF Housing	2.60	1.95	78
155	Quantum Works, Enville Street, Stourbridge	CF Housing	0.36	0.36	14
157	Balds Lane, Lye	CF Housing	2.60	1.95	68
158	Rufford Road, Stourbridge	CF Housing	0.41	0.41	16
159	Lyde Green	CF Housing	0.69	0.69	27
162	Land at corner of Saltwells Road and Halesowen Road, Netherton	CF Housing	1.40	1.40	49
164	Land off Thorns Road, Lye (North)	CF Housing	3.42	2.61	104

Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
173	Land off Engine Lane, Lye (south of railway)	CF Housing	1.70	1.70	68
177	East of Engine Lane, south of the railway, Lye	CF Housing	1.25	0.93	35
178	Bott Lane/Dudley Road, Lye	CF Housing	1.25	1.25	43
181	Bull Street, Dudley	CF Housing	2.06	2.06	80
182	280 Stourbridge Road, Holly Hall, (former Henry Boot training)	CF Housing	0.28	0.28	22
188	Land opposite Spicer Lodge, Envile Street, Stourbridge	CF Housing	0.25	0.25	10
189	St Marks House, Brook Street	CF Housing	0.29	0.29	12
190	Shaw Road/New Road, Dudley	CF Housing	0.39	0.39	16
200	The Straits, Lower Gornal	CF Housing	0.64	0.64	23
202	The Woodlands, Dixons Green Road	CF Housing	0.40	0.40	22
205	Ridge Hill	CF Housing	4.16	4.16	129
302	Industrial land at Marriott Road and Cradley Road	CF Housing	3.34	2.50	88
304	Hays Lane, Stour Vale Road	CF Housing	1.45	1.09	58
305	Leona Industrial Estate, Nimmings Road	CF Housing	0.53	0.53	22
306	206 Thorns Road, Quarry Bank	CF Housing	0.55	0.47	26
308	Land between Heath Road and Copse Road, Netherton	CF Housing	0.76	0.57	27
312	Land rear of Salcombe Grove, Coseley	CF Housing	1.10	0.80	44
318	High Street, Wollaston	CF Housing	0.40	0.30	14
321	Land rear of Two Gates Lane, Cradley	CF Housing	0.68	0.51	24
327	Land at Blowers Green Road, Dudley	CF Housing	1.88	1.41	63
330	Woodman Inn, 31 Leys Road, Brockmoor	CF Housing	0.26	0.26	12
331	Land Adj.Rear 84-86 Lyde Green, Halesowen	CF Housing	0.50	0.50	17
332	Former Factory Site, Park Lane, Cradley	CF Housing	3.60	2.00	80
336	Former MEB Headquarters, Mucklow Hill	CF Housing	1.50	1.50	60
341	Land adjacent 32 Whitegates Road, Coseley	CF Housing	0.25	0.25	10
346	Hampshire House, 434 High Street, Kingswinford	CF Housing	0.44	0.44	30
347	Former Mons Hill Campus, Wrens Hill Road	CF Housing	0.81	0.60	30
350	Car park at Oak Court, Dudley Road	CF Housing	0.37	0.37	24
352	Northmoor	CF Housing	0.53	0.40	22
358	Land rear of 294 to 364 Stourbridge Road, Halesowen	CF Housing	1.34	1.00	39
360	Sandvik, Halesowen	CF Housing	2.32	1.50	50
368	Vacant land west of Hickman Street to Timmis Road, Bagley Street, Lye	CF Housing	0.60	0.45	17



Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
370	Garage site adjacent Hinbrook Road, Dudley	CF Housing	0.29	0.29	14
372	Land at Anchor Hill, Delph Road	CF Housing	0.88	0.66	28
374	Land at Corporation Road and Cavell Road, Dudley	CF Housing	0.42	0.42	20
375	Land adjacent to Pear Tree Lane, Coseley	CF Housing	0.99	0.74	38
378	St Peter's Road, Netherton	CF Housing	0.85	0.85	55
382	Former New Hawne Colliery, Haysech Road, Halesowen	CF Housing	0.63	0.63	15
383	Baptist End Road	CF Housing	1.45	1.09	49
384	Church Road	CF Housing	0.88	0.66	29
H10.4	Former Ibstock Works	CF Housing	7.60	7.60	200
H16.1	Land at Birmingham New Street	CF Housing	26.40	26.40	500
S9	Bradley Road West	CF Housing	0.25	0.25	80
SA-0004-DUD	Ketley Quarry, Dudley Road, Kingswinford	CF Housing	21.37	14.90	600
SA-303	Site at Wellington Road and Dock Lane	CF Housing	2.20	1.65	74
SA-373 (SA-0373-DUD)	National Works, Hall Street, Dudley	CF Housing	5.00	3.75	150
104	Fountain Lane/ Budden Rd, Coseley	CF Employment	1.79	Unknown	N/A
122	Gibbons Industrial Park / United Steels, Pensnett	CF Employment	1.42	Unknown	N/A
123a	Dandy Bank Road Ph2 and 3, Pensnett	CF Employment	3.12	Unknown	N/A
123b	Tansey Green Road, Pensnett	CF Employment	1.66	Unknown	N/A
123c	Dreadnought Road, Pensnett	CF Employment	1.10	Unknown	N/A
132	Hulbert Drive, Blackbrook Valley	CF Employment	2.13	Unknown	N/A
135	New Road, Netherton / Hillcrest Business Park	CF Employment	0.42	Unknown	N/A
136	Narrowboat Way, Blackbrook Valley	CF Employment	1.43	Unknown	N/A
137	Brewins Way, Blackbrook Valley	CF Employment	0.64	Unknown	N/A
147	Cradley Road, Westminster Industrial Estate, Netherton	CF Employment	0.44	Unknown	N/A
149 (CFE)	Moor Street, Brierley Hill	CF Employment	2.17	Unknown	N/A
187	Steelpark Road, Halesowen	CF Employment	0.44	Unknown	N/A
198	Cakemore Road, Blackheath	CF Employment	1.16	Unknown	N/A
DY5 Site	Grazebrook Park, Blackbrook Valley	CF Employment	0.47	Unknown	N/A

## F.2 SA Objective 1: Cultural Heritage

### F.2.1 Grade I Listed Buildings

F.2.1.1 There are six Grade I Listed Buildings within Dudley. The proposed development at sites in Dudley would be unlikely to significantly impact any Grade I Listed Buildings, therefore a negligible impact has been identified across all sites.

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

F.2.2.1 There is a relatively small number of Grade II\* Listed Buildings within Dudley, mostly concentrated in Dudley town centre and the other major settlements in the borough. Sites SA-0214-DUD and 382 coincide with the Grade II\* Listed Building 'Fan House and Chimney at the former New Hawne Colliery'. The proposed development at these two sites could potentially have direct adverse effects on this Listed Building, resulting in a major negative impact.

F.2.2.2 Eight other sites (SA-0017-DUD, SA-0031-DUD-A, SA-0031-DUD-B, SA-0033-DUD, SA-0114-DUD, 22, 149(CFH) and 188) are located in close proximity to Grade II\* Listed Buildings, such as Site SA-0033-DUD which is adjacent to 'Holbeache House', and Site SA-0017-DUD which is located approximately 120m from this Listed Building. Furthermore, Sites SA-0031-DUD-A and SA-0031-DUD-B are situated approximately 570m and 540m respectively from 'Obelisk about ¾ mile north of Hagley Hall', and these two large sites are located downhill from the Obelisk, making them likely to be visible. The proposed development at these eight sites could potentially have a minor negative impact on the setting of these Listed Buildings. The remaining sites are deemed unlikely to have a significant impact on the setting of any Grade II\* Listed Building and have consequently been assessed as negligible.

### F.2.3 Grade II Listed Buildings

F.2.3.1 There are many Grade II Listed Buildings throughout the borough, generally clustered within the built-up areas and particularly within Dudley and Stourbridge town centres. Site SA-0081-DUD coincides with the Grade II Listed Building 'Foxcote House Farm' and Sites SA-0214-DUD and 382 coincide with 'Winding Engine House at the former New Hawne Colliery'. The proposed development at these three sites could potentially have direct adverse effects on these Listed Buildings, resulting in a major negative impact.

F.2.3.2 Additionally, 23 sites could potentially have a minor negative impact on the setting of various Grade II Listed Buildings, for example Site SA-0018-DUD-A which is adjacent to 'The Quarry' and Site SA-0025-DUD which is 50m from 'Summerhill Hotel'.

## **F.2.4 Conservation Area**

F.2.4.1 Dudley contains 22 Conservation Areas (CA), the majority of which cover sections of the urban area, as well as portions of the canal network and historic open spaces. The proposed development at the majority of sites in Dudley would be unlikely to significantly impact any of these CAs, as the sites are separated from nearby CAs by existing built form. However, seven sites are located wholly or partially within one of these CAs, including SA-0202-DUD which partially coincides with ‘Dudley Town Centre’ CA, and Site 22 which partially coincides with ‘Stourbridge Branch Canal’ CA. A further eight sites are located adjacent or in close proximity to a CA. The proposed development at these 15 sites could potentially result in a minor negative impact on the setting of CAs in Dudley.

## **F.2.5 Scheduled Monument**

F.2.5.1 There are 12 Scheduled Monuments (SMs) within Dudley, generally covering areas with little or no existing development, adjacent to the main settlements. Site 347 is located wholly within ‘Lime working remains in Dudley’ SM. The proposed development at this site could potentially have a direct adverse effect on this SM, resulting in a major negative impact.

F.2.5.2 Site 149 (CFH) is located adjacent to ‘Redhouse, Whitehouse and Newhouse glassworks’ SM. Sites SA-0031-DUD-A and SA-0031-DUD-B are located approximately 180m and 170m respectively from ‘Wychbury Ring’ SM, separated by open space. Therefore, the proposed development at these three sites could potentially have a minor negative impact on the setting of these SMs. The remaining sites are separated from nearby SMs by existing built form, and therefore, would be expected to result in a negligible impact on the setting of SMs.

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

F.2.6.1 Two Registered Parks and Gardens (RPGs) can be found within Dudley: ‘Priory Park’ and ‘The Leasowes’. Other nearby RPGs include ‘Himley Hall’ and ‘Hagley Hall’ RPGs, which lie adjacent to the borough boundary to the north west and south respectively. Site 336 is located adjacent to ‘The Leasowes’ RPG. Site SA-0031-DUD-A is a large site located approximately 510m downhill from ‘Hagley Hall’ RPG, and Site SA-0031-DUD-B is located approximately 390m from this RPG, separated by open space. As such, the proposed development at these three sites could potentially have a minor negative impact on the setting of these RPGs. The remaining sites are deemed unlikely to have a significant impact on the setting of any RPG and have consequently been assessed as negligible.

## **F.2.7 Archaeological Priority Area**

F.2.7.1 Archaeological Priority Areas (APAs) have been identified throughout Dudley’s urban and undeveloped areas. 24 sites in Dudley coincide wholly or partially with APAs, and a further seven sites are located adjacent to APAs. This includes Site SA-0015-DUD which coincides

with ‘Dudley No.2 Canal’ APA, and Site SA-0132-DUD which coincides with both ‘Hingley’s Canalside Complex’ and ‘Dudley No.2 Canal’ APAs. The proposed development at these 31 sites could potentially alter the setting of APAs, and as a result have a minor negative impact. The remaining sites are not located in close proximity to APAs, and therefore, would be expected to have a negligible impact on the setting of APAs.

## **F.2.8 Historic Landscape Characterisation**

F.2.8.1 The Black Country Historic Landscape Characterisation (HLC) Study<sup>1</sup> has identified a range of Historic Environment Area Designations within the Black Country, covering Dudley’s parkland and Green Belt as well as a number of features within the urban areas.

F.2.8.2 A total of 64 sites are located wholly or partially within an area of High Historic Landscape Value (HHLV) or High Historic Townscape Value (HHTV), including Sites SA-0018-DUD-A and SA-0018-DUD-B which are large sites located wholly within ‘Buckbury’ HHLV, and Site SA-0044-DUD which is located wholly within ‘Stourbridge Old Quarter’ HHTV. Additionally, Site SA-0200-DUD is located wholly within ‘Dudley Municipal Cemetery’ Designed Landscape of High Historic Value. Therefore, the proposed development at these 65 sites could potentially result in a minor negative impact on the surrounding historic environment. The remaining sites do not coincide with any identified areas of high historic value, and therefore, would be expected to have a negligible impact on the local historic environment.

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<sup>1</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf) [Date Accessed: 16/04/21]

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

Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
<b>Dudley Residential Sites</b>								
SA-0001-DUD	0	0	0	0	0	0	0	0
SA-0005-DUD-A	0	0	0	0	0	0	0	0
SA-0005-DUD-B	0	0	0	0	0	0	0	0
SA-0008-DUD	0	0	0	0	0	0	0	-
SA-0009-DUD	0	0	0	0	0	0	-	-
SA-0010-DUD-A	0	0	0	0	0	0	0	-
SA-0010-DUD-B	0	0	0	0	0	0	0	-
SA-0013-DUD	0	0	0	0	0	0	0	-
SA-0015-DUD	0	0	0	0	0	0	-	-
SA-0016-DUD	0	0	0	0	0	0	0	-
SA-0017-DUD	0	-	0	0	0	0	0	0
SA-0018-DUD-A	0	0	-	0	0	0	0	-
SA-0018-DUD-B	0	0	-	0	0	0	0	-
SA-0018-DUD-C	0	0	0	0	0	0	0	-
SA-0019-DUD	0	0	0	0	0	0	0	-
SA-0021-DUD	0	0	0	0	0	0	0	-
SA-0025-DUD	0	0	-	0	0	0	0	0
SA-0026-DUD	0	0	0	0	0	0	0	-
SA-0027-DUD	0	0	-	0	0	0	0	-
SA-0028-DUD	0	0	0	0	0	0	0	-
SA-0031-DUD-A	0	-	-	0	-	-	0	-
SA-0031-DUD-B	0	-	-	0	-	-	0	-
SA-0033-DUD	0	-	0	0	0	0	0	-
SA-0039-DUD	0	0	0	0	0	0	0	0
SA-0040-DUD	0	0	0	0	0	0	0	-
SA-0041-DUD	0	0	0	0	0	0	0	0
SA-0042-DUD	0	0	0	0	0	0	0	0
SA-0043-DUD	0	0	0	0	0	0	-	0
SA-0044-DUD	0	0	0	0	0	0	0	-
SA-0045-DUD	0	0	0	0	0	0	0	0
SA-0046-DUD	0	0	0	0	0	0	0	-
SA-0047-DUD	0	0	0	0	0	0	0	0
SA-0050-DUD	0	0	0	0	0	0	0	0
SA-0051-DUD-A	0	0	0	0	0	0	0	0
SA-0052-DUD	0	0	0	0	0	0	0	0
SA-0058-DUD	0	0	0	0	0	0	0	0
SA-0059-DUD	0	0	0	0	0	0	0	0
SA-0060-DUD	0	0	0	0	0	0	0	0
SA-0061-DUD	0	0	0	0	0	0	0	-

Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
SA-0064-DUD-A	0	0	0	0	0	0	-	0
SA-0064-DUD-B	0	0	0	0	0	0	0	0
SA-0068-DUD (south)	0	0	0	0	0	0	0	0
SA-0068-DUD (north)	0	0	0	-	0	0	-	0
SA-0076-DUD	0	0	0	0	0	0	0	0
SA-0078-DUD	0	0	0	0	0	0	0	-
SA-0079-DUD	0	0	-	0	0	0	0	-
SA-0080-DUD	0	0	0	0	0	0	-	0
SA-0081-DUD	0	0	--	0	0	0	0	-
SA-0084-DUD	0	0	0	0	0	0	0	0
SA-0091-DUD	0	0	0	0	0	0	0	-
SA-0105-DUD-A	0	0	0	0	0	0	0	0
SA-0105-DUD-B	0	0	-	0	0	0	0	0
SA-0109-DUD	0	0	0	-	0	0	-	0
SA-0114-DUD	0	-	0	0	0	0	0	-
SA-0126-DUD	0	0	0	0	0	0	0	0
SA-0132-DUD	0	0	0	0	0	0	-	-
SA-0134-DUD	0	0	0	-	0	0	0	0
SA-0135-DUD	0	0	-	0	0	0	0	-
SA-0139-DUD	0	0	0	0	0	0	0	0
SA-0145-DUD	0	0	0	0	0	0	-	-
SA-0173-DUD	0	0	0	0	0	0	0	0
SA-0174-DUD	0	0	0	0	0	0	0	0
SA-0175-DUD	0	0	0	0	0	0	0	0
SA-0176-DUD	0	0	0	0	0	0	0	0
SA-0181-DUD	0	0	0	0	0	0	0	0
SA-0182-DUD	0	0	0	0	0	0	0	0
SA-0185-DUD	0	0	0	0	0	0	-	-
SA-0186-DUD	0	0	0	0	0	0	0	0
SA-0187-DUD	0	0	-	-	0	0	0	0
SA-0188-DUD	0	0	0	0	0	0	0	0
SA-0189-DUD	0	0	0	0	0	0	0	0
SA-0191-DUD	0	0	0	0	0	0	0	0
SA-0192-DUD	0	0	0	0	0	0	0	0
SA-0193-DUD	0	0	0	0	0	0	-	-
SA-0194-DUD	0	0	0	0	0	0	0	0
SA-0196-DUD	0	0	0	0	0	0	0	0
SA-0197-DUD	0	0	0	0	0	0	0	0
SA-0198-DUD	0	0	0	0	0	0	0	0
SA-0199-DUD	0	0	0	0	0	0	0	0
SA-0200-DUD	0	0	0	-	0	0	0	-

Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
SA-0202-DUD	0	0	0	-	0	0	-	0
SA-0204-DUD	0	0	-	0	0	0	0	0
SA-0205-DUD	0	0	0	0	0	0	0	0
SA-0206-DUD	0	0	-	0	0	0	0	-
SA-0208-DUD	0	0	0	0	0	0	0	-
SA-0209-DUD	0	0	0	0	0	0	0	-
SA-0210-DUD	0	0	-	-	0	0	0	0
SA-0214-DUD	0	--	--	0	0	0	-	-
SA-0215-DUD	0	0	0	0	0	0	-	0
SA-0222-DUD	0	0	0	0	0	0	0	0
SA-0227-DUD	0	0	0	0	0	0	0	0
<b>Dudley Employment Sites</b>								
SA-0001-DUD	0	0	0	0	0	0	0	0
SA-0008-DUD	0	0	0	0	0	0	0	-
SA-0013-DUD	0	0	0	0	0	0	0	-
SA-0015-DUD	0	0	0	0	0	0	-	-
SA-0016-DUD	0	0	0	0	0	0	0	-
SA-0028-DUD	0	0	0	0	0	0	0	-
SA-0047-DUD	0	0	0	0	0	0	0	0
SA-0078-DUD	0	0	0	0	0	0	0	-
SA-0135-DUD	0	0	-	0	0	0	0	-
SA-0227-DUD	0	0	0	0	0	0	0	0
H16.1	0	0	0	0	0	0	-	0
<b>Dudley Carried Forward Residential Sites</b>								
19	0	0	-	0	0	0	-	-
22	0	-	-	-	0	0	0	0
29	0	0	0	0	0	0	0	-
30	0	0	0	0	0	0	0	0
31	0	0	-	0	0	0	0	0
32	0	0	0	0	0	0	0	-
35	0	0	0	0	0	0	0	-
82a	0	0	0	0	0	0	0	-
83	0	0	-	0	0	0	0	-
85	0	0	0	0	0	0	0	0
87	0	0	0	0	0	0	0	0
91	0	0	0	0	0	0	0	0
94	0	0	0	0	0	0	0	-
101	0	0	0	-	0	0	0	0
138	0	0	0	0	0	0	0	-
149 (CFH)	0	-	0	-	-	0	-	-
151	0	0	0	-	0	0	0	0

Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
155	0	0	0	0	0	0	0	0
157	0	0	0	0	0	0	0	0
158	0	0	0	0	0	0	0	0
159	0	0	0	0	0	0	0	-
162	0	0	0	0	0	0	-	0
164	0	0	0	0	0	0	0	0
173	0	0	0	0	0	0	0	0
177	0	0	0	0	0	0	0	0
178	0	0	0	0	0	0	0	0
181	0	0	0	0	0	0	0	0
182	0	0	0	0	0	0	0	-
188	0	-	0	0	0	0	0	0
189	0	0	0	0	0	0	0	-
190	0	0	0	0	0	0	0	0
200	0	0	0	0	0	0	0	0
202	0	0	0	0	0	0	0	0
205	0	0	0	-	0	0	0	0
302	0	0	0	0	0	0	-	-
304	0	0	0	0	0	0	0	-
305	0	0	0	0	0	0	0	0
306	0	0	0	0	0	0	0	0
308	0	0	0	0	0	0	0	0
312	0	0	0	0	0	0	0	0
318	0	0	0	0	0	0	0	-
321	0	0	0	0	0	0	0	0
327	0	0	0	0	0	0	0	-
330	0	0	0	0	0	0	0	0
331	0	0	0	0	0	0	0	0
332	0	0	-	0	0	0	0	0
336	0	0	-	-	0	-	0	0
341	0	0	0	0	0	0	0	0
346	0	0	0	0	0	0	0	0
347	0	0	0	0	-	0	0	-
350	0	0	0	0	0	0	-	0
352	0	0	0	0	0	0	0	0
358	0	0	0	0	0	0	0	0
360	0	0	0	0	0	0	-	0
368	0	0	0	0	0	0	-	0
370	0	0	0	0	0	0	0	0
372	0	0	0	0	0	0	-	0
374	0	0	0	0	0	0	0	0



Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
375	0	0	0	0	0	0	0	-
378	0	0	0	-	0	0	-	0
382	0	-	-	0	0	0	-	-
383	0	0	0	0	0	0	0	0
384	0	0	0	0	0	0	0	0
H10.4	0	0	0	0	0	0	0	0
H16.1	0	0	0	0	0	0	-	-
S9	0	0	0	-	0	0	-	0
SA-0004-DUD	0	0	0	0	0	0	0	0
SA-303	0	0	0	0	0	0	0	0
SA-373 (SA-0373-DUD)	0	0	0	0	0	0	0	-
<b>Dudley Carried Forward Employment Sites</b>								
104	0	0	0	0	0	0	0	0
122	0	0	0	0	0	0	0	0
123a	0	0	0	0	0	0	0	0
123b	0	0	0	0	0	0	0	0
123c	0	0	0	0	0	0	0	0
132	0	0	0	0	0	0	-	0
135	0	0	0	0	0	0	0	0
136	0	0	-	0	0	0	0	0
137	0	0	-	0	0	0	0	0
147	0	0	0	0	0	0	0	0
149 (CFE)	0	0	-	0	0	0	-	0
187	0	0	0	0	0	0	0	0
198	0	0	0	0	0	0	0	0
DY5 Site	0	0	0	0	0	0	-	0

## F.3 SA Objective 2: Landscape

### F.3.1 Cannock Chase AONB

F.3.1.1 Cannock Chase AONB is located at its closest point approximately 15km to the north east of Dudley. The proposed development at sites in Dudley would be unlikely to significantly impact the AONB, in terms of altering views of/from the AONB or altering the setting of the AONB. Therefore, a negligible impact has been identified across all sites.

### F.3.2 Landscape Sensitivity

F.3.2.1 The Black Country Landscape Sensitivity Assessment<sup>2</sup> identified the extent to which the character and quality of Black Country Green Belt land is susceptible to change as a result of future development. In Dudley, Green Belt is generally restricted to the south and north west of the borough, where the majority of largest sites are located. The majority of sites in Dudley, including all of the ‘carried forward’ sites, are located in the existing urban area and would be expected to result in a negligible impact on the local landscape. A total of 29 sites, including housing and employment sites SA-0015-DUD and SA-0135-DUD, as well as housing sites SA-0005-DUD-A, SA-0005-DUD-B, SA-0031-DUD-A, SA-0031-DUD-B, SA-0059-DUD and SA-0081-DUD are located within areas of ‘Moderate-High’ and/or ‘High’ landscape sensitivity and therefore could potentially result in major negative impacts on the local landscape if developed. 15 sites, including Sites SA-0018-DUD-A, SA-0018-DUD-B, SA-0025-DUD, SA-0105-DUD-A and SA-0105-DUD-B are located within areas of ‘Low-Moderate’ and/or ‘Moderate’ landscape sensitivity, and therefore, the proposed development at these sites could potentially have minor negative impacts on the local landscape.

### F.3.3 Alter Views for PRow Network Users

F.3.3.1 Many sites which are located within more rural areas of the borough (such as the large sites SA-0018-DUD-A and SA-0031-DUD-A) as well as sites within the urban area which currently comprise green spaces or parks (such as SA-0050-DUD and SA-0181-DUD), are located in the vicinity of Dudley’s PRow network, and the development of such sites could potentially alter the views of countryside or open space currently experienced by the users of these footpaths. Therefore, these 85 sites could potentially result in a minor negative impact on the landscape. Sites which contain existing development, or are separated from PRow by existing built form, would be unlikely to significantly alter views and are assessed as negligible.

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<sup>2</sup> LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: [https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf) [Date Accessed: 16/04/21]

### **F.3.4 Alter Views for Local Residents**

F.3.4.1 The development proposed at the majority of sites in Dudley are considered to have the potential to alter the views currently experienced by local residents primarily due to their location with respect to existing residential zones. Therefore, a minor negative impact on the local landscape could be expected at these 138 sites. The remaining sites comprise previously developed land and/or are located away from existing residential zones; therefore, the proposed development at these sites would be unlikely to result in a significant impact on views.

### **F.3.5 Green Belt Harm**

F.3.5.1 The Green Belt Study<sup>3</sup> classified parcels of Green Belt land into different ‘harm’ ratings, based on the assessment of potential harm caused by removing each parcel from the Green Belt based on a range of criteria. The majority of sites in Dudley, including all of the ‘carried forward’ sites, are located in the existing urban area and would be expected to result in a negligible impact. In general, the proposed sites which are largest in scale and rural in nature would be expected to result in Green Belt harm to some extent upon their development. According to the Green Belt Study, 27 sites including housing and employment sites SA-0015-DUD and SA-0135-DUD, as well as housing sites SA-0005-DUD-A, SA-0018-DUD-A, SA-0018-DUD-B, SA-0025-DUD, SA-0031-DUD-A, SA-0031-DUD-B, SA-0081-DUD, SA-0105-DUD-A and SA-0105-DUD-B are located within areas where ‘Moderate-High’ and/or ‘High’ Green Belt harm could be expected if developed. Therefore, the proposed development at these 27 sites could potentially result in a major negative impact on the landscape objective. Additionally, if developed, eight sites including SA-0059-DUD and SA-0017-DUD could potentially result in ‘Low-Moderate’ and/or ‘Moderate’ Green Belt harm, and therefore would be expected to have a minor negative impact on the landscape objective.

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<sup>3</sup> LUC (2019) Black Country Green Belt Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced_redacted.pdf) [Date Accessed: 15/04/21]

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

Site Ref	Cannock Chase AONB	Landscape Sensitivity	Alter Views for PRow Network Users	Alter Views for Local Residents	Green Belt Harm
<b>Dudley Residential Sites</b>					
SA-0001-DUD	0	--	0	0	0
SA-0005-DUD-A	0	--	-	-	--
SA-0005-DUD-B	0	--	-	-	0
SA-0008-DUD	0	--	-	0	--
SA-0009-DUD	0	-	0	-	--
SA-0010-DUD-A	0	-	-	-	-
SA-0010-DUD-B	0	-	-	-	--
SA-0013-DUD	0	--	-	-	0
SA-0015-DUD	0	--	-	-	--
SA-0016-DUD	0	--	-	-	--
SA-0017-DUD	0	0	-	-	-
SA-0018-DUD-A	0	-	-	-	--
SA-0018-DUD-B	0	-	-	-	--
SA-0018-DUD-C	0	-	-	-	--
SA-0019-DUD	0	-	-	-	--
SA-0021-DUD	0	-	-	-	--
SA-0025-DUD	0	-	0	-	--
SA-0026-DUD	0	--	-	-	0
SA-0027-DUD	0	--	-	-	--
SA-0028-DUD	0	--	-	-	0
SA-0031-DUD-A	0	--	-	-	--
SA-0031-DUD-B	0	--	-	-	--
SA-0033-DUD	0	-	0	-	-
SA-0039-DUD	0	0	-	-	0
SA-0040-DUD	0	--	0	-	--
SA-0041-DUD	0	0	0	-	0
SA-0042-DUD	0	0	-	-	0
SA-0043-DUD	0	0	-	-	0
SA-0044-DUD	0	0	0	-	0
SA-0045-DUD	0	0	0	-	0
SA-0046-DUD	0	0	0	-	0
SA-0047-DUD	0	0	-	-	0
SA-0050-DUD	0	0	-	-	0
SA-0051-DUD-A	0	0	0	-	0
SA-0052-DUD	0	0	-	-	0
SA-0058-DUD	0	--	-	-	0
SA-0059-DUD	0	--	0	-	-
SA-0060-DUD	0	--	0	-	-
SA-0061-DUD	0	0	-	-	0
SA-0064-DUD-A	0	0	0	-	0
SA-0064-DUD-B	0	0	0	-	0
SA-0068-DUD (south)	0	0	-	-	0

Site Ref	Cannock Chase AONB	Landscape Sensitivity	Alter Views for PRow Network Users	Alter Views for Local Residents	Green Belt Harm
SA-0068-DUD (north)	0	0	-	-	0
SA-0076-DUD	0	-	-	-	--
SA-0078-DUD	0	0	-	-	0
SA-0079-DUD	0	--	-	-	--
SA-0080-DUD	0	0	0	-	0
SA-0081-DUD	0	--	-	-	--
SA-0084-DUD	0	0	0	0	0
SA-0091-DUD	0	--	-	-	-
SA-0105-DUD-A	0	-	0	-	--
SA-0105-DUD-B	0	-	0	-	--
SA-0109-DUD	0	--	-	-	0
SA-0114-DUD	0	-	-	-	-
SA-0126-DUD	0	-	0	-	--
SA-0132-DUD	0	0	0	0	0
SA-0134-DUD	0	0	0	-	0
SA-0135-DUD	0	--	-	-	--
SA-0139-DUD	0	--	0	0	-
SA-0145-DUD	0	0	-	-	0
SA-0173-DUD	0	0	0	-	0
SA-0174-DUD	0	0	-	-	0
SA-0175-DUD	0	0	0	-	0
SA-0176-DUD	0	0	-	-	0
SA-0181-DUD	0	0	-	-	0
SA-0182-DUD	0	0	0	-	0
SA-0185-DUD	0	0	-	-	0
SA-0186-DUD	0	0	-	0	0
SA-0187-DUD	0	0	0	-	0
SA-0188-DUD	0	0	-	-	0
SA-0189-DUD	0	0	-	-	0
SA-0191-DUD	0	0	-	-	0
SA-0192-DUD	0	0	-	-	0
SA-0193-DUD	0	0	-	-	0
SA-0194-DUD	0	0	-	-	0
SA-0196-DUD	0	0	-	-	0
SA-0197-DUD	0	0	-	-	0
SA-0198-DUD	0	0	0	-	0
SA-0199-DUD	0	0	-	-	0
SA-0200-DUD	0	0	-	-	0
SA-0202-DUD	0	0	-	-	0
SA-0204-DUD	0	0	0	-	0
SA-0205-DUD	0	0	-	-	0
SA-0206-DUD	0	0	0	-	0
SA-0208-DUD	0	0	-	-	0
SA-0209-DUD	0	0	-	-	0

Site Ref	Cannock Chase AONB	Landscape Sensitivity	Alter Views for PRow Network Users	Alter Views for Local Residents	Green Belt Harm
SA-0210-DUD	0	0	0	-	0
SA-0214-DUD	0	0	-	-	0
SA-0215-DUD	0	0	0	0	0
SA-0222-DUD	0	0	0	-	0
SA-0227-DUD	0	0	-	0	0
<b>Dudley Employment Sites</b>					
SA-0001-DUD	0	--	0	0	0
SA-0008-DUD	0	--	-	0	--
SA-0013-DUD	0	--	-	-	0
SA-0015-DUD	0	--	-	-	--
SA-0016-DUD	0	--	-	-	--
SA-0028-DUD	0	--	-	-	0
SA-0047-DUD	0	0	-	-	0
SA-0078-DUD	0	0	-	-	0
SA-0135-DUD	0	--	-	-	--
SA-0227-DUD	0	0	-	0	0
H16.1	0	0	0	0	0
<b>Dudley Carried Forward Residential Sites</b>					
19	0	0	-	-	0
22	0	0	0	-	0
29	0	0	-	0	0
30	0	0	0	-	0
31	0	0	0	-	0
32	0	0	0	-	0
35	0	0	0	-	0
82a	0	0	-	-	0
83	0	0	0	-	0
85	0	0	-	-	0
87	0	0	0	-	0
91	0	0	-	-	0
94	0	0	0	-	0
101	0	0	0	-	0
138	0	0	0	0	0
149 (CFH)	0	0	0	0	0
151	0	0	-	-	0
155	0	0	0	0	0
157	0	0	0	-	0
158	0	0	0	0	0
159	0	0	0	0	0
162	0	0	0	0	0
164	0	0	0	-	0
173	0	0	0	0	0
177	0	0	0	0	0
178	0	0	0	0	0

Site Ref	Cannock Chase AONB	Landscape Sensitivity	Alter Views for PRow Network Users	Alter Views for Local Residents	Green Belt Harm
181	0	0	-	-	0
182	0	0	0	-	0
188	0	0	0	-	0
189	0	0	0	-	0
190	0	0	0	-	0
200	0	0	0	-	0
202	0	0	0	-	0
205	0	0	-	-	0
302	0	0	0	0	0
304	0	0	0	0	0
305	0	0	0	0	0
306	0	0	0	-	0
308	0	0	-	-	0
312	0	0	0	-	0
318	0	0	0	0	0
321	0	0	0	-	0
327	0	0	0	-	0
330	0	0	0	-	0
331	0	0	0	0	0
332	0	0	-	-	0
336	0	0	-	-	0
341	0	0	0	-	0
346	0	0	0	-	0
347	0	0	-	-	0
350	0	0	0	0	0
352	0	0	0	0	0
358	0	0	-	-	0
360	0	0	-	-	0
368	0	0	0	-	0
370	0	0	0	-	0
372	0	0	0	-	0
374	0	0	0	-	0
375	0	0	0	-	0
378	0	0	0	0	0
382	0	0	-	-	0
383	0	0	0	-	0
384	0	0	0	-	0
H10.4	0	0	0	0	0
H16.1	0	0	0	-	0
S9	0	0	0	0	0
SA-0004-DUD	0	0	-	-	0
SA-303	0	0	-	-	0
SA-373 (SA-0373-DUD)	0	0	0	0	0
<b>Dudley Carried Forward Employment Sites</b>					

Site Ref	Cannock Chase AONB	Landscape Sensitivity	Alter Views for PRow Network Users	Alter Views for Local Residents	Green Belt Harm
104	0	0	-	-	0
122	0	0	0	0	0
123a	0	0	-	-	0
123b	0	0	-	-	0
123c	0	0	0	-	0
132	0	0	0	0	0
135	0	0	0	0	0
136	0	0	-	0	0
137	0	0	0	0	0
147	0	0	0	-	0
149 (CFE)	0	0	-	0	0
187	0	0	0	0	0
198	0	0	0	0	0
DY5 Site	0	0	0	0	0

DRAFT



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

### F.4.1 European Sites

F.4.1.1 European sites are a network of nature protection areas which include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). 'Fens Pools' SAC is situated in the centre of Dudley. No Zone of Influence has been identified for 'Fens Pools' SAC to indicate areas where development could potentially result in significant adverse effects on its designated features, and therefore, at the time of writing the impact of all sites on European sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

### F.4.2 Sites of Special Scientific Interest

F.4.2.1 There are ten Sites of Special Scientific Interest (SSSIs) within Dudley, including 'Fens Pools' and 'Ketley Claypit' SSSIs located in the centre of the borough. Site SA-0004-DUD coincides with 'Ketley Claypit' SSSI and Site 347 coincides with 'Wren's Nest' SSSI. Site 336 is located adjacent to 'The Leasowes' SSSI. The proposed development at these three sites could potentially have a direct major negative impact on these SSSIs.

F.4.2.2 13 sites are located within IRZs which indicate that the proposed level of residential development should be consulted on with Natural England; these sites are identified as potentially resulting in a minor negative impact on nearby SSSIs. The remaining sites in Dudley are located within IRZs which do not indicate the proposed use (or proposed level of residential development) as a threat to nearby SSSIs, and as such, would be likely to have a negligible impact.

### F.4.3 National Nature Reserves

F.4.3.1 There are two National Nature Reserves (NNRs) located within Dudley, both of which are geological NNRs called 'Wren's Nest' and 'Saltwells'. A large proportion of Site 347 coincides with 'Wren's Nest' NNR. The proposed development at this site could potentially have a direct major negative impact on this NNR.

F.4.3.2 A further 18 sites are located within close proximity to one of these NNRs and are considered to have potential to result in adverse impacts on the NNRs to some extent, due to an increased risk of development related threats and pressures. The proposed development at the remaining sites in Dudley would be unlikely to significantly impact either of these NNRs, and therefore a negligible impact has been identified across all sites.

#### **F.4.4 Ancient Woodland**

F.4.4.1 In Dudley there are sparsely distributed areas of ancient woodland, mainly restricted to the Green Belt, but with a small proportion located in the urban areas. Housing and employment site SA-0135-DUD coincides with a small proportion of ‘Breach Dingle’ and is also adjacent to ‘Uffmoor Wood’, therefore the proposed development at these two sites could potentially result in direct adverse impacts or loss of these ancient woodlands, and as such, have a major negative impact.

F.4.4.2 Additionally, 14 sites are located in close proximity to various stands of ancient woodland, including SA-0031-DUD-A and SA-0031-DUD-B which are located approximately 250m and 150m from ‘Roundhill Wood’ respectively, and Site SA-0081-DUD which is located approximately 190m from ‘Hodge Hill Coppice’. The proposed development at these 14 sites could potentially have a minor negative impact on these ancient woodlands due to an increased risk of disturbance. The remaining sites in Dudley are unlikely to have a significant impact on any ancient woodland.

#### **F.4.5 Local Nature Reserves**

F.4.5.1 There are eight Local Nature Reserves (LNRs) within Dudley, mostly clustered in the north of the borough and within the Green Belt. Site SA-0021-DUD is located adjacent to ‘Cotwall End’ LNR, Sites SA-0064-DUD-A and 19 are adjacent to ‘Buckpool and Fens Pools’ LNR, and Site 132 is adjacent to ‘Saltwells’ LNR. A further 30 sites are located in close proximity to LNRs. The proposed development at these 34 sites could potentially result in a minor negative impact on these LNRs, due to an increased risk of development related threats and pressures. The majority of sites in Dudley are deemed unlikely to significantly impact on these LNRs, primarily due to being separated by existing built form.

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

F.4.6.1 Within Dudley, there are 58 Sites of Importance for Nature Conservation (SINCs) throughout the area, primarily comprising small areas of woodland. Seven proposed sites (SA-0004-DUD, SA-0005-DUD-B, SA-0018-DUD-A, SA-0081-DUD, SA-0145-DUD, SA-0214-DUD and 205) coincide wholly or partially with the following SINCs, respectively: ‘Ketley Quarry’, ‘Brick Kiln Lane’, ‘Pedmore Common’ and ‘Foxcote Meadow’, ‘Norton Covert’, ‘Hawne Colliery’ and ‘Buckpool and The Leys’. The proposed development at these seven sites could potentially have direct major negative impacts on these SINCs.

F.4.6.2 Additionally, 12 sites are located adjacent to SINCs, including Site SA-0018-DUD-B which is adjacent to ‘Ounty John Wood’ SINC and Site SA-0059-DUD which is adjacent to ‘Oak Farm’ SINC. The proposed development at these 12 sites may be expected to have a minor negative impact on these SINCs, due to an increased risk of development related threats and pressures. The proposed development at the remaining sites in Dudley are unlikely to significantly impact any SINC.

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

F.4.7.1 There are 118 Sites of Local Importance for Nature Conservation (SLINCs) within Dudley, covering a range of habitats and semi-natural spaces including parkland, sections of the canal network and disused railways. 39 sites coincide with these SLINCs, including Sites SA-0004-DUD, SA-0005-DUD-A, SA-0018-DUD-A, SA-0059-DUD, SA-0081-DUD, SA-0132-DUD and SA-0135-DUD. Furthermore, 29 sites in Dudley are located adjacent to a SLINC. Therefore, the proposed development at these 68 sites could potentially result in a minor negative impact on SLINCs, due to an increased risk of development related threats and pressures. The remaining sites are located further away from SLINCs, and as such, the proposed development at these sites would be less likely to significantly impact any SLINC.

## **F.4.8 Geological Sites**

F.4.8.1 Geological sites have been identified throughout the borough, which form part of the Black Country Global Geopark<sup>4</sup>. These sites include a range of notable geological features and formations. Sites SA-0145-DUD, 205, 336, 347 and SA-0004-DUD coincide with the following geological sites, respectively: 'Norton Covert', 'Buckpools and The Leys', 'Leasowe Park', 'Wren's Nest' and 'Ketley Quarry'. Therefore, the proposed development at these five sites could potentially have a minor negative impact on these areas of geological importance. No other sites in Dudley coincide with identified geological sites, and therefore the remaining sites are likely to have a negligible impact.

## **F.4.9 Priority Habitats**

F.4.9.1 Priority habitats can be found throughout the Dudley area and include 'deciduous woodland', 'traditional orchard', 'good quality semi-improved grassland' and 'coastal and floodplain grazing marsh'. The 35 sites which coincide with these priority habitats could potentially result in the loss or degradation of these habitats, and therefore the proposed development at these sites may result in a minor negative impact on the overall presence of priority habitats across the Plan area. The sites which do not coincide with any identified priority habitat are therefore likely to have a negligible impact.

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<sup>4</sup> Black Country Geopark (2021) Black Country Geopark. Available at: <https://blackcountrygeopark.dudley.gov.uk/bcg/> [Date Accessed: 07/05/21]

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

Site Ref	European Sites	SSSIs and IRZs	NNRS	Ancient Woodland	LNRS	SINGs	SLINCs	Geological Sites	Priority Habitats
<b>Dudley Residential Sites</b>									
SA-0001-DUD	+/-	0	0	-	0	0	-	0	0
SA-0005-DUD-A	+/-	0	0	0	0	0	-	0	-
SA-0005-DUD-B	+/-	0	0	0	0	-	0	0	-
SA-0008-DUD	+/-	0	0	0	0	0	0	0	0
SA-0009-DUD	+/-	0	0	0	0	0	0	0	0
SA-0010-DUD-A	+/-	0	0	0	0	0	-	0	0
SA-0010-DUD-B	+/-	0	0	0	0	0	-	0	0
SA-0013-DUD	+/-	0	-	-	-	0	-	0	-
SA-0015-DUD	+/-	-	0	0	0	0	-	0	-
SA-0016-DUD	+/-	0	0	0	0	0	0	0	0
SA-0017-DUD	+/-	0	0	0	0	0	-	0	0
SA-0018-DUD-A	+/-	0	0	0	0	-	-	0	-
SA-0018-DUD-B	+/-	0	0	0	0	-	0	0	0
SA-0018-DUD-C	+/-	0	0	0	0	0	-	0	0
SA-0019-DUD	+/-	0	0	0	0	0	0	0	0
SA-0021-DUD	+/-	0	0	0	-	0	-	0	0
SA-0025-DUD	+/-	0	0	0	0	0	0	0	0
SA-0026-DUD	+/-	0	0	-	0	0	-	0	0
SA-0027-DUD	+/-	0	0	0	0	0	0	0	0
SA-0028-DUD	+/-	0	0	-	0	0	-	0	0
SA-0031-DUD-A	+/-	0	0	-	0	0	-	0	0
SA-0031-DUD-B	+/-	0	0	-	0	0	0	0	0
SA-0033-DUD	+/-	0	0	0	0	0	0	0	0
SA-0039-DUD	+/-	0	0	0	0	0	0	0	0
SA-0040-DUD	+/-	0	0	0	0	0	0	0	0
SA-0041-DUD	+/-	0	0	0	0	0	0	0	0
SA-0042-DUD	+/-	0	0	0	0	0	0	0	0
SA-0043-DUD	+/-	0	-	0	-	0	-	0	0
SA-0044-DUD	+/-	0	0	0	0	0	0	0	0
SA-0045-DUD	+/-	0	0	0	0	0	-	0	0
SA-0046-DUD	+/-	0	0	0	0	0	0	0	0
SA-0047-DUD	+/-	0	0	0	0	0	0	0	0
SA-0050-DUD	+/-	-	0	0	-	0	0	0	0
SA-0051-DUD-A	+/-	0	0	0	0	0	0	0	0
SA-0052-DUD	+/-	0	0	0	0	0	-	0	0
SA-0058-DUD	+/-	0	0	0	0	0	0	0	0
SA-0059-DUD	+/-	0	0	0	0	-	-	0	-
SA-0060-DUD	+/-	0	0	0	0	0	-	0	0
SA-0061-DUD	+/-	0	-	0	-	0	-	0	0
SA-0064-DUD-A	+/-	-	0	0	-	-	0	0	0

Site Ref	European Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRS	SINGs	SLINCs	Geological Sites	Priority Habitats
SA-0064-DUD-B	+/-	-	0	0	-	0	0	0	0
SA-0068-DUD (south)	+/-	0	0	0	0	0	-	0	0
SA-0068-DUD (north)	+/-	0	0	0	-	0	-	0	-
SA-0076-DUD	+/-	0	0	0	0	0	0	0	0
SA-0078-DUD	+/-	0	-	0	-	0	-	0	0
SA-0079-DUD	+/-	0	0	0	0	0	-	0	0
SA-0080-DUD	+/-	0	0	0	0	0	0	0	0
SA-0081-DUD	+/-	0	0	-	0	--	-	0	-
SA-0084-DUD	+/-	0	0	0	0	0	0	0	0
SA-0091-DUD	+/-	0	0	-	0	0	-	0	0
SA-0105-DUD-A	+/-	0	0	0	0	0	0	0	0
SA-0105-DUD-B	+/-	0	0	0	0	0	0	0	0
SA-0109-DUD	+/-	0	0	0	0	0	-	0	0
SA-0114-DUD	+/-	0	0	0	-	-	-	0	-
SA-0126-DUD	+/-	0	0	0	0	0	0	0	-
SA-0132-DUD	+/-	0	0	0	0	0	-	0	0
SA-0134-DUD	+/-	0	0	0	0	0	-	0	0
SA-0135-DUD	+/-	-	0	--	0	0	-	0	-
SA-0139-DUD	+/-	0	0	0	0	0	-	0	0
SA-0145-DUD	+/-	0	0	0	0	--	0	-	-
SA-0173-DUD	+/-	0	0	-	0	0	-	0	0
SA-0174-DUD	+/-	0	0	0	0	0	0	0	0
SA-0175-DUD	+/-	0	0	0	0	0	0	0	0
SA-0176-DUD	+/-	0	0	0	0	0	0	0	0
SA-0181-DUD	+/-	0	-	0	-	0	0	0	0
SA-0182-DUD	+/-	0	-	0	-	0	-	0	0
SA-0185-DUD	+/-	0	0	0	0	0	-	0	-
SA-0186-DUD	+/-	-	0	0	0	0	0	0	-
SA-0187-DUD	+/-	0	0	0	0	0	0	0	0
SA-0188-DUD	+/-	0	0	0	0	0	0	0	0
SA-0189-DUD	+/-	0	0	0	0	0	0	0	-
SA-0191-DUD	+/-	0	0	0	0	0	0	0	0
SA-0192-DUD	+/-	0	0	0	0	0	0	0	0
SA-0193-DUD	+/-	0	0	0	0	0	-	0	-
SA-0194-DUD	+/-	-	0	0	-	0	0	0	0
SA-0196-DUD	+/-	-	-	0	-	0	0	0	0
SA-0197-DUD	+/-	-	0	0	-	0	0	0	0
SA-0198-DUD	+/-	0	0	0	0	0	-	0	-
SA-0199-DUD	+/-	0	0	0	0	0	0	0	0
SA-0200-DUD	+/-	0	0	0	0	0	0	0	0
SA-0202-DUD	+/-	0	0	0	0	0	0	0	0

Site Ref	European Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRs	SINGs	SLINCs	Geological Sites	Priority Habitats
SA-0204-DUD	+/-	0	0	0	0	0	0	0	0
SA-0205-DUD	+/-	0	0	0	0	0	-	0	-
SA-0206-DUD	+/-	0	0	0	0	0	-	0	0
SA-0208-DUD	+/-	0	-	0	-	0	0	0	0
SA-0209-DUD	+/-	0	-	0	-	0	0	0	0
SA-0210-DUD	+/-	0	-	0	-	0	0	0	0
SA-0214-DUD	+/-	0	0	0	0	--	-	0	-
SA-0215-DUD	+/-	0	0	0	-	0	-	0	0
SA-0222-DUD	+/-	0	0	0	0	0	0	0	0
SA-0227-DUD	+/-	0	0	0	0	0	0	0	0
<b>Dudley Employment Sites</b>									
SA-0001-DUD	+/-	0	0	-	0	0	-	0	0
SA-0008-DUD	+/-	0	0	0	0	0	0	0	0
SA-0013-DUD	+/-	0	-	-	-	0	-	0	-
SA-0015-DUD	+/-	0	0	0	0	0	-	0	-
SA-0016-DUD	+/-	0	0	0	0	0	0	0	0
SA-0028-DUD	+/-	0	0	-	0	0	-	0	0
SA-0047-DUD	+/-	0	0	0	0	0	0	0	0
SA-0078-DUD	+/-	0	-	0	-	0	-	0	0
SA-0135-DUD	+/-	0	0	--	0	0	-	0	-
SA-0227-DUD	+/-	0	0	0	0	0	0	0	0
H16.1	+/-	0	0	0	0	0	0	0	0
<b>Dudley Carried Forward Residential Sites</b>									
19	+/-	-	0	0	-	-	0	0	0
22	+/-	0	0	0	0	-	-	0	-
29	+/-	0	0	0	0	0	-	0	0
30	+/-	0	0	0	0	0	0	0	0
31	+/-	0	0	0	0	0	0	0	0
32	+/-	0	0	0	0	-	-	0	-
35	+/-	0	0	0	0	0	0	0	0
82a	+/-	0	0	0	0	0	0	0	0
83	+/-	0	0	0	0	0	0	0	0
85	+/-	0	0	0	0	0	0	0	-
87	+/-	0	0	0	0	0	0	0	0
91	+/-	0	-	0	-	0	-	0	-
94	+/-	0	0	0	0	0	0	0	0
101	+/-	0	0	0	0	-	-	0	0
138	+/-	0	0	0	0	0	0	0	0
149 (CFH)	+/-	0	0	0	0	0	-	0	0
151	+/-	0	0	0	-	0	0	0	0
155	+/-	0	0	0	0	0	0	0	0
157	+/-	0	0	0	0	-	0	0	-

Site Ref	European Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRS	SINGs	SLINCs	Geological Sites	Priority Habitats
158	+/-	0	0	0	0	0	0	0	0
159	+/-	0	0	0	0	0	-	0	0
162	+/-	0	0	0	0	0	-	0	0
164	+/-	0	0	0	0	0	0	0	0
173	+/-	0	0	0	0	0	0	0	0
177	+/-	0	0	0	0	0	0	0	0
178	+/-	0	0	0	0	0	0	0	0
181	+/-	0	0	0	0	0	0	0	0
182	+/-	-	0	0	-	-	0	0	-
188	+/-	0	0	0	0	0	0	0	0
189	+/-	0	0	0	0	0	0	0	0
190	+/-	0	0	0	0	0	0	0	0
200	+/-	0	0	0	0	0	0	0	0
202	+/-	0	0	0	0	0	0	0	0
205	+/-	0	0	0	-	--	0	-	-
302	+/-	0	0	0	0	0	-	0	0
304	+/-	0	0	0	0	0	0	0	0
305	+/-	0	0	0	0	0	0	0	0
306	+/-	0	0	0	0	0	0	0	0
308	+/-	-	-	-	-	0	0	0	0
312	+/-	0	0	0	0	0	0	0	0
318	+/-	0	0	0	0	0	-	0	0
321	+/-	0	0	0	0	0	0	0	0
327	+/-	0	0	0	0	0	0	0	0
330	+/-	0	0	0	0	0	0	0	0
331	+/-	0	0	0	0	0	0	0	0
332	+/-	0	0	0	0	0	-	0	-
336	+/-	--	0	-	0	-	-	-	0
341	+/-	0	0	0	0	0	0	0	0
346	+/-	0	0	0	0	0	0	0	0
347	+/-	--	--	0	-	0	0	-	-
350	+/-	-	0	0	0	0	0	0	0
352	+/-	0	0	0	0	0	0	0	0
358	+/-	0	0	0	0	0	-	0	-
360	+/-	0	0	0	0	0	-	0	0
368	+/-	0	0	0	0	0	0	0	0
370	+/-	0	0	0	0	0	0	0	0
372	+/-	0	0	0	0	0	-	0	0
374	+/-	0	0	0	0	0	-	0	0
375	+/-	0	0	0	0	0	0	0	0
378	+/-	0	0	0	0	0	0	0	0
382	+/-	0	0	0	0	-	0	0	0

Site Ref	European Sites	SSSIs and IRZs	NNRS	Ancient Woodland	LNRs	SINCS	SLINCS	Geological Sites	Priority Habitats
383	+/-	0	0	0	-	0	0	0	0
384	+/-	0	0	0	-	0	0	0	0
H10.4	+/-	0	0	0	0	0	-	0	0
H16.1	+/-	0	-	0	-	0	-	0	0
S9	+/-	0	0	0	0	0	-	0	0
SA-0004-DUD	+/-	--	0	0	0	--	-	-	-
SA-303	+/-	0	0	0	0	0	0	0	0
SA-373 (SA-0373-DUD)	+/-	0	0	0	0	0	0	0	0
<b>Dudley Carried Forward Employment Sites</b>									
104	+/-	0	0	0	0	0	0	0	0
122	+/-	0	0	0	0	0	0	0	0
123a	+/-	0	0	0	0	0	0	0	-
123b	+/-	0	0	0	0	0	0	0	-
123c	+/-	0	0	0	0	0	0	0	0
132	+/-	0	-	0	-	0	-	0	0
135	+/-	0	0	0	0	0	0	0	0
136	+/-	0	-	0	-	0	0	0	0
137	+/-	0	-	0	-	0	0	0	0
147	+/-	0	0	0	0	0	0	0	0
149 (CFE)	+/-	0	0	0	0	0	0	0	0
187	+/-	0	0	0	0	0	-	0	0
198	+/-	0	0	0	0	0	0	0	0
DY5 Site	+/-	0	0	0	0	0	0	0	0



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

### F.5.1 Potential Increase in Carbon Footprint

- F.5.1.1 Residential-led development is likely to result in an increase in carbon emissions, to some extent. 122 sites are proposed for the development of 95 dwellings or less. The proposed development at these sites would be likely to result in a negligible contribution to Dudley's total carbon emissions.
- F.5.1.2 33 sites are proposed for the development of between 96 and 962 dwellings. The proposed development at these sites could potentially increase local carbon emissions, as a proportion of Dudley's total, by more than 0.1%. Therefore, a minor negative impact on Dudley's carbon emissions would be expected at these 33 sites.
- F.5.1.3 Site SA-0135-DUD is proposed for the development of 1,668 dwellings. The proposed development at this site could potentially increase local carbon emissions, as a proportion of Dudley's total, by more than 1%. Therefore, a major negative impact on Dudley's carbon emissions could be expected at this site.
- F.5.1.4 The housing capacity at four residential sites in Dudley is unknown at the time of writing, and therefore, the impact of the proposed development at these sites is uncertain.
- F.5.1.5 The carbon emissions likely to be generated as a result of non-residential development is uncertain. This would be entirely dependent on the nature and scale of the employment land proposed, which is unknown at present.

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

Site Ref	Potential Increase in Carbon Footprint	Site Ref	Potential Increase in Carbon Footprint
<b>Dudley Residential Sites</b>		SA-0068-DUD (north)	0
SA-0001-DUD	0	SA-0076-DUD	-
SA-0005-DUD-A	-	SA-0078-DUD	-
SA-0005-DUD-B	-	SA-0079-DUD	0
SA-0008-DUD	0	SA-0080-DUD	0
SA-0009-DUD	0	SA-0081-DUD	+/-
SA-0010-DUD-A	0	SA-0084-DUD	0
SA-0010-DUD-B	0	SA-0091-DUD	0
SA-0013-DUD	0	SA-0105-DUD-A	-
SA-0015-DUD	-	SA-0105-DUD-B	+/-
SA-0016-DUD	-	SA-0109-DUD	0
SA-0017-DUD	-	SA-0114-DUD	-
SA-0018-DUD-A	+/-	SA-0126-DUD	0
SA-0018-DUD-B	+/-	SA-0132-DUD	-
SA-0018-DUD-C	0	SA-0134-DUD	0
SA-0019-DUD	0	SA-0135-DUD	--
SA-0021-DUD	0	SA-0139-DUD	0
SA-0025-DUD	-	SA-0145-DUD	-
SA-0026-DUD	-	SA-0173-DUD	0
SA-0027-DUD	-	SA-0174-DUD	0
SA-0028-DUD	0	SA-0175-DUD	0
SA-0031-DUD-A	-	SA-0176-DUD	0
SA-0031-DUD-B	-	SA-0181-DUD	0
SA-0033-DUD	0	SA-0182-DUD	-
SA-0039-DUD	0	SA-0185-DUD	0
SA-0040-DUD	0	SA-0186-DUD	-
SA-0041-DUD	0	SA-0187-DUD	0
SA-0042-DUD	0	SA-0188-DUD	0
SA-0043-DUD	0	SA-0189-DUD	0
SA-0044-DUD	0	SA-0191-DUD	0
SA-0045-DUD	0	SA-0192-DUD	0
SA-0046-DUD	0	SA-0193-DUD	0
SA-0047-DUD	0	SA-0194-DUD	0
SA-0050-DUD	-	SA-0196-DUD	0
SA-0051-DUD-A	0	SA-0197-DUD	0
SA-0052-DUD	-	SA-0198-DUD	0
SA-0058-DUD	0	SA-0199-DUD	0
SA-0059-DUD	-	SA-0200-DUD	0
SA-0060-DUD	0	SA-0202-DUD	0
SA-0061-DUD	-	SA-0204-DUD	0
SA-0064-DUD-A	0	SA-0205-DUD	0
SA-0064-DUD-B	0	SA-0206-DUD	-
SA-0068-DUD (south)	0	SA-0208-DUD	0

Site Ref	Potential Increase in Carbon Footprint
SA-0209-DUD	0
SA-0210-DUD	0
SA-0214-DUD	-
SA-0215-DUD	0
SA-0222-DUD	0
SA-0227-DUD	0
<b>Dudley Employment Sites</b>	
SA-0001-DUD	+/-
SA-0008-DUD	+/-
SA-0013-DUD	+/-
SA-0015-DUD	+/-
SA-0016-DUD	+/-
SA-0028-DUD	+/-
SA-0047-DUD	+/-
SA-0078-DUD	+/-
SA-0135-DUD	+/-
SA-0227-DUD	+/-
H16.1	+/-
<b>Dudley Carried Forward Residential Sites</b>	
19	0
22	-
29	-
30	0
31	0
32	-
35	0
82a	0
83	0
85	0
87	0
91	0
94	0
101	0
138	0
149 (CFH)	0
151	0
155	0
157	0
158	0
159	0
162	0
164	-
173	0

Site Ref	Potential Increase in Carbon Footprint
177	0
178	0
181	0
182	0
188	0
189	0
190	0
200	0
202	0
205	-
302	0
304	0
305	0
306	0
308	0
312	0
318	0
321	0
327	0
330	0
331	0
332	0
336	0
341	0
346	0
347	0
350	0
352	0
358	0
360	0
368	0
370	0
372	0
374	0
375	0
378	0
382	0
383	0
384	0
H10.4	-
H16.1	-
S9	0
SA-0004-DUD	-

Site Ref	Potential Increase in Carbon Footprint
SA-303	0
SA-373 (SA-0373-DUD)	-
<b>Dudley Carried Forward Employment Sites</b>	
104	+/-
122	+/-
123a	+/-
123b	+/-
123c	+/-

Site Ref	Potential Increase in Carbon Footprint
132	+/-
135	+/-
136	+/-
137	+/-
147	+/-
149 (CFE)	+/-
187	+/-
198	+/-
DY5 Site	+/-

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

### F.6.1 Flood Zones

F.6.1.1 Flood Zones 2, 3a and 3b occur within the vicinity of watercourses such as the River Stour, with the largest areas of flood risk generally found in the south of the borough. Ten sites in Dudley are located partially within Flood Zone 3a and/or 3b, and therefore, the proposed development at these sites could potentially have a major negative impact on flooding in the area and exacerbate existing issues of flooding in Dudley. A further six sites are located partially within Flood Zone 2, and therefore, the proposed development at these sites could potentially have a minor negative impact on flooding. The remaining 169 sites which are located wholly within Flood Zone 1 would be expected to have a minor positive impact on flooding, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

### F.6.2 Indicative Flood Zone 3b

F.6.2.1 Indicative Flood Zone 3b is present in areas where flooding will potentially worsen in future due to climate change. In Dudley this generally covers areas currently within Flood Zone 3a. Six sites partially coincide with Indicative Flood Zone 3b (SA-0005-DUD-A, SA-0005-DUD-B, SA-0114-DUD, SA-0135-DUD, SA-0135-DUD and H16.1). Therefore, the proposed development at these six sites could potentially have a major negative impact on flooding and may exacerbate existing issues of flooding in Dudley. The remaining sites which do not coincide with Indicative Flood Zone 3b may have a negligible impact on contributing to flooding issues in the future, although further site-specific assessments and reference to emerging data would help to provide a more accurate picture of changing flood risk due to climate change.

### F.6.3 Surface Water Flood Risk

F.6.3.1 Surface Water Flood Risk (SWFR) is categorised into low (1/1000), medium (1/100) and high (1/30) in relation to the probability of surface water flooding occurring in a given area. Areas affected by surface water flooding in Dudley is widespread, and extensively affects roads and pathways. The proposed development at 38 sites which coincide with areas of high SWFR could potentially have a major negative impact on flooding, as development would be likely to locate site end users in areas at high risk of surface water flooding as well as exacerbate pluvial flood risk in surrounding locations. The proposed development at a further 76 sites in Dudley which coincide with areas of low and/or medium SWFR could potentially have a minor negative impact on surface water flooding. The remaining sites

which do not coincide with any significant areas of SWFR would be expected to have a negligible impact on surface water flooding.

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

Site Ref	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
<b>Dudley Residential Sites</b>			
SA-0001-DUD	+	0	0
SA-0005-DUD-A	--	--	--
SA-0005-DUD-B	--	--	--
SA-0008-DUD	+	0	0
SA-0009-DUD	+	0	--
SA-0010-DUD-A	+	0	--
SA-0010-DUD-B	+	0	0
SA-0013-DUD	+	0	0
SA-0015-DUD	+	0	-
SA-0016-DUD	+	0	-
SA-0017-DUD	+	0	-
SA-0018-DUD-A	+	0	--
SA-0018-DUD-B	+	0	-
SA-0018-DUD-C	+	0	0
SA-0019-DUD	+	0	0
SA-0021-DUD	+	0	0
SA-0025-DUD	+	0	-
SA-0026-DUD	+	0	--
SA-0027-DUD	+	0	-
SA-0028-DUD	+	0	0
SA-0031-DUD-A	+	0	0
SA-0031-DUD-B	+	0	0
SA-0033-DUD	+	0	0
SA-0039-DUD	+	0	--
SA-0040-DUD	+	0	-
SA-0041-DUD	+	0	0
SA-0042-DUD	+	0	--
SA-0043-DUD	+	0	-
SA-0044-DUD	+	0	0
SA-0045-DUD	+	0	0
SA-0046-DUD	+	0	0
SA-0047-DUD	-	0	0
SA-0050-DUD	+	0	-
SA-0051-DUD-A	+	0	0
SA-0052-DUD	+	0	-
SA-0058-DUD	+	0	-
SA-0059-DUD	+	0	-
SA-0060-DUD	+	0	--
SA-0061-DUD	+	0	--
SA-0064-DUD-A	+	0	--

SA-0064-DUD-B	+	0	-
SA-0068-DUD (south)	+	0	-
SA-0068-DUD (north)	+	0	-
SA-0076-DUD	+	0	0
SA-0078-DUD	+	0	--
SA-0079-DUD	+	0	0
SA-0080-DUD	+	0	-
SA-0081-DUD	+	0	--
SA-0084-DUD	+	0	-
SA-0091-DUD	+	0	-
SA-0105-DUD-A	+	0	0
SA-0105-DUD-B	+	0	0
SA-0109-DUD	-	0	--
SA-0114-DUD	-	--	0
SA-0126-DUD	+	0	0
SA-0132-DUD	+	0	-
SA-0134-DUD	+	0	0
SA-0135-DUD	--	--	--
SA-0139-DUD	+	0	0
SA-0145-DUD	+	0	-
SA-0173-DUD	+	0	0
SA-0174-DUD	+	0	-
SA-0175-DUD	+	0	-
SA-0176-DUD	+	0	0
SA-0181-DUD	+	0	-
SA-0182-DUD	+	0	-
SA-0185-DUD	-	0	--
SA-0186-DUD	+	0	-
SA-0187-DUD	-	0	0
SA-0188-DUD	+	0	-
SA-0189-DUD	+	0	--
SA-0191-DUD	+	0	-
SA-0192-DUD	+	0	-
SA-0193-DUD	+	0	--
SA-0194-DUD	+	0	0
SA-0196-DUD	+	0	--
SA-0197-DUD	+	0	0
SA-0198-DUD	+	0	-
SA-0199-DUD	+	0	0
SA-0200-DUD	+	0	-
SA-0202-DUD	+	0	0
SA-0204-DUD	+	0	0
SA-0205-DUD	+	0	--
SA-0206-DUD	+	0	-
SA-0208-DUD	+	0	0
SA-0209-DUD	+	0	0
SA-0210-DUD	+	0	0

SA-0214-DUD	--	0	--
SA-0215-DUD	+	0	-
SA-0222-DUD	+	0	0
SA-0227-DUD	+	0	--
<b>Dudley Employment Sites</b>			
SA-0001-DUD	+	0	0
SA-0008-DUD	+	0	0
SA-0013-DUD	+	0	0
SA-0015-DUD	+	0	-
SA-0016-DUD	+	0	-
SA-0028-DUD	+	0	0
SA-0047-DUD	-	0	0
SA-0078-DUD	+	0	--
SA-0135-DUD	--	--	--
SA-0227-DUD	+	0	--
H16.1	--	--	-
<b>Dudley Carried Forward Residential Sites</b>			
19	+	0	-
22	--	0	-
29	+	0	--
30	+	0	0
31	+	0	0
32	--	0	--
35	+	0	-
82a	+	0	0
83	+	0	0
85	+	0	0
87	+	0	0
91	+	0	--
94	+	0	-
101	+	0	-
138	+	0	0
149 (CFH)	+	0	-
151	+	0	0
155	+	0	-
157	+	0	0
158	+	0	--
159	--	0	-
162	+	0	-
164	+	0	--
173	+	0	0
177	+	0	0
178	+	0	0
181	+	0	-
182	+	0	0
188	+	0	0
189	+	0	-



190	+	0	0
200	+	0	0
202	+	0	-
205	+	0	--
302	+	0	-
304	+	0	-
305	+	0	-
306	+	0	-
308	+	0	-
312	+	0	--
318	+	0	-
321	+	0	0
327	+	0	-
330	+	0	0
331	+	0	-
332	+	0	-
336	+	0	0
341	+	0	-
346	+	0	0
347	+	0	-
350	+	0	0
352	+	0	0
358	+	0	--
360	+	0	-
368	+	0	-
370	+	0	0
372	+	0	--
374	+	0	0
375	+	0	0
378	+	0	0
382	+	0	-
383	+	0	0
384	+	0	-
H10.4	+	0	-
H16.1	+	0	-
S9	--	0	-
SA-0004-DUD	+	0	--
SA-303	+	0	-
SA-373 (SA-0373-DUD)	+	0	-
<b>Dudley Carried Forward Employment Sites</b>			
104	+	0	-
122	+	0	-
123a	+	0	-
123b	+	0	0
123c	+	0	-
132	+	0	-
135	+	0	--

136	+	0	-
137	+	0	-
147	+	0	-
149 (CFE)	+	0	-
187	+	0	0
198	+	0	--
DY5 Site	+	0	--

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## F.7 SA Objective 6: Natural Resources

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

F.7.1.1 Dudley can be described as largely built-up with some areas of green space and other undeveloped Green Belt land scattered throughout, particularly around the edges of the borough.

F.7.1.2 32 sites in Dudley comprise previously developed land which would be likely to have little or no environmental value. The proposed development at these sites would be expected to have a minor positive impact on natural resources as development would be classed as an efficient use of land.

F.7.1.3 The majority of sites in Dudley wholly or partially comprise undeveloped land and/or contain areas likely to be of environmental value such as hedgerows, trees and scrub that may be lost or further fragmented if developed. The proposed development at five of these sites would be expected to have a major negative impact on natural resources due to the loss of 20ha or more of previously undeveloped land. The proposed development at 148 sites would be expected to have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land.

### F.7.2 Agricultural Land Classification

F.7.2.1 In relation to Agricultural Land Classification (ALC) in Dudley, the majority of the borough's land is classed as 'Urban' and 'Non-Agricultural', with smaller areas of Grade 2, 3 and 4 land. Grades 2 and 3, which potentially represent some of the 'best and most versatile' (BMV) land within Dudley, are only found in small areas at the southern and western boundaries. 24 sites are located wholly or partially upon areas of Grade 2 or 3 land and as such, the proposed development at these sites could potentially have a minor negative impact due to the loss of this important natural resource.

F.7.2.2 129 sites are located upon areas of less agriculturally important Grade 4, 'Urban' and/or 'Non-Agricultural' land, and therefore, development in these areas could potentially have a minor positive impact on natural resources as the proposed development at these sites would help to prevent the loss of BMV land across the Plan area.

F.7.2.3 The proposed development at the 32 sites which are located wholly on previously developed land would be likely to have a negligible impact on agricultural land.

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

F.7.3.1 There are no Mineral Safeguarding Areas (MSAs) identified within Dudley, however, there are three areas identified as Areas of Search (AOS) in the west of the borough. Sites SA-

0005-DUD-B, SA-0198-DUD, H10.4 and SA-0004-DUD are located wholly or partially within an AOS; therefore, the proposed development at these four sites could have the potential to sterilise the brick clay resources within these areas. The remaining sites in Dudley would be expected to result in a negligible impact on mineral resources.

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

Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Area / Area of Search
<b>Dudley Residential Sites</b>			
SA-0001-DUD	-	+	0
SA-0005-DUD-A	-	+	0
SA-0005-DUD-B	-	+	-
SA-0008-DUD	-	-	0
SA-0009-DUD	-	-	0
SA-0010-DUD-A	-	-	0
SA-0010-DUD-B	-	-	0
SA-0013-DUD	-	+	0
SA-0015-DUD	-	-	0
SA-0016-DUD	-	-	0
SA-0017-DUD	-	-	0
SA-0018-DUD-A	--	-	0
SA-0018-DUD-B	--	-	0
SA-0018-DUD-C	-	-	0
SA-0019-DUD	-	+	0
SA-0021-DUD	-	+	0
SA-0025-DUD	-	-	0
SA-0026-DUD	-	+	0
SA-0027-DUD	-	-	0
SA-0028-DUD	-	+	0
SA-0031-DUD-A	-	-	0
SA-0031-DUD-B	-	-	0
SA-0033-DUD	-	-	0
SA-0039-DUD	-	+	0
SA-0040-DUD	-	+	0
SA-0041-DUD	-	+	0
SA-0042-DUD	-	+	0
SA-0043-DUD	-	+	0
SA-0044-DUD	-	+	0
SA-0045-DUD	-	+	0
SA-0046-DUD	-	+	0
SA-0047-DUD	-	+	0
SA-0050-DUD	-	+	0
SA-0051-DUD-A	-	+	0
SA-0052-DUD	-	+	0
SA-0058-DUD	-	+	0
SA-0059-DUD	-	+	0

Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Area / Area of Search
SA-0060-DUD	-	+	0
SA-0061-DUD	-	+	0
SA-0064-DUD-A	-	+	0
SA-0064-DUD-B	-	+	0
SA-0068-DUD (south)	-	+	0
SA-0068-DUD (north)	-	+	0
SA-0076-DUD	-	+	0
SA-0078-DUD	-	+	0
SA-0079-DUD	-	-	0
SA-0080-DUD	-	+	0
SA-0081-DUD	--	-	0
SA-0084-DUD	+	0	0
SA-0091-DUD	-	+	0
SA-0105-DUD-A	-	+	0
SA-0105-DUD-B	-	+	0
SA-0109-DUD	-	+	0
SA-0114-DUD	-	-	0
SA-0126-DUD	-	+	0
SA-0132-DUD	+	0	0
SA-0134-DUD	+	0	0
SA-0135-DUD	--	-	0
SA-0139-DUD	-	+	0
SA-0145-DUD	-	+	0
SA-0173-DUD	-	+	0
SA-0174-DUD	-	-	0
SA-0175-DUD	-	+	0
SA-0176-DUD	-	+	0
SA-0181-DUD	-	+	0
SA-0182-DUD	-	+	0
SA-0185-DUD	-	+	0
SA-0186-DUD	-	+	0
SA-0187-DUD	-	+	0
SA-0188-DUD	-	+	0
SA-0189-DUD	-	+	0
SA-0191-DUD	-	+	0
SA-0192-DUD	-	+	0
SA-0193-DUD	-	+	0
SA-0194-DUD	-	+	0
SA-0196-DUD	-	+	0
SA-0197-DUD	-	+	0
SA-0198-DUD	-	+	-
SA-0199-DUD	-	+	0
SA-0200-DUD	-	+	0
SA-0202-DUD	-	+	0

Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Area / Area of Search
SA-0204-DUD	-	+	0
SA-0205-DUD	-	+	0
SA-0206-DUD	-	+	0
SA-0208-DUD	-	+	0
SA-0209-DUD	-	+	0
SA-0210-DUD	-	+	0
SA-0214-DUD	-	+	0
SA-0215-DUD	+	0	0
SA-0222-DUD	-	+	0
SA-0227-DUD	+	0	0
<b>Dudley Employment Sites</b>			
SA-0001-DUD	-	+	0
SA-0008-DUD	-	-	0
SA-0013-DUD	-	+	0
SA-0015-DUD	-	-	0
SA-0016-DUD	-	-	0
SA-0028-DUD	-	+	0
SA-0047-DUD	-	+	0
SA-0078-DUD	-	+	0
SA-0135-DUD	--	-	0
SA-0227-DUD	+	0	0
H16.1	-	+	0
<b>Dudley Carried Forward Residential Sites</b>			
19	-	+	0
22	-	+	0
29	+	0	0
30	-	+	0
31	-	+	0
32	-	+	0
35	-	+	0
82a	-	+	0
83	-	+	0
85	-	+	0
87	-	+	0
91	-	+	0
94	-	+	0
101	+	0	0
138	+	0	0
149 (CFH)	+	0	0
151	-	+	0
155	+	0	0
157	-	+	0
158	+	0	0
159	+	0	0

Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Area / Area of Search
162	-	+	0
164	-	+	0
173	+	0	0
177	+	0	0
178	-	+	0
181	-	+	0
182	-	+	0
188	-	+	0
189	-	+	0
190	-	+	0
200	-	+	0
202	-	+	0
205	-	+	0
302	+	0	0
304	+	0	0
305	+	0	0
306	+	0	0
308	-	+	0
312	-	+	0
318	+	0	0
321	-	+	0
327	-	+	0
330	-	+	0
331	+	0	0
332	-	+	0
336	-	+	0
341	-	+	0
346	+	0	0
347	-	+	0
350	+	0	0
352	+	0	0
358	-	+	0
360	+	0	0
368	+	0	0
370	+	0	0
372	+	0	0
374	-	+	0
375	-	+	0
378	+	0	0
382	-	+	0
383	-	+	0
384	-	+	0
H10.4	-	+	-
H16.1	-	+	0

Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Area / Area of Search
S9	+	0	0
SA-0004-DUD	-	+	-
SA-303	-	+	0
SA-373 (SA-0373-DUD)	+	0	0
<b>Dudley Carried Forward Employment Sites</b>			
104	-	+	0
122	-	+	0
123a	-	+	0
123b	-	+	0
123c	-	+	0
132	-	+	0
135	-	+	0
136	-	+	0
137	-	+	0
147	-	+	0
149 (CFE)	+	0	0
187	-	+	0
198	-	+	0
DY5 Site	-	+	0

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## F.8 SA Objective 7: Pollution

### F.8.1 Air Quality Management Area

F.8.1.1 The entirety of Dudley is classed as 'Dudley Air Quality Management Area' (AQMA). All of the sites in Dudley are located wholly within this AQMA. Several sites are also located within 200m of neighbouring AQMAs including 'Birmingham AQMA' to the south east, 'Sandwell AQMA' to the east, 'Wolverhampton AQMA' to the north and 'Hagley AQMA' to the south. The proposed development at all sites would be likely to locate site end users in areas of existing poor air quality and have a minor negative impact on air pollution.

### F.8.2 Main Road

F.8.2.1 Many major roads pass through Dudley, including the A461, A4101, A4036 and the M5 Motorway which passes adjacent to the south eastern borough boundary. 87 sites are located partially or wholly within 200m of a major road, and therefore, the proposed development at these sites could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using these main roads would be expected to have a minor negative impact on air quality and noise at these sites. On the other hand, the proposed development at the remaining sites which are over 200m from a main road would be expected to have a negligible impact on transport associated air and noise pollution associated with main roads.

### F.8.3 Watercourse

F.8.3.1 There are several watercourses within Dudley, including the River Stour and various canals and brooks. 33 sites coincide with or are located within 10m of various watercourses. The proposed development at these sites would be likely to increase the risk of contamination of these watercourses, and therefore have a minor negative impact on water quality. Sites which are located over 10m from watercourses are less likely to have a significant impact on the quality of watercourses however each site would need to be evaluated according to land use type, size of development and exact location.

F.8.3.2 Sites SA-0186-DUD, SA-0200-DUD and SA-303 have been identified as coinciding with the Dudley canal tunnels. It is uncertain if the development at these three sites would increase the risk of contamination of these watercourses.

### F.8.4 Groundwater Source Protection Zone

F.8.4.1 Source Protection Zones (SPZs) for groundwater within Dudley are located to the west and south west of the borough and are grouped from 1 to 3 based on the level of protection that the groundwater requires. 38 sites in Dudley are located in these areas. The proposed development at sites which partially or wholly coincide with any SPZ could potentially

increase the risk of groundwater contamination within the SPZ, and have a minor negative impact on the quality or status of groundwater resources. The remaining sites do not coincide with the catchment of on any SPZ, and therefore, the proposed development at these sites may have a negligible impact on groundwater quality.

### F.8.5 Potential Increase in Air Pollution

- F.8.5.1 33 sites are proposed for the development of 100 or more dwellings, and 2 sites are proposed for non-residential end use and comprise more than 1ha. The proposed development at these 35 sites could potentially result in a significant increase in local air pollution; therefore, a major negative impact would be expected.
- F.8.5.2 115 sites are proposed for the development of between ten and 99 dwellings, and 15 sites are proposed for non-residential end use and comprise between one and 10ha. Therefore, the proposed development at these 130 sites could potentially have a minor negative impact on air pollution in the local area.
- F.8.5.3 Eight sites are proposed for the development of less than ten dwellings, and eight sites are proposed for non-residential end use and comprise less than 1ha. The proposed development at these 16 sites would be expected to have a negligible impact on local air pollution.
- F.8.5.4 The housing capacity at four residential sites in Dudley is unknown at the time of writing, and therefore, the impact of the proposed development at these sites is uncertain.

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

Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
<b>Dudley Residential Sites</b>					
SA-0001-DUD	-	-	0	0	0
SA-0005-DUD-A	-	0	-	0	--
SA-0005-DUD-B	-	0	-	0	--
SA-0008-DUD	-	-	0	0	-
SA-0009-DUD	-	-	0	-	-
SA-0010-DUD-A	-	0	0	-	-
SA-0010-DUD-B	-	0	0	-	-
SA-0013-DUD	-	-	0	0	-
SA-0015-DUD	-	-	0	0	--
SA-0016-DUD	-	-	0	-	--
SA-0017-DUD	-	-	0	-	--
SA-0018-DUD-A	-	0	0	-	+/-
SA-0018-DUD-B	-	-	0	-	+/-
SA-0018-DUD-C	-	0	0	-	-
SA-0019-DUD	-	0	0	-	-
SA-0021-DUD	-	0	0	0	-

Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
SA-0025-DUD	-	-	0	-	--
SA-0026-DUD	-	-	0	0	--
SA-0027-DUD	-	0	0	0	--
SA-0028-DUD	-	-	0	0	-
SA-0031-DUD-A	-	0	0	-	--
SA-0031-DUD-B	-	-	0	-	--
SA-0033-DUD	-	-	0	-	-
SA-0039-DUD	-	-	0	0	-
SA-0040-DUD	-	0	0	0	-
SA-0041-DUD	-	-	0	0	0
SA-0042-DUD	-	0	0	0	-
SA-0043-DUD	-	0	-	0	-
SA-0044-DUD	-	0	0	-	0
SA-0045-DUD	-	0	0	0	0
SA-0046-DUD	-	0	0	0	0
SA-0047-DUD	-	0	0	-	-
SA-0050-DUD	-	0	0	0	--
SA-0051-DUD-A	-	-	0	-	0
SA-0052-DUD	-	-	0	-	--
SA-0058-DUD	-	0	0	-	-
SA-0059-DUD	-	0	-	0	--
SA-0060-DUD	-	0	0	0	-
SA-0061-DUD	-	0	0	0	--
SA-0064-DUD-A	-	0	-	0	-
SA-0064-DUD-B	-	0	0	0	-
SA-0068-DUD (south)	-	0	0	0	-
SA-0068-DUD (north)	-	0	-	0	-
SA-0076-DUD	-	0	0	-	--
SA-0078-DUD	-	0	0	0	-
SA-0079-DUD	-	0	0	0	-
SA-0080-DUD	-	-	0	0	-
SA-0081-DUD	-	0	0	0	+/-
SA-0084-DUD	-	0	0	0	0
SA-0091-DUD	-	-	-	0	-
SA-0105-DUD-A	-	0	0	-	--
SA-0105-DUD-B	-	0	0	-	+/-
SA-0109-DUD	-	0	-	-	-
SA-0114-DUD	-	0	-	-	--
SA-0126-DUD	-	0	0	-	-
SA-0132-DUD	-	-	-	0	--
SA-0134-DUD	-	0	-	-	-
SA-0135-DUD	-	-	-	0	--
SA-0139-DUD	-	0	0	0	0
SA-0145-DUD	-	-	0	-	--

Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
SA-0173-DUD	-	0	0	0	-
SA-0174-DUD	-	0	0	0	-
SA-0175-DUD	-	0	0	0	-
SA-0176-DUD	-	0	0	0	-
SA-0181-DUD	-	0	0	0	-
SA-0182-DUD	-	0	0	0	--
SA-0185-DUD	-	-	-	-	-
SA-0186-DUD	-	-	+/-	0	--
SA-0187-DUD	-	-	0	-	-
SA-0188-DUD	-	-	0	0	-
SA-0189-DUD	-	0	0	0	-
SA-0191-DUD	-	-	0	0	-
SA-0192-DUD	-	0	0	0	-
SA-0193-DUD	-	-	-	0	-
SA-0194-DUD	-	0	0	0	-
SA-0196-DUD	-	-	0	0	-
SA-0197-DUD	-	0	0	0	-
SA-0198-DUD	-	0	0	0	-
SA-0199-DUD	-	-	0	0	-
SA-0200-DUD	-	-	+/-	0	-
SA-0202-DUD	-	-	0	0	-
SA-0204-DUD	-	0	0	0	-
SA-0205-DUD	-	0	0	0	-
SA-0206-DUD	-	0	0	0	--
SA-0208-DUD	-	-	0	0	-
SA-0209-DUD	-	0	0	0	-
SA-0210-DUD	-	0	0	0	-
SA-0214-DUD	-	0	-	0	--
SA-0215-DUD	-	0	-	0	-
SA-0222-DUD	-	-	0	0	-
SA-0227-DUD	-	-	0	0	-
<b>Dudley Employment Sites</b>					
SA-0001-DUD	-	-	0	0	0
SA-0008-DUD	-	-	0	0	-
SA-0013-DUD	-	-	0	0	-
SA-0015-DUD	-	-	0	0	--
SA-0016-DUD	-	-	0	-	-
SA-0028-DUD	-	-	0	0	0
SA-0047-DUD	-	0	0	-	0
SA-0078-DUD	-	0	0	0	-
SA-0135-DUD	-	-	-	0	--
SA-0227-DUD	-	-	0	0	-
H16.1	-	-	0	0	-
<b>Dudley Carried Forward Residential Sites</b>					

Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
19	-	0	-	0	-
22	-	-	-	-	--
29	-	-	0	0	--
30	-	0	0	0	-
31	-	0	0	0	-
32	-	-	-	0	--
35	-	-	0	0	-
82a	-	-	0	0	-
83	-	-	0	0	-
85	-	0	0	0	-
87	-	0	0	0	-
91	-	0	0	0	-
94	-	0	0	0	-
101	-	0	-	0	-
138	-	0	0	0	-
149 (CFH)	-	-	-	-	-
151	-	0	0	0	-
155	-	-	0	-	-
157	-	-	0	0	-
158	-	0	0	0	-
159	-	0	-	0	-
162	-	-	-	0	-
164	-	-	0	0	--
173	-	-	0	0	-
177	-	-	0	0	-
178	-	-	0	0	-
181	-	-	0	0	-
182	-	-	0	0	-
188	-	-	0	-	-
189	-	-	0	0	-
190	-	-	0	0	-
200	-	0	0	0	-
202	-	0	0	0	-
205	-	0	-	-	--
302	-	0	-	0	-
304	-	0	0	0	-
305	-	-	0	0	-
306	-	-	0	0	-
308	-	0	0	0	-
312	-	0	0	0	-
318	-	-	-	-	-
321	-	-	0	0	-
327	-	-	0	0	-
330	-	0	0	0	-

Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
331	-	0	-	0	-
332	-	0	0	0	-
336	-	-	0	0	-
341	-	0	0	0	-
346	-	-	0	-	-
347	-	0	0	0	-
350	-	-	0	0	-
352	-	0	0	0	-
358	-	-	0	0	-
360	-	-	0	0	-
368	-	-	0	0	-
370	-	0	0	0	-
372	-	-	-	0	-
374	-	0	0	0	-
375	-	0	0	0	-
378	-	0	-	0	-
382	-	0	0	0	-
383	-	-	0	0	-
384	-	-	0	0	-
H10.4	-	0	0	0	--
H16.1	-	-	-	0	--
S9	-	0	-	-	-
SA-0004-DUD	-	-	0	0	--
SA-303	-	0	+/-	0	-
SA-373 (SA-0373-DUD)	-	-	0	0	--
<b>Dudley Carried Forward Employment Sites</b>					
104	-	-	0	0	-
122	-	-	0	0	-
123a	-	-	0	0	-
123b	-	0	0	0	-
123c	-	0	0	0	-
132	-	0	-	0	-
135	-	-	0	0	0
136	-	-	0	0	-
137	-	-	0	0	0
147	-	0	0	0	0
149 (CFE)	-	0	0	0	-
187	-	-	-	0	0
198	-	0	0	0	-
DY5 Site	-	0	0	0	0

## F.9 SA Objective 8: Waste

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

- F.9.1.1 Residential-led development is likely to result in an increase in household waste generation, to some extent. 130 sites are proposed for the development of 124 dwellings or less. The proposed development at these sites would be expected to have a negligible impact on household waste generation in comparison to current levels.
- F.9.1.2 25 sites are proposed for the development of between 125 and 1,250 dwellings. The proposed development at these sites would be expected to increase household waste generation by more than 0.1% in comparison to current levels. Therefore, the proposed development at these sites could potentially result in a minor negative impact on household waste generation.
- F.9.1.3 Site SA-0135-DUD is proposed for the development of 1,668 dwellings. The proposed development at this site could potentially increase household waste generation, as a proportion of Dudley’s current total, by more than 1%. Therefore, a major negative impact could be expected.
- F.9.1.4 The housing capacity at four residential sites in Dudley is unknown at the time of writing, and therefore, the impact of the proposed development at these sites is uncertain.
- F.9.1.5 The waste likely to be generated as a result of non-residential development is uncertain.

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

Site Ref	Increase in household waste generation	Site Ref	Increase in household waste generation
<b>Dudley Residential Sites</b>		SA-0021-DUD	0
SA-0001-DUD	0	SA-0025-DUD	-
SA-0005-DUD-A	-	SA-0026-DUD	0
SA-0005-DUD-B	-	SA-0027-DUD	-
SA-0008-DUD	0	SA-0028-DUD	0
SA-0009-DUD	0	SA-0031-DUD-A	-
SA-0010-DUD-A	0	SA-0031-DUD-B	-
SA-0010-DUD-B	0	SA-0033-DUD	0
SA-0013-DUD	0	SA-0039-DUD	0
SA-0015-DUD	-	SA-0040-DUD	0
SA-0016-DUD	-	SA-0041-DUD	0
SA-0017-DUD	-	SA-0042-DUD	0
SA-0018-DUD-A	+/-	SA-0043-DUD	0
SA-0018-DUD-B	+/-	SA-0044-DUD	0
SA-0018-DUD-C	0	SA-0045-DUD	0
SA-0019-DUD	0	SA-0046-DUD	0

Site Ref	Increase in household waste generation
SA-0047-DUD	0
SA-0050-DUD	0
SA-0051-DUD-A	0
SA-0052-DUD	-
SA-0058-DUD	0
SA-0059-DUD	-
SA-0060-DUD	0
SA-0061-DUD	-
SA-0064-DUD-A	0
SA-0064-DUD-B	0
SA-0068-DUD (south)	0
SA-0068-DUD (north)	0
SA-0076-DUD	-
SA-0078-DUD	0
SA-0079-DUD	0
SA-0080-DUD	0
SA-0081-DUD	+/-
SA-0084-DUD	0
SA-0091-DUD	0
SA-0105-DUD-A	0
SA-0105-DUD-B	+/-
SA-0109-DUD	0
SA-0114-DUD	-
SA-0126-DUD	0
SA-0132-DUD	-
SA-0134-DUD	0
SA-0135-DUD	--
SA-0139-DUD	0
SA-0145-DUD	-
SA-0173-DUD	0
SA-0174-DUD	0
SA-0175-DUD	0
SA-0176-DUD	0
SA-0181-DUD	0
SA-0182-DUD	0
SA-0185-DUD	0
SA-0186-DUD	0
SA-0187-DUD	0
SA-0188-DUD	0
SA-0189-DUD	0
SA-0191-DUD	0
SA-0192-DUD	0
SA-0193-DUD	0
SA-0194-DUD	0

Site Ref	Increase in household waste generation
SA-0196-DUD	0
SA-0197-DUD	0
SA-0198-DUD	0
SA-0199-DUD	0
SA-0200-DUD	0
SA-0202-DUD	0
SA-0204-DUD	0
SA-0205-DUD	0
SA-0206-DUD	0
SA-0208-DUD	0
SA-0209-DUD	0
SA-0210-DUD	0
SA-0214-DUD	-
SA-0215-DUD	0
SA-0222-DUD	0
SA-0227-DUD	0
<b>Dudley Employment Sites</b>	
SA-0001-DUD	+/-
SA-0008-DUD	+/-
SA-0013-DUD	+/-
SA-0015-DUD	+/-
SA-0016-DUD	+/-
SA-0028-DUD	+/-
SA-0047-DUD	+/-
SA-0078-DUD	+/-
SA-0135-DUD	+/-
SA-0227-DUD	+/-
H16.1	+/-
<b>Dudley Carried Forward Residential Sites</b>	
19	0
22	-
29	-
30	0
31	0
32	-
35	0
82a	0
83	0
85	0
87	0
91	0
94	0
101	0



Site Ref	Increase in household waste generation
138	0
149 (CFH)	0
151	0
155	0
157	0
158	0
159	0
162	0
164	0
173	0
177	0
178	0
181	0
182	0
188	0
189	0
190	0
200	0
202	0
205	-
302	0
304	0
305	0
306	0
308	0
312	0
318	0
321	0
327	0
330	0
331	0
332	0
336	0
341	0
346	0
347	0

Site Ref	Increase in household waste generation
350	0
352	0
358	0
360	0
368	0
370	0
372	0
374	0
375	0
378	0
382	0
383	0
384	0
H10.4	-
H16.1	-
S9	0
SA-0004-DUD	-
SA-303	0
SA-373 (SA-0373-DUD)	-
<b>Dudley Carried Forward Employment Sites</b>	
104	+/-
122	+/-
123a	+/-
123b	+/-
123c	+/-
132	+/-
135	+/-
136	+/-
137	+/-
147	+/-
149 (CFE)	+/-
187	+/-
198	+/-
DY5 Site	+/-

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

### F.10.1 Bus Stop

F.10.1.1 Throughout Dudley there are many bus stops, which would be expected to generally provide good public transport access to the local and wider community. However, some small areas of the borough would be likely to have more restricted access to bus services, particularly in the outskirts of the borough and the Green Belt where several of the largest sites are located. 15 sites are located wholly or partially outside of the sustainable distance of 400m from a bus stop providing regular services, and therefore, the proposed development at these sites could potentially have a minor negative impact on site end users' access to sustainable transport. On the other hand, the majority of proposed sites in Dudley are located amongst existing settlements and are within 400m of a bus stop; therefore, the proposed development at these 170 sites would be expected to have a minor positive impact on access to sustainable transport.

### F.10.2 Railway Station

F.10.2.1 There are four railway stations located within the borough of Dudley: Stourbridge Town Station, Stourbridge Junction and Lye Station in the south, and Coseley Station in the north east. As such, sustainable access to railway stations in Dudley is generally restricted to the south of the borough with more limited access likely in the centre and north west of the borough. Approximately half of the proposed sites (95 in total) are situated wholly or partially outside of the sustainable distance of 2km from a railway station, and therefore, the proposed development at these sites could potentially have a minor negative impact on site end users' access to rail services. The remaining 90 sites are located in the south or north east of Dudley, within 2km of a railway station, and are therefore identified as having a minor positive impact on access to rail services.

### F.10.3 Pedestrian Access

F.10.3.1 Sites with good pedestrian access can be described as those with existing pavements or pathways which are segregated from traffic use in the area, which are found throughout the built-up areas of Dudley. The majority of sites in Dudley are well connected to the existing footpath networks, and therefore, the proposed development at these 167 sites would be likely to have a minor positive impact on local transport and accessibility, by encouraging travel by foot and reducing the requirement for new pedestrian access to be created. Conversely, 18 sites currently have poor access to the existing footpath network. Therefore, the proposed development at these sites could potentially have a minor negative impact on

local accessibility, and pedestrian access to the wider community would need improvement to be considered a viable transport option.

#### **F.10.4 Road Access**

F.10.4.1 There are many major and minor roads which run through Dudley allowing for good transport and accessibility in the local area and nationally. The majority of sites in Dudley are adjacent to or coincide with existing roads, and therefore the proposed development at all sites would be expected to provide site end users with good access to the existing road network, resulting in a minor positive impact on transport and accessibility. Only sites 347 and 187 are not accessible from the current road network. The proposed development at these two sites could potentially result in a minor negative impact on accessibility.

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

F.10.5.1 Sites with sustainable pedestrian access to local fresh food and services in Dudley are considered to be those within a 15-minute walking distance. Accessibility modelling data indicates the distribution of local services across Dudley, showing a total of 35 locations, which are generally found in existing centres with more sparse services found towards the outskirts. 59 sites are located outside of a 15-minute walking distance to these services, and therefore, the proposed development at these sites could potentially have a minor negative impact on the access of site end users to local services, based on current infrastructure. 126 sites are identified to be within 15-minute walking distance, and therefore, the proposed development at these sites would be expected to have a minor positive impact on sustainable access to local services.

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

F.10.6.1 Accessibility modelling data indicates that almost the entirety of the borough has good sustainable transport access to local fresh food and services, within a 15-minute travel time via public transport. The majority of sites meet these criteria, and therefore the proposed development at these 175 sites could potentially have a minor positive impact on the access of site end users to local services, based on existing infrastructure. However, ten sites are located wholly or partially outside of the sustainable travel time via public transport to these local services, and therefore may potentially have a minor negative impact on transport and accessibility.

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

Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
<b>Dudley Residential Sites</b>						
SA-0001-DUD	+	+	+	+	+	+
SA-0005-DUD-A	-	-	+	+	+	+
SA-0005-DUD-B	+	-	+	+	+	+
SA-0008-DUD	-	-	-	+	-	-
SA-0009-DUD	-	-	+	+	-	-
SA-0010-DUD-A	-	+	+	+	-	+
SA-0010-DUD-B	-	+	+	+	-	+
SA-0013-DUD	+	+	+	+	+	+
SA-0015-DUD	+	-	+	+	-	-
SA-0016-DUD	+	+	-	+	-	+
SA-0017-DUD	+	-	+	+	+	+
SA-0018-DUD-A	-	+	+	+	-	+
SA-0018-DUD-B	-	+	+	+	-	+
SA-0018-DUD-C	-	+	+	+	-	-
SA-0019-DUD	-	+	-	+	-	+
SA-0021-DUD	+	-	+	+	+	+
SA-0025-DUD	+	-	+	+	+	+
SA-0026-DUD	+	+	+	+	+	+
SA-0027-DUD	+	+	-	+	-	+
SA-0028-DUD	+	-	+	+	+	+
SA-0031-DUD-A	+	+	+	+	-	+
SA-0031-DUD-B	+	+	+	+	-	+
SA-0033-DUD	+	-	+	+	+	+
SA-0039-DUD	+	+	+	+	+	+
SA-0040-DUD	+	+	+	+	-	+
SA-0041-DUD	+	+	+	+	-	+
SA-0042-DUD	+	-	+	+	-	+
SA-0043-DUD	+	+	+	+	+	+
SA-0044-DUD	+	+	+	+	+	+
SA-0045-DUD	+	+	+	+	-	+
SA-0046-DUD	+	-	+	+	+	+
SA-0047-DUD	+	-	+	+	+	+
SA-0050-DUD	+	-	+	+	-	+
SA-0051-DUD-A	+	+	+	+	+	+
SA-0052-DUD	+	-	+	+	+	+
SA-0058-DUD	+	-	+	+	-	+
SA-0059-DUD	-	-	-	+	+	+
SA-0060-DUD	+	-	+	+	+	+
SA-0061-DUD	+	-	+	+	+	-
SA-0064-DUD-A	+	-	+	+	-	+

Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
SA-0064-DUD-B	+	-	+	+	+	+
SA-0068-DUD (south)	+	-	+	+	-	+
SA-0068-DUD (north)	+	-	+	+	-	+
SA-0076-DUD	+	-	-	+	-	+
SA-0078-DUD	+	-	+	+	+	-
SA-0079-DUD	+	+	+	+	-	+
SA-0080-DUD	+	+	+	+	+	+
SA-0081-DUD	-	+	-	+	-	+
SA-0084-DUD	+	+	+	+	+	+
SA-0091-DUD	+	-	+	+	-	+
SA-0105-DUD-A	+	-	-	+	-	+
SA-0105-DUD-B	+	-	-	+	-	+
SA-0109-DUD	+	-	+	+	+	+
SA-0114-DUD	-	-	+	+	+	+
SA-0126-DUD	+	-	+	+	-	+
SA-0132-DUD	+	+	+	+	+	+
SA-0134-DUD	+	+	-	+	+	+
SA-0135-DUD	-	-	+	+	-	+
SA-0139-DUD	+	-	+	+	+	+
SA-0145-DUD	+	-	+	+	-	+
SA-0173-DUD	+	+	+	+	-	+
SA-0174-DUD	+	-	+	+	-	-
SA-0175-DUD	+	+	+	+	-	+
SA-0176-DUD	+	-	+	+	+	+
SA-0181-DUD	+	-	+	+	-	+
SA-0182-DUD	+	+	+	+	+	+
SA-0185-DUD	+	+	+	+	+	+
SA-0186-DUD	+	+	+	+	-	+
SA-0187-DUD	+	-	+	+	+	+
SA-0188-DUD	+	+	+	+	+	+
SA-0189-DUD	+	-	+	+	-	+
SA-0191-DUD	+	+	+	+	+	+
SA-0192-DUD	+	+	+	+	+	+
SA-0193-DUD	+	-	+	+	+	+
SA-0194-DUD	+	-	+	+	+	+
SA-0196-DUD	+	-	+	+	+	+
SA-0197-DUD	+	-	+	+	+	+
SA-0198-DUD	+	-	+	+	-	+
SA-0199-DUD	+	-	+	+	+	+
SA-0200-DUD	+	-	+	+	+	+
SA-0202-DUD	+	-	+	+	+	+
SA-0204-DUD	+	-	+	+	+	+
SA-0205-DUD	+	-	+	+	+	+

Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
SA-0206-DUD	+	-	+	+	+	+
SA-0208-DUD	+	-	+	+	+	+
SA-0209-DUD	+	-	+	+	+	+
SA-0210-DUD	+	+	+	+	+	+
SA-0214-DUD	+	+	+	+	+	+
SA-0215-DUD	+	-	+	+	-	+
SA-0222-DUD	+	-	+	+	+	+
SA-0227-DUD	+	+	+	+	+	+
<b>Dudley Employment Sites</b>						
SA-0001-DUD	+	+	+	+	+	+
SA-0008-DUD	-	-	-	+	-	-
SA-0013-DUD	+	+	+	+	+	+
SA-0015-DUD	+	-	+	+	-	-
SA-0016-DUD	+	+	-	+	-	+
SA-0028-DUD	+	-	+	+	+	+
SA-0047-DUD	+	-	+	+	+	+
SA-0078-DUD	+	-	+	+	+	-
SA-0135-DUD	-	-	+	+	-	+
SA-0227-DUD	+	+	+	+	+	+
H16.1	+	+	-	+	-	+
<b>Dudley Carried Forward Residential Sites</b>						
19	+	-	+	+	-	+
22	+	+	+	+	+	+
29	+	+	+	+	+	+
30	+	+	+	+	+	+
31	+	+	+	+	+	+
32	+	+	-	+	+	+
35	+	+	+	+	+	+
82a	+	+	+	+	+	+
83	+	+	+	+	+	+
85	+	+	+	+	+	+
87	+	-	+	+	+	+
91	+	+	+	+	+	+
94	+	-	+	+	+	+
101	+	+	+	+	-	+
138	+	+	+	+	+	+
149 (CFH)	+	-	+	+	+	+
151	+	-	+	+	-	+
155	+	+	+	+	+	+
157	+	+	+	+	+	+
158	+	+	+	+	+	+
159	+	+	+	+	+	+
162	+	+	+	+	+	+

Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
164	+	+	+	+	+	+
173	+	+	+	+	+	+
177	+	+	+	+	+	+
178	+	+	+	+	+	+
181	+	-	+	+	-	+
182	+	-	+	+	-	+
188	+	+	+	+	+	+
189	+	+	+	+	+	+
190	+	-	+	+	+	+
200	+	-	+	+	-	+
202	+	-	+	+	+	+
205	+	-	+	+	+	+
302	+	+	+	+	+	+
304	+	+	+	+	+	+
305	+	+	+	+	+	+
306	+	+	+	+	+	+
308	+	+	+	+	+	+
312	+	+	+	+	-	+
318	+	+	+	+	+	+
321	+	+	+	+	+	+
327	+	-	+	+	+	+
330	+	-	+	+	-	+
331	+	+	+	+	+	+
332	+	+	+	+	+	+
336	+	+	+	+	+	+
341	+	+	+	+	-	+
346	+	-	+	+	+	+
347	+	+	-	-	+	+
350	+	-	+	+	+	+
352	+	-	+	+	+	+
358	+	+	+	+	+	+
360	+	-	+	+	+	+
368	+	+	+	+	+	+
370	+	-	+	+	-	+
372	+	+	+	+	+	+
374	+	+	+	+	+	+
375	+	+	+	+	+	+
378	+	-	+	+	+	+
382	+	+	-	+	+	+
383	+	-	+	+	+	+
384	+	-	+	+	+	+
H10.4	+	-	-	+	-	+
H16.1	+	+	+	+	+	+

Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
S9	+	+	+	+	+	+
SA-0004-DUD	+	-	+	+	-	+
SA-303	+	-	+	+	+	+
SA-373 (SA-0373-DUD)	+	-	+	+	+	+
<b>Dudley Carried Forward Employment Sites</b>						
104	+	+	+	+	+	+
122	+	-	+	+	+	+
123a	+	-	+	+	+	+
123b	+	-	+	+	-	+
123c	+	-	+	+	+	+
132	+	-	+	+	+	+
135	+	-	+	+	+	+
136	+	-	+	+	-	+
137	+	-	+	+	+	+
147	+	+	+	+	+	+
149 (CFE)	+	-	+	+	+	+
187	+	+	-	-	-	+
198	+	+	+	+	+	+
DY5 Site	+	-	+	+	+	+

DRAFT



# F.11 SA Objective 10: Housing

## F.11.1 Housing Provision

F.11.1.1 Residential-led development is likely to result in a net gain in housing. Sites in Dudley proposed for residential use would therefore be expected to result in positive impacts under this objective. Sites which have been identified as having capacity for 100 or more dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision. Sites which have been identified as having capacity for 99 dwellings or less would be expected to result in a minor positive impact on housing provision. This includes the majority of carried forward residential sites which are generally smaller sites within the existing urban area.

F.11.1.2 However, the housing capacity at four of the residential sites is unknown at the time of writing; therefore, the impact of the proposed development at these sites is uncertain although it is likely there would be a net gain to some extent.

F.11.1.3 Employment-led sites in Dudley would not be expected to result in a net change in housing provision and therefore a negligible impact has been identified for these sites.

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

Site Ref	Housing Provision	Site Ref	Housing Provision
<b>Dudley Residential Sites</b>		SA-0033-DUD	+
SA-0001-DUD	+	SA-0039-DUD	+
SA-0005-DUD-A	++	SA-0040-DUD	+
SA-0005-DUD-B	++	SA-0041-DUD	+
SA-0008-DUD	+	SA-0042-DUD	+
SA-0009-DUD	+	SA-0043-DUD	+
SA-0010-DUD-A	+	SA-0044-DUD	+
SA-0010-DUD-B	+	SA-0045-DUD	+
SA-0013-DUD	+	SA-0046-DUD	+
SA-0015-DUD	++	SA-0047-DUD	+
SA-0016-DUD	++	SA-0050-DUD	++
SA-0017-DUD	++	SA-0051-DUD-A	+
SA-0018-DUD-A	+/-	SA-0052-DUD	++
SA-0018-DUD-B	+/-	SA-0058-DUD	+
SA-0018-DUD-C	+	SA-0059-DUD	++
SA-0019-DUD	+	SA-0060-DUD	+
SA-0021-DUD	+	SA-0061-DUD	++
SA-0025-DUD	++	SA-0064-DUD-A	+
SA-0026-DUD	++	SA-0064-DUD-B	+
SA-0027-DUD	++	SA-0068-DUD (south)	+
SA-0028-DUD	+	SA-0068-DUD (north)	+
SA-0031-DUD-A	++	SA-0076-DUD	++
SA-0031-DUD-B	++	SA-0078-DUD	+

Site Ref	Housing Provision
SA-0079-DUD	+
SA-0080-DUD	+
SA-0081-DUD	+/-
SA-0084-DUD	+
SA-0091-DUD	+
SA-0105-DUD-A	++
SA-0105-DUD-B	+/-
SA-0109-DUD	+
SA-0114-DUD	++
SA-0126-DUD	+
SA-0132-DUD	++
SA-0134-DUD	+
SA-0135-DUD	++
SA-0139-DUD	+
SA-0145-DUD	++
SA-0173-DUD	+
SA-0174-DUD	+
SA-0175-DUD	+
SA-0176-DUD	+
SA-0181-DUD	+
SA-0182-DUD	++
SA-0185-DUD	+
SA-0186-DUD	++
SA-0187-DUD	+
SA-0188-DUD	+
SA-0189-DUD	+
SA-0191-DUD	+
SA-0192-DUD	+
SA-0193-DUD	+
SA-0194-DUD	+
SA-0196-DUD	+
SA-0197-DUD	+
SA-0198-DUD	+
SA-0199-DUD	+
SA-0200-DUD	+
SA-0202-DUD	+
SA-0204-DUD	+
SA-0205-DUD	+
SA-0206-DUD	++
SA-0208-DUD	+
SA-0209-DUD	+
SA-0210-DUD	+
SA-0214-DUD	++
SA-0215-DUD	+
SA-0222-DUD	+
SA-0227-DUD	+

Site Ref	Housing Provision
<b>Dudley Employment Sites</b>	
SA-0001-DUD	0
SA-0008-DUD	0
SA-0013-DUD	0
SA-0015-DUD	0
SA-0016-DUD	0
SA-0028-DUD	0
SA-0047-DUD	0
SA-0078-DUD	0
SA-0135-DUD	0
SA-0227-DUD	0
H16.1	0
<b>Dudley Carried Forward Residential Sites</b>	
19	+
22	++
29	++
30	+
31	+
32	++
35	+
82a	+
83	+
85	+
87	+
91	+
94	+
101	+
138	+
149 (CFH)	+
151	+
155	+
157	+
158	+
159	+
162	+
164	++
173	+
177	+
178	+
181	+
182	+
188	+
189	+
190	+
200	+

Site Ref	Housing Provision
202	+
205	++
302	+
304	+
305	+
306	+
308	+
312	+
318	+
321	+
327	+
330	+
331	+
332	+
336	+
341	+
346	+
347	+
350	+
352	+
358	+
360	+
368	+
370	+
372	+
374	+
375	+

Site Ref	Housing Provision
378	+
382	+
383	+
384	+
H10.4	++
H16.1	++
S9	+
SA-0004-DUD	++
SA-303	+
SA-373 (SA-0373-DUD)	++
Dudley Carried Forward Employment Sites	
104	0
122	0
123a	0
123b	0
123c	0
132	0
135	0
136	0
137	0
147	0
149 (CFE)	0
187	0
198	0
DY5 Site	0

## F.12 SA Objective 11: Equality

### F.12.1 Index of Multiple Deprivation

F.12.1.1 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England<sup>5</sup>. Out of 317 Local Authorities in England, Dudley is ranked as the 91<sup>st</sup> most deprived<sup>6</sup>. Overall deprivation is relatively high across the Black Country, with 21 of the LSOAs in Dudley ranked among the 10% most deprived in England. Deprivation levels within the borough of Dudley varies from area to area, and generally the 10% most deprived areas are within the central and north eastern parts of the borough.

F.12.1.2 39 sites are located wholly or partially within the 10% most deprived LSOAs, and therefore development at these sites could potentially have a minor negative impact on equality by exacerbating existing social pressures faced by current residents and place increased pressure on local services. The remaining sites are located outside of the most deprived 10% LSOAs, and therefore, the proposed development at the majority of sites may have a negligible impact on equality.

F.12.1.3 It should be noted that there is a degree of uncertainty in regard to the impacts of each site on equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.

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

Site Ref	IMD 10% Most Deprived	Site Ref	IMD 10% Most Deprived
<b>Dudley Residential Sites</b>		SA-0018-DUD-B	0
SA-0001-DUD	0	SA-0018-DUD-C	0
SA-0005-DUD-A	0	SA-0019-DUD	0
SA-0005-DUD-B	0	SA-0021-DUD	0
SA-0008-DUD	0	SA-0025-DUD	0
SA-0009-DUD	0	SA-0026-DUD	0
SA-0010-DUD-A	0	SA-0027-DUD	0
SA-0010-DUD-B	0	SA-0028-DUD	0
SA-0013-DUD	0	SA-0031-DUD-A	0
SA-0015-DUD	0	SA-0031-DUD-B	0
SA-0016-DUD	0	SA-0033-DUD	0
SA-0017-DUD	0	SA-0039-DUD	-
SA-0018-DUD-A	0	SA-0040-DUD	0

<sup>5</sup> Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date Accessed: 05/05/21]

<sup>6</sup> Black Country Consortium (2019) The English Indices of Deprivation 2019. Available at: <https://www.the-blackcountry.com/upload/BC%20IMD%202019.pdf> [Date Accessed: 05/05/21]

Site Ref	IMD 10% Most Deprived
SA-0041-DUD	0
SA-0042-DUD	0
SA-0043-DUD	-
SA-0044-DUD	0
SA-0045-DUD	0
SA-0046-DUD	-
SA-0047-DUD	0
SA-0050-DUD	-
SA-0051-DUD-A	0
SA-0052-DUD	0
SA-0058-DUD	0
SA-0059-DUD	0
SA-0060-DUD	0
SA-0061-DUD	0
SA-0064-DUD-A	-
SA-0064-DUD-B	0
SA-0068-DUD (south)	0
SA-0068-DUD (north)	0
SA-0076-DUD	0
SA-0078-DUD	0
SA-0079-DUD	0
SA-0080-DUD	0
SA-0081-DUD	0
SA-0084-DUD	0
SA-0091-DUD	0
SA-0105-DUD-A	0
SA-0105-DUD-B	0
SA-0109-DUD	0
SA-0114-DUD	0
SA-0126-DUD	0
SA-0132-DUD	-
SA-0134-DUD	0
SA-0135-DUD	0
SA-0139-DUD	0
SA-0145-DUD	0
SA-0173-DUD	0
SA-0174-DUD	0
SA-0175-DUD	0
SA-0176-DUD	-
SA-0181-DUD	0
SA-0182-DUD	-
SA-0185-DUD	0
SA-0186-DUD	0
SA-0187-DUD	0
SA-0188-DUD	0

Site Ref	IMD 10% Most Deprived
SA-0189-DUD	-
SA-0191-DUD	0
SA-0192-DUD	0
SA-0193-DUD	0
SA-0194-DUD	0
SA-0196-DUD	-
SA-0197-DUD	-
SA-0198-DUD	0
SA-0199-DUD	0
SA-0200-DUD	-
SA-0202-DUD	-
SA-0204-DUD	-
SA-0205-DUD	0
SA-0206-DUD	0
SA-0208-DUD	0
SA-0209-DUD	0
SA-0210-DUD	0
SA-0214-DUD	0
SA-0215-DUD	0
SA-0222-DUD	-
SA-0227-DUD	-
<b>Dudley Employment Sites</b>	
SA-0001-DUD	0
SA-0008-DUD	0
SA-0013-DUD	0
SA-0015-DUD	0
SA-0016-DUD	0
SA-0028-DUD	0
SA-0047-DUD	0
SA-0078-DUD	0
SA-0135-DUD	0
SA-0227-DUD	-
H16.1	-
<b>Dudley Carried Forward Residential Sites</b>	
19	0
22	0
29	-
30	0
31	0
32	-
35	-
82a	0
83	0
85	0

Site Ref	IMD 10% Most Deprived
87	0
91	0
94	0
101	0
138	0
149 (CFH)	0
151	-
155	0
157	0
158	0
159	0
162	0
164	0
173	-
177	-
178	-
181	0
182	-
188	0
189	0
190	-
200	0
202	-
205	0
302	0
304	0
305	0
306	0
308	0
312	0
318	0
321	0
327	-
330	0
331	0
332	0
336	0
341	0

Site Ref	IMD 10% Most Deprived
346	0
347	-
350	-
352	0
358	0
360	0
368	0
370	0
372	0
374	0
375	0
378	0
382	0
383	0
384	0
H10.4	0
H16.1	-
S9	0
SA-0004-DUD	0
SA-303	-
SA-373 (SA-0373-DUD)	-
<b>Dudley Carried Forward Employment Sites</b>	
104	-
122	0
123a	0
123b	0
123c	0
132	-
135	-
136	0
137	0
147	0
149 (CFE)	-
187	0
198	0
DY5 Site	-

## F.13 SA Objective 12: Health

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

F.13.1.1 Within Dudley, Russells Hall Hospital is the only NHS Hospital with an Accident & Emergency department, although there are several other hospitals within and surrounding the Black Country providing these services such as the Queen Elizabeth Hospital, approximately 4.7km to the south east of the borough. The majority of Dudley is within 5km of Russells Hall Hospital, although a proportion in the south of the borough lies outside of this distance and could potentially have more restricted sustainable access to emergency healthcare. 120 sites are located within 5km of Russells Hall Hospital and could therefore potentially have a minor positive impact on access to emergency healthcare due being within a sustainable distance to the services. However, 65 sites in Dudley are located in the south or north eastern corner of the borough, over 5km from a hospital, and therefore the proposed development at these sites could potentially have a minor negative effect on access to emergency healthcare.

### F.13.2 Pedestrian Access to GP Surgery

F.13.2.1 There are 55 GP Surgeries within Dudley and many others in the wider Black Country area, serving the existing local communities. Accessibility modelling data has been provided to Lepus by the BCA, mapping the location of GP surgeries and areas within a sustainable travel time to these facilities for pedestrians. A large proportion of the built-up areas are located within a 15-minute walk to a GP surgery, however, some areas are likely to have more restricted access, such as in the outskirts of the borough and the Green Belt, and some inner-city areas where existing development is mainly industrial/commercial.

F.13.2.2 52 sites in Dudley are located outside of this travel time to a GP and are therefore identified as potentially having a minor negative impact on sustainable access to healthcare. On the other hand, 133 sites in Dudley are located within a 15-minute walking distance to a GP surgery; therefore, the proposed development at these sites would be expected to have a minor positive impact on access to healthcare, based on existing infrastructure.

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

F.13.3.1 Sustainable public transport access to a local GP surgery is identified to be within a 15-minute journey. Accessibility modelling data indicates that the majority of the borough falls within this distance, with the exception of an area to the south west of Stourbridge and small pockets elsewhere such as to the north of Merry Hill. The majority of sites within Dudley are located in areas within this travel time to a GP surgery via public transport, and therefore, the proposed development at these 168 sites would be expected to have a minor positive impact on sustainable access to healthcare. However, 17 sites are located outside of a 15-minute public transport journey to a GP surgery, and therefore, the proposed development

at these sites could potentially have a minor negative impact on sustainable access to healthcare.

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

F.13.4.1 The entirety of Dudley is classed as 'Dudley AQMA'. All sites are wholly within this AQMA, and several sites are also located within 200m of neighbouring AQMAs including 'Birmingham AQMA' to the south east, 'Sandwell AQMA' to the east, 'Wolverhampton AQMA' to the north and 'Hagley AQMA' to the south. The proposed development at all sites in Dudley would be likely to expose site end users to poor air quality associated with these AQMAs, and therefore, have a minor negative impact on health.

### **F.13.5 Main Road**

F.13.5.1 Many major roads pass through Dudley, including the A461, A4101, A4036 and also the M5 Motorway which passes adjacent to the south eastern borough boundary. 87 sites are located partially or wholly within 200m of a major road; therefore, the proposed development at these sites could potentially have a minor negative impact on site end users' health, due to the vicinity of the main roads and likely higher levels of transport associated air pollution. On the other hand, the proposed development at the 98 sites which are over 200m from a main road could potentially have a minor positive impact on health, as site end users in these locations would be situated away from major sources of traffic related air pollution.

### **F.13.6 Access to Greenspace**

F.13.6.1 Greenspaces are distributed throughout the borough, including parks, allotments, playing fields and sports facilities. All sites in Dudley, with the exception of Site 123a, are located within 600m of one or more greenspaces. Therefore, a minor positive impact would be expected at these sites, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits. The majority of Site 123a is located over 600m from a greenspace, and therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to outdoor space.

### **F.13.7 Net Loss of Greenspace**

F.13.7.1 18 proposed sites coincide wholly or partially with greenspaces, including Site SA-0043-DUD-A which wholly coincides with Golden Hillock Open Space, and Site SA-0109-DUD which coincides with the majority of Kinver Play Park. The proposed development at these 18 sites would be likely to result in the net loss of greenspace, and therefore, have a minor negative impact on the provision of greenspace across the Plan area.



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

F.13.8.1 All sites in Dudley are located within 600m of the PRoW and/or cycle network. The proposed development at these 185 sites would be likely to provide site end users with good pedestrian and/or cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

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

Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
<b>Dudley Residential Sites</b>								
SA-0001-DUD	+	+	+	-	-	+	0	+
SA-0005-DUD-A	+	+	+	-	+	+	0	+
SA-0005-DUD-B	+	+	+	-	+	+	0	+
SA-0008-DUD	-	-	+	-	-	+	0	+
SA-0009-DUD	-	-	-	-	-	+	0	+
SA-0010-DUD-A	-	-	+	-	+	+	0	+
SA-0010-DUD-B	-	-	+	-	+	+	0	+
SA-0013-DUD	+	+	+	-	-	+	0	+
SA-0015-DUD	-	-	+	-	-	+	0	+
SA-0016-DUD	-	-	-	-	-	+	0	+
SA-0017-DUD	+	-	+	-	-	+	0	+
SA-0018-DUD-A	-	-	-	-	+	+	-	+
SA-0018-DUD-B	-	-	-	-	-	+	0	+
SA-0018-DUD-C	-	-	-	-	+	+	0	+
SA-0019-DUD	-	-	-	-	+	+	0	+
SA-0021-DUD	+	+	+	-	+	+	0	+
SA-0025-DUD	+	+	+	-	-	+	0	+
SA-0026-DUD	+	+	+	-	-	+	0	+
SA-0027-DUD	-	-	+	-	+	+	0	+
SA-0028-DUD	+	+	+	-	-	+	0	+
SA-0031-DUD-A	-	-	+	-	+	+	0	+
SA-0031-DUD-B	-	-	+	-	-	+	0	+
SA-0033-DUD	+	-	+	-	-	+	0	+
SA-0039-DUD	-	+	+	-	-	+	0	+
SA-0040-DUD	-	-	+	-	+	+	-	+
SA-0041-DUD	-	+	+	-	-	+	0	+
SA-0042-DUD	+	+	+	-	+	+	0	+
SA-0043-DUD	+	+	+	-	+	+	-	+
SA-0044-DUD	-	+	+	-	+	+	0	+
SA-0045-DUD	-	-	+	-	+	+	0	+
SA-0046-DUD	+	+	+	-	+	+	0	+
SA-0047-DUD	+	+	+	-	+	+	0	+

Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
SA-0050-DUD	+	-	+	-	+	+	0	+
SA-0051-DUD-A	-	+	+	-	-	+	0	+
SA-0052-DUD	+	+	+	-	-	+	-	+
SA-0058-DUD	-	-	-	-	+	+	0	+
SA-0059-DUD	+	+	+	-	+	+	0	+
SA-0060-DUD	+	+	+	-	+	+	0	+
SA-0061-DUD	+	+	+	-	+	+	0	+
SA-0064-DUD-A	+	-	+	-	+	+	0	+
SA-0064-DUD-B	+	+	+	-	+	+	0	+
SA-0068-DUD (south)	+	-	+	-	+	+	0	+
SA-0068-DUD (north)	+	-	+	-	+	+	0	+
SA-0076-DUD	-	-	-	-	+	+	0	+
SA-0078-DUD	+	+	+	-	+	+	0	+
SA-0079-DUD	-	+	+	-	+	+	0	+
SA-0080-DUD	+	+	+	-	-	+	0	+
SA-0081-DUD	-	-	+	-	+	+	0	+
SA-0084-DUD	+	+	+	-	+	+	0	+
SA-0091-DUD	-	-	+	-	-	+	0	+
SA-0105-DUD-A	-	-	-	-	+	+	0	+
SA-0105-DUD-B	-	-	-	-	+	+	0	+
SA-0109-DUD	+	+	+	-	+	+	-	+
SA-0114-DUD	+	-	+	-	+	+	0	+
SA-0126-DUD	-	-	-	-	+	+	0	+
SA-0132-DUD	+	+	+	-	-	+	-	+
SA-0134-DUD	-	-	-	-	+	+	0	+
SA-0135-DUD	-	-	+	-	-	+	0	+
SA-0139-DUD	+	+	+	-	+	+	0	+
SA-0145-DUD	-	-	-	-	-	+	0	+
SA-0173-DUD	-	+	+	-	+	+	0	+
SA-0174-DUD	-	-	+	-	+	+	-	+
SA-0175-DUD	-	+	+	-	+	+	0	+
SA-0176-DUD	-	+	+	-	+	+	-	+
SA-0181-DUD	+	+	+	-	+	+	0	+
SA-0182-DUD	+	+	+	-	+	+	0	+
SA-0185-DUD	-	+	+	-	-	+	0	+
SA-0186-DUD	-	-	+	-	-	+	0	+
SA-0187-DUD	+	+	+	-	-	+	0	+
SA-0188-DUD	+	+	+	-	-	+	0	+
SA-0189-DUD	+	-	+	-	+	+	-	+
SA-0191-DUD	+	+	+	-	-	+	0	+
SA-0192-DUD	+	+	+	-	+	+	0	+

Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PROW/ Cycle Path
SA-0193-DUD	+	+	+	-	-	+	0	+
SA-0194-DUD	+	+	+	-	+	+	0	+
SA-0196-DUD	+	+	+	-	-	+	0	+
SA-0197-DUD	+	+	+	-	+	+	-	+
SA-0198-DUD	+	+	+	-	+	+	0	+
SA-0199-DUD	+	+	+	-	-	+	0	+
SA-0200-DUD	+	+	+	-	-	+	-	+
SA-0202-DUD	+	+	+	-	-	+	0	+
SA-0204-DUD	+	+	+	-	+	+	0	+
SA-0205-DUD	+	+	+	-	+	+	-	+
SA-0206-DUD	+	+	+	-	+	+	-	+
SA-0208-DUD	+	+	+	-	-	+	0	+
SA-0209-DUD	+	+	+	-	+	+	0	+
SA-0210-DUD	+	+	+	-	+	+	0	+
SA-0214-DUD	-	+	+	-	+	+	-	+
SA-0215-DUD	+	+	+	-	+	+	0	+
SA-0222-DUD	+	+	+	-	-	+	0	+
SA-0227-DUD	+	+	+	-	-	+	0	+
<b>Dudley Employment Sites</b>								
SA-0001-DUD	+	+	+	-	-	+	0	+
SA-0008-DUD	-	-	+	-	-	+	0	+
SA-0013-DUD	+	+	+	-	-	+	0	+
SA-0015-DUD	-	-	+	-	-	+	0	+
SA-0016-DUD	-	-	-	-	-	+	0	+
SA-0028-DUD	+	+	+	-	-	+	0	+
SA-0047-DUD	+	+	+	-	+	+	0	+
SA-0078-DUD	+	+	+	-	+	+	0	+
SA-0135-DUD	-	-	+	-	-	+	0	+
SA-0227-DUD	+	+	+	-	-	+	0	+
H16.1	+	-	+	-	-	+	0	+
<b>Dudley Carried Forward Residential Sites</b>								
19	+	+	+	-	+	+	0	+
22	-	+	+	-	-	+	0	+
29	+	+	+	-	-	+	0	+
30	-	+	+	-	+	+	0	+
31	-	+	+	-	+	+	0	+
32	+	+	+	-	-	+	0	+
35	+	+	+	-	-	+	-	+
82a	-	+	+	-	-	+	0	+
83	-	+	+	-	-	+	0	+
85	+	+	+	-	+	+	0	+

Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PROW/ Cycle Path
87	+	+	+	-	+	+	0	+
91	+	+	+	-	+	+	0	+
94	+	+	+	-	+	+	0	+
101	-	+	+	-	+	+	0	+
138	-	+	+	-	+	+	0	+
149 (CFH)	+	+	+	-	-	+	0	+
151	+	-	+	-	+	+	0	+
155	-	+	+	-	-	+	0	+
157	-	+	+	-	-	+	0	+
158	-	-	+	-	+	+	0	+
159	+	+	+	-	+	+	0	+
162	+	+	+	-	-	+	0	+
164	+	+	+	-	-	+	0	+
173	+	+	+	-	-	+	0	+
177	+	+	+	-	-	+	0	+
178	+	+	+	-	-	+	0	+
181	+	+	+	-	-	+	0	+
182	+	+	+	-	-	+	0	+
188	-	+	+	-	-	+	0	+
189	-	+	+	-	-	+	0	+
190	+	+	+	-	-	+	0	+
200	+	-	+	-	+	+	0	+
202	+	+	+	-	+	+	0	+
205	+	+	+	-	+	+	0	+
302	+	+	+	-	+	+	0	+
304	+	+	+	-	+	+	0	+
305	-	+	+	-	-	+	0	+
306	+	+	+	-	-	+	0	+
308	+	+	+	-	+	+	0	+
312	-	+	+	-	+	+	0	+
318	+	+	-	-	-	+	0	+
321	-	+	+	-	-	+	0	+
327	+	+	+	-	-	+	0	+
330	+	-	+	-	+	+	0	+
331	+	+	+	-	+	+	0	+
332	+	+	+	-	+	+	0	+
336	-	+	+	-	-	+	0	+
341	-	+	+	-	+	+	0	+
346	+	+	+	-	-	+	0	+
347	+	+	+	-	+	+	-	+
350	+	+	+	-	-	+	0	+
352	+	+	+	-	+	+	0	+

Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PROW/ Cycle Path
358	-	+	+	-	-	+	0	+
360	-	+	+	-	-	+	0	+
368	+	+	+	-	-	+	0	+
370	+	+	+	-	+	+	0	+
372	+	+	+	-	-	+	0	+
374	+	+	+	-	+	+	0	+
375	-	+	+	-	+	+	0	+
378	+	+	+	-	+	+	0	+
382	-	+	+	-	+	+	0	+
383	+	+	+	-	-	+	0	+
384	+	+	+	-	-	+	-	+
H10.4	+	-	+	-	+	+	0	+
H16.1	+	+	+	-	-	+	0	+
S9	-	+	+	-	+	+	0	+
SA-0004-DUD	+	+	+	-	-	+	0	+
SA-303	+	+	+	-	+	+	-	+
SA-373 (SA-0373-DUD)	+	+	+	-	-	+	0	+
<b>Dudley Carried Forward Employment Sites</b>								
104	+	+	+	-	-	+	+	+
122	+	+	+	-	-	+	+	+
123a	+	+	+	-	-	+	-	+
123b	+	-	+	-	+	+	+	+
123c	+	+	+	-	+	+	+	+
132	+	-	+	-	+	+	+	+
135	+	-	+	-	-	+	+	+
136	+	-	-	-	-	+	+	+
137	+	-	-	-	-	+	+	+
147	+	+	+	-	+	+	+	+
149	+	+	+	-	+	+	+	+
187	-	-	+	-	-	+	+	+
198	-	+	+	-	+	+	+	+
DY5 Site	+	-	+	-	+	+	+	+

## F.14 SA Objective 13: Economy

### F.14.1 Employment Floorspace Provision

- F.14.1.1 Employment floorspace provision has been assessed with consideration of current land use and the proposed development at each site.
- F.14.1.2 There are 25 sites in Dudley which are proposed for employment use, 23 of which currently comprise areas of undeveloped land. Therefore, the proposed development at these 23 sites would be expected to result in a net gain in employment floorspace and have a major positive impact on providing local employment opportunities. Sites SA-0227-DUD and 122 currently coincide with 'SD Waste'. At this stage, it is uncertain whether the proposed development at these two sites would result in a net change in employment floorspace.
- F.14.1.3 37 sites proposed for residential use coincide with existing employment areas, and therefore, development at these sites could potentially result in a net loss of employment floorspace. The proposed development at 26 of these sites could potentially have a minor negative impact on employment floorspace provision due to the possible loss of small areas of employment land or small businesses, whereas the proposed development at eleven of these sites could potentially have a major negative impact due to the possible loss of a large area of employment land.
- F.14.1.4 Three residential sites (Sites 101, 205 and H16.1) currently contain some existing development which may provide employment opportunities, as well as undeveloped areas. It is uncertain whether the proposed development at these three sites would result in a net change in employment floorspace.
- F.14.1.5 The remaining 120 residential sites are located on previously undeveloped land and would not be expected to result in a net change in employment floorspace; therefore, the proposed development at these sites would be likely to have a negligible impact on the provision of employment opportunities.

### F.14.2 Pedestrian Access to Employment Opportunities

- F.14.2.1 There is a range of employment opportunities currently within Dudley, with over 100 key employment locations identified. Accessibility modelling data has been provided to Lepus by the BCA, mapping key employment locations and areas within a sustainable travel time. According to the modelling data, almost the entirety of the borough is within a 30-minute walk to an employment location, however, some small areas at the southern boundary are likely to have more restricted access for pedestrians. 157 residential sites in Dudley could potentially have a minor positive impact on pedestrian access to employment due to being situated within this identified sustainable travel time to employment opportunities. However, Sites SA-0009-DUD, SA-0091-DUD and SA-0145-DUD are located outside of this

travel time, and therefore, the proposed development at these three sites could potentially have a minor negative impact on pedestrian access to employment opportunities, based on current infrastructure.

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

F.14.3.1 Accessibility modelling data indicates that the majority of the borough is located within a sustainable travel time via public transport to employment opportunities, identified as being within a 30-minute journey. Public transport provision within Dudley is widespread, with only a small proportion of the borough in the south outside of this distance. Therefore, most of the proposed residential sites in Dudley would be expected to have a minor positive impact on sustainable access to employment opportunities. On the other hand, Sites SA-0009-DUD, SA-0018-DUD-B and SA-0019-DUD are situated largely outside of this travel time, and consequently the proposed development at these three sites could potentially have a minor negative impact on sustainable access to employment.

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

Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
<b>Dudley Residential Sites</b>			
SA-0001-DUD	0	+	+
SA-0005-DUD-A	0	+	+
SA-0005-DUD-B	0	+	+
SA-0008-DUD	0	+	+
SA-0009-DUD	0	-	-
SA-0010-DUD-A	0	+	+
SA-0010-DUD-B	0	+	+
SA-0013-DUD	0	+	+
SA-0015-DUD	0	+	+
SA-0016-DUD	0	+	+
SA-0017-DUD	0	+	+
SA-0018-DUD-A	-	+	+
SA-0018-DUD-B	0	+	-
SA-0018-DUD-C	0	+	+
SA-0019-DUD	0	+	-
SA-0021-DUD	0	+	+
SA-0025-DUD	0	+	+
SA-0026-DUD	0	+	+
SA-0027-DUD	0	+	+
SA-0028-DUD	0	+	+
SA-0031-DUD-A	0	+	+
SA-0031-DUD-B	0	+	+
SA-0033-DUD	0	+	+
SA-0039-DUD	0	+	+

Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
SA-0040-DUD	0	+	+
SA-0041-DUD	0	+	+
SA-0042-DUD	0	+	+
SA-0043-DUD	0	+	+
SA-0044-DUD	0	+	+
SA-0045-DUD	0	+	+
SA-0046-DUD	0	+	+
SA-0047-DUD	0	+	+
SA-0050-DUD	0	+	+
SA-0051-DUD-A	0	+	+
SA-0052-DUD	-	+	+
SA-0058-DUD	0	+	+
SA-0059-DUD	-	+	+
SA-0060-DUD	0	+	+
SA-0061-DUD	0	+	+
SA-0064-DUD-A	0	+	+
SA-0064-DUD-B	0	+	+
SA-0068-DUD (south)	0	+	+
SA-0068-DUD (north)	0	+	+
SA-0076-DUD	0	+	+
SA-0078-DUD	0	+	+
SA-0079-DUD	0	+	+
SA-0080-DUD	0	+	+
SA-0081-DUD	0	+	+
SA-0084-DUD	0	+	+
SA-0091-DUD	0	+	+
SA-0105-DUD-A	0	-	+
SA-0105-DUD-B	0	+	+
SA-0109-DUD	0	+	+
SA-0114-DUD	0	+	+
SA-0126-DUD	0	+	+
SA-0132-DUD	--	+	+
SA-0134-DUD	-	+	+
SA-0135-DUD	0	+	+
SA-0139-DUD	0	+	+
SA-0145-DUD	0	-	+
SA-0173-DUD	0	+	+
SA-0174-DUD	0	+	+
SA-0175-DUD	0	+	+
SA-0176-DUD	0	+	+
SA-0181-DUD	0	+	+
SA-0182-DUD	0	+	+
SA-0185-DUD	0	+	+



Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
SA-0186-DUD	0	+	+
SA-0187-DUD	0	+	+
SA-0188-DUD	0	+	+
SA-0189-DUD	0	+	+
SA-0191-DUD	0	+	+
SA-0192-DUD	0	+	+
SA-0193-DUD	0	+	+
SA-0194-DUD	0	+	+
SA-0196-DUD	0	+	+
SA-0197-DUD	0	+	+
SA-0198-DUD	0	+	+
SA-0199-DUD	0	+	+
SA-0200-DUD	0	+	+
SA-0202-DUD	0	+	+
SA-0204-DUD	0	+	+
SA-0205-DUD	0	+	+
SA-0206-DUD	0	+	+
SA-0208-DUD	0	+	+
SA-0209-DUD	0	+	+
SA-0210-DUD	0	+	+
SA-0214-DUD	0	+	+
SA-0215-DUD	--	+	+
SA-0222-DUD	-	+	+
SA-0227-DUD	--	+	+
<b>Dudley Employment Sites</b>			
SA-0001-DUD	++	0	0
SA-0008-DUD	++	0	0
SA-0013-DUD	++	0	0
SA-0015-DUD	++	0	0
SA-0016-DUD	++	0	0
SA-0028-DUD	++	0	0
SA-0047-DUD	++	0	0
SA-0078-DUD	++	0	0
SA-0135-DUD	++	0	0
SA-0227-DUD	+/-	0	0
H16.1	++	0	0
<b>Dudley Carried Forward Residential Sites</b>			
19	0	+	+
22	0	+	+
29	--	+	+
30	0	+	+
31	0	+	+
32	0	+	+

Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
35	0	+	+
82a	0	+	+
83	-	+	+
85	0	+	+
87	0	+	+
91	0	+	+
94	0	+	+
101	+/-	+	+
138	-	+	+
149 (CFH)	-	+	+
151	--	+	+
155	-	+	+
157	-	+	+
158	-	+	+
159	-	+	+
162	-	+	+
164	--	+	+
173	--	+	+
177	-	+	+
178	-	+	+
181	0	+	+
182	0	+	+
188	0	+	+
189	-	+	+
190	-	+	+
200	0	+	+
202	0	+	+
205	+/-	+	+
302	-	+	+
304	--	+	+
305	-	+	+
306	0	+	+
308	0	+	+
312	0	+	+
318	-	+	+
321	0	+	+
327	0	+	+
330	0	+	+
331	-	+	+
332	0	+	+
336	0	+	+
341	0	+	+

Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
346	-	+	+
347	0	+	+
350	-	+	+
352	-	+	+
358	0	+	+
360	--	+	+
368	0	+	+
370	0	+	+
372	0	+	+
374	0	+	+
375	0	+	+
378	0	+	+
382	0	+	+
383	0	+	+
384	0	+	+
H10.4	-	+	+
H16.1	+/-	+	+
S9	-	+	+
SA-0004-DUD	0	+	+
SA-303	--	+	+
SA-373 (SA-0373-DUD)	--	+	+
<b>Dudley Carried Forward Employment Sites</b>			
104	++	0	0
122	+/-	0	0
123a	++	0	0
123b	++	0	0
123c	++	0	0
132	++	0	0
135	++	0	0
136	++	0	0
137	++	0	0
147	++	0	0
149	++	0	0
187	++	0	0
198	++	0	0
DY5 Site	++	0	0

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

### F.15.1 Pedestrian Access to Primary School

F.15.1.1 Accessibility modelling data has been provided to Lepus by the BCA, mapping the location of primary schools and areas within a sustainable travel time to these schools. There are a total of 80 primary schools within Dudley. The majority of the built-up areas are located within a 15-minute walk to a primary school, however, some areas are likely to have more restricted access, such as within the Green Belt in the south where several of the largest sites are located.

F.15.1.2 There are 21 sites proposed for residential use where the entirety or majority of the site is located outside of a 15-minute walk to a primary school. Therefore, the proposed development at these sites could potentially have a minor negative impact on access to primary schools due to the likely increased reliance on less sustainable travel methods.

F.15.1.3 On the other hand, 139 sites proposed for residential use are located within a 15-minute walking distance to a primary school. Therefore, the proposed development at these sites could potentially have a minor positive impact on pedestrian access to primary schools.

### F.15.2 Pedestrian Access to Secondary School

F.15.2.1 Accessibility modelling data has been provided to Lepus by the BCA, mapping the location of secondary schools and areas within a sustainable travel time to these schools. There are 18 secondary schools within Dudley, the majority of which are located within the more built-up areas of the borough, and therefore, sites within existing settlements are likely to have better pedestrian access compared to the outskirts of settlements or Green Belt.

F.15.2.2 46 of the residential sites in Dudley are situated in the areas of the borough outside of a 25-minute walk to a secondary school, and as such, the proposed development at these sites could potentially have a minor negative impact on sustainable access to education. Conversely, 114 residential sites in Dudley are within a 25-minute walk to a secondary school, and therefore, the proposed development at these sites could be expected to encourage pedestrian access to secondary schools and have a minor positive impact on education, skills and training.

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

F.15.3.1 Existing public transport within Dudley is widespread and would be expected to provide residents with good access to the local and wider area. Accessibility modelling data indicates

only localised pockets of the borough where public transport access to secondary schools is limited.

F.15.3.2 The majority of proposed residential sites (140 in total) are located within a 25-minute public transport journey to a secondary school, and therefore, the proposed development at these sites would be expected to have a minor positive impact on sustainable access to education, based on current infrastructure. However, 20 sites are located outside of this sustainable travel time to a secondary school, and therefore, the proposed development at these sites could potentially have a minor negative impact on new residents’ access to education, based on current infrastructure.

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

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
<b>Dudley Residential Sites</b>			
SA-0001-DUD	+	+	-
SA-0005-DUD-A	-	-	+
SA-0005-DUD-B	+	+	+
SA-0008-DUD	-	-	+
SA-0009-DUD	-	-	-
SA-0010-DUD-A	+	-	+
SA-0010-DUD-B	+	-	+
SA-0013-DUD	+	+	+
SA-0015-DUD	-	-	+
SA-0016-DUD	+	-	+
SA-0017-DUD	+	+	+
SA-0018-DUD-A	+	-	+
SA-0018-DUD-B	-	-	-
SA-0018-DUD-C	-	-	-
SA-0019-DUD	-	-	-
SA-0021-DUD	+	+	+
SA-0025-DUD	-	+	+
SA-0026-DUD	+	+	-
SA-0027-DUD	+	-	+
SA-0028-DUD	+	+	+
SA-0031-DUD-A	+	+	+
SA-0031-DUD-B	+	-	+
SA-0033-DUD	+	+	+
SA-0039-DUD	+	+	+
SA-0040-DUD	+	-	+
SA-0041-DUD	+	+	+
SA-0042-DUD	+	+	+
SA-0043-DUD	+	+	+
SA-0044-DUD	+	+	+
SA-0045-DUD	+	-	+
SA-0046-DUD	+	-	+

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
SA-0047-DUD	+	+	+
SA-0050-DUD	+	+	+
SA-0051-DUD-A	+	+	+
SA-0052-DUD	+	+	+
SA-0058-DUD	+	+	+
SA-0059-DUD	-	-	+
SA-0060-DUD	+	+	+
SA-0061-DUD	-	+	+
SA-0064-DUD-A	+	+	+
SA-0064-DUD-B	+	+	+
SA-0068-DUD (south)	+	+	+
SA-0068-DUD (north)	+	+	+
SA-0076-DUD	-	+	-
SA-0078-DUD	-	+	+
SA-0079-DUD	+	-	+
SA-0080-DUD	+	+	+
SA-0081-DUD	-	-	+
SA-0084-DUD	+	+	+
SA-0091-DUD	+	-	+
SA-0105-DUD-A	-	-	+
SA-0105-DUD-B	-	-	+
SA-0109-DUD	+	+	+
SA-0114-DUD	-	-	+
SA-0126-DUD	-	-	+
SA-0132-DUD	+	+	+
SA-0134-DUD	+	-	+
SA-0135-DUD	-	-	+
SA-0139-DUD	+	-	+
SA-0145-DUD	-	-	+
SA-0173-DUD	+	+	+
SA-0174-DUD	+	-	+
SA-0175-DUD	+	+	+
SA-0176-DUD	+	+	+
SA-0181-DUD	+	+	+
SA-0182-DUD	+	-	+
SA-0185-DUD	+	+	+
SA-0186-DUD	+	+	+
SA-0187-DUD	+	+	+
SA-0188-DUD	+	+	+
SA-0189-DUD	+	+	+
SA-0191-DUD	+	+	+
SA-0192-DUD	-	+	+
SA-0193-DUD	+	+	+
SA-0194-DUD	+	-	+
SA-0196-DUD	+	+	+

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
SA-0197-DUD	+	+	+
SA-0198-DUD	+	+	+
SA-0199-DUD	+	-	+
SA-0200-DUD	+	+	+
SA-0202-DUD	+	+	+
SA-0204-DUD	+	+	-
SA-0205-DUD	+	+	+
SA-0206-DUD	+	+	+
SA-0208-DUD	+	+	+
SA-0209-DUD	+	+	+
SA-0210-DUD	+	+	-
SA-0214-DUD	+	+	-
SA-0215-DUD	+	+	+
SA-0222-DUD	+	+	+
SA-0227-DUD	+	+	+
<b>Dudley Employment Sites</b>			
SA-0001-DUD	0	0	0
SA-0008-DUD	0	0	0
SA-0013-DUD	0	0	0
SA-0015-DUD	0	0	0
SA-0016-DUD	0	0	0
SA-0028-DUD	0	0	0
SA-0047-DUD	0	0	0
SA-0078-DUD	0	0	0
SA-0135-DUD	0	0	0
SA-0227-DUD	0	0	0
H16.1	0	0	0
<b>Dudley Carried Forward Residential Sites</b>			
19	+	+	+
22	+	+	+
29	+	+	+
30	+	+	+
31	+	+	+
32	+	+	+
35	+	+	+
82a	+	-	+
83	+	-	+
85	+	+	+
87	+	+	+
91	+	+	+
94	+	+	+
101	+	+	-
138	+	+	+
149 (CFH)	+	+	+

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
151	+	+	+
155	+	+	+
157	+	-	+
158	+	+	+
159	+	-	+
162	+	+	+
164	+	+	-
173	+	+	+
177	+	+	+
178	+	+	+
181	+	+	+
182	+	+	+
188	+	+	+
189	+	+	+
190	+	+	+
200	+	-	+
202	+	+	+
205	+	+	+
302	+	+	+
304	+	-	+
305	+	+	+
306	+	+	-
308	+	+	+
312	+	+	-
318	+	+	+
321	+	-	+
327	+	+	+
330	+	+	+
331	+	-	+
332	+	-	-
336	+	+	+
341	+	+	-
346	+	+	+
347	+	+	-
350	+	-	+
352	+	+	+
358	+	+	+
360	+	+	+
368	+	+	+
370	+	+	+
372	+	+	+
374	+	-	-
375	+	-	-



Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
378	+	+	+
382	+	+	-
383	+	+	+
384	+	+	+
H10.4	-	-	+
H16.1	+	-	+
S9	+	+	+
SA-0004-DUD	+	+	+
SA-303	+	+	+
SA-373 (SA-0373-DUD)	+	+	+
<b>Dudley Carried Forward Employment Sites</b>			
104	0	0	0
122	0	0	0
123a	0	0	0
123b	0	0	0
123c	0	0	0
132	0	0	0
135	0	0	0
136	0	0	0
137	0	0	0
147	0	0	0
149	0	0	0
187	0	0	0
198	0	0	0
DY5 Site	0	0	0

# Appendix G: Sandwell Reasonable Alternative Site Assessments

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# G.1 Introduction

## G.1.1 Overview

- G.1.1.1 A total of 65 reasonable alternative sites have been identified within Sandwell (see **Table G.1.1**). This includes 50 sites proposed for residential use (40 of which are ‘carried forward’ (CF) from existing development plans), and 15 sites proposed for employment use (3 of which are ‘carried forward’ from existing development plans).
- G.1.1.2 Each of the sites appraised within this report have been assessed for likely impacts on each of the 14 SA Objectives, as outlined in the SA Framework (see **Appendix A**). Likely sustainability impacts have been set out in **Tables G.2.1 – G.14.1** within each SA Objective chapter, in accordance with the methodology set out in **Chapter 5** of the main SA Report.
- G.1.1.3 At this stage, only a baseline assessment has been carried out. Baseline assessment is the receptor-only site assessment of the red line boundary. The receptor-only impacts help to identify the potential impacts on site if there were no policy or mitigation.
- G.1.1.4 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by the Black Country Authorities (BCA), as well as expert judgement.

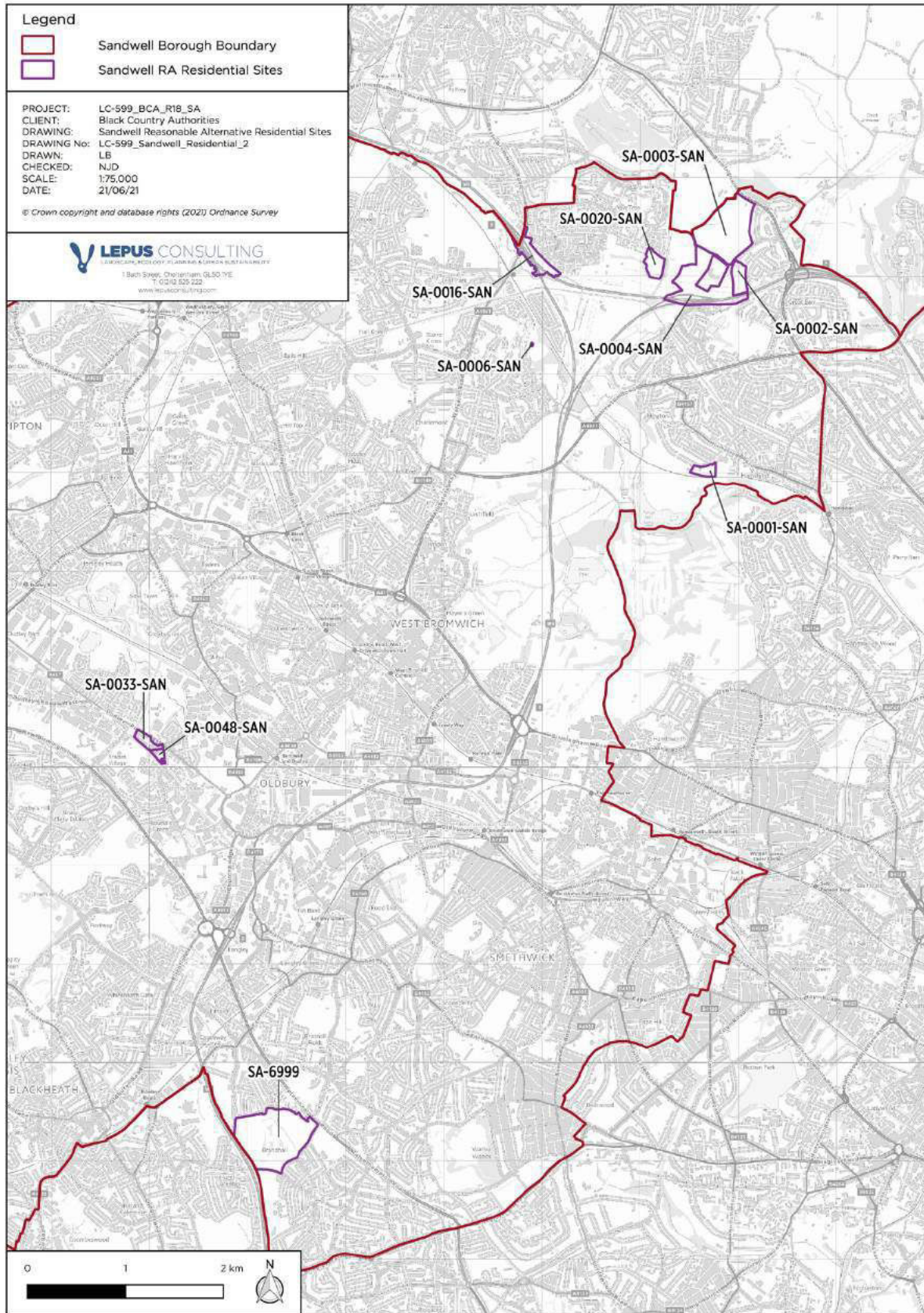


Figure G.1.1: Reasonable alternative sites proposed for residential use in Sandwell

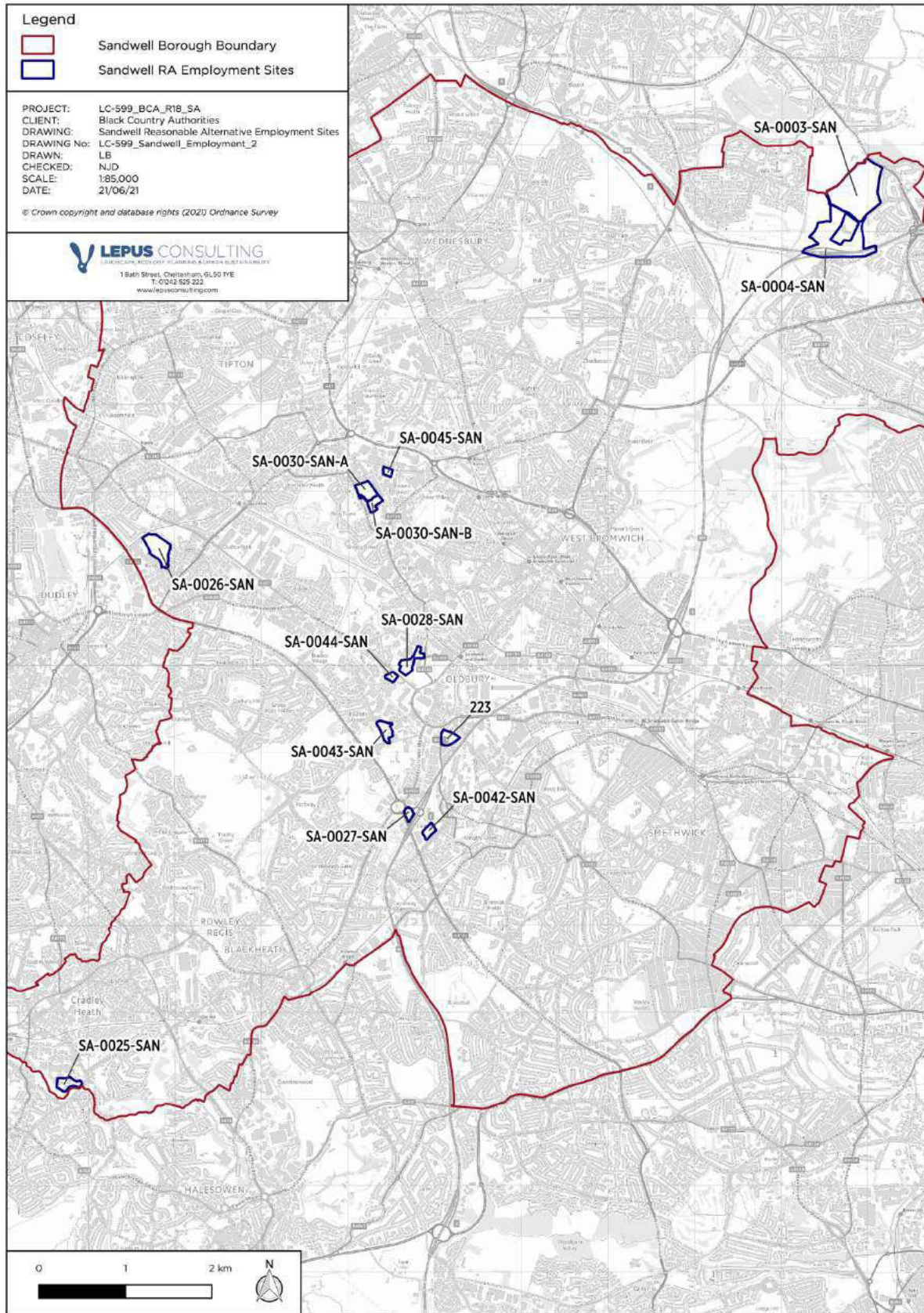


Figure G.1.2: Reasonable alternative sites proposed for employment use in Sandwell

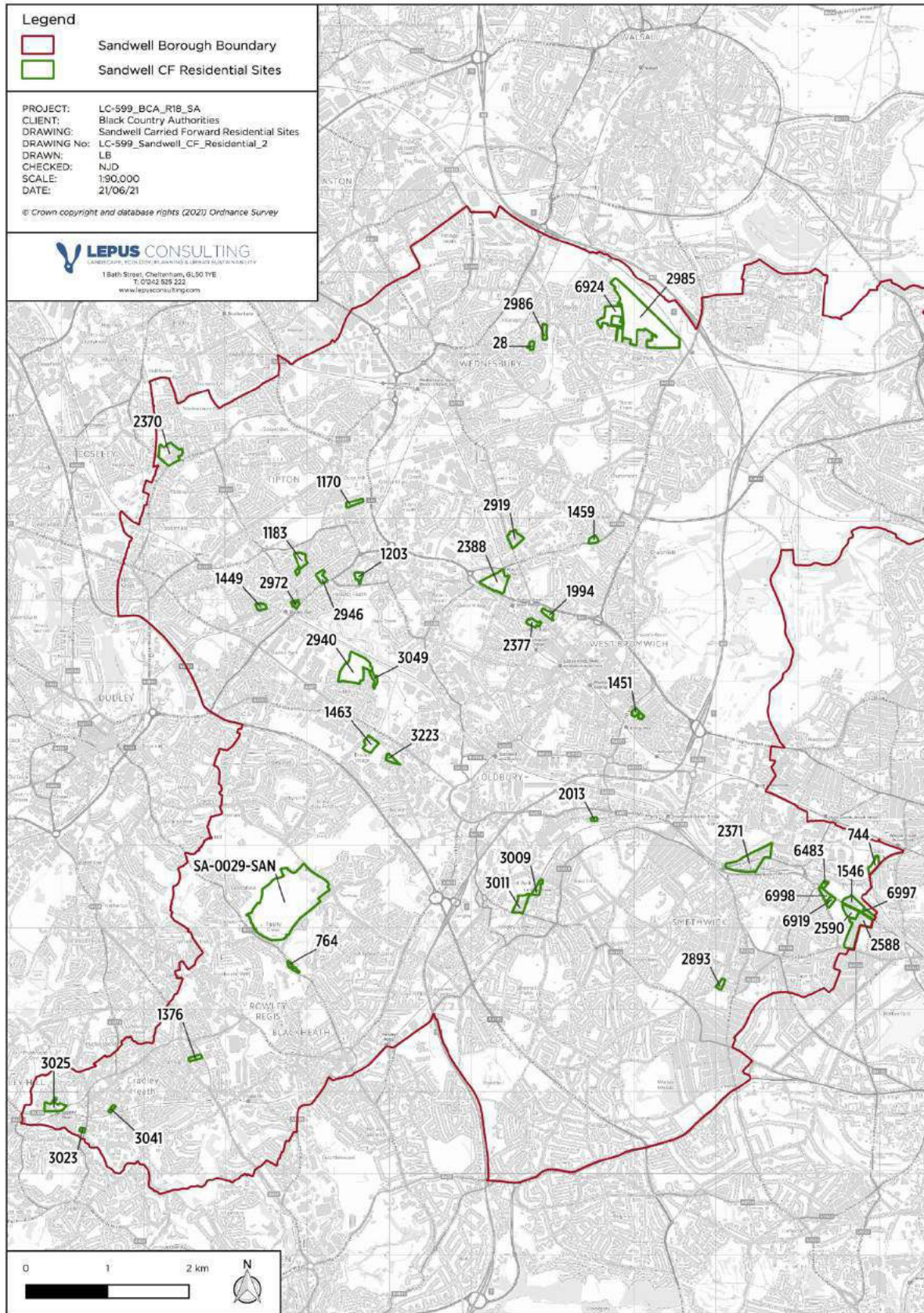


Figure G.1.3: Carried forward sites proposed for residential use in Sandwell

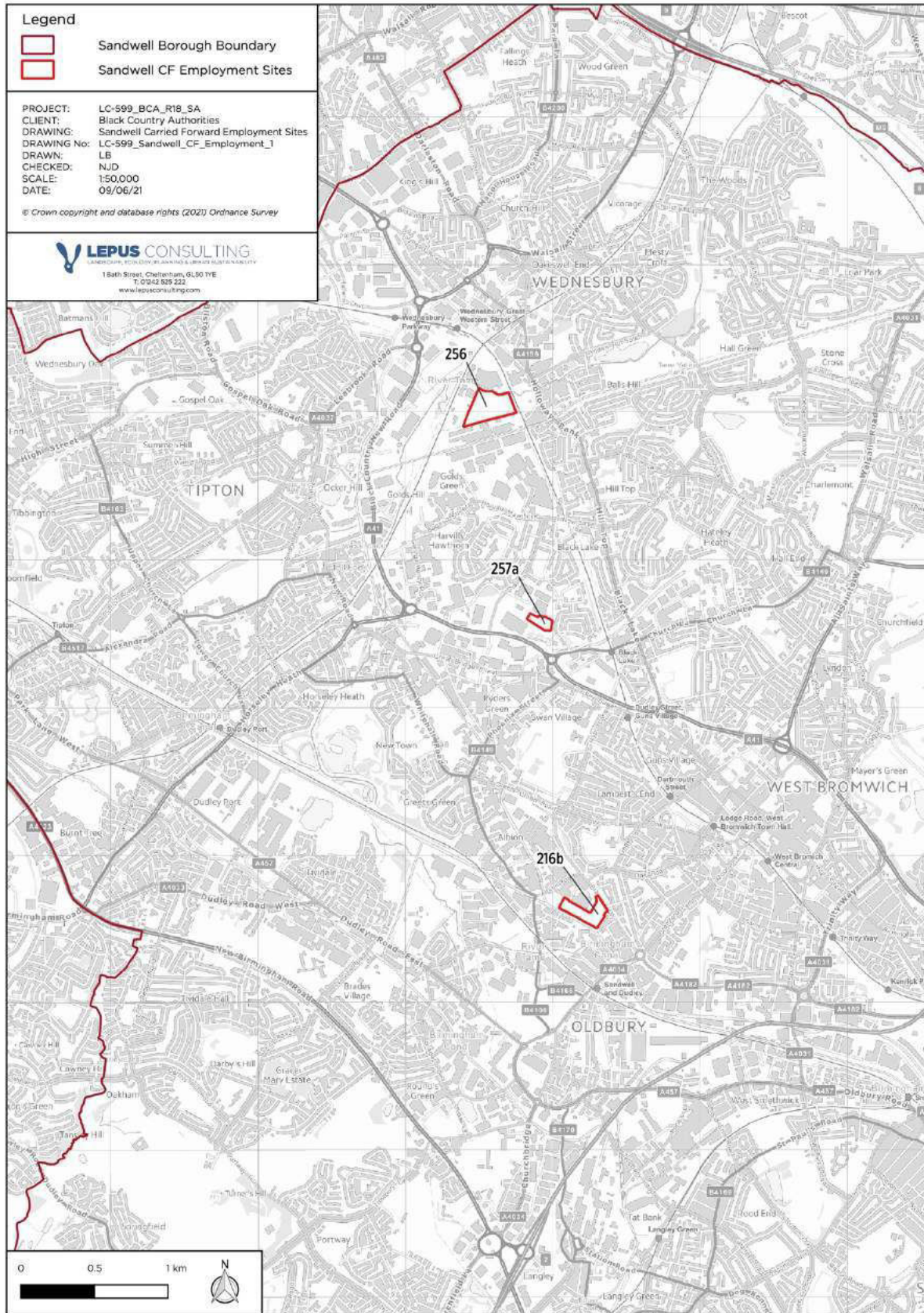


Figure G.1.4: Carried forward sites proposed for employment use in Sandwell



**Table G.1.1: Reasonable alternative sites in Sandwell**

Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
SA-0001-SAN	Tanhouse Avenue	Housing	2.49	1.25	50
SA-0002-SAN	Wilderness Lane, B43 7TB	Housing	3.00	Unknown	Unknown
SA-0003-SAN	Land off Birmingham Road, Great Barr	Housing	27.00	Unknown	300-355 (if mixed use with employment) or 700-900 (if all residential)
SA-0004-SAN	Wilderness Lane - Land surrounding Q3	Housing	22.55	13.53	541
SA-0006-SAN	Charlemont Community Centre	Housing	0.05	Unknown	1
SA-0016-SAN	Tamebridge Parkway Station North of Train Station(a)	Housing	7.00	Unknown	Unknown
SA-0020-SAN	Land to North of Painswick Close Sub Station	Housing	4.30	Unknown	120
SA-0033-SAN	Dudley Road East/Brades Road	Housing	2.65	Unknown	90
SA-0048-SAN	Brades Road, Oldbury	Housing	1.14	1.14	51
SA-6999	Brandhall Golf Course	Housing	37.2	37.2	560
SA-0003-SAN	Land off Birmingham Road, Great Barr	Employment	27.00	Unknown	N/A
SA-0025-SAN	Land off Overend Road, Cradley Heath Business Park	Employment	3.04	Unknown	N/A
SA-0026-SAN	Land at Coneygre, Newcomen Drive, Sandwell	Employment	6.92	Unknown	N/A
SA-0027-SAN	Land at Birchley Island, Junction 2 of M5, Oldbury, Sandwell	Employment	1.12	Unknown	N/A
SA-0028-SAN	Roway Lane, Oldbury, B69 3AY	Employment	3.47	Unknown	N/A
SA-0030-SAN-A	Whitehall Road (North), Tipton	Employment	3.51	Unknown	N/A
SA-0030-SAN-B	Whitehall Road (South), Tipton	Employment	1.99	Unknown	N/A
SA-0042-SAN	Land Adj To Asda Wolverhampton Road Oldbury	Employment	1.60	Unknown	N/A
SA-0043-SAN	Rounds Green Road/Shidas Lane, Oldburymove	Employment	2.78	Unknown	N/A
SA-0044-SAN	British Gas, Land off Dudley Rd, Oldbury	Employment	1.05	Unknown	N/A
SA-0045-SAN	Legacy 43, Ryder Street, West Bromwich	Employment	0.88	Unknown	N/A
223	Seven Stars Road, Oldbury	Employment	2.51	Unknown	N/A
28	Alma Street, Wednesbury	CF Housing	0.52	0.52	23
744	Perrott Street / Kitchener Street Black Patch, Smethwick	CF Housing	1.50	1.50	52
764	Hawes Lane, Rowley Regis	CF Housing	0.56	0.56	15
1170	Beever Road, Great Bridge	CF Housing	1.01	1.01	18
1183	Land at Horseley Heath, Alexandra Road, and Lower Church Lane, Tipton	CF Housing	2.26	1.90	86
1203	Mill Street, Great Bridge	CF Housing	0.86	0.86	34
1376	Elbow Street, Old Hill	CF Housing	0.77	0.77	33
1449	Wellington Road, Tipton	CF Housing	0.91	0.91	40
1451	28-64 High Street, West Bromwich	CF Housing	0.60	0.60	53

Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
1459	Bank Street (West) Hateley Heath	CF Housing	0.85	0.85	43
1463	Lower City Road, Oldbury	CF Housing	1.83	1.83	64
1546	Heartlands Furniture, Cranford Street, Smethwick	CF Housing	2.40	2.40	300
1994	Land and Premises at Winkle Street and John Street, West Bromwich	CF Housing	1.01	1.01	45
2013	Land Between No.32 And George Betts School, West End Avenue, Smethwick	CF Housing	0.29	0.29	11
2370	Bradleys Lane / High Street, Tipton	CF Housing	5.60	5.60	241
2371	North Smethwick Canalside, Smethwick	CF Housing	8.77	8.77	400
2377	Carters Green / Gun Lane, West Bromwich	CF Housing	1.09	1.09	49
2388	Swan Lane, North of A41, West Bromwich	CF Housing	5.40	4.07	149
2588	Abberley Street, Smethwick	CF Housing	6.27	6.27	200
2590	South of Cranford Street and Heath Street, Smethwick	CF Housing	1.85	1.85	70
2893	Former Sunlight Laundry, Stanhope Road, Smethwick B67 6HN	CF Housing	0.73	0.73	32
2919	Land to east of Black Lake, West Bromwich	CF Housing	2.45	2.45	110
2940	Rattlechain Site Land to the north of Temple Way, Tividale	CF Housing	7.24	7.24	322
2946	Site surrounding former Post office and Telephone exchange, Horseley heath, tipton	CF Housing	1.16	1.16	52
2972	Used Car Sales site on corner of Lower Church Lane and Horseley Heath, Tipton	CF Housing	0.56	0.56	23
2985	STW/SMBC Land, Friar Park Road, Wednesbury	CF Housing	27.87	27.87	750
2986	Friar Street, Wednesbury	CF Housing	1.01	1.01	45
3009	Tatbank Road, Oldbury B69 4NB	CF Housing	1.15	1.15	52
3011	Langley Maltings, Western Road, Langly B69 4LY	CF Housing	2.72	2.72	95
3023	Macarthur Road Industrial Estate, Cradley Heath	CF Housing	0.30	0.30	13
3025	Silverthorne Lane/ Forge Lane, Cradley Heath	CF Housing	2.82	2.82	127
3041	Cokeland Place / Graingers Lane, Cradley Heath	CF Housing	0.36	0.36	16
3049	Land between Addington Way and River Tame; Temple Way (Rattlechain)	CF Housing	0.90	0.90	32
3223	Summertown Road, Oldbury	CF Housing	0.89	0.89	32
6483	Thandi Coach Station, Alma Street, Smethwick B66 2RL	CF Housing	0.71	0.71	58
6919	PJ Commercial - Phase 4 of Grove Lane MP	CF Housing	0.80	0.80	28
6924	The Phoenix Collegiate, Friar Park Road, Wednesbury	CF Housing	4.80	4.80	84

Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
6997	Heath Street - Phase 3 of Grove Lane MP	CF Housing	0.90	0.90	30
6998	Phase 6 of Grove Lane MP	CF Housing	1.18	1.18	40
SA-0029-SAN	Edwin Richards Quarry, Portway Road, Rowley Regis	CF Housing	10.10	10.10	281
216b	Brandon Way / Albion Road	CF Employment	3.95	Unknown	N/A
256	Bilport Lane, Wednesbury	CF Employment	5.30	Unknown	N/A
257a	Site off Richmond Street, West Bromwich	CF Employment	1.10	Unknown	N/A

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## G.2 SA Objective 1: Cultural Heritage

### G.2.1 Grade I Listed Buildings

G.2.1.1 There are two Grade I Listed Buildings in Sandwell. The proposed development at sites in Sandwell would be unlikely to significantly impact either of these Grade I Listed Buildings, therefore a negligible impact has been identified across all sites.

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

G.2.2.1 There are eight Grade II\* Listed Buildings within Sandwell, mostly concentrated in and around the Smethwick area in the south east of the borough. Site 2371 is located adjacent to the Grade II\* Listed Building 'Engine Arm Aqueduct, Birmingham Canal Wolverhampton Level'. The proposed development at this site could potentially have a minor negative impact on the setting of this Listed Building. However, this site contains some existing development so it is acknowledged that there may also be opportunities to improve the historic setting of the area through regeneration of degraded industrial buildings currently on site.

G.2.2.2 The proposed development at all other sites within Sandwell would be unlikely to significantly impact any Grade II\* Listed Buildings, primarily due to the sites being separated from Listed Buildings by existing built form. Therefore, a negligible impact has been identified across these sites.

### G.2.3 Grade II Listed Buildings

G.2.3.1 There are many Grade II Listed Buildings throughout Sandwell, generally clustered within the built-up areas, along the canal network, and particularly within West Bromwich and Oldbury town centres. Site 3011 coincides with the Grade II Listed Building 'Langley Maltings', and is adjacent to 'Station Road Bridge Birmingham Canal Titford Branch'. The proposed development at this site could potentially have direct adverse effects on 'Langley Maltings', resulting in a major negative impact. Although, there is an element of uncertainty regarding the impact of development at this site, as there may be opportunities to improve the historic setting of the area through regeneration of degraded buildings currently on site.

G.2.3.2 Four sites are located adjacent to Grade II Listed Buildings (SA-0020-SAN, SA-0030-SAN-A, SA-0030-SAN-B and 2371), and a further eight sites could potentially have an adverse impact on the setting of various Listed Buildings. For example, proposed housing and employment site SA-0003-SAN is located approximately 230m from the Grade II Listed Building 'Walsall (or Merrion's) Lodge' and around 330m from 'Hill Farm Bridge (Rushall Canal)' and housing site SA-0004-SAN is located approximately 160m from 'Brickfields Bridge Footbridge' and 180m from 'Farm Bridge (Rushall Canal)'. The proposed development at these 12 sites could potentially result in a minor negative impact on the setting of one or more Grade II Listed Buildings.

## **G.2.4 Conservation Area**

G.2.4.1 Sandwell contains nine Conservation Areas (CA), the majority of which cover sections of the urban area, as well as portions of the canal network, historic open spaces and nature reserves. A large proportion of Site 1546 and a small proportion of Site 2371 are located within 'Smethwick Galton Valley' CA, and Sites 2590 and 6997 are located adjacent to this CA. A further four sites are located in close proximity to various CAs, such as housing and employment site SA-0003-SAN which is located approximately 50m from 'Great Barr' CA (in Walsall). The proposed development at these eight sites could potentially result in a minor negative impact on the setting of these CAs. The remaining sites would not be expected to have a significant impact on the setting of any CA and have consequently been assessed as negligible.

## **G.2.5 Scheduled Monument**

G.2.5.1 There are eight Scheduled Monuments (SMs) within Sandwell, generally covering previously developed areas in relation to Birmingham Canal or areas with industrial history. Site 2371 coincides with 'Smethwick Engine House' SM and a proportion of 'Engine Arm Aqueduct, Warley' SMs. The proposed development at this site could potentially have a direct adverse effect on these SMs, resulting in a major negative impact. However, this site contains some existing development so it is acknowledged that there may also be opportunities to improve the historic setting of the area and associated SMs through regeneration of degraded industrial buildings currently on site.

G.2.5.2 All other sites within Sandwell are not located in close proximity to any SMs, and as such, the proposed development at these sites would not be expected to significantly impact the setting of any of these SMs.

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

G.2.6.1 Five Registered Parks and Gardens (RPGs) can be found within Sandwell: 'Brunswick Park', 'Victoria Park (Tipton)', 'Dartmouth Park', 'Warley Park' and a small proportion of 'Great Barr Hall'. Housing and employment site SA-0003-SAN is located approximately 50m from 'Great Barr Hall' RPG, and employment site SA-0026-SAN is located approximately 200m from 'Victoria Park (Tipton)' RPG. Although there is some intervening built form separating the sites from the RPGs, both sites comprise large areas of undeveloped land. The proposed development at these two sites could potentially result in a minor negative impact on the setting of these RPGs. The remaining sites are deemed unlikely to have a significant impact on the setting of any RPG and have consequently been assessed as negligible.

## **G.2.7 Archaeological Priority Area**

G.2.7.1 Archaeological Priority Areas (APAs) have been identified throughout Sandwell’s urban and undeveloped areas. Five sites coincide with APAs, including proposed housing and employment site SA-0003-SAN which coincides with ‘Peak House Farm Moated Site’ APA. A further five sites are located adjacent to APAs. The proposed development at these ten sites could potentially alter the setting of these APAs, and as a result have a minor negative impact. The remaining sites are not located in close proximity to APAs, and therefore, would be expected to have a negligible impact on the setting of APAs.

## **G.2.8 Historic Landscape Characterisation**

G.2.8.1 The Black Country Historic Landscape Characterisation (HLC) Study<sup>1</sup> has identified a range of Historic Environment Area Designations within the Black Country, covering a large proportion of Sandwell’s parkland and Green Belt as well as a number of features within the urban areas. Eight of the proposed sites in Sandwell coincide wholly or partially within an area of High Historic Landscape Value (HHLV) or High Historic Townscape Value (HHTV). This includes proposed housing and employment site SA-0003-SAN which wholly coincides with ‘Peak House Farm Field System’ HHLV, and housing site SA-6999 which wholly coincides with ‘Brandhall Ridge and Furrow’ HHLV. Therefore, the proposed development at these eight sites could potentially result in a minor negative impact on the surrounding historic environment. The remaining 57 sites do not coincide with any identified areas of high historic value, and therefore, would be expected to have a negligible impact on the local historic environment.

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<sup>1</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf) [Date Accessed: 19/04/21]

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

Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
<b>Sandwell Residential Sites</b>								
SA-0001-SAN	0	0	0	0	0	0	0	0
SA-0002-SAN	0	0	0	0	0	0	0	0
SA-0003-SAN	0	0	-	-	0	-	-	-
SA-0004-SAN	0	0	-	0	0	0	0	-
SA-0006-SAN	0	0	0	0	0	0	0	0
SA-0016-SAN	0	0	0	0	0	0	0	0
SA-0020-SAN	0	0	-	0	0	0	0	0
SA-0033-SAN	0	0	0	0	0	0	-	0
SA-0048-SAN	0	0	0	0	0	0	-	-
SA-6999	0	0	0	0	0	0	0	-
<b>Sandwell Employment Sites</b>								
SA-0003-SAN	0	0	-	-	0	-	-	-
SA-0025-SAN	0	0	0	0	0	0	0	-
SA-0026-SAN	0	0	0	0	0	-	0	0
SA-0027-SAN	0	0	0	0	0	0	0	0
SA-0028-SAN	0	0	0	0	0	0	0	0
SA-0030-SAN-A	0	0	-	0	0	0	0	0
SA-0030-SAN-B	0	0	-	0	0	0	0	0
SA-0042-SAN	0	0	0	0	0	0	0	0
SA-0043-SAN	0	0	0	0	0	0	0	0
SA-0044-SAN	0	0	0	0	0	0	0	0
SA-0045-SAN	0	0	0	0	0	0	0	0
223	0	0	0	-	0	0	-	0
<b>Sandwell Carried Forward Residential Sites</b>								
28	0	0	0	0	0	0	0	0
744	0	0	-	0	0	0	0	0
764	0	0	0	0	0	0	-	0
1170	0	0	0	0	0	0	0	0
1183	0	0	0	0	0	0	0	0
1203	0	0	0	0	0	0	0	0
1376	0	0	0	0	0	0	0	0
1449	0	0	0	0	0	0	-	-
1451	0	0	0	0	0	0	0	0
1459	0	0	0	0	0	0	0	0
1463	0	0	-	0	0	0	-	-
1546	0	0	0	-	0	0	0	0
1994	0	0	0	0	0	0	0	0
2013	0	0	0	0	0	0	0	0
2370	0	0	0	0	0	0	0	0

Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
2371	0	-	-	-	-	0	0	0
2377	0	0	0	0	0	0	0	0
2388	0	0	0	0	0	0	0	0
2588	0	0	0	0	0	0	0	0
2590	0	0	0	-	0	0	0	0
2893	0	0	0	0	0	0	0	0
2919	0	0	0	0	0	0	0	0
2940	0	0	-	0	0	0	0	0
2946	0	0	0	0	0	0	0	0
2972	0	0	0	0	0	0	0	0
2985	0	0	0	0	0	0	0	0
2986	0	0	0	0	0	0	0	0
3009	0	0	0	0	0	0	0	0
3011	0	0	-	0	0	0	0	-
3023	0	0	0	0	0	0	0	0
3025	0	0	0	0	0	0	0	0
3041	0	0	0	0	0	0	0	0
3049	0	0	0	0	0	0	0	0
3223	0	0	0	0	0	0	-	0
6483	0	0	0	0	0	0	0	0
6919	0	0	0	0	0	0	0	0
6924	0	0	0	0	0	0	0	0
6997	0	0	-	-	0	0	0	0
6998	0	0	0	0	0	0	0	0
SA-0029-SAN	0	0	-	-	0	0	0	0
<b>Sandwell Carried Forward Employment Sites</b>								
216b	0	0	0	0	0	0	-	0
256	0	0	0	0	0	0	0	0
257a	0	0	0	0	0	0	0	0



## G.3 SA Objective 2: Landscape

### G.3.1 Cannock Chase AONB

G.3.1.1 Cannock Chase AONB is located at its closest point approximately 14km to the north west of Sandwell. The proposed development at all sites in Sandwell would be unlikely to significantly impact the AONB, in terms of altering views of/from the AONB or altering the setting of the AONB. Therefore, a negligible impact has been identified across all sites.

### G.3.2 Landscape Sensitivity

G.3.2.1 The Black Country Landscape Sensitivity Assessment<sup>2</sup> identified the extent to which the character and quality of Black Country Green Belt land is susceptible to change as a result of future development. In Sandwell, Green Belt is restricted to the north east of the borough, where the majority of the largest sites are located. Housing and employment site SA-0003-SAN and housing sites SA-0002-SAN and SA-0004-SAN are located within areas of 'Moderate' landscape sensitivity, and site SA-0006-SAN is located within an area of 'Low-Moderate' landscape sensitivity. Therefore, the proposed development at these five sites could potentially have a minor negative impact on the local landscape.

G.3.2.2 The majority of sites in Sandwell, including all of the 'carried forward' sites, are located in the existing urban area, or areas of 'Low' landscape sensitivity; therefore, the proposed development at these 60 sites would be expected to result in a negligible impact on the local landscape.

### G.3.3 Alter Views for PRow Network Users

G.3.3.1 The majority of proposed sites in Sandwell are located within the existing urban area and are separated from the PRow network by existing built form; therefore, development at these sites would be expected to result in a negligible impact on views. However, some sites (including the large sites SA-0003-SAN and SA-0004-SAN) currently comprise areas of open space within the Green Belt, or areas of open space within the urban area (such as site SA-6999 which coincides with PRows), in the vicinity of Sandwell's PRow network. The proposed development at these 13 sites could potentially alter the views of open space currently experienced by the users of these footpaths. Therefore, these sites have been identified as having a minor negative impact on the landscape.

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<sup>2</sup> LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: [https://blackcountryplan.dudlev.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr\\_redacted.pdf](https://blackcountryplan.dudlev.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf) [Date Accessed: 16/04/21]

### **G.3.4 Alter Views for Local Residents**

G.3.4.1 The proposed development at 29 of the proposed sites in Sandwell are considered to have the potential to alter the views currently experienced by nearby local residents, due to their location with respect to existing residential zones. Therefore, a minor negative impact on the local landscape could be expected at these sites. On the other hand, the remaining 36 sites are separated from nearby residential properties by existing built form, and therefore, development at these sites would be expected to have a negligible impact on views.

### **G.3.5 Green Belt Harm**

G.3.5.1 The Green Belt Study<sup>3</sup> classified parcels of Green Belt land into different ‘harm’ ratings, based on the assessment of potential harm caused by removing each parcel from the Green Belt based on a range of criteria. Due to the large scale and undeveloped nature of some of these proposed sites, Green Belt harm can be expected upon their development. Housing and employment site SA-0003-SAN is located within an area of ‘High’ Green Belt harm and housing sites SA-0002-SAN and SA-0004-SAN are located within an area of ‘Moderate-High’ Green Belt harm. Therefore, the proposed development at these four sites could potentially result in a major negative impact on the landscape objective. Additionally, sites SA-0001-SAN, SA-0016-SAN and SA-0020-SAN could potentially result in ‘Low-Moderate’ and/or ‘Moderate’ Green Belt harm, and therefore, the proposed development at these three sites would be expected to have a minor negative impact on the landscape objective. The majority of sites, including all ‘carried forward’ sites, are located away from the Green Belt and would be expected to result in a negligible impact.

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<sup>3</sup> LUC (11702019) Black Country Green Belt Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb1183-stage-1-and-2-plus-app1-final-reduced\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb1183-stage-1-and-2-plus-app1-final-reduced_redacted.pdf) [Date Accessed: 19/04/21]

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

Site Ref	Cannock Chase AONB	Landscape Sensitivity	Alter Views for PRow Network Users	Alter Views for Local Residents	Green Belt Harm
<b>Sandwell Residential Sites</b>					
SA-0001-SAN	0	0	0	-	-
SA-0002-SAN	0	-	-	-	--
SA-0003-SAN	0	-	-	-	--
SA-0004-SAN	0	-	-	0	--
SA-0006-SAN	0	-	0	0	0
SA-0016-SAN	0	0	0	-	-
SA-0020-SAN	0	0	-	-	-
SA-0033-SAN	0	0	0	0	0
SA-0048-SAN	0	0	0	0	0
SA-6999	0	0	-	-	0
<b>Sandwell Employment Sites</b>					
SA-0003-SAN	0	-	-	-	--
SA-0025-SAN	0	0	0	0	0
SA-0026-SAN	0	0	0	-	0
SA-0027-SAN	0	0	0	0	0
SA-0028-SAN	0	0	0	-	0
SA-0030-SAN-A	0	0	-	0	0
SA-0030-SAN-B	0	0	-	-	0
SA-0042-SAN	0	0	0	-	0
SA-0043-SAN	0	0	0	0	0
SA-0044-SAN	0	0	0	0	0
SA-0045-SAN	0	0	0	0	0
223	0	0	0	-	0
<b>Sandwell Carried Forward Residential Sites</b>					
28	0	0	0	-	0
744	0	0	0	-	0
764	0	0	0	-	0
1170	0	0	0	-	0
1183	0	0	0	-	0
1203	0	0	0	-	0
1376	0	0	0	0	0
1449	0	0	0	0	0
1451	0	0	0	0	0
1459	0	0	0	0	0
1463	0	0	0	-	0
1546	0	0	0	0	0
1994	0	0	0	0	0
2013	0	0	0	-	0
2370	0	0	0	0	0
2371	0	0	0	0	0
2377	0	0	0	0	0
2388	0	0	0	0	0

Site Ref	Cannock Chase AONB	Landscape Sensitivity	Alter Views for PRoW Network Users	Alter Views for Local Residents	Green Belt Harm
2588	0	0	0	0	0
2590	0	0	0	0	0
2893	0	0	0	-	0
2919	0	0	0	0	0
2940	0	0	-	-	0
2946	0	0	0	0	0
2972	0	0	0	0	0
2985	0	0	0	-	0
2986	0	0	0	0	0
3009	0	0	0	0	0
3011	0	0	0	0	0
3023	0	0	0	0	0
3025	0	0	0	-	0
3041	0	0	0	0	0
3049	0	0	-	-	0
3223	0	0	0	0	0
6483	0	0	0	0	0
6919	0	0	0	0	0
6924	0	0	0	-	0
6997	0	0	0	0	0
6998	0	0	0	0	0
SA-0029-SAN	0	0	-	-	0
<b>Sandwell Carried Forward Employment Sites</b>					
216b	0	0	-	-	0
256	0	0	0	0	0
257a	0	0	-	-	0

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

### G.4.1 European Sites

G.4.1.1 European sites are a network of nature protection areas which include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). There are no European sites within Sandwell, with the nearest being 'Fens Pools' SAC located approximately 3km to the west, in Dudley. No Zone of Influence has been identified for 'Fens Pools' SAC to indicate areas where development could potentially result in significant adverse effects on its designated features, and therefore, at the time of writing the impact of all proposed sites on European sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

### G.4.2 Sites of Special Scientific Interest

G.4.2.1 There are no Sites of Special Scientific Interest (SSSIs) within Sandwell borough however nearby SSSIs include 'The Leasowes' and 'Doulton's Claypit' in the neighbouring borough of Dudley. All sites are located within IRZs which do not indicate the proposed use as a threat to nearby SSSIs, and as such, would be likely to have a negligible impact.

### G.4.3 National Nature Reserves

G.4.3.1 There are no National Nature Reserves (NNRs) within Sandwell, with 'Wren's Nest' and 'Saltwells' NNRs in Dudley being the closest to the borough, located at their closest points approximately 800m and 700m to the west of Sandwell, respectively. None of the proposed sites within Sandwell are located in close proximity to these NNRs, and therefore, the proposed development at all sites would be unlikely to have a significant impact any NNR.

### G.4.4 Ancient Woodland

G.4.4.1 In Sandwell, there are some small areas of ancient woodland including 'Codsall Coppice' and 'Warley Rack Wood' in the south of the borough, and 'Dartmouth Golf Wood' and 'Chambers Wood' towards the north east. Site SA-0020-SAN is located adjacent to a stand of ancient woodland, and Site SA-0004-SAN is located approximately 170m from this ancient woodland across the Rushall Canal with foot bridge access. Housing and employment site SA-0003-SAN is located approximately 200m from 'Merrion's Wood' with only a small area of intervening development and non-designated woodland between the large site and ancient woodland. Therefore, the proposed development at these four sites could potentially have a minor negative impact on these ancient woodlands due to an increased

risk of disturbance. The remaining sites in Sandwell are unlikely to have a significant impact on any ancient woodland.

#### **G.4.5 Local Nature Reserves**

G.4.5.1 There are nine Local Nature Reserves (LNR) within Sandwell, found within both the urban areas and Green Belt, including ‘Sheepwash’, ‘Merrion Wood’ and ‘Sot’s Hole with Bluebell Wood’ LNRs. A small proportion of site SA-0001-SAN coincides with ‘Forge Mill Lake’ LNR. Seven further sites are located in close proximity to LNRs, including housing and employment site SA-0003-SAN which is located approximately 60m from ‘Merrion Wood’ LNR. Therefore, the proposed development at these eight sites could potentially have a minor negative impact on these LNRs, due to an increased risk of development related threats and pressures. On the other hand, the remaining sites would be likely to have a negligible impact on LNRs, primarily due to being separated by existing built form.

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

G.4.6.1 Within Sandwell, there are 33 Sites of Importance for Nature Conservation (SINCs). Four sites coincide with SINCs: A small proportion of Site SA-0001-SAN coincides with ‘Forge Mill, Sandwell Valley’ SINC; Site SA-0002-SAN wholly coincides with ‘Wilderness Wood’ SINC; and housing and employment site SA-0003-SAN wholly coincides with ‘Peakhouse Farm’ SINC. The proposed development at these four sites could potentially result in direct adverse impacts or possible loss of these SINCs. A major negative impact would be expected.

G.4.6.2 Site SA-0004-SAN is adjacent to three SINCs: ‘Hill Farm Bridge Fields’, ‘Wilderness Wood’ and ‘Peakhouse Farm’. Site SA-0033-SAN is adjacent to ‘Gower Branch Canal’ SINC, and Site 2919 is adjacent to ‘Ridgeacre Branch Canal’ SINC. The proposed development at these three sites could potentially have a minor negative impact on these SINCs, due to an increased risk of development related threats and pressures. None of the remaining sites coincide with or are located adjacent to SINCs, and therefore, the proposed development at these sites would not be expected to significantly impact any SINC.

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

G.4.7.1 There are 71 Sites of Local Importance for Nature Conservation (SLINCs) found throughout Sandwell, but particularly in the south west and north east of the borough. 12 sites coincide with SLINCs, including Site SA-0001-SAN which coincides with ‘Tanhouse Avenue, Sandwell Valley’ SLINC, and Site SA-0020-SAN which coincides with ‘Land at Yew Tree’ SLINC. Additionally, a further three sites are located adjacent to SLINCs. The proposed development at these 15 sites could potentially have a minor negative impact on these SLINCs due to an increased risk of development related threats and pressures. The remaining sites do not coincide with, or are located adjacent to, any SLINC; therefore, the proposed development at these sites would not be expected to result in a significant impact on SLINCs.

## **G.4.8 Geological Sites**

G.4.8.1 Geological sites have been identified throughout the Plan area, which form part of the Black Country Global Geopark<sup>4</sup>. These sites include a range of notable geological features and formations, including a number of SSSIs and SINCS. Within Sandwell, there are five geological sites found in the east and south west of the borough, including ‘The Rowley Hills’, ‘Blue Rock Quarry SINCS’ and ‘Bumble Hole & Warren’s Park LNR’. The proposed development at all sites within Sandwell would be likely to have a negligible impact on geological sites as they do not coincide with any identified areas of geological importance.

## **G.4.9 Priority Habitats**

G.4.9.1 Priority habitats are found throughout the Sandwell area, particularly concentrated in the Green Belt to the north east and include ‘coastal and floodplain grazing marsh’, ‘good quality semi-improved grassland’ and ‘deciduous woodland’. A total of 16 sites coincide wholly or partially with priority habitats, including a large proportion of Site SA-0003-SAN which coincides with ‘good quality semi-improved grassland’ and a large proportion of Site SA-0004-SAN which coincides with ‘deciduous woodland’. The proposed development at these 16 sites therefore would be likely to have a minor negative impact on these priority habitats due to the potential loss or degradation of these habitats. On the other hand, the remaining 49 sites do not coincide with any identified priority habitat; therefore, the proposed development at these sites would be likely to have a negligible impact on the overall presence of priority habitats.

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<sup>4</sup> Black Country Geopark (2021) Black Country Geopark. Available at: <https://blackcountrygeopark.dudley.gov.uk/bcg/> [Date Accessed: 07/05/21]

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

Site Ref	European Sites	SSSIs and IRZs	NNRS	Ancient Woodland	LNRS	SINGs	SLINCs	Geological Sites	Priority Habitats
<b>Sandwell Residential Sites</b>									
SA-0001-SAN	+/-	0	0	0	-	--	-	0	0
SA-0002-SAN	+/-	0	0	0	0	--	-	0	-
SA-0003-SAN	+/-	0	0	-	-	--	0	0	-
SA-0004-SAN	+/-	0	0	-	0	-	-	0	-
SA-0006-SAN	+/-	0	0	0	0	0	0	0	0
SA-0016-SAN	+/-	0	0	0	0	0	0	0	-
SA-0020-SAN	+/-	0	0	-	0	0	-	0	-
SA-0033-SAN	+/-	0	0	0	0	-	0	0	0
SA-0048-SAN	+/-	0	0	0	0	0	0	0	0
SA-6999	+/-	0	0	0	0	0	-	0	-
<b>Sandwell Employment Sites</b>									
SA-0003-SAN	+/-	0	0	-	-	--	0	0	-
SA-0025-SAN	+/-	0	0	0	0	0	-	0	0
SA-0026-SAN	+/-	0	0	0	0	0	0	0	0
SA-0027-SAN	+/-	0	0	0	0	0	0	0	0
SA-0028-SAN	+/-	0	0	0	0	0	0	0	-
SA-0030-SAN-A	+/-	0	0	0	-	0	0	0	0
SA-0030-SAN-B	+/-	0	0	0	-	0	0	0	0
SA-0042-SAN	+/-	0	0	0	0	0	0	0	0
SA-0043-SAN	+/-	0	0	0	0	0	0	0	0
SA-0044-SAN	+/-	0	0	0	0	0	0	0	0
SA-0045-SAN	+/-	0	0	0	0	0	0	0	0
223	+/-	0	0	0	0	0	0	0	0
<b>Sandwell Carried Forward Residential Sites</b>									
28	+/-	0	0	0	0	0	0	0	0
744	+/-	0	0	0	0	0	0	0	-
764	+/-	0	0	0	0	0	0	0	0
1170	+/-	0	0	0	0	0	0	0	-
1183	+/-	0	0	0	0	0	-	0	0
1203	+/-	0	0	0	-	0	0	0	0
1376	+/-	0	0	0	0	0	0	0	0
1449	+/-	0	0	0	0	0	0	0	0
1451	+/-	0	0	0	0	0	0	0	0
1459	+/-	0	0	0	0	0	0	0	0
1463	+/-	0	0	0	0	0	0	0	0
1546	+/-	0	0	0	0	0	0	0	0
1994	+/-	0	0	0	0	0	0	0	0
2013	+/-	0	0	0	0	0	0	0	0
2370	+/-	0	0	0	0	0	-	0	0
2371	+/-	0	0	0	0	0	0	0	-



Site Ref	European Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRs	SINCs	SLINCs	Geological Sites	Priority Habitats
2377	+/-	0	0	0	0	0	0	0	0
2388	+/-	0	0	0	0	0	-	0	0
2588	+/-	0	0	0	0	0	0	0	0
2590	+/-	0	0	0	0	0	0	0	0
2893	+/-	0	0	0	0	0	0	0	0
2919	+/-	0	0	0	0	-	0	0	0
2940	+/-	0	0	0	-	0	-	0	-
2946	+/-	0	0	0	0	0	0	0	0
2972	+/-	0	0	0	0	0	0	0	0
2985	+/-	0	0	0	0	0	-	0	-
2986	+/-	0	0	0	0	0	0	0	0
3009	+/-	0	0	0	0	0	0	0	0
3011	+/-	0	0	0	0	0	0	0	0
3023	+/-	0	0	0	0	0	0	0	0
3025	+/-	0	0	0	-	0	0	0	0
3041	+/-	0	0	0	0	0	0	0	0
3049	+/-	0	0	0	0	0	-	0	-
3223	+/-	0	0	0	0	0	0	0	0
6483	+/-	0	0	0	0	0	0	0	0
6919	+/-	0	0	0	0	0	0	0	0
6924	+/-	0	0	0	0	0	-	0	-
6997	+/-	0	0	0	0	0	0	0	0
6998	+/-	0	0	0	0	0	0	0	0
SA-0029-SAN	+/-	0	0	0	0	0	-	0	-
<b>Sandwell Carried Forward Employment Sites</b>									
216b	+/-	0	0	0	0	0	0	0	0
256	+/-	0	0	0	0	0	-	0	0
257a	+/-	0	0	0	0	0	0	0	0

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

### G.5.1 Potential Increase in Carbon Footprint

- G.5.1.1 Residential-led development is likely to result in an increase in carbon emissions, to some extent. 37 sites are proposed for the development of 134 dwellings or less. The proposed development at these sites would be likely to result in a negligible contribution to Sandwell's total carbon emissions.
- G.5.1.2 Eleven sites are proposed for the development of 135 dwellings or more. The proposed development at these sites could potentially increase local carbon emissions, as a proportion of Sandwell's total, by more than 0.1%. Therefore, a minor negative impact on Sandwell's carbon emissions would be expected at these eleven sites.
- G.5.1.3 The housing capacity at two residential sites (SA-0002-SAN and SA-0016-SAN) is unknown at the time of writing, and therefore, the impact of the proposed development at these sites is uncertain.
- G.5.1.4 The carbon emissions likely to be generated as a result of non-residential development is uncertain. This would be entirely dependent on the nature and scale of the employment land proposed, which is unknown at present.

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

Site Ref	Potential Increase in Carbon Footprint	Site Ref	Potential Increase in Carbon Footprint
<b>Sandwell Residential Sites</b>		1463	0
SA-0001-SAN	0	1546	-
SA-0002-SAN	+/-	1994	0
SA-0003-SAN	-	2013	0
SA-0004-SAN	-	2370	-
SA-0006-SAN	0	2371	-
SA-0016-SAN	+/-	2377	0
SA-0020-SAN	0	2388	-
SA-0033-SAN	0	2588	-
SA-0048-SAN	0	2590	0
SA-6999	-	2893	0
<b>Sandwell Employment Sites</b>		2919	0
SA-0003-SAN	+/-	2940	-
SA-0025-SAN	+/-	2946	0
SA-0026-SAN	+/-	2972	0
SA-0027-SAN	+/-	2985	-
SA-0028-SAN	+/-	2986	0
SA-0030-SAN-A	+/-	3009	0
SA-0030-SAN-B	+/-	3011	0
SA-0042-SAN	+/-	3023	0
SA-0043-SAN	+/-	3025	0
SA-0044-SAN	+/-	3041	0
SA-0045-SAN	+/-	3049	0
223	+/-	3223	0
<b>Sandwell Carried Forward Residential Sites</b>		6483	0
28	0	6919	0
744	0	6924	0
764	0	6997	0
1170	0	6998	0
1183	0	SA-0029-SAN	-
1203	0	<b>Sandwell Carried Forward Employment Sites</b>	
1376	0	216b	+/-
1449	0	256	+/-
1451	0	257a	+/-
1459	0		

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

### G.6.1 Flood Zones

G.6.1.1 Flood Zones 2, 3a and 3b occur alongside watercourses throughout the borough, such as the River Tame, with the majority of areas at risk of fluvial flooding found towards the north. The majority of sites are located wholly within Flood Zone 1 and therefore would be expected to have a minor positive impact on flooding, as the proposed development at these sites would be likely to locate site end users away from areas at risk of fluvial flooding. However, eight sites are located partially within Flood Zone 3a and/or 3b; therefore, the proposed development at these sites could potentially have a major negative impact on flooding in the area and exacerbate existing issues of flooding in Sandwell. Additionally, sites SA-0016-SAN and 2985 are located partially within Flood Zone 2, and therefore, the proposed development at these two sites could potentially have a minor negative impact on flooding.

### G.6.2 Indicative Flood Zone 3b

G.6.2.1 Indicative Flood Zone 3b is present in areas where flooding will potentially worsen in the future due to climate change, areas of which are scattered throughout Sandwell generally covering areas currently within Flood Zone 3a. The majority of Site 1170, and a small proportion of Sites 2940 and 3049, coincide with Indicative Flood Zone 3b. Therefore, the proposed development at these three sites could potentially have a major negative impact on flooding and may exacerbate existing issues of flooding in Sandwell. There are no other sites within Sandwell which are located within Indicative Flood Zone 3b, and therefore, the remaining sites could potentially have a negligible impact on contributing to flooding issues in the future, although further site-specific assessments and reference to emerging data would help to provide a more accurate picture of changing flood risk due to climate change.

### G.6.3 Surface Water Flood Risk

G.6.3.1 Surface Water Flood Risk (SWFR) is categorised into low (1/1000), medium (1/100) and high (1/30) in relation to the probability of surface water flooding occurring in a given area. Areas affected by surface water flooding can be found throughout Sandwell, in particular along roads, as well as within urban parkland, and associated with ponds and watercourses. 17 sites coincide with an area of high SWFR, and therefore, the proposed development at these sites could potentially have a major negative impact on surface water flooding in the area, as development would be likely to locate site end users in areas at high risk of surface water flooding as well as exacerbate pluvial flood risk in surrounding locations. Additionally, a further 39 sites coincide with areas of low and/or medium SWFR, and as such, the proposed development at these sites could potentially have a minor negative impact on surface water

flooding in the area. The remaining sites which do not coincide with any significant areas of SWFR would be expected to have a negligible impact on surface water flooding.

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

Site Ref	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
<b>Sandwell Residential Sites</b>			
SA-0001-SAN	+	0	-
SA-0002-SAN	+	0	--
SA-0003-SAN	+	0	-
SA-0004-SAN	+	0	-
SA-0006-SAN	+	0	0
SA-0016-SAN	-	0	-
SA-0020-SAN	+	0	-
SA-0033-SAN	+	0	0
SA-0048-SAN	+	0	-
SA-6999	--	0	--
<b>Sandwell Employment Sites</b>			
SA-0003-SAN	+	0	-
SA-0025-SAN	+	0	-
SA-0026-SAN	+	0	-
SA-0027-SAN	+	0	-
SA-0028-SAN	+	0	-
SA-0030-SAN-A	+	0	--
SA-0030-SAN-B	+	0	-
SA-0042-SAN	--	0	-
SA-0043-SAN	+	0	-
SA-0044-SAN	+	0	-
SA-0045-SAN	+	0	0
223	+	0	-
<b>Sandwell Carried Forward Residential Sites</b>			
28	+	0	0
744	+	0	-
764	+	0	0
1170	--	--	-
1183	+	0	-
1203	--	0	--
1376	+	0	-
1449	+	0	-
1451	+	0	-
1459	+	0	0
1463	+	0	-
1546	+	0	--
1994	+	0	--
2013	+	0	0
2370	+	0	--
2371	+	0	-
2377	+	0	--

2388	+	0	-
2588	+	0	-
2590	+	0	--
2893	+	0	-
2919	+	0	-
2940	--	--	--
2946	+	0	-
2972	+	0	--
2985	-	0	--
2986	--	0	-
3009	+	0	-
3011	+	0	--
3023	+	0	-
3025	+	0	-
3041	+	0	0
3049	--	--	-
3223	+	0	--
6483	+	0	--
6919	+	0	0
6924	+	0	-
6997	+	0	-
6998	+	0	-
SA-0029-SAN	+	0	--
<b>Sandwell Carried Forward Employment Sites</b>			
216b	+	0	--
256	--	0	-
257a	+	0	-

## G.7 SA Objective 6: Natural Resources

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

G.7.1.1 Sandwell is principally built-up, although it also contains a range of large green spaces distributed throughout the borough and a small proportion of undeveloped Green Belt land in the north east.

G.7.1.2 29 sites in Sandwell wholly comprise previously developed land which would be likely to have little or no environmental value. The proposed development at these sites would be expected to have a minor positive impact on natural resources as development would be classed as an efficient use of land.

G.7.1.3 The remaining 36 sites wholly or partially comprise undeveloped land and/or contain areas likely to be of environmental value such as hedgerows, trees and scrub that may be lost or further fragmented if developed. The proposed development at four of these sites (housing and employment site SA-0003-SAN, as well as housing sites SA-6999 and 2985) would be expected to have a major negative impact on natural resources due to the loss of 20ha or more of previously undeveloped land. The proposed development at 32 sites of these sites would be expected to have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land.

### G.7.2 Agricultural Land Classification

G.7.2.1 The land within Sandwell borough is almost entirely 'Urban' according to the Agricultural Land Classification (ALC), with a small proportion of 'Non-Agricultural' and Grade 4 land in the north east. Only a very small area in the north east, within Sandwell Valley Country Park, is classed as Grade 3, which potentially represents some of the 'best and most versatile' (BMV) land within Sandwell. The proposed development at all of the 36 sites within Sandwell which wholly or partially comprise undeveloped land would be likely to have a minor positive impact on natural resources due to being located upon areas of less agriculturally important 'Urban' and/or 'Non-Agricultural' land, which would help to prevent the loss of BMV land across the Plan area.

G.7.2.2 The proposed development at the 29 sites which are located wholly on previously developed land would be likely to have a negligible impact on agricultural land.

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

G.7.3.1 There are no Mineral Safeguarding Areas (MSAs) or Areas of Search (AOS) identified within Sandwell. All proposed sites in Sandwell would be expected to result in a negligible impact on mineral resources.

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

Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Areas / Areas of Search
<b>Sandwell Residential Sites</b>			
SA-0001-SAN	-	+	0
SA-0002-SAN	-	+	0
SA-0003-SAN	--	+	0
SA-0004-SAN	-	+	0
SA-0006-SAN	+	0	0
SA-0016-SAN	-	+	0
SA-0020-SAN	-	+	0
SA-0033-SAN	+	0	0
SA-0048-SAN	+	0	0
SA-6999	--	+	0
<b>Sandwell Employment Sites</b>			
SA-0003-SAN	--	+	0
SA-0025-SAN	+	0	0
SA-0026-SAN	-	+	0
SA-0027-SAN	-	+	0
SA-0028-SAN	-	+	0
SA-0030-SAN-A	+	0	0
SA-0030-SAN-B	-	+	0
SA-0042-SAN	-	+	0
SA-0043-SAN	-	+	0
SA-0044-SAN	-	+	0
SA-0045-SAN	-	+	0
223	+	0	0
<b>Sandwell Carried Forward Residential Sites</b>			
28	+	0	0
744	-	+	0
764	-	+	0
1170	-	+	0
1183	-	+	0
1203	-	+	0
1376	+	0	0
1449	+	0	0
1451	+	0	0
1459	+	0	0
1463	-	+	0
1546	+	0	0
1994	+	0	0
2013	-	+	0
2370	+	0	0
2371	-	+	0
2377	+	0	0
2388	-	+	0



Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Areas / Areas of Search
2588	+	0	0
2590	+	0	0
2893	-	+	0
2919	+	0	0
2940	-	+	0
2946	+	0	0
2972	+	0	0
2985	--	+	0
2986	+	0	0
3009	-	+	0
3011	+	0	0
3023	+	0	0
3025	+	0	0
3041	+	0	0
3049	-	+	0
3223	-	+	0
6483	+	0	0
6919	+	0	0
6924	-	+	0
6997	+	0	0
6998	+	0	0
SA-0029-SAN	-	+	0
<b>Sandwell Carried Forward Employment Sites</b>			
216b	-	+	0
256	-	+	0
257a	-	+	0

## G.8 SA Objective 7: Pollution

### G.8.1 Air Quality Management Area

G.8.1.1 The entirety of Sandwell borough is classed as 'Sandwell Air Quality Management Area' (AQMA). All sites are located wholly within this AQMA, whilst several sites are also located partially within 200m of the adjacent 'Walsall AQMA', 'Birmingham AQMA' or 'Dudley AQMA'. The proposed development at all sites would be likely to locate site end users in areas of existing poor air quality and have a minor negative impact on air pollution.

### G.8.2 Main Road

G.8.2.1 Many major roads pass through Sandwell, including the A34, A4041 and the M6 Motorway. 36 of the sites proposed within Sandwell are located within 200m of a main road, including Sites SA-0002-SAN, SA-0004-SAN and SA-0016-SAN which are adjacent to the M6. Therefore, the proposed development at these 36 sites could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using these main roads would be expected to have a minor negative impact on air quality and noise at these sites. The proposed development at the remaining sites which are over 200m from a main road would be expected to have a negligible impact on transport associated air and noise pollution associated with main roads.

### G.8.3 Watercourse

G.8.3.1 There are several watercourses within Sandwell, including the River Tame and various canals and brooks. 26 sites coincide with or are located within 10m of various watercourses. The proposed development at these sites would be likely to increase the risk of contamination of these watercourses, and therefore have a minor negative impact on water quality. The remaining 39 sites which are located over 10m from watercourses are less likely to have a significant impact on the quality of watercourses however each site would need to be evaluated according to land use type, size of development and exact location.

### G.8.4 Groundwater Source Protection Zone

G.8.4.1 Source Protection Zones (SPZs) for groundwater within Sandwell are located only within the south east of the borough. SPZs are grouped from 1 to 3 based on the level of protection that the groundwater requires. Ten of the 'carried forward' residential sites in Sandwell are located within the total catchment (zone 3) of this SPZ. The proposed development at these sites could potentially increase the risk of groundwater contamination within the SPZ and have a minor negative impact on the quality or status of groundwater resources. The remaining sites in Sandwell do not coincide with the catchment of any SPZ; therefore, the

proposed development at these 55 sites would be expected to have a negligible impact on quality or status of groundwater.

### **G.8.5 Potential Increase in Air Pollution**

- G.8.5.1 14 sites are proposed for the development of 100 or more dwellings, and one site (SA-0003-SAN) is proposed for non-residential end use and comprises more than 1ha. The proposed development at these 15 sites could potentially result in a significant increase in local air pollution; therefore, a major negative impact would be expected.
- G.8.5.2 34 sites are proposed for the development of between ten and 99 dwellings, and 12 sites are proposed for non-residential end use and comprise between one and 10ha. Therefore, the proposed development at these 46 sites could potentially have a minor negative impact on air pollution in the local area.
- G.8.5.3 One site is proposed for the development of less than ten dwellings (SA-0006-SAN proposed for one dwelling), and one site is proposed for non-residential end use and comprise less than 1ha (Site SA-0045-SAN). The proposed development at these two sites would be expected to have a negligible impact on local air pollution.
- G.8.5.4 The housing capacity at two residential sites in Sandwell (SA-0002-SAN and SA-0016-SAN) is unknown at the time of writing, and therefore, the impact of the proposed development at these sites is uncertain.

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

Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
<b>Sandwell Residential Sites</b>					
SA-0001-SAN	-	0	0	0	-
SA-0002-SAN	-	-	0	0	+/-
SA-0003-SAN	-	-	0	0	--
SA-0004-SAN	-	-	0	0	--
SA-0006-SAN	-	0	0	0	0
SA-0016-SAN	-	-	-	0	+/-
SA-0020-SAN	-	0	-	0	--
SA-0033-SAN	-	-	-	0	-
SA-0048-SAN	-	-	-	0	-
SA-6999	-	-	-	0	--
<b>Sandwell Employment Sites</b>					
SA-0003-SAN	-	-	0	0	--
SA-0025-SAN	-	0	-	0	-
SA-0026-SAN	-	0	-	0	-
SA-0027-SAN	-	-	0	0	-
SA-0028-SAN	-	-	0	0	-
SA-0030-SAN-A	-	0	-	0	-
SA-0030-SAN-B	-	0	-	0	-
SA-0042-SAN	-	-	-	0	-
SA-0043-SAN	-	0	0	0	-
SA-0044-SAN	-	-	0	0	-
SA-0045-SAN	-	0	0	0	0
223	-	-	-	0	-
<b>Sandwell Carried Forward Residential Sites</b>					
28	-	0	0	0	-
744	-	0	0	-	-
764	-	0	0	0	-
1170	-	-	-	0	-
1183	-	0	0	0	-
1203	-	-	0	0	-
1376	-	-	0	0	-
1449	-	0	-	0	-
1451	-	-	0	0	-
1459	-	0	0	0	-
1463	-	-	-	0	-
1546	-	0	-	-	--
1994	-	-	0	0	-
2013	-	-	-	0	-
2370	-	-	0	0	--
2371	-	-	-	-	--
2377	-	-	0	0	-
2388	-	-	0	0	--

Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
2588	-	-	-	-	--
2590	-	-	-	-	-
2893	-	-	-	-	-
2919	-	-	0	0	--
2940	-	0	-	0	--
2946	-	-	0	0	-
2972	-	-	0	0	-
2985	-	0	0	0	--
2986	-	0	0	0	-
3009	-	0	0	0	-
3011	-	0	-	0	-
3023	-	0	0	0	-
3025	-	-	0	0	--
3041	-	0	0	0	-
3049	-	0	-	0	-
3223	-	-	-	0	-
6483	-	-	0	-	-
6919	-	-	0	-	-
6924	-	0	0	0	-
6997	-	0	0	-	-
6998	-	-	0	-	-
SA-0029-SAN	-	0	0	0	--
<b>Sandwell Carried Forward Employment Sites</b>					
216b	-	0	-	0	-
256	-	0	-	0	-
257a	-	-	0	0	-

## G.9 SA Objective 8: Waste

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

- G.9.1.1 Residential-led development is likely to result in an increase in household waste generation, to some extent.
- G.9.1.2 37 sites are proposed for the development of 130 dwellings or less. The proposed development at these sites would be expected to have a negligible impact on household waste generation in comparison to current levels.
- G.9.1.3 Eleven sites are proposed for the development of 131 dwellings or more. The proposed development at these sites would be expected to increase household waste generation by more than 0.1% in comparison to current levels. Therefore, the proposed development at these sites could potentially result in a minor negative impact on household waste generation.
- G.9.1.4 The housing capacity at two residential sites in Sandwell (SA-0002-SAN and SA-0016-SAN) is unknown at the time of writing, and therefore, the impact of the proposed development at these sites is uncertain.
- G.9.1.5 The waste likely to be generated as a result of non-residential development is uncertain.

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

Site Ref	Increase in household waste generation	Site Ref	Increase in household waste generation
<b>Sandwell Residential Sites</b>		1463	0
SA-0001-SAN	0	1546	-
SA-0002-SAN	+/-	1994	0
SA-0003-SAN	-	2013	0
SA-0004-SAN	-	2370	-
SA-0006-SAN	0	2371	-
SA-0016-SAN	+/-	2377	0
SA-0020-SAN	0	2388	-
SA-0033-SAN	0	2588	-
SA-0048-SAN	0	2590	0
SA-6999	-	2893	0
<b>Sandwell Employment Sites</b>		2919	0
SA-0003-SAN	+/-	2940	-
SA-0025-SAN	+/-	2946	0
SA-0026-SAN	+/-	2972	0
SA-0027-SAN	+/-	2985	-
SA-0028-SAN	+/-	2986	0
SA-0030-SAN-A	+/-	3009	0
SA-0030-SAN-B	+/-	3011	0
SA-0042-SAN	+/-	3023	0
SA-0043-SAN	+/-	3025	0
SA-0044-SAN	+/-	3041	0
SA-0045-SAN	+/-	3049	0
223	+/-	3223	0
<b>Sandwell Carried Forward Residential Sites</b>		6483	0
28	0	6919	0
744	0	6924	0
764	0	6997	0
1170	0	6998	0
1183	0	SA-0029-SAN	-
1203	0	<b>Sandwell Carried Forward Employment Sites</b>	
1376	0	216b	+/-
1449	0	256	+/-
1451	0	257a	+/-
1459	0		

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

### G.10.1 Bus Stop

G.10.1.1 In Sandwell, there are many bus stops, which would be expected to generally provide good public transport access, with the exception of some small areas to the east of the borough and pockets in the centre where bus stops are more thinly distributed. The majority of sites within Sandwell are located within 400m of a bus stop (61 sites in total), and therefore, the proposed development at these sites would be expected to have a minor positive impact on access to sustainable transport options. Four sites (SA-0020-SAN, 2940, 2985 and 3049) are located wholly or partially outside of the sustainable distance of 400m from a bus stop providing regular services, and therefore, the proposed development at these sites could potentially have a minor negative impact on site end users' access to sustainable transport.

### G.10.2 Railway Station

G.10.2.1 There are several railway stations located within the borough of Sandwell, as well as many metro stations located along the West Midlands Metro line which goes through West Bromwich Central Station. A large proportion of the borough would be expected to have good access to these stations although small areas in the south west, south east and north east lie outside of a sustainable 2km distance from these stations. The majority of the sites are located within 2km of a railway station, and therefore, the proposed development at these 61 sites would be likely to have a minor positive impact on access to rail services. However, housing and employment site SA-0003-SAN, as well as housing sites SA-0002-SAN and SA-0029-SAN are located over 2km from a railway station, and therefore, the proposed development at these four sites could potentially have a minor negative impact on site end users' access to rail services.

### G.10.3 Pedestrian Access

G.10.3.1 Sites with good pedestrian access can be described those with existing pavements or pathways which are segregated from traffic use in the area, which are generally well distributed throughout Sandwell, due to its built-up nature. The majority of the sites within Sandwell are well connected to the existing footpath networks. Therefore, the proposed development at these 63 sites would be likely to have a minor positive impact on local transport and accessibility, by potentially encouraging travel by foot and reducing requirement for new pedestrian access to be created. Two sites, SA-0042-SAN and 257a, currently have poor access to the existing footpath network. Therefore, the proposed development at these two sites could potentially have a minor negative impact on local accessibility, and pedestrian access to the wider community would need improvement.



## **G.10.4 Road Access**

G.10.4.1 A network of major and minor roads can be found throughout Sandwell, which would be expected to provide good road access in the local area and nationally. The majority of sites proposed within Sandwell are adjacent to a road, and therefore, the proposed development at these 63 sites would be expected to provide site end users with good access to the existing road network, resulting in a minor positive impact on transport and accessibility. Only sites SA-0042-SAN and 257a are not accessible from the current road network. The proposed development at these two sites could potentially result in a minor negative impact on accessibility.

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

G.10.5.1 Sites with sustainable pedestrian access to local fresh food and services in Sandwell are considered to be those within a 15-minute walking distance. According to accessibility modelling data, a large proportion of the borough meets these criteria, however, there are some sections in the north east, south west and centre of the borough where pedestrian access to services is likely to be more restricted. 24 sites are located wholly or partially outside of a 15-minute walking distance to these services, and therefore, the proposed development at these sites could potentially have a minor negative impact on the sustainable access of site end users to local services, based on current infrastructure. The remaining 41 sites are identified to be within 15-minute walking distance, and therefore, the proposed development at these sites would be expected to have a minor positive impact on sustainable access to local services.

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

G.10.6.1 Accessibility modelling data indicates that almost the entirety of the borough has good sustainable transport access to local fresh food and services, within 15 minutes travel time via public transport. The majority of sites are situated within the sustainable travel time via public transport to local services, and therefore, the proposed development at these 63 sites could potentially have a minor positive impact on the access of site end users to local services, based on existing infrastructure. However, Sites 744 and 6997 are located wholly outside of this travel time; therefore, the proposed development at these two sites could potentially have a minor negative impact on sustainable access to local services.

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

Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
<b>Sandwell Residential Sites</b>						
SA-0001-SAN	+	+	+	+	-	+
SA-0002-SAN	+	-	+	+	-	+
SA-0003-SAN	+	-	+	+	-	+
SA-0004-SAN	+	+	+	+	-	+
SA-0006-SAN	+	+	+	+	+	+
SA-0016-SAN	+	+	+	+	-	+
SA-0020-SAN	-	+	+	+	+	+
SA-0033-SAN	+	+	+	+	-	+
SA-0048-SAN	+	+	+	+	-	+
SA-6999	+	+	+	+	+	+
<b>Sandwell Employment Sites</b>						
SA-0003-SAN	+	-	+	+	-	+
SA-0025-SAN	+	+	+	+	+	+
SA-0026-SAN	+	+	+	+	+	+
SA-0027-SAN	+	+	+	+	+	+
SA-0028-SAN	+	+	+	+	+	+
SA-0030-SAN-A	+	+	+	+	+	+
SA-0030-SAN-B	+	+	+	+	+	+
SA-0042-SAN	+	+	-	-	+	+
SA-0043-SAN	+	+	+	+	+	+
SA-0044-SAN	+	+	+	+	+	+
SA-0045-SAN	+	+	+	+	+	+
223	+	+	+	+	+	+
<b>Sandwell Carried Forward Residential Sites</b>						
28	+	+	+	+	+	+
744	+	+	+	+	-	-
764	+	+	+	+	-	+
1170	+	+	+	+	+	+
1183	+	+	+	+	+	+
1203	+	+	+	+	+	+
1376	+	+	+	+	+	+
1449	+	+	+	+	+	+
1451	+	+	+	+	-	+
1459	+	+	+	+	+	+
1463	+	+	+	+	+	+
1546	+	+	+	+	-	+
1994	+	+	+	+	+	+
2013	+	+	+	+	+	+
2370	+	+	+	+	+	+
2371	+	+	+	+	+	+

Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
2377	+	+	+	+	+	+
2388	+	+	+	+	+	+
2588	+	+	+	+	-	+
2590	+	+	+	+	-	+
2893	+	+	+	+	+	+
2919	+	+	+	+	+	+
2940	-	+	+	+	-	+
2946	+	+	+	+	+	+
2972	+	+	+	+	+	+
2985	-	+	+	+	+	+
2986	+	+	+	+	+	+
3009	+	+	+	+	+	+
3011	+	+	+	+	+	+
3023	+	+	+	+	+	+
3025	+	+	+	+	+	+
3041	+	+	+	+	+	+
3049	-	+	+	+	-	+
3223	+	+	+	+	-	+
6483	+	+	+	+	-	+
6919	+	+	+	+	-	+
6924	+	+	+	+	+	+
6997	+	+	+	+	-	-
6998	+	+	+	+	+	+
SA-0029-SAN	+	-	+	+	-	+
<b>Sandwell Carried Forward Employment Sites</b>						
216b	+	+	+	+	-	+
256	+	+	+	+	-	+
257a	+	+	-	-	-	+

## G.11 SA Objective 10: Housing

### G.11.1 Housing Provision

- G.11.1.1 Residential-led development is likely to result in a net gain in housing. The sites in Sandwell proposed for residential use would therefore be expected to result in positive impacts under this objective. Sites which have been identified as having capacity for 100 or more dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision. Sites which have been identified as having capacity for 99 dwellings or less would be expected to result in a minor positive impact on housing provision.
- G.11.1.2 The housing capacity at two residential sites in Sandwell (SA-0002-SAN and SA-0016-SAN) is unknown at the time of writing, and therefore, the impact of the proposed development at these sites is uncertain although it is likely there would be a net gain to some extent.
- G.11.1.3 Employment-led sites in Sandwell would not be expected to result in a net change in housing provision and therefore a negligible impact would be likely.

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

Site Ref	Housing Provision	Site Ref	Housing Provision
<b>Sandwell Residential Sites</b>		1463	+
SA-0001-SAN	+	1546	++
SA-0002-SAN	+/-	1994	+
SA-0003-SAN	++	2013	+
SA-0004-SAN	++	2370	++
SA-0006-SAN	+	2371	++
SA-0016-SAN	+/-	2377	+
SA-0020-SAN	++	2388	++
SA-0033-SAN	+	2588	++
SA-0048-SAN	+	2590	+
SA-6999	++	2893	+
<b>Sandwell Employment Sites</b>		2919	++
SA-0003-SAN	0	2940	++
SA-0025-SAN	0	2946	+
SA-0026-SAN	0	2972	+
SA-0027-SAN	0	2985	++
SA-0028-SAN	0	2986	+
SA-0030-SAN-A	0	3009	+
SA-0030-SAN-B	0	3011	+
SA-0042-SAN	0	3023	+
SA-0043-SAN	0	3025	++
SA-0044-SAN	0	3041	+
SA-0045-SAN	0	3049	+
223	0	3223	+
<b>Sandwell Carried Forward Residential Sites</b>		6483	+
28	+	6919	+
744	+	6924	+
764	+	6997	+
1170	+	6998	+
1183	+	SA-0029-SAN	++
1203	+	<b>Sandwell Carried Forward Employment Sites</b>	
1376	+	216b	0
1449	+	256	0
1451	+	257a	0
1459	+		

## G.12 SA Objective 11: Equality

### G.12.1 Index of Multiple Deprivation

G.12.1.1 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England<sup>5</sup>. Out of 317 Local Authorities in England, Sandwell is ranked as the 12<sup>th</sup> most deprived<sup>6</sup>. Overall deprivation is relatively high across the Black Country, with 36 of the LSOAs in Sandwell ranked among the 10% most deprived in England. Deprivation levels within the borough of Sandwell varies from area to area, with the 36 most deprived LSOAs found throughout the borough, and in particular clustered within the south eastern and north western parts of the borough.

G.12.1.2 25 sites are located wholly or partially within the 10% most deprived LSOAs, and therefore development at these sites could potentially have a minor negative impact on equality by exacerbating existing social pressures faced by current residents and place increased pressure on local services. The remaining 40 sites are located outside of the most deprived 10% LSOAs, and therefore, the proposed development at these sites may have a negligible impact on equality.

G.12.1.3 It should be noted that there is a degree of uncertainty in regard to the impacts of each site on equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.

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<sup>5</sup> Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date Accessed: 05/05/21]

<sup>6</sup> Black Country Consortium (2019) The English Indices of Deprivation 2019. Available at: <https://www.the-blackcountry.com/upload/BC%20IMD%202019.pdf> [Date Accessed: 05/05/21]

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

Site Ref	IMD 10% Most Deprived	Site Ref	IMD 10% Most Deprived
<b>Sandwell Residential Sites</b>		1463	0
SA-0001-SAN	0	1546	-
SA-0002-SAN	0	1994	0
SA-0003-SAN	0	2013	-
SA-0004-SAN	0	2370	-
SA-0006-SAN	-	2371	-
SA-0016-SAN	0	2377	0
SA-0020-SAN	0	2388	-
SA-0033-SAN	0	2588	-
SA-0048-SAN	0	2590	-
SA-6999	0	2893	-
<b>Sandwell Employment Sites</b>		2919	0
SA-0003-SAN	0	2940	0
SA-0025-SAN	0	2946	0
SA-0026-SAN	0	2972	-
SA-0027-SAN	-	2985	0
SA-0028-SAN	0	2986	0
SA-0030-SAN-A	-	3009	0
SA-0030-SAN-B	-	3011	-
SA-0042-SAN	-	3023	0
SA-0043-SAN	0	3025	0
SA-0044-SAN	0	3041	0
SA-0045-SAN	0	3049	0
223	-	3223	0
<b>Sandwell Carried Forward Residential Sites</b>		6483	-
28	0	6919	-
744	-	6924	-
764	0	6997	-
1170	0	6998	-
1183	0	SA-0029-SAN	0
1203	-	<b>Sandwell Carried Forward Employment Sites</b>	
1376	0	216b	0
1449	-	256	0
1451	-	257a	0
1459	0		

## G.13 SA Objective 12: Health

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

G.13.1.1 Sandwell General Hospital is the only NHS Hospital with an Accident & Emergency department within the borough itself, although there are several other nearby hospitals such as Manor Hospital in Walsall to the north, and Birmingham City Hospital to the south east, which also provide these services. The majority of the proposed sites are located within 5km of one or more of these hospitals (61 sites in total). Therefore, the proposed development at these sites could potentially have a minor positive impact on access to emergency healthcare due being within a sustainable distance to the services. Four sites (SA-6999, SA-0025-SAN, 764 and 2370) are located wholly over 5km from a hospital, and therefore, the proposed development at these sites could potentially have a minor negative impact on access to emergency healthcare.

### G.13.2 Pedestrian Access to GP Surgery

G.13.2.1 There are 73 GP Surgeries distributed within Sandwell, serving the existing local communities, particularly clustered within the south east and north west of the borough. Accessibility modelling data has been provided to Lepus by the BCA, mapping the location of GP surgeries and areas within a sustainable travel time to these facilities for pedestrians. A large proportion of the built-up areas are located within a 15-minute walk to a GP surgery; however, the modelling data indicates that some areas in the north east and centre of Sandwell are likely to have more restricted access for pedestrians.

G.13.2.2 13 sites, including the majority of the largest sites, are located wholly or partially outside of this sustainable travel time. Therefore, the proposed development at these sites could potentially have a minor negative impact on pedestrian access to healthcare, based on existing infrastructure. On the other hand, the majority of proposed sites in Sandwell are located within a 15-minute walking distance to a GP surgery; therefore, the proposed development at these 52 sites would be expected to have a minor positive impact on access to healthcare, based on existing infrastructure.

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

G.13.3.1 Good and sustainable public transport access to a local GP surgery is identified to be within a 15-minute journey. According to accessibility modelling data, this travel time to healthcare is likely to be achieved across the majority of Sandwell, with the exception of small pockets in the east and west. All sites within Sandwell are all situated in areas within this time frame, with the exception of Site 1183 as the majority of this site is located outside of this travel time. Therefore, the proposed development at 64 of the sites would be expected to have a minor positive impact on sustainable access to healthcare, based on existing infrastructure.



The proposed development at Site 1183 could potentially have a minor negative impact on sustainable access to healthcare.

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

G.13.4.1 The entirety of Sandwell is classed as ‘Sandwell AQMA’. All sites are located wholly within this AQMA, and several sites are also located within 200m of the adjacent ‘Walsall AQMA’, ‘Birmingham AQMA’ or ‘Dudley AQMA’. The proposed development at all sites in Sandwell would be likely to expose site end users to poor air quality associated with these AQMAs, and therefore, have a minor negative impact on health.

### **G.13.5 Main Road**

G.13.5.1 Many major roads pass through Sandwell, including the A34, A4041 and the M6 Motorway. 36 sites proposed within Sandwell are located within 200m of a main road, including Sites SA-0002-SAN, SA-0004-SAN and SA-0016-SAN which are adjacent to the M6. Therefore, the proposed development at these sites could potentially have a minor negative impact on site end users’ health, due to the vicinity of the main roads and likely higher levels of transport associated air pollution. The proposed development at the remaining sites which are over 200m from a main road could potentially have a minor positive impact on health, as site end users in these locations would be situated away from major sources of traffic related air pollution.

### **G.13.6 Access to Greenspace**

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

### **G.13.7 Net Loss of Greenspace**

G.13.7.1 Six proposed sites coincide wholly or partially with greenspaces, including Site 1170 which wholly coincides with a playing field, and Site SA-6999 which coincides with Parson’s Hill Park and the former Brandhall Golf Course which includes PRow’s for recreational use. The proposed development at these six sites would be likely to result in the net loss of greenspace, and therefore, have a minor negative impact on the provision of greenspace across the Plan area.

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

G.13.8.1 54 sites in Sandwell are located within 600m of the PRow and/or cycle network. The proposed development at these sites would be likely to provide site end users with good pedestrian and/or cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents. However, the remaining eleven sites are located wholly or partially over 600m from the PRow and cycle network; therefore, the proposed development at these sites could potentially have a minor negative impact on pedestrian and cycle access.

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

Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	AGMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PRow/ Cycle Path
<b>Sandwell Residential Sites</b>								
SA-0001-SAN	+	+	+	-	+	+	0	+
SA-0002-SAN	+	-	+	-	-	+	0	+
SA-0003-SAN	+	-	+	-	-	+	0	+
SA-0004-SAN	+	-	+	-	-	+	0	+
SA-0006-SAN	+	+	+	-	+	+	0	+
SA-0016-SAN	+	+	+	-	-	+	0	+
SA-0020-SAN	+	+	+	-	+	+	0	+
SA-0033-SAN	+	-	+	-	-	+	0	+
SA-0048-SAN	+	-	+	-	-	+	0	+
SA-6999	-	+	+	-	-	+	-	+
<b>Sandwell Employment Sites</b>								
SA-0003-SAN	+	-	+	-	-	+	0	+
SA-0025-SAN	-	+	+	-	+	+	0	+
SA-0026-SAN	+	+	+	-	+	+	0	+
SA-0027-SAN	+	+	+	-	-	+	0	+
SA-0028-SAN	+	+	+	-	-	+	0	+
SA-0030-SAN-A	+	+	+	-	+	+	0	+
SA-0030-SAN-B	+	+	+	-	+	+	0	+
SA-0042-SAN	+	+	+	-	-	+	0	+
SA-0043-SAN	+	+	+	-	+	+	0	+
SA-0044-SAN	+	+	+	-	-	+	0	+
SA-0045-SAN	+	+	+	-	+	+	0	+
223	+	+	+	-	-	+	0	-
<b>Sandwell Carried Forward Residential Sites</b>								
28	+	+	+	-	+	+	0	+
744	+	+	+	-	+	+	0	-
764	-	+	+	-	+	+	-	+
1170	+	+	+	-	-	+	-	+
1183	+	+	-	-	+	+	0	+

Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PROW/ Cycle Path
1203	+	+	+	-	-	+	0	+
1376	+	+	+	-	-	+	0	+
1449	+	+	+	-	+	+	0	+
1451	+	+	+	-	-	+	0	+
1459	+	+	+	-	+	+	0	+
1463	+	-	+	-	-	+	0	+
1546	+	+	+	-	+	+	0	-
1994	+	+	+	-	-	+	0	+
2013	+	+	+	-	-	+	0	+
2370	-	-	+	-	-	+	0	+
2371	+	+	+	-	-	+	0	+
2377	+	+	+	-	-	+	0	+
2388	+	+	+	-	-	+	0	+
2588	+	+	+	-	-	+	0	-
2590	+	+	+	-	-	+	0	-
2893	+	+	+	-	-	+	0	-
2919	+	+	+	-	-	+	0	+
2940	+	-	+	-	+	+	0	+
2946	+	+	+	-	-	+	0	+
2972	+	+	+	-	-	+	0	+
2985	+	-	+	-	+	+	-	+
2986	+	+	+	-	+	+	0	+
3009	+	+	+	-	+	+	0	-
3011	+	+	+	-	+	+	0	+
3023	+	+	+	-	+	+	0	+
3025	+	+	+	-	-	+	0	+
3041	+	+	+	-	+	+	0	+
3049	+	-	+	-	+	+	0	+
3223	+	-	+	-	-	+	0	+
6483	+	+	+	-	-	+	0	-
6919	+	+	+	-	-	+	0	-
6924	+	+	+	-	+	+	-	+
6997	+	+	+	-	+	+	0	-
6998	+	+	+	-	-	+	0	-
SA-0029-SAN	+	+	+	-	+	+	-	+
<b>Sandwell Carried Forward Employment Sites</b>								
216b	+	+	+	-	+	+	0	+
256	+	-	+	-	+	+	0	+
257a	+	+	+	-	-	+	0	+

## G.14 SA Objective 13: Economy

### G.14.1 Employment Floorspace Provision

G.14.1.1 Employment floorspace provision has been assessed with consideration of current land use and the proposed development at each site.

G.14.1.2 There are 15 sites proposed for employment use in Sandwell. 13 of these sites currently comprise areas of undeveloped or vacant land; therefore, the proposed development at these sites would be expected to result in a significant net gain in employment floorspace and have a major positive impact on providing local employment opportunities. Site 256 currently coincides with 'BHM Motorhome Hire Depot'. Site SA-0025-SAN currently coincides with several businesses including 'Aspen Concepts', 'Totally Modular' and 'Kee Safety'. At this stage, it is uncertain whether the proposed development at these two sites would result in a net change in employment floorspace.

G.14.1.3 33 sites proposed for residential use coincide with existing employment areas, and therefore, development at these sites could potentially result in a net loss of employment floorspace. The proposed development at 21 of these sites could potentially have a minor negative impact on employment floorspace provision due to the possible loss of small areas of employment land or small businesses, whereas the proposed development at 12 of these sites could potentially have a major negative impact due to the possible loss of a large area of employment land.

G.14.1.4 The remaining 17 sites proposed for residential development are located on previously undeveloped land and would not be expected to result in a net change in employment floorspace; therefore, the proposed development at these sites would be likely to have a negligible impact on the provision of employment opportunities.

### G.14.2 Pedestrian Access to Employment Opportunities

G.14.2.1 There are many employment opportunities currently within Sandwell, with 254 key employment locations identified. Most existing employment land is concentrated in the centre of the borough and close to the strategic road network. Accessibility modelling data has been provided to Lepus by the BCA, mapping key employment locations and areas within a sustainable travel time. According to the modelling data, almost the entirety of the borough is within a 30-minute walk to an employment location, however, a small area in the north east is likely to have more restricted access for pedestrians. All of the proposed residential sites in Sandwell could potentially have a minor positive impact on pedestrian access to employment due to being within this sustainable travel time to employment opportunities, with the exception of Site SA-0001-SAN. The majority of Site SA-0001-SAN is located outside of this travel time, and therefore, the proposed development at this site

could potentially have a minor negative impact on pedestrian access to employment opportunities, based on current infrastructure.

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

G.14.3.1 Accessibility modelling data indicates that the majority of the borough is located within a sustainable travel time via public transport to employment opportunities, identified as being within a 30-minute journey. All of the proposed residential sites in Sandwell would be expected to have a minor positive impact on sustainable access to employment opportunities.

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

Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
<b>Sandwell Residential Sites</b>			
SA-0001-SAN	0	-	+
SA-0002-SAN	0	+	+
SA-0003-SAN	0	+	+
SA-0004-SAN	0	+	+
SA-0006-SAN	0	+	+
SA-0016-SAN	0	+	+
SA-0020-SAN	0	+	+
SA-0033-SAN	--	+	+
SA-0048-SAN	-	+	+
SA-6999	0	+	+
<b>Sandwell Employment Sites</b>			
SA-0003-SAN	++	0	0
SA-0025-SAN	+/-	0	0
SA-0026-SAN	++	0	0
SA-0027-SAN	++	0	0
SA-0028-SAN	++	0	0
SA-0030-SAN-A	++	0	0
SA-0030-SAN-B	++	0	0
SA-0042-SAN	++	0	0
SA-0043-SAN	++	0	0
SA-0044-SAN	++	0	0
SA-0045-SAN	++	0	0
223	++	0	0
<b>Sandwell Carried Forward Residential Sites</b>			
28	-	+	+
744	0	+	+
764	0	+	+
1170	0	+	+
1183	-	+	+
1203	-	+	+

Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
1376	-	+	+
1449	-	+	+
1451	-	+	+
1459	-	+	+
1463	-	+	+
1546	-	+	+
1994	-	+	+
2013	0	+	+
2370	--	+	+
2371	--	+	+
2377	--	+	+
2388	--	+	+
2588	--	+	+
2590	--	+	+
2893	0	+	+
2919	--	+	+
2940	0	+	+
2946	-	+	+
2972	-	+	+
2985	-	+	+
2986	--	+	+
3009	--	+	+
3011	--	+	+
3023	-	+	+
3025	-	+	+
3041	-	+	+
3049	0	+	+
3223	-	+	+
6483	-	+	+
6919	-	+	+
6924	0	+	+
6997	-	+	+
6998	--	+	+
SA-0029-SAN	0	+	+
<b>Sandwell Carried Forward Employment Sites</b>			
216b	++	0	0
256	+/-	0	0
257a	++	0	0

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

### G.15.1 Pedestrian Access to Primary School

G.15.1.1 There are 98 primary schools distributed throughout Sandwell. Accessibility modelling data has been provided to Lepus by the BCA, mapping the location of primary schools and areas within a sustainable travel time to these schools. The majority of borough is located within a 15-minute walk to a primary school, however, some areas are likely to have more restricted access, such as within the Green Belt and along the M5 corridor in the east.

G.15.1.2 The majority of the proposed residential sites are situated within a 15-minute walking distance to a primary school, and therefore, the proposed development at these 48 sites could potentially have a minor positive impact on pedestrian access to primary schools. However, the majority of Sites SA-0004-SAN and SA-0016-SAN are located outside of a 15-minute walk to a primary school, and therefore, the proposed development at these two sites could potentially have a minor negative impact on access to primary schools due to the likely increased reliance on less sustainable travel methods.

### G.15.2 Pedestrian Access to Secondary School

G.15.2.1 Accessibility modelling data has been provided to Lepus by the BCA, mapping the location of secondary schools and areas within a sustainable travel time to these schools. There are 20 secondary schools within Sandwell which are fairly evenly distributed across the borough, serving communities within the existing built-up areas but providing more limited access for areas which currently contain less dense development, particularly in the Green Belt to the north east.

G.15.2.2 The majority of residential sites in Sandwell are located within a 25-minute walk to a secondary school. Therefore, the proposed development at these 46 sites would be expected to have a minor positive impact on sustainable access to education, as development at these locations would be likely to encourage pedestrian access to secondary schools. However, four residential sites (SA-0006-SAN, 2985, 3023 and 3025) are situated in the areas of the borough outside of a 25-minute walk to a secondary school, and as such, the proposed development at these sites could potentially have a minor negative impact on sustainable access to education.

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

G.15.3.1 Existing public transport access to secondary schools within Sandwell is widespread, according to accessibility modelling data, and would be likely to provide local residents with

good access to schools in the local and wider area. The data indicates only localised pockets of the borough where public transport access to secondary schools is more limited.

G.15.3.2 The majority of residential sites in Sandwell are located within a 25-minute public transport journey to a secondary school, and therefore, the proposed development at these 45 sites would be expected to have a minor positive impact on sustainable access to education, based on current infrastructure. Five of the ‘carried forward’ residential sites (28, 2940, 2986, 3011 and 3049) are located wholly or partially outside of this sustainable travel time to a secondary school, and therefore, the proposed development at these sites could potentially have a minor negative impact on new residents’ access to education, based on current infrastructure.

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

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
<b>Sandwell Residential Sites</b>			
SA-0001-SAN	+	+	+
SA-0002-SAN	+	+	+
SA-0003-SAN	+	+	+
SA-0004-SAN	-	+	+
SA-0006-SAN	+	-	+
SA-0016-SAN	-	+	+
SA-0020-SAN	+	+	+
SA-0033-SAN	+	+	+
SA-0048-SAN	+	+	+
SA-6999	+	+	+
<b>Sandwell Employment Sites</b>			
SA-0003-SAN	0	0	0
SA-0025-SAN	0	0	0
SA-0026-SAN	0	0	0
SA-0027-SAN	0	0	0
SA-0028-SAN	0	0	0
SA-0030-SAN-A	0	0	0
SA-0030-SAN-B	0	0	0
SA-0042-SAN	0	0	0
SA-0043-SAN	0	0	0
SA-0044-SAN	0	0	0
SA-0045-SAN	0	0	0
223	0	0	0
<b>Sandwell Carried Forward Residential Sites</b>			
28	+	+	-
744	+	+	+
764	+	+	+
1170	+	+	+
1183	+	+	+
1203	+	+	+



Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
1376	+	+	+
1449	+	+	+
1451	+	+	+
1459	+	+	+
1463	+	+	+
1546	+	+	+
1994	+	+	+
2013	+	+	+
2370	+	+	+
2371	+	+	+
2377	+	+	+
2388	+	+	+
2588	+	+	+
2590	+	+	+
2893	+	+	+
2919	+	+	+
2940	+	+	-
2946	+	+	+
2972	+	+	+
2985	+	-	+
2986	+	+	-
3009	+	+	+
3011	+	+	-
3023	+	-	+
3025	+	-	+
3041	+	+	+
3049	+	+	-
3223	+	+	+
6483	+	+	+
6919	+	+	+
6924	+	+	+
6997	+	+	+
6998	+	+	+
SA-0029-SAN	+	+	+
<b>Sandwell Carried Forward Employment Sites</b>			
216b	0	0	0
256	0	0	0
257a	0	0	0

# Appendix H: Walsall Reasonable Alternative Site Assessments

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# H.1 Introduction

## H.1.1 Overview

H.1.1.1 A total of 294 reasonable alternative sites have been identified within Walsall (see **Table H.1.1**). This includes 194 sites proposed for residential use (76 of which are ‘carried forward’ (CF) from existing development plans), and 100 sites proposed for employment use (47 of which are ‘carried forward’ from existing development plans).

H.1.1.2 Each of the sites appraised within this report have been assessed for likely impacts on each of the 14 SA Objectives, as outlined in the SA Framework (see **Appendix A**). Likely sustainability impacts have been set out in **Tables H.2.1 – H.14.1** within each SA Objective chapter, in accordance with the methodology set out in **Chapter 5** of the main SA Report.

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

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

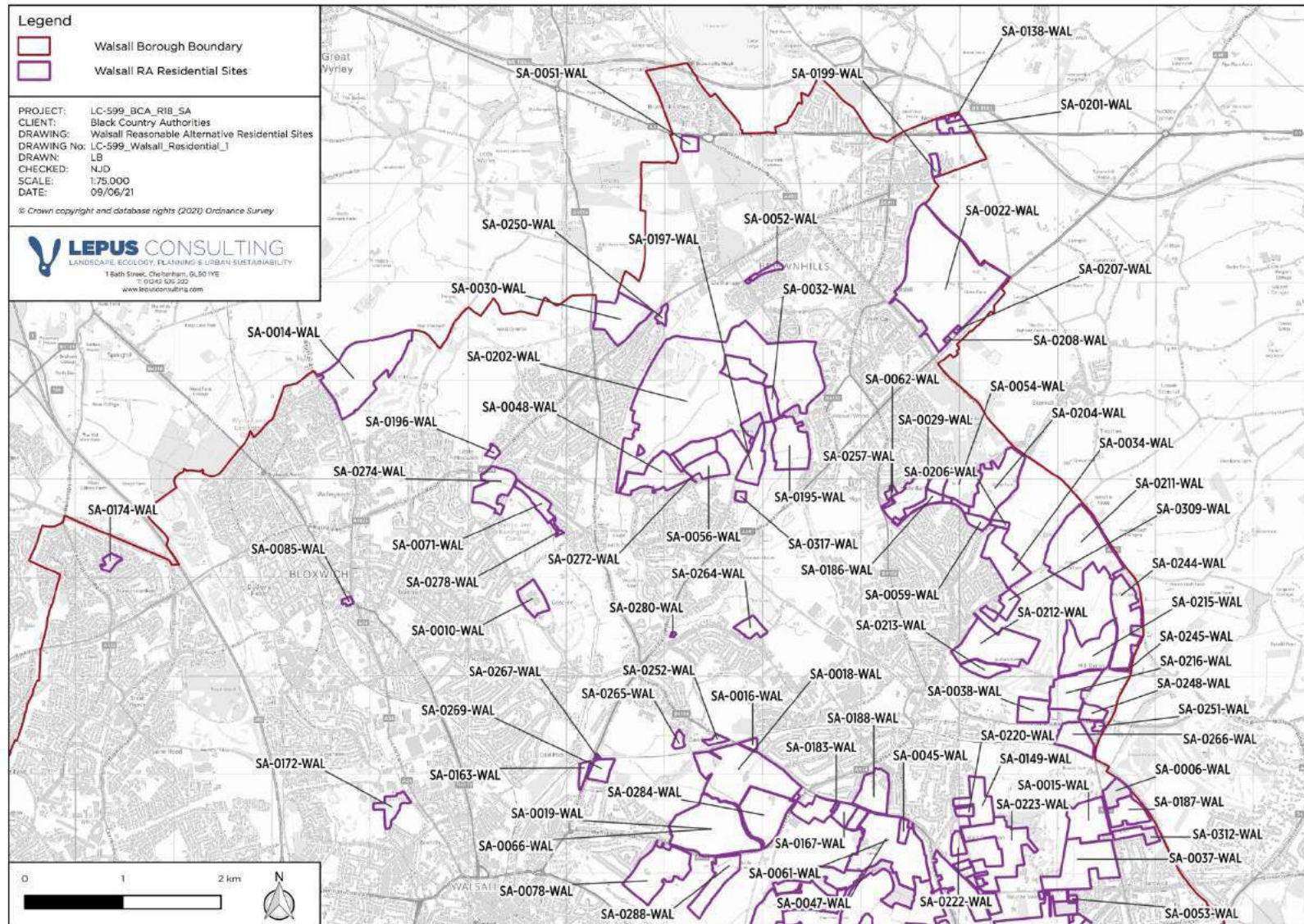


Figure H.1.1: Reasonable alternative sites proposed for residential use in Walsall (northern section)



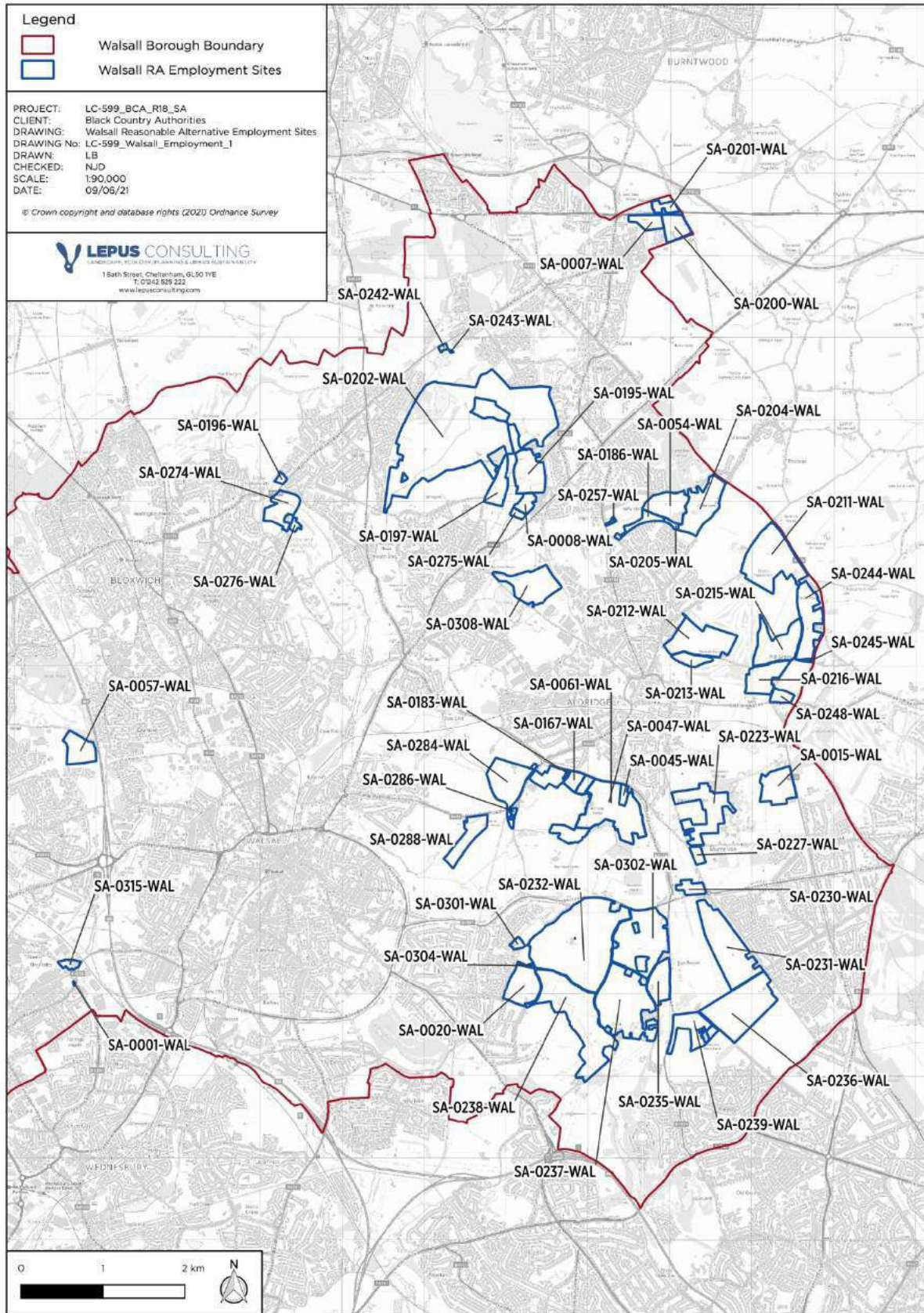


Figure H.1.3: Reasonable alternative sites proposed for employment use in Walsall



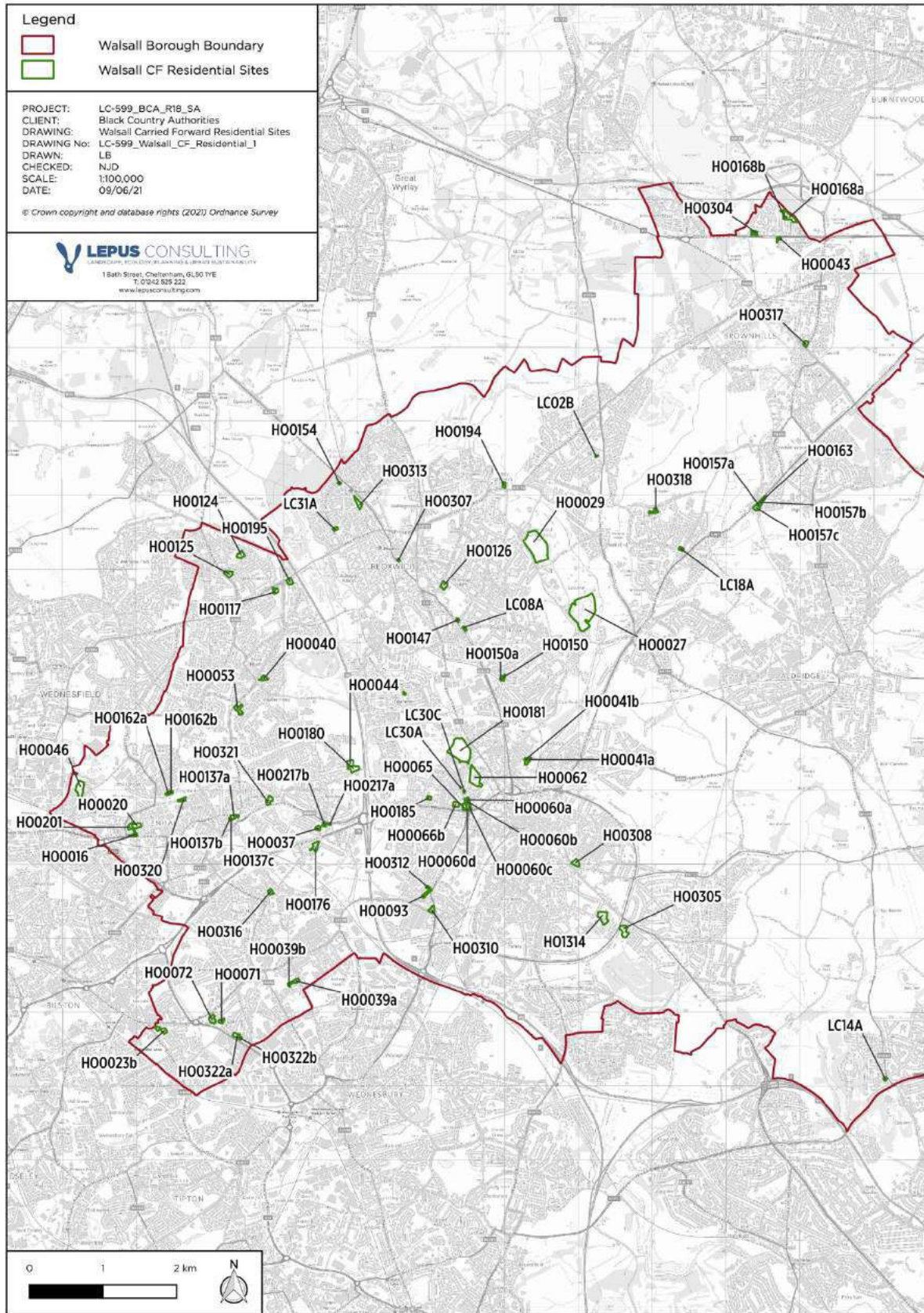


Figure H.1.4: Carried forward sites proposed for residential use in Walsall

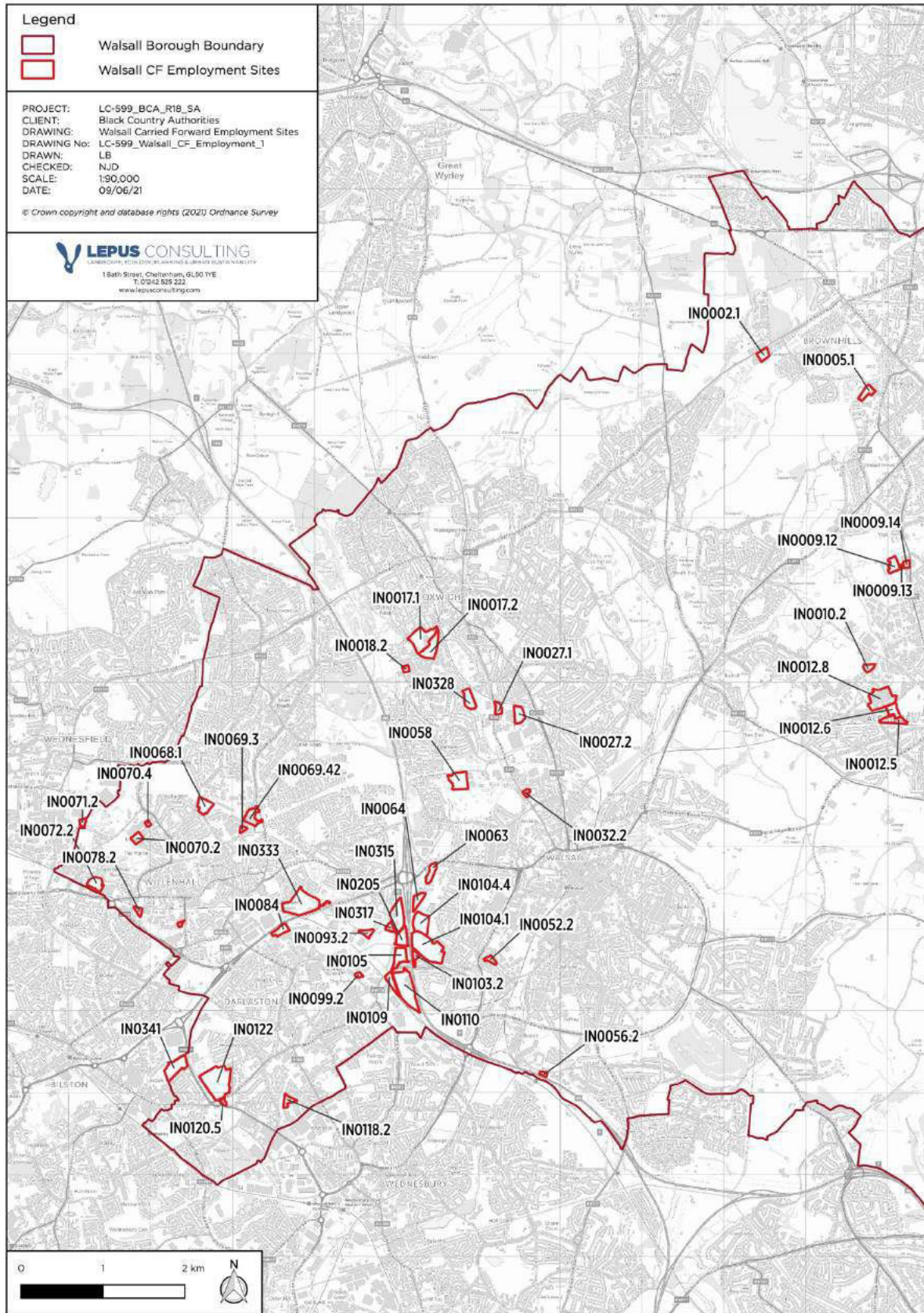


Figure H.1.5: Carried forward sites proposed for employment use in Walsall

**Table H.1.1: Reasonable alternative sites in Walsall**

Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
SA-0001-WAL	Land off Heath Road, Darlaston, Walsall	Housing	0.10	0.10	3
SA-0006-WAL	Land on the East side of Chester Road, Aldridge	Housing	5.09	2.55	67
SA-0010-WAL	Land at Former Goscote Hospital, Goscote Lane, Walsall	Housing	6.92	6.92	182
SA-0012-WAL	Land off Sutton Road, Longwood Lane, Walsall	Housing	11.90	7.74	203
SA-0014-WAL	Land at Yieldsfield Farm, Stafford Road, North of Bloxwich	Housing	39.55	37.26	978
SA-0015-WAL	Land to the West of Chester Road, Hardwick, Walsall	Housing	15.17	15.13	397
SA-0016-WAL	Middlemore Lane West, Aldridge	Housing	1.35	1.35	35
SA-0017-WAL	Columba Park, Land at Queslett Road/ Aldridge Road, Walsall	Housing	42.47	42.47	1,427
SA-0018-WAL	Land at Bosty Lane, Aldridge, Walsall.	Housing	39.94	39.81	1,045
SA-0019-WAL	Land at Stencils Farm, Aldridge Road (A454), Walsall	Housing	37.21	37.21	977
SA-0020-WAL	Land north of Park Hall Road, Walsall	Housing	15.73	15.73	413
SA-0022-WAL	Home Farm, Sandhills, Walsall Wood, Walsall, West Midlands	Housing	85.05	54.00	1,418
SA-0029-WAL	Land at King Hays Farm, Off Walsall Wood Road, Walsall	Housing	17.41	17.41	457
SA-0030-WAL	Land at Yorks Bridge, Lichfield Road, Pelsall, Walsall	Housing	17.67	13.47	455
SA-0032-WAL	Walsall Wood	Housing	3.11	3.11	82
SA-0034-WAL	Land north of Stonnall Road, Aldridge, Walsall	Housing	13.82	13.82	363
SA-0035-WAL	Skip Lane Walsall	Housing	2.43	2.43	64
SA-0036-WAL	Skip Lane Walsall	Housing	4.40	4.40	116
SA-0037-WAL	Land at Chester Road, Streetly, Walsall	Housing	25.51	25.51	670
SA-0038-WAL	Land at Little Aston Road, Aldridge.	Housing	7.51	7.51	197
SA-0045-WAL	Land adjacent to Barr Common Road, Aldridge	Housing	2.16	2.16	65
SA-0047-WAL	Land south of Bosty Lane, Aldridge, Walsall	Housing	47.07	47.06	1,235
SA-0048-WAL	Land at Vicarage Road / Coronation Road, High Heath, Walsall	Housing	22.52	22.20	583
SA-0050-WAL	Land east of Longwood Lane, Daisy Bank, Walsall	Housing	2.77	2.77	73
SA-0051-WAL	Chester Road North, Brownhills, Walsall	Housing	2.57	2.20	58
SA-0052-WAL	Land to the north of Northfields Way, Clayhanger, Brownhills, Walsall	Housing	1.87	1.37	46
SA-0053-WAL	Land to the rear of 118 Little Hardwick Road, Streetly	Housing	0.66	0.66	17
SA-0054-WAL	Castlehill Road, Walsall	Housing	14.47	14.47	380
SA-0056-WAL	Land at Mob Lane, Pelsall, Walsall	Housing	7.99	7.99	210

Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
SA-0059-WAL	Land at Greenwood Road and Lazy Hill Road, Aldridge, Walsall	Housing	2.64	2.64	69
SA-0061-WAL	Aldridge School and land to the south of Bosty Lane	Housing	52.40	52.36	1,374
SA-0062-WAL	Land south of Castle Road, Walsall Wood	Housing	1.01	1.01	34
SA-0064-WAL	Former NHS Site, land east of Nether Hall Avenue, Great Barr	Housing	1.43	0.71	19
SA-0066-WAL	Land at Stencils Farm, Aldridge Road (A454), Walsall	Housing	37.21	37.21	977
SA-0071-WAL	Land off Allen's Lane, Pelsall	Housing	4.99	3.61	95
SA-0078-WAL	Aldridge Road, Walsall	Housing	22.55	18.60	488
SA-0085-WAL	Bloxwich Hospital, Reeves Street, Walsall -Bloxwich Hospital	Housing	0.69	0.69	23
SA-0102-WAL	Sunny Bank Quarry	Housing	3.23	Unknown	Unknown
SA-0138-WAL	Hannay Hay Road, Watling Street, Brownhills	Housing	0.77	0.77	20
SA-0149-WAL	Erdington Road Farm	Housing	10.83	10.83	325
SA-0153-WAL	Former Queslett School	Housing	1.36	1.36	36
SA-0163-WAL	Cartbridge Lane South Open Space	Housing	1.81	1.81	61
SA-0167-WAL	Land East of Bosty Lane Farm, Land to the rear of 414 Bosty Lane, Aldridge	Housing	3.85	Unknown	Unknown
SA-0172-WAL	Former Reedswood Golf Course	Housing	5.60	2.80	95
SA-0174-WAL	Former Allens Centre and Hilton Road Amenity Greenspace	Housing	2.09	0.71	24
SA-0183-WAL	Bosty Lane Farm	Housing	0.38	Unknown	Unknown
SA-0186-WAL	Grazing Land at 1, 2 and 3 Greenwood Road	Housing	4.46	4.46	117
SA-0187-WAL	Land to the East of Chester Road, Hardwick, Walsall	Housing	8.69	8.69	228
SA-0188-WAL	Aldridge School, Tynings Lane, Walsall	Housing	1.93	1.93	51
SA-0195-WAL	Jockey Fields West of Hall Lane	Housing	16.99	16.99	446
SA-0196-WAL	Leyland's Farm North of Wolverhampton Road	Housing	1.24	1.24	33
SA-0197-WAL	Jockey Fields East of Green Lane	Housing	9.21	9.21	242
SA-0199-WAL	Sandfield Farm	Housing	1.64	1.64	43
SA-0201-WAL	Land adj 92, Land off Hanney Hay Road, Land to the	Housing	3.69	3.69	97
SA-0202-WAL	Grange Farm & Railswood Farm, land between Pelsall	Housing	168.95	164.20	4,310
SA-0204-WAL	Gorse Farm, Lazy Hill	Housing	21.13	21.13	555
SA-0205-WAL	Land South of Lazy Hill Wood, King's Hayes Fields	Housing	1.10	1.10	29
SA-0206-WAL	Land North of 154 Lazy Hill Road	Housing	1.12	1.12	29
SA-0207-WAL	Land to the North East of Shire Oak House, Lichfie	Housing	0.37	0.37	10
SA-0208-WAL	Land South West of Shire Oak House	Housing	0.32	0.32	8
SA-0211-WAL	Fairview Nurseries, Land between Birch Lane, Chester Road and Back Lane.	Housing	36.39	36.39	955

Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
SA-0212-WAL	Nuttalls Farm, Land Between Stonnal Road & Hobs Hole Lane	Housing	25.40	25.40	667
SA-0213-WAL	South of Hobs Hole Lane	Housing	5.17	5.17	136
SA-0215-WAL	South of Druid's Heath Farm & West of Back Lane	Housing	20.54	20.54	539
SA-0216-WAL	Land West of Gould Firm Lane	Housing	13.54	13.54	355
SA-0220-WAL	Land East of Erdington Road, adjacent Knights Hill	Housing	1.58	1.58	53
SA-0222-WAL	Land rear of houses on Knights Hill West of Erdington Road	Housing	2.83	2.83	85
SA-0223-WAL	Land South and South West of Shrubbery Cottage	Housing	24.17	24.17	634
SA-0224-WAL	Valley Nurseries Between Erdington Road & Barr Common Road	Housing	1.22	1.22	32
SA-0225-WAL	Land South of Alder Tree Grove, Between Erdington Road and Barr Common Road	Housing	0.77	0.77	20
SA-0226-WAL	Land Between Longwood Road & Erdington Road, South of Barr Common Road	Housing	15.34	15.34	403
SA-0227-WAL	Corner of Little Hardwick Road & Erdington Road	Housing	2.73	2.73	72
SA-0228-WAL	Birch Wood, Potters Wood, Land South of the Dingle	Housing	58.42	58.42	1,534
SA-0229-WAL	Land South of Streetly Cemetary and between Little Hardwick Road and Foley Road West	Housing	22.57	22.57	592
SA-0230-WAL	Land North of Beacon Hill	Housing	4.49	4.49	118
SA-0231-WAL	Land West of Aldridge Road	Housing	36.42	36.42	956
SA-0232-WAL	North of Barr Lakes Lane	Housing	83.94	83.94	2,203
SA-0233-WAL	Star Service Garage	Housing	0.27	0.27	53
SA-0235-WAL	Beacon Farm	Housing	11.57	11.57	304
SA-0236-WAL	Blue House Farm	Housing	39.19	39.19	1,029
SA-0237-WAL	Land associated with Beacon Farm and Crook Cottage	Housing	46.12	46.12	1,211
SA-0238-WAL	Pastures south of Barr Lakes Lane to Chapel Lane	Housing	51.88	51.20	1,344
SA-0239-WAL	Beacon Dairy Farm	Housing	14.20	14.20	373
SA-0240-WAL	Foxhills Farm	Housing	5.27	5.27	138
SA-0241-WAL	Old Hall Farm	Housing	16.60	16.60	436
SA-0244-WAL	Land Between Back Lane & Chester Road	Housing	19.54	19.54	513
SA-0245-WAL	Land South of Hobs Hole Lane corner of Chester Road	Housing	0.24	0.24	6
SA-0248-WAL	Land adjacent Irish Harp, North of Little Aston Road	Housing	3.71	3.71	97
SA-0250-WAL	Land Rear of 76 to 84, Fairburn Crescent	Housing	1.52	1.52	51
SA-0251-WAL	Between Little Aston Road & Chester Road	Housing	0.94	0.94	25
SA-0252-WAL	Linley Farm South of 34 Bosty Lane.	Housing	1.40	1.40	37
SA-0257-WAL	Land South of 17a The Barn, Northgate, King's Hayes Field	Housing	0.50	0.50	13

Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
SA-0264-WAL	Barns Farm	Housing	4.26	4.26	144
SA-0265-WAL	Land South of Manor Farm Buildings	Housing	1.56	1.56	41
SA-0266-WAL	Land South of Little Aston Road and East of Green	Housing	8.82	8.82	232
SA-0267-WAL	Land South of Lady Pool	Housing	0.19	0.19	5
SA-0269-WAL	Land North of Harpur Close, Rushall Hall Farm	Housing	4.42	4.42	116
SA-0272-WAL	Land North of 3 Ashton Drive	Housing	0.02	0.02	1
SA-0274-WAL	Land adjacent Goscote House Farm	Housing	12.11	11.38	341
SA-0278-WAL	Goscote Wedge	Housing	0.69	0.61	16
SA-0280-WAL	Land rear of houses on Barns Lane and Lichfield Road	Housing	0.19	0.19	6
SA-0284-WAL	Berryfields Farm	Housing	20.57	20.57	540
SA-0288-WAL	Land East of Longwood Cottage, Calderfields.	Housing	11.83	11.83	311
SA-0289-WAL	Hay Head Farm North	Housing	15.88	15.88	417
SA-0291-WAL	Brookside Farm, Longwood Lane	Housing	9.22	9.22	242
SA-0292-WAL	Land adjacent and to the East of 15 - 17 Longwood	Housing	1.60	1.60	42
SA-0294-WAL	North of Sutton Road Between Front of Three Crowns	Housing	0.85	0.85	22
SA-0295-WAL	The Three Crowns	Housing	0.70	0.70	7
SA-0296-WAL	Corner of Longwood Road and Beacon Hill	Housing	0.56	0.56	15
SA-0297-WAL	Amenity Land Between Sutton Road adjacent The Thre	Housing	0.90	0.90	24
SA-0301-WAL	Orchard Hills, Daisy Bank & other houses	Housing	1.60	1.60	42
SA-0302-WAL	Beacon Farm Land to the West	Housing	38.33	38.33	1,006
SA-0304-WAL	The Skip	Housing	0.64	0.64	17
SA-0305-WAL	Land to the East of 113 Park Hall Road	Housing	0.08	0.08	2
SA-0309-WAL	South of Stonnall Road	Housing	5.07	3.81	100
SA-0312-WAL	Pacific Nurseries	Housing	4.65	2.09	55
SA-0313-WAL	Rear of 91 Wood Lane	Housing	2.33	1.70	45
SA-0317-WAL	Land to the rear of 114-130 Green Lane	Housing	1.11	0.91	31
SA-0001-WAL	Land off Heath Road, Darlaston, Walsall	Employment	0.10	0.10	N/A
SA-0007-WAL	237 Watling Street, Brownhills, Walsall	Employment	5.92	5.92	N/A
SA-0008-WAL	Land at Highfields, Walsall Road, Walsall Wood	Employment	4.20	4.19	N/A
SA-0015-WAL	Land to the West of Chester Road, Hardwick, Walsall	Employment	15.17	15.13	N/A
SA-0020-WAL	Land north of Park Hall Road, Walsall	Employment	15.73	15.73	N/A
SA-0030-WAL	Land at Yorks Bridge, Lichfield Road, Pelsall, Walsall	Employment	17.67	13.47	N/A
SA-0045-WAL	Land adjacent to Barr Common Road, Aldridge	Employment	2.16	2.16	N/A
SA-0047-WAL	Land south of Bosty Lane, Aldridge, Walsall	Employment	47.07	47.06	N/A

Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
SA-0054-WAL	Castlehill Road, Walsall	Employment	14.47	14.47	N/A
SA-0057-WAL	Land to the South of Bentley Lane, Willenhall, Walsall	Employment	11.27	11.27	N/A
SA-0061-WAL	Aldridge School and land to the south of Bosty Lane	Employment	52.40	52.36	N/A
SA-0167-WAL	Land East of Bosty Lane Farm, Land to the rear of 414 Bosty Lane, Aldridge	Employment	3.85	Unknown	N/A
SA-0183-WAL	Bosty Lane Farm	Employment	0.38	Unknown	N/A
SA-0186-WAL	Grazing Land at 1, 2 and 3 Greenwood Road	Employment	4.46	4.46	N/A
SA-0195-WAL	Jockey Fields West of Hall Lane	Employment	16.99	16.99	N/A
SA-0196-WAL	Leyland's Farm North of Wolverhampton Road	Employment	1.24	1.24	N/A
SA-0197-WAL	Jockey Fields East of Green Lane	Employment	9.21	9.21	N/A
SA-0200-WAL	Johnsons Farm & Meadow Farm	Employment	8.41	8.41	N/A
SA-0201-WAL	Land adj 92, Land off Hanney Hay Road, Land to the	Employment	3.69	3.69	N/A
SA-0202-WAL	Grange Farm & Railswood Farm, land between Pelsall	Employment	168.95	164.20	N/A
SA-0204-WAL	Gorse Farm, Lazy Hill	Employment	21.13	21.13	N/A
SA-0205-WAL	Land South of Lazy Hill Wood, King's Hayes Fields	Employment	1.10	1.10	N/A
SA-0211-WAL	Fairview Nurseries, Land between Birch Lane, Chester Road and Back Lane.	Employment	36.39	36.39	N/A
SA-0212-WAL	Nuttalls Farm, Land Between Stonnal Road & Hobs Hole Lane	Employment	25.40	25.40	N/A
SA-0213-WAL	South of Hobs Hole Lane	Employment	5.17	5.17	N/A
SA-0215-WAL	South of Druid's Heath Farm & West of Back Lane	Employment	20.54	20.54	N/A
SA-0216-WAL	Land West of Gould Firm Lane	Employment	13.54	13.54	N/A
SA-0223-WAL	Land South and South West of Shrubbery Cottage	Employment	24.17	24.17	N/A
SA-0227-WAL	Corner of Little Hardwick Road & Erdington Road	Employment	2.73	2.73	N/A
SA-0230-WAL	Land North of Beacon Hill	Employment	4.49	4.49	N/A
SA-0231-WAL	Land West of Aldridge Road	Employment	36.42	36.42	N/A
SA-0232-WAL	North of Barr Lakes Lane	Employment	83.94	83.94	N/A
SA-0235-WAL	Beacon Farm	Employment	11.57	11.57	N/A
SA-0237-WAL	Land associated with Beacon Farm and Crook Cottage	Employment	46.12	46.12	N/A
SA-0238-WAL	Pastures south of Barr Lakes Lane to Chapel Lane	Employment	51.88	51.20	N/A
SA-0239-WAL	Beacon Dairy Farm	Employment	14.20	14.20	N/A
SA-0242-WAL	Stevies Stables, Pelsall Road	Employment	0.66	0.66	N/A
SA-0243-WAL	Land South of Stevies Stables, Pelsall Road	Employment	0.12	0.12	N/A
SA-0244-WAL	Land Between Back Lane & Chester Road	Employment	19.54	19.54	N/A
SA-0245-WAL	Land South of Hobs Hole Lane corner of Chester Road	Employment	0.24	0.24	N/A
SA-0248-WAL	Land adjacent Irish Harp, North of Little Aston Road	Employment	3.71	3.71	N/A

Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
SA-0257-WAL	Land South of 17a The Barn, Northgate, King's Hayes Field	Employment	0.50	0.50	N/A
SA-0274-WAL	Land adjacent Goscote House Farm	Employment	12.11	11.38	N/A
SA-0275-WAL	Jockey Fields Rear of Horse and Jockey	Employment	1.42	1.42	N/A
SA-0276-WAL	Field House Farm	Employment	1.41	1.41	N/A
SA-0284-WAL	Berryfields Farm	Employment	20.57	20.57	N/A
SA-0286-WAL	Land to the South East of Longwood Bridge	Employment	1.51	1.46	N/A
SA-0288-WAL	Land East of Longwood Cottage, Calderfields.	Employment	11.83	11.83	N/A
SA-0301-WAL	Orchard Hills, Daisy Bank & other houses	Employment	1.60	1.60	N/A
SA-0302-WAL	Beacon Farm Land to the West	Employment	38.33	38.33	N/A
SA-0304-WAL	The Skip	Employment	0.64	0.64	N/A
SA-0308-WAL	Sandown Quarry	Employment	20.85	17.97	N/A
SA-0315-WAL	Land at Kendricks Road, Heath Road and Station Street	Employment	2.22	2.22	N/A
HO0016	New Road (former car showroom), Willenhall	CF Housing	0.27	Unknown	9
HO0020	Field Street (Gilberts' Club), Willenhall	CF Housing	0.77	Unknown	26
HO0023b	Kendrick Place and Castle View Road, Moxley	CF Housing	0.73	Unknown	25
HO0027	Goscote Lodge Crescent (Site B), Goscote	CF Housing	11.11	Unknown	407
HO0029	Goscote Lane Copper Works, Goscote	CF Housing	8.76	Unknown	263
HO0037	Bentley Road North (corner of King Charles Avenue), Bentley	CF Housing	0.34	Unknown	19
HO0039a	Joynson Street (site of former Kings Hill JMI School), Darlaston	CF Housing	0.49	Unknown	17
HO0039b	Adjoining 15 Joynson Street, Darlaston	CF Housing	0.08	Unknown	5
HO0040	Riding Way, Short Heath	CF Housing	0.40	Unknown	14
HO0041a	Hatherton Liberal Club, North Street, Walsall	CF Housing	0.18	Unknown	6
HO0041b	Mill Street, (former scrap yard), Walsall	CF Housing	0.34	Unknown	12
HO0043	Watling Street (land north of Kings Deer Road), Brownhills	CF Housing	0.21	Unknown	15
HO0044	Poplar Avenue (east), Bentley	CF Housing	0.63	Unknown	23
HO0046	Noose Crescent (former Lakeside School), Willenhall	CF Housing	1.71	Unknown	59
HO0053	Rear of 16 High Road, Lane Head, Willenhall	CF Housing	0.84	Unknown	29
HO0060a	Hollyhedge Lane (east side) (30 to 32), Walsall	CF Housing	0.29	Unknown	33
HO0060b	Hollyhedge Lane (east side) (28), Walsall	CF Housing	0.21	Unknown	24
HO0060c	Hollyhedge Lane (east side) (former Bradford Coal Wharf), Walsall	CF Housing	0.45	Unknown	52
HO0060d	Orange Tree, 20 Wolverhampton Road, Walsall	CF Housing	0.03	Unknown	4



Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
HO0062	Former Metal Casements, Birch Street, Walsall	CF Housing	2.71	Unknown	95
HO0065	Hollyhedge Lane (west side), Walsall	CF Housing	0.39	Unknown	14
HO0066b	Walsall Iron and Steel, Wolverhampton Road, Walsall	CF Housing	0.48	Unknown	67
HO0071	Festival Avenue (end of street), Darlaston	CF Housing	0.31	Unknown	10
HO0072	Festival Avenue, Darlaston	CF Housing	0.68	Unknown	24
HO0093	Woodwards Road (former garage and vehicle storage yard), Walsall	CF Housing	0.37	Unknown	24
HO0117	New Invention Methodist Church, Lichfield Road, New Invention	CF Housing	0.42	Unknown	14
HO0124	Allen's Centre, Hilton Road, New Invention	CF Housing	0.64	Unknown	22
HO0125	Essington Lodge, Essington Road, New Invention	CF Housing	0.66	Unknown	23
HO0126	Field Road Education Development Centre	CF Housing	0.63	Unknown	25
HO0137a	60, Walsall Road, Willenhall, Walsall, West Midlands	CF Housing	0.39	Unknown	24
HO0137b	Fletchers Lane (1 and 2), Willenhall	CF Housing	0.05	Unknown	2
HO0137c	3 Fletchers Lane, Willenhall	CF Housing	0.06	Unknown	3
HO0147	ASK Motors, 664 Bloxwich Road, Walsall	CF Housing	0.15	Unknown	20
HO0150	British Lion Works, Forest Lane, Walsall	CF Housing	0.23	Unknown	16
HO0150a	British Lion Works, Forest Lane, Walsall	CF Housing	0.07	Unknown	3
HO0154	Eagle Public House, Creswell Crescent, Bloxwich	CF Housing	0.12	Unknown	17
HO0157a	Former Autocraft, Walsall Road, Walsall Wood	CF Housing	0.21	Unknown	20
HO0157b	Motor City, 117b Walsall Road, Walsall Wood	CF Housing	0.12	Unknown	4
HO0157c	Jubilee House, Walsall Road, Walsall Wood	CF Housing	0.47	Unknown	16
HO0162a	Former Works Site C/O Cemetery Road, Villiers Street, Willenhall	CF Housing	0.16	Unknown	14
HO0162b	Villiers Street (AJM Buildings), Willenhall	CF Housing	0.16	Unknown	9
HO0163	Former Select Windows, Walsall Road, Walsall Wood	CF Housing	0.30	Unknown	27
HO0168a	Howdles Lane/Castle Street, Brownhills	CF Housing	1.19	Unknown	40
HO0168b	Gladstone House, 45 Castle Street, Brownhills, WS8 7PX	CF Housing	0.18	Unknown	6
HO0176	Land Adjacent Bentley Green, Bentley Road North, Walsall	CF Housing	0.78	Unknown	144
HO0180	Land at Churchill Road and Kent Road to the Rear of 2-14 Kent Road And 201-205 Churchill Road, Bentl	CF Housing	0.92	Unknown	26
HO0181	Land at Former Caparo Works, Between the Wyrley & Essington Canal and Miner Street, Walsall	CF Housing	6.53	Unknown	252

Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
HO0185	Bentley Moor Club, Bentley Drive, Walsall, West Midlands	CF Housing	0.27	Unknown	10
HO0194	Lichfield Road, Little Bloxwich	CF Housing	0.29	Unknown	10
HO0195	Petrol Station, 274-276 Lichfield Road, Willenhall	CF Housing	0.51	Unknown	21
HO0201	Rear of Pinson Road, Willenhall	CF Housing	0.40	Unknown	15
HO0205	Corner of Edison Road and Arkwright Road, Beechdale, Walsall	CF Housing	0.10	Unknown	11
HO0217a	Former Petrol Station corner of Bentley Mill Way, Wolverhampton Road West, Walsall	CF Housing	0.10	Unknown	21
HO0217b	Former Lane Arms Public House corner of Bentley Road North, Wolverhampton Road West, Walsall	CF Housing	0.24	Unknown	12
HO0304	Between 114 and 120 and 122a and 127 Watling Street/ Roman Close Brownhills	CF Housing	0.29	Unknown	10
HO0305	Cricket Close Allotments and Tennis Courts, Walsall	CF Housing	1.22	Unknown	42
HO0307	Former Royal Navy Club, 120 Elmore Green Road, Bloxwich	CF Housing	0.10	Unknown	10
HO0308	Gordon House (TA Centre), Sutton Road, Walsall	CF Housing	0.63	Unknown	22
HO0310	Narrow Lane House and Neighbourhood Office Site, Narrow Lane, Walsall	CF Housing	0.48	Unknown	14
HO0312	Pleck Working Men's Club, Pleck Road, Walsall	CF Housing	0.24	Unknown	11
HO0313	Royal British Legion Club, Broad Lane Gardens, Bloxwich	CF Housing	0.71	Unknown	25
HO0316	Premier Aftercare, The Green, Darlaston	CF Housing	0.34	Unknown	24
HO0317	Former Warreners Arms, High Street, Brownhills	CF Housing	0.36	Unknown	58
HO0318	Springside, 2 Spring Lane, Pelsall	CF Housing	0.46	Unknown	6
HO0320	Birway Garage, Newhall Street, Willenhall	CF Housing	0.33	Unknown	28
HO0321	Willenhall Coachcraft, 348 Wolverhampton Road West, Willenhall	CF Housing	0.62	Unknown	33
HO0322a	Rowley View, Moxley (former nursery and open space)	CF Housing	0.43	Unknown	15
HO0322b	Rowley View, Moxley (Former Highgate Arms)	CF Housing	0.17	Unknown	11
HO1314	Gorway Road	CF Housing	1.65	Unknown	25
LC02B	Land Adjacent 33 High Street, Pelsall, Walsall, WS3 4LX	CF Housing	0.04	Unknown	1
LC08A	Butler's Arms Site, Bloxwich Road/ Harden Road, Leamore	CF Housing	0.18	Unknown	18
LC14A	Corner of Moreton Avenue & Beacon Road, Great Barr, Birmingham, B43 7BW	CF Housing	0.15	Unknown	14
LC18A	The Four Crosses, 1, Green Lane, Shelfield, Walsall, WS4 1RN	CF Housing	0.23	Unknown	4
LC30A	70 Hollyhedge Lane (111)	CF Housing	0.02	Unknown	12

Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
LC30C	43/44, Birchills Street, Walsall, West Midlands, WS2 8MG	CF Housing	0.05	Unknown	8
LC31A	The Leathern Bottle PH., Cresswell Crescent, Walsall, WS3 2UW	CF Housing	0.24	Unknown	9
IN0002.1	Pelsall Road/ Bullows Road, Brownhills	CF Employment	1.51	Unknown	N/A
IN0005.1	North of Maybrook/ Clayhanger Road, Brownhills	CF Employment	1.79	Unknown	N/A
IN0009.12	Former Scrapyard, North of Joberns Tip, Coppice Lane, Walsall Wood	CF Employment	1.91	Unknown	N/A
IN0009.13	Longleat Road, Walsall Wood (South of Focus Car Park)	CF Employment	0.19	Unknown	N/A
IN0009.14	Land Corner of Northgate/ Longleat Road, Aldridge	CF Employment	0.62	Unknown	N/A
IN0010.2	Adjacent Shaylor's, Anchor Industrial Park, Wharf Approach, Aldridge	CF Employment	0.95	Unknown	N/A
IN0012.5	Former Aldridge Rail Sidings, Middlemore Lane, Aldridge	CF Employment	2.16	Unknown	N/A
IN0012.6	Former Jack Allen Site, South of Middlemore Lane, Aldridge	CF Employment	1.87	Unknown	N/A
IN0012.8	McKechnie Brass, Middlemore Lane, Aldridge	CF Employment	6.34	Unknown	N/A
IN0017.1	Focus 10 (adjacent former Trident Alloys, Willenhall Lane, Bloxwich	CF Employment	1.95	Unknown	N/A
IN0017.2	Fryers Road, Bloxwich	CF Employment	4.64	Unknown	N/A
IN0018.2	Rear of Biasi House, Opposite Mary Elliot School, Leamore Lane	CF Employment	0.55	Unknown	N/A
IN0027.1	Former Calor Gas Site fronting Green Lane, Walsall	CF Employment	1.01	Unknown	N/A
IN0027.2	North of Newfield Close, Walsall	CF Employment	2.19	Unknown	N/A
IN0032.2	Former Scrap Yard, Alma Street, Walsall	CF Employment	0.51	Unknown	N/A
IN0052.2	Walsall Enterprise Park West, Regal Drive, Pleck	CF Employment	0.79	Unknown	N/A
IN0056.2	Adj to Middletons, Bescot Crescent	CF Employment	0.43	Unknown	N/A
IN0058	Reedswood Way	CF Employment	4.02	Unknown	N/A
IN0063	Tempus 10 North (Land East of KFC, Tempus Drive)	CF Employment	1.76	Unknown	N/A
IN0064	Tempus 10 South (Land South of Village Hotel, Tempus Drive)	CF Employment	1.64	Unknown	N/A
IN0068.1	Land between St Annes Road, Monmer Lane and Sharesacre Street, Willenhall	CF Employment	2.57	Unknown	N/A
IN0069.3	Adjacent Rainbow Business Park, Stringes Lane, Willenhall	CF Employment	0.45	Unknown	N/A
IN0069.42	Former Ductile, Charles Street, Willenhall	CF Employment	2.59	Unknown	N/A
IN0070.2	Aspray (Former George Carter Pressings), Park Road, Willenhall	CF Employment	1.24	Unknown	N/A
IN0070.4	Land rear of Guardian Lock and 47 Wednesfield Road, Willenhall	CF Employment	0.39	Unknown	N/A
IN0071.2	North of Watery Lane, Willenhall	CF Employment	0.63	Unknown	N/A

Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
IN0072.2	Rear of Assa Abloy, School Street, Willenhall	CF Employment	2.24	Unknown	N/A
IN0078.12	Rear of 18 Rose Hill, Willenhall	CF Employment	0.3	Unknown	N/A
IN0078.2	North of Westacre, Willenhall	CF Employment	0.64	Unknown	N/A
IN0084	Central Point, Willenhall Road, Darlaston	CF Employment	1.67	Unknown	N/A
IN0093.2	Access 10 Business Park, Land adjacent Unit 401, Bentley Road South	CF Employment	1.03	Unknown	N/A
IN0099.2	Heath Road / Kendricks Road, Darlaston	CF Employment	0.41	Unknown	N/A
IN0103.2	Former IMI South of Canal, Darlaston Road, Pleck (Phoenix 10 Site A - Part)	CF Employment	0.84	Unknown	N/A
IN0104.1	Former IMI Works, Pleck (Phoenix 10 Site A - part)	CF Employment	9.45	Unknown	N/A
IN0104.4	North of IMI, Pleck (Phoenix 10 Site B)	CF Employment	4.09	Unknown	N/A
IN0105	Rear of Globe Pub, Darlaston Road, Walsall	CF Employment	2.89	Unknown	N/A
IN0109	Box Pool Site, Darlaston Road, Walsall	CF Employment	1.67	Unknown	N/A
IN0110	James Bridge Gasholders Site, Darlaston Road, Walsall	CF Employment	8.22	Unknown	N/A
IN0118.2	Rear of Woods Bank Trading Estate, Woden Road West, Darlaston	CF Employment	1.20	Unknown	N/A
IN0120.5	Moxley Junction, Moxley	CF Employment	0.48	Unknown	N/A
IN0122	Former Moxley Tip, Moxley Road	CF Employment	10.38	Unknown	N/A
IN0205	Bentley Mill Way East (Phoenix 10 Site C)	CF Employment	2.40	Unknown	N/A
IN0315	Casino and Cinema, Bentley Mill Way	CF Employment	4.58	Unknown	N/A
IN0317	Millers Close, Bentley Mill Way	CF Employment	0.82	Unknown	N/A
IN0328	Leamore Lane (south side - former Dealeys Castings)	CF Employment	2.54	Unknown	N/A
IN0333	Willenhall Sewage Works	CF Employment	8.90	Unknown	N/A
IN0341	Hughes Road, Moxley	CF Employment	4.37	Unknown	N/A

## H.2 SA Objective 1: Cultural Heritage

### H.2.1 Grade I Listed Buildings

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

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

H.2.2.1 There are five Grade II\* Listed Buildings within Walsall, mostly concentrated in Walsall town centre. Five sites have been identified as having potential to result in adverse impacts, primarily due to their close proximity to Grade II\* Listed Buildings. Housing and employment site SA-0212-WAL is located approximately 400m from 'Church of St Mary the Virgin' and when developed may be visible over the trees and development currently in place. Sites SA-0019-WAL and SA-0066-WAL are located approximately 640m from 'Gatehouse and Curtain Walls at Rushall Hall', and due to the large nature of these sites, they may be visible from the Listed Building and affect its setting. Site SA-0269-WAL is also located approximately 140m from 'Gatehouse and Curtain Walls at Rushall Hall'. The proposed development at these five sites could potentially have a minor negative impact on the setting of these Listed Buildings. The remaining sites would not be expected to have a significant impact on the setting of any Grade II\* Listed Building and have consequently been assessed as negligible.

### H.2.3 Grade II Listed Buildings

H.2.3.1 There are many Grade II Listed Buildings throughout the borough, generally clustered within the built-up areas and particularly within Walsall and Willenhall town centres. Four sites coincide with Grade II Listed Buildings: housing and employment site SA-0014-WAL coincides with 'Yieldfields Hall Farmhouse'; Site SA-0018-WAL coincides with 'Wyrley and Essington Canal Daw End Branch Riddion Bridge'; and Site SA-0183-WAL coincides with 'Bosty Lane Farmhouse and Farm Building adjoining to east' and 'Barn south west of Bosty Lane Farmhouse'. The proposed development at these sites could therefore potentially have direct adverse effects on these Listed Buildings, resulting in a major negative impact. Additionally, the proposed development at 55 other sites could potentially have a minor negative impact on the setting of various Grade II Listed Buildings, including housing and employment site SA-0237-WAL which is adjacent to 'The Pinfold' and housing site SA-0241-WAL which is adjacent to 'Old Hall Farmhouse' and 'Barn approximately 20m north of Old Hall Farmhouse'.

## H.2.4 Conservation Area

H.2.4.1 Walsall contains 18 Conservation Areas (CA), the majority of which cover sections of the urban area and historic open spaces including the large ‘Great Barr’ CA in the south east of the borough. The proposed development at the majority of sites in Walsall would be unlikely to significantly impact any of these CAs, primarily due to the sites being separated from nearby CAs by existing built form. However, the proposed development at 71 sites in Walsall could potentially have a minor negative impact on the setting of these CAs, including 31 sites which wholly or partially coincide with the CAs. This includes several of the largest sites which are located wholly within ‘Great Barr’ CA, such as SA-0232-WAL, SA-0238-WAL and SA-0302-WAL.

## H.2.5 Scheduled Monument

H.2.5.1 There are five Scheduled Monuments (SMs) within Walsall, generally covering small historically important areas or features. 17 sites within Walsall are located in close proximity to SMs and their development could potentially have a minor negative impact on these SMs by altering their settings, including housing and employment site SA-0232-WAL which is adjacent to ‘Moated Site – 15m south of Moat Farm’ SM. The remaining sites are separated from nearby SMs by existing built form, and therefore, would be likely to result in a negligible impact on the setting of SMs.

## H.2.6 Registered Park and Garden

H.2.6.1 Three Registered Parks and Gardens (RPGs) can be found within Walsall: ‘Walsall Arboretum’, ‘Walsall Memorial Garden’, ‘Great Barr Hall’, with ‘Sutton Park’ located adjacent to the borough to the south east. The proposed development at 13 sites within Walsall could potentially have a minor negative impact on the settings of these RPGs due to their close proximity, including Site SA-0241-WAL which is adjacent to ‘Great Barr Hall’ RPG. The remaining sites are deemed unlikely to have a significant impact on the setting of any RPG and have consequently been assessed as negligible.

## H.2.7 Archaeological Priority Area

H.2.7.1 Archaeological Priority Areas (APAs) have been identified throughout Walsall’s urban and undeveloped areas. A total of 36 sites within Walsall wholly or partially coincide with APAs, and a further 16 sites are located adjacent to APAs. This includes Site SA-0015-WAL which wholly coincides with ‘Bourne Pool Area’ APA, and Site SA-0051-WAL which coincides with ‘Watling Street’ APA. The proposed development at these 52 sites could potentially have a minor negative impact on the settings of the APAs. The remaining sites are not located in close proximity to APAs, and therefore, would be expected to have a negligible impact on the setting of APAs.

## H.2.8 Historic Landscape Characterisation

H.2.8.1 The Black Country Historic Landscape Characterisation (HLC) Study<sup>1</sup> has identified a range of Historic Environment Area Designations within the Black Country, covering Walsall’s parkland and Green Belt as well as a number of features within the urban areas, including along the canal network.

H.2.8.2 The proposed development at 51 sites within Walsall wholly or partially coincide with an area of High Historic Landscape Value (HHLV) and/or an area of High Historic Townscape Value (HHTV). Furthermore, a small proportion of Site SA-0172-WAL coincides with ‘Reedwood Park’ Designed Landscape of High Historic Value. Therefore, the proposed development at these 52 sites could potentially result in a minor negative impact on the surrounding historic environment. The remaining sites do not coincide with any identified areas of high historic value, and therefore, would be expected to have a negligible impact on the historic environment.

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

Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
<b>Walsall Residential Sites</b>								
SA-0001-WAL	0	0	0	0	0	0	0	0
SA-0006-WAL	0	0	0	0	0	0	0	0
SA-0010-WAL	0	0	0	0	0	0	0	0
SA-0012-WAL	0	0	0	0	0	0	-	-
SA-0014-WAL	0	0	--	0	0	0	0	0
SA-0015-WAL	0	0	0	0	0	0	-	-
SA-0016-WAL	0	0	0	0	0	0	0	0
SA-0017-WAL	0	0	-	-	0	0	0	0
SA-0018-WAL	0	0	--	0	0	0	-	-
SA-0019-WAL	0	-	-	-	-	0	0	0
SA-0020-WAL	0	0	0	-	0	0	0	0
SA-0022-WAL	0	0	-	0	0	0	0	0
SA-0029-WAL	0	0	0	0	-	0	-	-
SA-0030-WAL	0	0	-	0	0	0	0	0
SA-0032-WAL	0	0	0	0	0	0	0	0
SA-0034-WAL	0	0	0	0	0	0	0	0
SA-0035-WAL	0	0	0	-	0	0	0	0
SA-0036-WAL	0	0	0	-	0	0	0	0

<sup>1</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-1r\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-1r_redacted.pdf) [Date Accessed: 20/04/21]

Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
SA-0037-WAL	0	0	0	0	0	0	-	0
SA-0038-WAL	0	0	0	-	0	0	0	0
SA-0045-WAL	0	0	0	0	0	0	0	0
SA-0047-WAL	0	0	-	0	0	0	-	-
SA-0048-WAL	0	0	0	-	0	0	-	0
SA-0050-WAL	0	0	0	0	0	0	0	0
SA-0051-WAL	0	0	0	0	0	0	-	-
SA-0052-WAL	0	0	-	0	0	0	0	0
SA-0053-WAL	0	0	0	0	0	0	0	0
SA-0054-WAL	0	0	0	0	-	0	0	-
SA-0056-WAL	0	0	0	0	0	0	0	0
SA-0059-WAL	0	0	0	0	0	0	0	-
SA-0061-WAL	0	0	-	0	0	0	-	-
SA-0062-WAL	0	0	0	0	0	0	0	-
SA-0064-WAL	0	0	0	-	0	-	0	0
SA-0066-WAL	0	-	-	-	-	0	0	0
SA-0071-WAL	0	0	0	-	0	0	0	0
SA-0078-WAL	0	0	0	-	0	-	0	0
SA-0085-WAL	0	0	0	-	0	0	-	0
SA-0102-WAL	0	0	0	0	0	0	0	0
SA-0138-WAL	0	0	0	0	0	0	-	0
SA-0149-WAL	0	0	0	0	0	0	0	-
SA-0153-WAL	0	0	0	-	0	-	0	0
SA-0163-WAL	0	0	0	0	0	0	0	0
SA-0167-WAL	0	0	-	0	0	0	0	-
SA-0172-WAL	0	0	-	-	0	0	0	-
SA-0174-WAL	0	0	0	0	0	0	0	0
SA-0183-WAL	0	0	-	0	0	0	0	-
SA-0186-WAL	0	0	0	0	-	0	-	-
SA-0187-WAL	0	0	0	0	0	0	0	0
SA-0188-WAL	0	0	-	0	0	0	0	0
SA-0195-WAL	0	0	0	0	0	0	0	0
SA-0196-WAL	0	0	0	0	0	0	0	0
SA-0197-WAL	0	0	0	0	0	0	0	0
SA-0199-WAL	0	0	0	0	0	0	-	0
SA-0201-WAL	0	0	0	0	0	0	-	0
SA-0202-WAL	0	0	-	-	0	0	-	0
SA-0204-WAL	0	0	-	0	-	0	0	-
SA-0205-WAL	0	0	0	0	-	0	0	-
SA-0206-WAL	0	0	0	0	0	0	0	0
SA-0207-WAL	0	0	0	0	0	0	0	0



Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
SA-0208-WAL	0	0	0	0	0	0	0	0
SA-0211-WAL	0	0	-	0	0	0	0	0
SA-0212-WAL	0	-	-	-	0	0	0	0
SA-0213-WAL	0	0	-	-	0	0	-	0
SA-0215-WAL	0	0	0	-	0	0	0	0
SA-0216-WAL	0	0	0	-	0	0	0	0
SA-0220-WAL	0	0	0	0	0	0	0	-
SA-0222-WAL	0	0	0	0	0	0	0	0
SA-0223-WAL	0	0	0	0	0	0	-	-
SA-0224-WAL	0	0	0	0	0	0	0	0
SA-0225-WAL	0	0	0	0	0	0	0	0
SA-0226-WAL	0	0	0	-	0	0	0	0
SA-0227-WAL	0	0	0	0	0	0	0	0
SA-0228-WAL	0	0	0	-	-	0	0	-
SA-0229-WAL	0	0	0	-	0	0	0	0
SA-0230-WAL	0	0	0	-	0	0	0	0
SA-0231-WAL	0	0	0	-	0	0	0	0
SA-0232-WAL	0	0	0	-	-	-	-	-
SA-0233-WAL	0	0	-	-	0	0	0	0
SA-0235-WAL	0	0	0	-	0	0	0	-
SA-0236-WAL	0	0	0	-	0	0	0	0
SA-0237-WAL	0	0	-	-	0	-	0	0
SA-0238-WAL	0	0	-	-	0	-	-	-
SA-0239-WAL	0	0	0	-	0	0	0	0
SA-0240-WAL	0	0	-	-	0	-	0	0
SA-0241-WAL	0	0	-	-	0	-	0	-
SA-0244-WAL	0	0	0	0	0	0	0	0
SA-0245-WAL	0	0	0	0	0	0	0	0
SA-0248-WAL	0	0	-	0	0	0	0	0
SA-0250-WAL	0	0	0	0	0	0	0	0
SA-0251-WAL	0	0	-	0	0	0	0	0
SA-0252-WAL	0	0	0	0	0	0	0	-
SA-0257-WAL	0	0	0	0	0	0	-	-
SA-0264-WAL	0	0	0	0	0	0	0	0
SA-0265-WAL	0	0	-	0	0	0	0	0
SA-0266-WAL	0	0	0	-	0	0	0	0
SA-0267-WAL	0	0	0	0	0	0	-	0
SA-0269-WAL	0	-	-	-	-	0	-	0
SA-0272-WAL	0	0	0	0	0	0	0	0
SA-0274-WAL	0	0	0	-	0	0	0	0
SA-0278-WAL	0	0	0	0	0	0	0	0

Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
SA-0280-WAL	0	0	0	0	0	0	0	0
SA-0284-WAL	0	0	-	0	0	0	-	0
SA-0288-WAL	0	0	0	0	0	0	-	0
SA-0289-WAL	0	0	0	0	0	0	0	0
SA-0291-WAL	0	0	0	0	0	0	0	-
SA-0292-WAL	0	0	0	0	0	0	0	0
SA-0294-WAL	0	0	0	-	0	0	0	-
SA-0295-WAL	0	0	0	-	0	0	0	0
SA-0296-WAL	0	0	0	-	0	0	0	0
SA-0297-WAL	0	0	0	-	0	0	0	0
SA-0301-WAL	0	0	0	-	0	0	0	0
SA-0302-WAL	0	0	0	-	-	-	0	-
SA-0304-WAL	0	0	0	-	0	0	0	0
SA-0305-WAL	0	0	0	-	0	0	0	0
SA-0309-WAL	0	0	0	0	0	0	0	0
SA-0312-WAL	0	0	0	0	0	0	0	0
SA-0313-WAL	0	0	0	0	0	0	0	0
SA-0317-WAL	0	0	0	0	0	0	0	0
<b>Walsall Employment Sites</b>								
SA-0001-WAL	0	0	0	0	0	0	0	0
SA-0007-WAL	0	0	0	0	0	0	-	0
SA-0008-WAL	0	0	0	0	0	0	0	0
SA-0015-WAL	0	0	0	0	0	0	-	-
SA-0020-WAL	0	0	0	-	0	0	0	0
SA-0030-WAL	0	0	-	0	0	0	0	0
SA-0045-WAL	0	0	0	0	0	0	0	0
SA-0047-WAL	0	0	-	0	0	0	-	-
SA-0054-WAL	0	0	0	0	-	0	0	-
SA-0057-WAL	0	0	0	0	0	0	0	0
SA-0061-WAL	0	0	-	0	0	0	-	-
SA-0167-WAL	0	0	-	0	0	0	0	-
SA-0183-WAL	0	0	--	0	0	0	0	-
SA-0186-WAL	0	0	0	0	-	0	-	-
SA-0195-WAL	0	0	0	0	0	0	0	0
SA-0196-WAL	0	0	0	0	0	0	0	0
SA-0197-WAL	0	0	0	0	0	0	0	0
SA-0200-WAL	0	0	0	0	0	0	-	0
SA-0201-WAL	0	0	0	0	0	0	-	0
SA-0202-WAL	0	0	-	-	0	0	-	0
SA-0204-WAL	0	0	-	0	-	0	0	-
SA-0205-WAL	0	0	0	0	-	0	0	-

Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
SA-0211-WAL	0	0	-	0	0	0	0	0
SA-0212-WAL	0	-	-	-	0	0	0	0
SA-0213-WAL	0	0	-	-	0	0	-	0
SA-0215-WAL	0	0	0	-	0	0	0	0
SA-0216-WAL	0	0	0	-	0	0	0	0
SA-0223-WAL	0	0	0	0	0	0	-	-
SA-0227-WAL	0	0	0	0	0	0	0	0
SA-0230-WAL	0	0	0	-	0	0	0	0
SA-0231-WAL	0	0	0	-	0	0	0	0
SA-0232-WAL	0	0	0	-	-	-	-	-
SA-0235-WAL	0	0	0	-	0	0	0	-
SA-0237-WAL	0	0	-	-	0	-	0	0
SA-0238-WAL	0	0	-	-	0	-	-	-
SA-0239-WAL	0	0	0	-	0	0	0	0
SA-0242-WAL	0	0	0	0	0	0	0	0
SA-0243-WAL	0	0	0	0	0	0	0	0
SA-0244-WAL	0	0	0	0	0	0	0	0
SA-0245-WAL	0	0	0	0	0	0	0	0
SA-0248-WAL	0	0	-	0	0	0	0	0
SA-0257-WAL	0	0	0	0	0	0	-	-
SA-0274-WAL	0	0	0	-	0	0	0	0
SA-0275-WAL	0	0	0	0	0	0	0	0
SA-0276-WAL	0	0	0	0	0	0	0	0
SA-0284-WAL	0	0	-	0	0	0	-	0
SA-0286-WAL	0	0	0	0	0	0	0	-
SA-0288-WAL	0	0	0	0	0	0	-	0
SA-0301-WAL	0	0	0	-	0	0	0	0
SA-0302-WAL	0	0	0	-	-	-	0	-
SA-0304-WAL	0	0	0	-	0	0	0	0
SA-0308-WAL	0	0	0	0	0	0	0	0
SA-0315-WAL	0	0	0	0	0	0	0	0
<b>Walsall Carried Forward Residential Sites</b>								
HO0016	0	0	0	0	0	0	-	0
HO0020	0	0	0	0	0	0	-	0
HO0023b	0	0	0	0	0	0	0	0
HO0027	0	0	0	0	0	0	-	0
HO0029	0	0	0	0	0	0	0	0
HO0037	0	0	-	0	0	0	0	0
HO0039a	0	0	0	0	0	0	0	0
HO0039b	0	0	0	0	0	0	0	0
HO0040	0	0	0	0	0	0	0	0

Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
HO0041a	0	0	0	0	0	0	0	0
HO0041b	0	0	0	0	0	0	0	0
HO0043	0	0	0	0	0	0	-	0
HO0044	0	0	0	0	0	0	0	0
HO0046	0	0	0	0	0	0	0	0
HO0053	0	0	0	0	0	0	0	0
HO0060a	0	0	-	-	0	0	0	0
HO0060b	0	0	-	-	0	0	0	0
HO0060c	0	0	-	-	0	0	0	0
HO0060d	0	0	-	-	0	0	0	0
HO0062	0	0	-	-	0	0	0	0
HO0065	0	0	-	-	0	0	0	0
HO0066b	0	0	-	0	0	0	0	0
HO0071	0	0	0	0	0	0	0	0
HO0072	0	0	0	0	0	0	-	0
HO0093	0	0	0	0	0	0	0	0
HO0117	0	0	0	0	0	0	0	0
HO0124	0	0	0	0	0	0	0	0
HO0125	0	0	0	0	0	0	0	0
HO0126	0	0	0	0	0	0	0	0
HO0137a	0	0	0	0	0	0	0	0
HO0137b	0	0	0	0	0	0	0	0
HO0137c	0	0	0	0	0	0	0	0
HO0147	0	0	0	0	0	0	0	0
HO0150	0	0	0	0	0	0	0	0
HO0150a	0	0	0	0	0	0	0	0
HO0154	0	0	0	0	0	0	0	0
HO0157a	0	0	0	0	0	0	0	0
HO0157b	0	0	0	0	0	0	0	0
HO0157c	0	0	0	0	0	0	0	0
HO0162a	0	0	0	0	0	0	0	0
HO0162b	0	0	0	0	0	0	0	0
HO0163	0	0	0	0	0	0	0	0
HO0168a	0	0	0	0	0	0	0	0
HO0168b	0	0	0	0	0	0	0	0
HO0176	0	0	0	0	0	0	0	0
HO0180	0	0	0	0	0	0	0	0
HO0181	0	0	-	-	0	0	0	-
HO0185	0	0	0	0	0	0	0	0
HO0194	0	0	0	0	0	0	0	0
HO0195	0	0	0	0	0	0	0	0

Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
HO0201	0	0	0	0	0	0	0	0
HO0205	0	0	0	0	0	0	0	0
HO0217a	0	0	-	0	0	0	0	0
HO0217b	0	0	-	0	0	0	0	0
HO0304	0	0	0	0	0	0	-	0
HO0305	0	0	0	0	0	0	0	0
HO0307	0	0	0	-	0	0	-	0
HO0308	0	0	0	0	0	0	0	0
HO0310	0	0	0	0	0	0	0	0
HO0312	0	0	0	0	0	0	0	0
HO0313	0	0	0	0	0	0	0	0
HO0316	0	0	0	0	0	0	-	0
HO0317	0	0	0	0	0	0	0	0
HO0318	0	0	0	0	0	0	0	0
HO0320	0	0	0	0	0	0	-	-
HO0321	0	0	0	0	0	0	0	0
HO0322a	0	0	0	0	0	0	0	0
HO0322b	0	0	0	0	0	0	0	0
HO1314	0	0	0	0	0	0	0	0
LC02B	0	0	0	-	0	0	0	0
LC08A	0	0	0	0	0	0	0	0
LC14A	0	0	0	0	0	0	0	0
LC18A	0	0	0	0	0	0	0	0
LC30A	0	0	0	0	0	0	0	-
LC30C	0	0	0	0	0	0	0	-
LC31A	0	0	0	0	0	0	0	0
<b>Walsall Carried Forward Employment Sites</b>								
IN0002.1	0	0	0	0	0	0	0	0
IN0005.1	0	0	0	0	0	0	0	-
IN0009.12	0	0	0	0	0	0	0	0
IN0009.13	0	0	0	0	0	0	0	0
IN0009.14	0	0	0	0	0	0	0	0
IN0010.2	0	0	0	0	0	0	0	0
IN0012.5	0	0	0	0	0	0	0	0
IN0012.6	0	0	0	0	0	0	0	0
IN0012.8	0	0	0	0	0	0	0	0
IN0017.1	0	0	0	0	0	0	0	0
IN0017.2	0	0	0	0	0	0	0	0
IN0018.2	0	0	0	0	0	0	0	0
IN0027.1	0	0	0	0	0	0	0	0
IN0027.2	0	0	0	0	0	0	0	0

Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
IN0032.2	0	0	-	-	0	0	0	0
IN0052.2	0	0	0	0	0	0	0	0
IN0056.2	0	0	0	0	0	0	0	0
IN0058	0	0	0	0	0	0	0	0
IN0063	0	0	0	0	0	0	0	0
IN0064	0	0	0	0	0	0	0	0
IN0068.1	0	0	0	0	0	0	0	0
IN0069.3	0	0	0	0	0	0	0	0
IN0069.42	0	0	0	0	0	0	0	0
IN0070.2	0	0	0	0	0	0	0	0
IN0070.4	0	0	0	0	0	0	0	0
IN0071.2	0	0	0	0	0	0	0	-
IN0072.2	0	0	0	0	0	0	0	0
IN0078.12	0	0	0	0	0	0	0	0
IN0078.2	0	0	0	0	0	0	0	0
IN0084	0	0	0	0	0	0	0	0
IN0093.2	0	0	0	0	0	0	-	0
IN0099.2	0	0	0	0	0	0	0	0
IN0103.2	0	0	0	0	0	0	0	0
IN0104.1	0	0	0	0	0	0	0	0
IN0104.4	0	0	0	0	0	0	-	0
IN0105	0	0	-	0	0	0	0	0
IN0109	0	0	-	0	0	0	0	0
IN0110	0	0	-	0	0	0	0	0
IN0118.2	0	0	0	0	0	0	0	0
IN0120.5	0	0	0	0	0	0	-	0
IN0122	0	0	0	0	0	0	0	0
IN0205	0	0	-	0	0	0	0	0
IN0315	0	0	0	0	0	0	0	-
IN0317	0	0	0	0	0	0	-	0
IN0328	0	0	0	0	0	0	0	0
IN0333	0	0	0	0	0	0	0	0
IN0341	0	0	0	0	0	0	0	0

## H.3 SA Objective 2: Landscape

### H.3.1 Cannock Chase AONB

H.3.1.1 Cannock Chase AONB is located at its closest point approximately 4km to the north of Walsall. The proposed development at sites in Walsall would be unlikely to significantly impact the AONB, in terms of altering views of/from the AONB or altering the setting of the AONB. Therefore, a negligible impact has been identified across all sites.

### H.3.2 Landscape Sensitivity

H.3.2.1 The Black Country Landscape Sensitivity Assessment<sup>2</sup> identified the extent to which the character and quality of Black Country Green Belt land is susceptible to change as a result of future development. Of the four BCA, Walsall has the largest proportion of Green Belt, which is generally in the north and east of the borough, where the majority of sites are located. The proposed development at 124 sites within Walsall are located within areas of 'Moderate-High' and/or 'High' landscape sensitivity and could potentially have major negative impacts on the local landscape if developed. The proposed development at 40 sites in Walsall are located within areas of 'Low-Moderate' and/or 'Moderate' landscape sensitivity, and therefore, development at these sites could potentially have minor negative impacts on the local landscape. However, a total of 130 sites (including all of the 'carried forward' sites) are located outside of the Green Belt, and do not coincide with any identified area of landscape sensitivity; therefore, the proposed development at these sites would be likely to have a negligible impact on the local landscape.

### H.3.3 Alter Views for PRow Network Users

H.3.3.1 Many of the proposed sites in Walsall, including the majority of the largest sites, are located within rural areas in close proximity to Walsall's PRow network, and the development of such sites could potentially alter the views of countryside or open space currently experienced by the users of these footpaths. Therefore, these 95 sites have been identified as having a minor negative impact on the landscape. The remaining sites, which contain existing development or are separated from nearby PRow's by existing built form, would be unlikely to significantly alter views and are assessed as negligible.

### H.3.4 Alter Views for Local Residents

H.3.4.1 The development proposed at the majority of sites in Walsall (216 in total) could potentially alter views experienced by existing local residents, as these sites are located in close

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<sup>2</sup> LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: [https://blackcountryplan.dudlev.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr\\_redacted.pdf](https://blackcountryplan.dudlev.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf) [Date Accessed: 20/04/21]

proximity to existing residential zones and/or comprise large areas of undeveloped land. Therefore, a minor negative impact on the local landscape could be expected at these 215 sites. The remaining sites, including approximately half of the ‘carried forward’ sites, comprise previously developed land and/or are not located in close proximity to a residential area; therefore, the proposed development at these 78 sites would be unlikely to result in a significant impact on views.

### H.3.5 Green Belt Harm

H.3.5.1 The Green Belt Study<sup>3</sup> classified parcels of Green Belt land into different ‘harm’ ratings, based on the assessment of potential harm caused by removing each parcel from the Green Belt based on a range of criteria. Due to the large scale and rural nature of many of the proposed sites in Walsall, Green Belt harm can be expected upon their development.

H.3.5.2 154 of the proposed sites in Walsall are located within land parcels identified as having ‘Moderate-High’, ‘High’ and/or ‘Very High’ Green Belt Harm if developed, thus potentially resulting in a major negative impact on the landscape objective. Sites SA-0057-WAL and SA-0296-WAL are located within land classed as ‘Moderate’ Green Belt Harm, and therefore, the proposed development at these two sites could potentially lead to a minor negative impact on the landscape objective. However, 138 sites, including all ‘carried forward’ sites, are not located within any identified area with potential for Green Belt Harm; therefore, the proposed development at these sites would be likely to have a negligible impact on the landscape objective.

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

Site Ref	Cannock Chase AONB	Landscape Sensitivity	Alter Views for PRoW Network Users	Alter Views for Local Residents	Green Belt Harm
<b>Walsall Residential Sites</b>					
SA-0001-WAL	0	0	0	0	0
SA-0006-WAL	0	-	-	-	--
SA-0010-WAL	0	--	-	-	0
SA-0012-WAL	0	--	0	-	--
SA-0014-WAL	0	-	0	-	--
SA-0015-WAL	0	-	-	-	--
SA-0016-WAL	0	--	0	-	--
SA-0017-WAL	0	--	0	-	--
SA-0018-WAL	0	--	-	-	--
SA-0019-WAL	0	--	-	-	--
SA-0020-WAL	0	--	-	-	--
SA-0022-WAL	0	-	0	-	--
SA-0029-WAL	0	--	0	-	--

<sup>3</sup> LUC (2019) Black Country Green Belt Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced_redacted.pdf) [Date Accessed: 20/04/21]



Site Ref	Cannock Chase AONB	Landscape Sensitivity	Alter Views for PRoW Network Users	Alter Views for Local Residents	Green Belt Harm
SA-0030-WAL	0	--	-	-	--
SA-0032-WAL	0	--	-	-	--
SA-0034-WAL	0	--	0	-	--
SA-0035-WAL	0	--	-	-	--
SA-0036-WAL	0	--	0	-	--
SA-0037-WAL	0	-	0	-	--
SA-0038-WAL	0	--	-	-	--
SA-0045-WAL	0	--	-	-	--
SA-0047-WAL	0	--	-	-	--
SA-0048-WAL	0	-	-	-	--
SA-0050-WAL	0	--	0	-	--
SA-0051-WAL	0	--	-	-	0
SA-0052-WAL	0	-	-	-	0
SA-0053-WAL	0	-	0	-	--
SA-0054-WAL	0	--	0	-	--
SA-0056-WAL	0	-	-	-	--
SA-0059-WAL	0	--	0	-	--
SA-0061-WAL	0	--	-	-	--
SA-0062-WAL	0	--	0	-	--
SA-0064-WAL	0	--	0	-	0
SA-0066-WAL	0	--	-	-	--
SA-0071-WAL	0	--	0	-	--
SA-0078-WAL	0	--	-	-	--
SA-0085-WAL	0	0	0	0	0
SA-0102-WAL	0	-	0	-	--
SA-0138-WAL	0	-	0	-	--
SA-0149-WAL	0	-	-	-	--
SA-0153-WAL	0	--	0	-	0
SA-0163-WAL	0	--	-	-	--
SA-0167-WAL	0	--	0	-	--
SA-0172-WAL	0	0	-	-	0
SA-0174-WAL	0	0	0	-	0
SA-0183-WAL	0	--	0	0	--
SA-0186-WAL	0	--	0	-	--
SA-0187-WAL	0	-	0	-	--
SA-0188-WAL	0	0	0	-	0
SA-0195-WAL	0	--	-	-	--
SA-0196-WAL	0	--	0	-	--
SA-0197-WAL	0	-	-	-	--
SA-0199-WAL	0	-	0	-	--
SA-0201-WAL	0	-	0	-	--
SA-0202-WAL	0	--	-	-	--
SA-0204-WAL	0	--	0	-	--
SA-0205-WAL	0	--	0	-	--

Site Ref	Cannock Chase AONB	Landscape Sensitivity	Alter Views for PRoW Network Users	Alter Views for Local Residents	Green Belt Harm
SA-0206-WAL	0	--	0	-	--
SA-0207-WAL	0	-	0	-	--
SA-0208-WAL	0	-	0	-	--
SA-0211-WAL	0	--	-	-	--
SA-0212-WAL	0	--	-	-	--
SA-0213-WAL	0	--	-	-	--
SA-0215-WAL	0	--	-	-	--
SA-0216-WAL	0	--	-	-	--
SA-0220-WAL	0	-	0	-	--
SA-0222-WAL	0	--	0	-	--
SA-0223-WAL	0	-	0	-	--
SA-0224-WAL	0	--	0	-	--
SA-0225-WAL	0	--	0	-	--
SA-0226-WAL	0	--	0	-	--
SA-0227-WAL	0	-	0	-	--
SA-0228-WAL	0	--	-	-	--
SA-0229-WAL	0	-	0	-	--
SA-0230-WAL	0	--	0	-	--
SA-0231-WAL	0	--	0	-	--
SA-0232-WAL	0	--	-	-	--
SA-0233-WAL	0	--	0	-	--
SA-0235-WAL	0	--	-	-	--
SA-0236-WAL	0	--	0	-	--
SA-0237-WAL	0	--	-	-	--
SA-0238-WAL	0	--	-	-	--
SA-0239-WAL	0	--	0	-	--
SA-0240-WAL	0	--	-	0	--
SA-0241-WAL	0	--	-	-	--
SA-0244-WAL	0	--	-	-	--
SA-0245-WAL	0	--	0	0	--
SA-0248-WAL	0	--	0	-	--
SA-0250-WAL	0	-	-	-	0
SA-0251-WAL	0	--	0	-	--
SA-0252-WAL	0	--	0	-	--
SA-0257-WAL	0	--	0	0	--
SA-0264-WAL	0	-	-	-	--
SA-0265-WAL	0	--	-	-	--
SA-0266-WAL	0	--	-	-	--
SA-0267-WAL	0	--	0	-	--
SA-0269-WAL	0	--	-	-	--
SA-0272-WAL	0	-	0	-	--
SA-0274-WAL	0	--	0	-	--
SA-0278-WAL	0	--	0	-	--
SA-0280-WAL	0	-	0	-	--

Site Ref	Cannock Chase AONB	Landscape Sensitivity	Alter Views for PRoW Network Users	Alter Views for Local Residents	Green Belt Harm
SA-0284-WAL	0	--	-	-	--
SA-0288-WAL	0	--	-	0	--
SA-0289-WAL	0	--	-	-	--
SA-0291-WAL	0	--	0	-	--
SA-0292-WAL	0	--	0	-	--
SA-0294-WAL	0	--	-	-	--
SA-0295-WAL	0	--	-	-	--
SA-0296-WAL	0	--	0	-	-
SA-0297-WAL	0	--	-	-	--
SA-0301-WAL	0	--	0	-	--
SA-0302-WAL	0	--	-	-	--
SA-0304-WAL	0	--	-	-	--
SA-0305-WAL	0	--	0	-	--
SA-0309-WAL	0	--	0	-	--
SA-0312-WAL	0	-	-	-	--
SA-0313-WAL	0	-	0	-	--
SA-0317-WAL	0	-	0	-	--
<b>Walsall Employment Sites</b>					
SA-0001-WAL	0	0	0	0	0
SA-0007-WAL	0	-	0	-	--
SA-0008-WAL	0	--	-	0	--
SA-0015-WAL	0	-	-	-	--
SA-0020-WAL	0	--	-	-	--
SA-0030-WAL	0	--	-	-	--
SA-0045-WAL	0	--	-	-	--
SA-0047-WAL	0	--	-	-	--
SA-0054-WAL	0	--	0	-	--
SA-0057-WAL	0	-	-	-	-
SA-0061-WAL	0	--	-	-	--
SA-0167-WAL	0	--	0	-	--
SA-0183-WAL	0	--	0	0	--
SA-0186-WAL	0	--	0	-	--
SA-0195-WAL	0	--	-	-	--
SA-0196-WAL	0	--	0	-	--
SA-0197-WAL	0	-	-	-	--
SA-0200-WAL	0	-	0	-	--
SA-0201-WAL	0	-	0	-	--
SA-0202-WAL	0	--	-	-	--
SA-0204-WAL	0	--	0	-	--
SA-0205-WAL	0	--	0	-	--
SA-0211-WAL	0	--	-	-	--
SA-0212-WAL	0	--	-	-	--
SA-0213-WAL	0	--	-	-	--
SA-0215-WAL	0	--	-	-	--

Site Ref	Cannock Chase AONB	Landscape Sensitivity	Alter Views for PRoW Network Users	Alter Views for Local Residents	Green Belt Harm
SA-0216-WAL	0	--	-	-	--
SA-0223-WAL	0	-	0	-	--
SA-0227-WAL	0	-	0	-	--
SA-0230-WAL	0	--	0	-	--
SA-0231-WAL	0	--	0	-	--
SA-0232-WAL	0	--	-	-	--
SA-0235-WAL	0	--	-	-	--
SA-0237-WAL	0	--	-	-	--
SA-0238-WAL	0	--	-	-	--
SA-0239-WAL	0	--	0	-	--
SA-0242-WAL	0	-	0	0	0
SA-0243-WAL	0	-	0	0	0
SA-0244-WAL	0	--	-	-	--
SA-0245-WAL	0	--	0	0	--
SA-0248-WAL	0	--	0	-	--
SA-0257-WAL	0	--	0	0	--
SA-0274-WAL	0	--	0	-	--
SA-0275-WAL	0	--	-	0	--
SA-0276-WAL	0	--	0	-	--
SA-0284-WAL	0	--	-	-	--
SA-0286-WAL	0	--	0	0	--
SA-0288-WAL	0	--	-	0	--
SA-0301-WAL	0	--	0	-	--
SA-0302-WAL	0	--	-	-	--
SA-0304-WAL	0	--	-	-	--
SA-0308-WAL	0	-	-	-	--
SA-0315-WAL	0	0	0	0	0
<b>Walsall Carried Forward Residential Sites</b>					
HO0016	0	0	0	0	0
HO0020	0	0	0	-	0
HO0023b	0	0	0	-	0
HO0027	0	0	-	-	0
HO0029	0	0	0	-	0
HO0037	0	0	0	-	0
HO0039a	0	0	-	-	0
HO0039b	0	0	-	-	0
HO0040	0	0	-	-	0
HO0041a	0	0	0	-	0
HO0041b	0	0	0	-	0
HO0043	0	0	0	-	0
HO0044	0	0	0	-	0
HO0046	0	0	-	-	0
HO0053	0	0	0	0	0
HO0060a	0	0	0	0	0

Site Ref	Cannock Chase AONB	Landscape Sensitivity	Alter Views for PRoW Network Users	Alter Views for Local Residents	Green Belt Harm
HO0060b	0	0	0	0	0
HO0060c	0	0	0	0	0
HO0060d	0	0	0	0	0
HO0062	0	0	0	-	0
HO0065	0	0	0	0	0
HO0066b	0	0	0	-	0
HO0071	0	0	-	-	0
HO0072	0	0	-	-	0
HO0093	0	0	0	-	0
HO0117	0	0	0	-	0
HO0124	0	0	0	-	0
HO0125	0	0	0	0	0
HO0126	0	0	0	0	0
HO0137a	0	0	0	0	0
HO0137b	0	0	0	0	0
HO0137c	0	0	0	0	0
HO0147	0	0	0	-	0
HO0150	0	0	0	0	0
HO0150a	0	0	0	0	0
HO0154	0	0	0	0	0
HO0157a	0	0	0	0	0
HO0157b	0	0	0	0	0
HO0157c	0	0	0	-	0
HO0162a	0	0	0	0	0
HO0162b	0	0	0	0	0
HO0163	0	0	0	0	0
HO0168a	0	0	0	-	0
HO0168b	0	0	0	-	0
HO0176	0	0	0	-	0
HO0180	0	0	0	-	0
HO0181	0	0	0	-	0
HO0185	0	0	0	-	0
HO0194	0	0	0	0	0
HO0195	0	0	0	0	0
HO0201	0	0	0	-	0
HO0205	0	0	0	-	0
HO0217a	0	0	0	0	0
HO0217b	0	0	0	-	0
HO0304	0	0	0	-	0
HO0305	0	0	0	-	0
HO0307	0	0	0	0	0
HO0308	0	0	0	0	0
HO0310	0	0	0	-	0
HO0312	0	0	0	-	0

Site Ref	Cannock Chase AONB	Landscape Sensitivity	Alter Views for PRoW Network Users	Alter Views for Local Residents	Green Belt Harm
HO0313	0	0	0	-	0
HO0316	0	0	0	-	0
HO0317	0	0	0	-	0
HO0318	0	0	0	-	0
HO0320	0	0	0	0	0
HO0321	0	0	0	0	0
HO0322a	0	0	0	-	0
HO0322b	0	0	0	-	0
HO1314	0	0	0	-	0
LC02B	0	0	0	0	0
LC08A	0	0	0	0	0
LC14A	0	0	0	-	0
LC18A	0	0	0	-	0
LC30A	0	0	0	0	0
LC30C	0	0	0	0	0
LC31A	0	0	0	-	0
<b>Walsall Carried Forward Employment Sites</b>					
IN0002.1	0	0	0	-	0
IN0005.1	0	0	0	-	0
IN0009.12	0	0	0	0	0
IN0009.13	0	0	0	0	0
IN0009.14	0	0	0	0	0
IN0010.2	0	0	-	0	0
IN0012.5	0	0	0	-	0
IN0012.6	0	0	0	0	0
IN0012.8	0	0	0	0	0
IN0017.1	0	0	0	-	0
IN0017.2	0	0	0	0	0
IN0018.2	0	0	0	0	0
IN0027.1	0	0	0	0	0
IN0027.2	0	0	0	-	0
IN0032.2	0	0	0	0	0
IN0052.2	0	0	0	-	0
IN0056.2	0	0	0	0	0
IN0058	0	0	-	0	0
IN0063	0	0	0	0	0
IN0064	0	0	0	0	0
IN0068.1	0	0	-	0	0
IN0069.3	0	0	0	-	0
IN0069.42	0	0	0	0	0
IN0070.2	0	0	0	-	0
IN0070.4	0	0	0	0	0
IN0071.2	0	0	-	0	0
IN0072.2	0	0	0	-	0

Site Ref	Cannock Chase AONB	Landscape Sensitivity	Alter Views for PRow Network Users	Alter Views for Local Residents	Green Belt Harm
IN0078.12	0	0	-	-	0
IN0078.2	0	0	0	0	0
IN0084	0	0	0	0	0
IN0093.2	0	0	0	0	0
IN0099.2	0	0	-	0	0
IN0103.2	0	0	0	0	0
IN0104.1	0	0	0	0	0
IN0104.4	0	0	0	0	0
IN0105	0	0	0	-	0
IN0109	0	0	0	-	0
IN0110	0	0	0	-	0
IN0118.2	0	0	-	-	0
IN0120.5	0	0	0	0	0
IN0122	0	0	-	-	0
IN0205	0	0	0	0	0
IN0315	0	0	0	0	0
IN0317	0	0	0	0	0
IN0328	0	0	0	-	0
IN0333	0	0	0	-	0
IN0341	0	0	-	-	0

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

### H.4.1 European Sites

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

H.4.1.2 A total of 148 proposed sites within Walsall are located within 15km of ‘Cannock Chase SAC’, and therefore, the proposed development at these sites could potentially result in a minor negative impact on this SAC. No ZoI has currently been identified for ‘Cannock Extension Canal’ SAC or other surrounding European sites, and therefore, the impact that development at the remaining sites may have on European sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

### H.4.2 Sites of Special Scientific Interest

H.4.2.1 There are several Sites of Special Scientific Interest (SSSIs) within Walsall, generally found towards the east of the borough, including ‘Hay Head Quarry’, ‘Jockey Fields’ and ‘Swan Pool & The Stag’ SSSIs.

H.4.2.2 A proportion of employment site SA-0308-WAL coincides with ‘Swan Pool & The Stag’ SSSI. A small proportion of Site SA-0018-WAL coincides with ‘Daw End Railway Cutting’ SSSI. A further 17 sites are located adjacent to various SSSIs, including Sites SA-0008-WAL, SA-0275-WAL, SA-0195-WAL and SA-0197-WAL which are adjacent to ‘Jockey Fields’ SSSI. The proposed development at these 20 sites could potentially have direct and major negative impacts on the features for which these SSSIs have been designated. All planning applications within these sites should be consulted on with Natural England.

H.4.2.3 Additionally, a further 115 sites are located within SSSI Impact Risk Zones (IRZ) which indicate that the proposed level of development should be consulted on with Natural England; these sites are identified as potentially resulting in a minor negative impact on the SSSIs.

H.4.2.4 The remaining proposed sites in Walsall are located within IRZs which do not indicate the proposed use as a threat to nearby SSSIs, and as such, would be likely to have a negligible impact.



### **H.4.3 National Nature Reserves**

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

### **H.4.4 Ancient Woodland**

H.4.4.1 Areas of ancient woodland within Walsall include ‘Rough Wood’ in the west, and ‘Cuckoos Nook’ and ‘Towers Covert’ in the south east. Seven of the proposed sites (housing and employment site SA-0015-WAL, as well as housing sites SA-0037-WAL, SA-0047-WAL, SA-0228-WAL, SA-0289-WAL and SA-0294-WAL) are located adjacent to ancient woodlands, whilst 28 sites are located in close proximity to areas of ancient woodland. The sites which are adjacent or in close proximity to ancient woodland could potentially have a minor negative impact due to an increased risk of disturbance. Proposed sites which are not located in close proximity to ancient woodland and/or are separated by existing built form would be unlikely to have a significant impact on ancient woodland.

### **H.4.5 Local Nature Reserves**

H.4.5.1 There are ten Local Nature Reserves (LNRs) within Walsall largely located within areas of Green Belt, including ‘Rough Wood Chase’, ‘Shire Oak Park’ and ‘Pelsall North Common’ LNRs. A small proportion of Site SA-0289-WAL coincides with ‘Cuckoos Nook and The Dingles’ LNR, ten other sites are adjacent to an LNR, and 37 sites are identified as being in close proximity to an LNR with potential for adverse impacts to arise. These 48 sites could therefore potentially have a minor negative impact on the LNRs due to increased risk of development related threats and pressures. The proposed development at the remaining sites on the other hand would not be expected to have a significant impact on LNRs, primarily due to being separated by existing built form.

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

H.4.6.1 Within Walsall there are 36 Sites of Importance for Nature Conservation (SINCs), primarily comprised of small woodland areas and mainly clustered within the Green Belt parcels. Eight proposed sites (housing and employment site SA-0054-WAL, housing sites SA-0018-WAL, SA-0019-WAL, SA-0051-WAL and SA-0066-WAL, and employment site IN0071.2) partially coincide with SINCs such as ‘Park Lime Pits’ and ‘Lazy Hill Wood’. Therefore, the proposed development at these eight sites could potentially have direct major negative impacts on these SINCs.

H.4.6.2 Additionally, 28 sites are located adjacent to one or more SINCS, and therefore, the proposed development at these sites could potentially have a minor negative impact on these SINCS due to an increased risk of development related threats and pressures. Affected SINCS include ‘Hay Head Wood’ and ‘Grange Farm Wood’. The remaining sites are located further away from SINCS and therefore are less likely to significantly impact any SINC if developed.

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

H.4.7.1 There are 77 Sites of Local Importance for Nature Conservation (SLINCS) within Walsall covering a range of habitats, hedgerows and semi-natural spaces including ‘Corporation Wood’, ‘Jockey Fields’ and ‘Daw End Canal’. 41 sites in Walsall coincide with a SLINC, including Sites SA-0008-WAL, SA-0195-WAL, SA-0197-WAL and SA-0275-WAL which coincide with ‘Jockey Fields’ SLINC. Furthermore, 75 sites are located adjacent to a SLINC. The proposed development at these 116 sites could potentially have a minor negative impact on SLINCS, due to an increased risk of development related threats and pressures. The sites which are not located in close proximity to any SLINCS would be expected to have a negligible impact.

#### **H.4.8 Geological Sites**

H.4.8.1 Geological sites have been identified throughout the Plan area, which form part of the Black Country Global Geopark<sup>4</sup>. These sites include a range of notable geological features and formations, including a number of SSSIs and SINCS. There are seven geological sites identified throughout Walsall, including ‘Park Lime Pits LNR’, ‘Shire Oak Quarry LNR’ and ‘Hay Head Quarry and The Dingle SSSI’. Site SA-0289-WAL coincides with ‘Hay Head Quarry and The Dingle SSSI’ geological site, and therefore, the proposed development at this site could potentially have a minor negative impact on this designated area of geological importance. No other sites coincide with any identified geological sites and therefore the remaining sites are likely to have a negligible impact.

#### **H.4.9 Priority Habitats**

H.4.9.1 Priority habitats can be found in small sections throughout Walsall, although the majority are restricted to the Green Belt. These habitats include ‘good quality semi-improved grassland’, ‘deciduous woodland’ and ‘traditional orchard’. The proposed development at sites which wholly or partially coincide with priority habitats could potentially result in the loss or degradation of these habitats, and therefore, 59 of the sites have been identified as potentially having a minor negative impact. The sites which do not coincide with any

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<sup>4</sup> Black Country Geopark (2021) Black Country Geopark. Available at: <https://blackcountrygeopark.dudley.gov.uk/bcg/> [Date Accessed: 07/05/21]

identified priority habitat would be likely to have a negligible impact on the overall presence of priority habitats within the Plan area.

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

Site Ref	European Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRS	SINCS	SLINCS	Geological Sites	Priority Habitats
<b>Walsall Residential Sites</b>									
SA-0001-WAL	+/-	0	0	0	0	0	0	0	0
SA-0006-WAL	+/-	0	0	0	0	0	0	0	-
SA-0010-WAL	-	-	0	0	0	0	-	0	0
SA-0012-WAL	+/-	0	0	0	0	0	-	0	-
SA-0014-WAL	-	-	0	0	0	0	0	0	-
SA-0015-WAL	+/-	0	0	-	0	0	-	0	0
SA-0016-WAL	-	--	0	0	0	0	0	0	0
SA-0017-WAL	+/-	-	0	0	0	0	0	0	0
SA-0018-WAL	-	--	0	0	-	--	-	0	-
SA-0019-WAL	-	-	0	-	-	--	-	0	0
SA-0020-WAL	+/-	0	0	0	0	0	-	0	0
SA-0022-WAL	-	-	0	0	-	0	-	0	-
SA-0029-WAL	-	-	0	0	-	--	0	0	-
SA-0030-WAL	-	-	0	0	-	0	-	0	-
SA-0032-WAL	-	-	0	0	0	0	-	0	-
SA-0034-WAL	-	-	0	0	0	0	0	0	0
SA-0035-WAL	+/-	0	0	0	0	0	-	0	-
SA-0036-WAL	+/-	0	0	0	0	0	-	0	-
SA-0037-WAL	+/-	0	0	-	0	0	-	0	0
SA-0038-WAL	-	-	0	0	0	0	0	0	0
SA-0045-WAL	+/-	0	0	-	-	0	0	0	0
SA-0047-WAL	+/-	--	0	-	-	-	-	0	0
SA-0048-WAL	-	-	0	0	0	0	-	0	-
SA-0050-WAL	+/-	0	0	-	-	0	0	0	0
SA-0051-WAL	-	-	0	0	0	--	0	0	-
SA-0052-WAL	-	-	0	0	0	0	-	0	0
SA-0053-WAL	+/-	0	0	0	0	0	0	0	-
SA-0054-WAL	-	-	0	0	-	--	0	0	-
SA-0056-WAL	-	-	0	0	0	0	0	0	0
SA-0059-WAL	-	-	0	0	0	0	0	0	0
SA-0061-WAL	+/-	--	0	-	-	-	-	0	0
SA-0062-WAL	-	-	0	0	0	-	0	0	0
SA-0064-WAL	+/-	0	0	0	0	0	-	0	-
SA-0066-WAL	-	-	0	-	-	--	-	0	0
SA-0071-WAL	-	-	0	0	0	0	-	0	-
SA-0078-WAL	+/-	0	0	0	0	0	0	0	-
SA-0085-WAL	-	-	0	0	0	0	0	0	0

Site Ref	European Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRS	SINGs	SLINCs	Geological Sites	Priority Habitats
SA-0102-WAL	+/-	0	0	0	0	0	0	0	-
SA-0138-WAL	-	-	0	0	0	0	0	0	0
SA-0149-WAL	+/-	0	0	0	0	0	-	0	0
SA-0153-WAL	+/-	0	0	0	0	0	-	0	-
SA-0163-WAL	-	-	0	0	-	0	0	0	0
SA-0167-WAL	+/-	0	0	-	-	0	0	0	0
SA-0172-WAL	-	-	0	0	0	0	-	0	0
SA-0174-WAL	-	-	0	0	0	0	0	0	0
SA-0183-WAL	+/-	0	0	0	0	0	0	0	0
SA-0186-WAL	-	-	0	0	0	-	0	0	0
SA-0187-WAL	+/-	0	0	0	0	0	0	0	0
SA-0188-WAL	-	-	0	0	-	0	0	0	0
SA-0195-WAL	-	--	0	0	0	0	-	0	0
SA-0196-WAL	-	-	0	0	0	0	-	0	0
SA-0197-WAL	-	--	0	0	0	0	-	0	0
SA-0199-WAL	-	-	0	0	0	0	-	0	0
SA-0201-WAL	-	-	0	0	0	0	0	0	0
SA-0202-WAL	-	-	0	0	0	-	-	0	-
SA-0204-WAL	-	-	0	0	-	-	0	0	0
SA-0205-WAL	-	-	0	0	0	-	0	0	0
SA-0206-WAL	-	-	0	0	0	0	-	0	0
SA-0207-WAL	-	-	0	0	0	0	0	0	0
SA-0208-WAL	-	-	0	0	0	0	0	0	0
SA-0211-WAL	-	-	0	0	0	0	-	0	0
SA-0212-WAL	-	-	0	0	0	0	-	0	0
SA-0213-WAL	-	-	0	0	0	0	-	0	0
SA-0215-WAL	-	-	0	0	0	0	-	0	0
SA-0216-WAL	-	-	0	0	0	0	-	0	0
SA-0220-WAL	+/-	0	0	0	0	0	0	0	0
SA-0222-WAL	+/-	0	0	0	0	0	0	0	-
SA-0223-WAL	+/-	0	0	-	0	0	-	0	-
SA-0224-WAL	+/-	0	0	0	0	0	0	0	0
SA-0225-WAL	+/-	0	0	0	0	0	0	0	0
SA-0226-WAL	+/-	0	0	-	-	0	0	0	-
SA-0227-WAL	+/-	0	0	0	0	0	0	0	0
SA-0228-WAL	+/-	--	0	-	-	-	-	0	-
SA-0229-WAL	+/-	0	0	0	0	0	0	0	0
SA-0230-WAL	+/-	0	0	0	0	0	0	0	0
SA-0231-WAL	+/-	-	0	0	0	0	0	0	0
SA-0232-WAL	+/-	0	0	-	-	0	-	0	-
SA-0233-WAL	+/-	0	0	0	0	0	0	0	0
SA-0235-WAL	+/-	0	0	0	0	0	0	0	0

Site Ref	European Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRS	SINGs	SLINCs	Geological Sites	Priority Habitats
SA-0236-WAL	+/-	-	0	0	0	0	0	0	0
SA-0237-WAL	+/-	0	0	0	0	0	0	0	0
SA-0238-WAL	+/-	0	0	-	-	0	-	0	-
SA-0239-WAL	+/-	-	0	0	0	0	0	0	0
SA-0240-WAL	+/-	0	0	-	0	-	0	0	0
SA-0241-WAL	+/-	0	0	-	-	-	-	0	0
SA-0244-WAL	-	-	0	0	0	0	-	0	0
SA-0245-WAL	-	-	0	0	0	0	0	0	0
SA-0248-WAL	-	-	0	0	0	0	0	0	0
SA-0250-WAL	-	--	0	0	0	0	-	0	0
SA-0251-WAL	+/-	0	0	0	0	0	0	0	0
SA-0252-WAL	-	--	0	0	-	0	0	0	0
SA-0257-WAL	-	-	0	0	0	-	0	0	0
SA-0264-WAL	-	-	0	0	0	0	-	0	0
SA-0265-WAL	-	-	0	0	-	-	0	0	0
SA-0266-WAL	-	-	0	0	0	0	0	0	0
SA-0267-WAL	-	-	0	0	0	-	0	0	-
SA-0269-WAL	-	-	0	0	-	-	0	0	0
SA-0272-WAL	-	-	0	0	0	0	0	0	0
SA-0274-WAL	-	-	0	0	0	0	0	0	-
SA-0278-WAL	-	-	0	0	0	0	-	0	-
SA-0280-WAL	-	-	0	0	0	0	-	0	0
SA-0284-WAL	-	-	0	-	-	0	-	0	-
SA-0288-WAL	+/-	0	0	0	-	0	0	0	0
SA-0289-WAL	+/-	--	0	-	-	-	0	-	0
SA-0291-WAL	+/-	0	0	-	-	-	-	0	-
SA-0292-WAL	+/-	0	0	-	-	0	0	0	0
SA-0294-WAL	+/-	--	0	-	-	-	0	0	0
SA-0295-WAL	+/-	-	0	-	-	-	0	0	0
SA-0296-WAL	+/-	0	0	0	0	0	0	0	0
SA-0297-WAL	+/-	0	0	-	-	0	0	0	0
SA-0301-WAL	+/-	0	0	0	0	0	-	0	-
SA-0302-WAL	+/-	0	0	-	0	0	-	0	-
SA-0304-WAL	+/-	0	0	0	0	0	-	0	0
SA-0305-WAL	+/-	0	0	0	0	0	0	0	0
SA-0309-WAL	-	-	0	0	0	0	0	0	-
SA-0312-WAL	+/-	0	0	0	0	0	0	0	-
SA-0313-WAL	+/-	0	0	0	0	0	0	0	0
SA-0317-WAL	-	-	0	0	0	0	-	0	0
<b>Walsall Employment Sites</b>									
SA-0001-WAL	+/-	0	0	0	0	0	0	0	0
SA-0007-WAL	-	-	0	0	0	0	-	0	0

Site Ref	European Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRS	SINGs	SLINCs	Geological Sites	Priority Habitats
SA-0008-WAL	-	--	0	0	0	0	-	0	0
SA-0015-WAL	+/-	0	0	-	0	0	-	0	0
SA-0020-WAL	+/-	0	0	0	0	0	-	0	0
SA-0030-WAL	-	-	0	0	-	0	-	0	-
SA-0045-WAL	+/-	0	0	-	-	0	0	0	0
SA-0047-WAL	+/-	--	0	-	-	-	-	0	0
SA-0054-WAL	-	-	0	0	-	--	0	0	-
SA-0057-WAL	-	0	0	0	-	0	-	0	0
SA-0061-WAL	+/-	--	0	-	-	-	-	0	0
SA-0167-WAL	+/-	0	0	-	-	0	0	0	0
SA-0183-WAL	+/-	0	0	0	0	0	0	0	0
SA-0186-WAL	-	-	0	0	0	-	0	0	0
SA-0195-WAL	-	--	0	0	0	0	-	0	0
SA-0196-WAL	-	-	0	0	0	0	-	0	0
SA-0197-WAL	-	--	0	0	0	0	-	0	0
SA-0200-WAL	-	-	0	0	0	0	0	0	0
SA-0201-WAL	-	-	0	0	0	0	0	0	0
SA-0202-WAL	-	-	0	0	0	-	-	0	-
SA-0204-WAL	-	0	0	0	-	-	0	0	0
SA-0205-WAL	-	-	0	0	0	-	0	0	0
SA-0211-WAL	-	0	0	0	0	0	-	0	0
SA-0212-WAL	-	-	0	0	0	0	-	0	0
SA-0213-WAL	-	-	0	0	0	0	-	0	0
SA-0215-WAL	-	0	0	0	0	0	-	0	0
SA-0216-WAL	-	0	0	0	0	0	-	0	0
SA-0223-WAL	+/-	0	0	-	0	0	-	0	-
SA-0227-WAL	+/-	0	0	0	0	0	0	0	0
SA-0230-WAL	+/-	0	0	0	0	0	0	0	0
SA-0231-WAL	+/-	-	0	0	0	0	0	0	0
SA-0232-WAL	+/-	0	0	-	-	0	-	0	-
SA-0235-WAL	+/-	0	0	0	0	0	0	0	0
SA-0237-WAL	+/-	0	0	0	0	0	0	0	0
SA-0238-WAL	+/-	0	0	-	-	0	-	0	-
SA-0239-WAL	+/-	-	0	0	0	0	0	0	0
SA-0242-WAL	-	--	0	0	0	0	0	0	-
SA-0243-WAL	-	--	0	0	0	0	0	0	-
SA-0244-WAL	-	0	0	0	0	0	-	0	0
SA-0245-WAL	-	-	0	0	0	0	0	0	0
SA-0248-WAL	-	-	0	0	0	0	0	0	0
SA-0257-WAL	-	-	0	0	0	-	0	0	0
SA-0274-WAL	-	0	0	0	0	0	0	0	-
SA-0275-WAL	-	--	0	0	0	0	-	0	0

Site Ref	European Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRS	SINGs	SLINCs	Geological Sites	Priority Habitats
SA-0276-WAL	-	-	0	0	0	0	-	0	-
SA-0284-WAL	-	0	0	-	-	0	-	0	-
SA-0286-WAL	+/-	0	0	-	-	0	-	0	-
SA-0288-WAL	+/-	0	0	0	-	0	0	0	0
SA-0301-WAL	+/-	0	0	0	0	0	-	0	-
SA-0302-WAL	+/-	0	0	-	0	0	-	0	-
SA-0304-WAL	+/-	0	0	0	0	0	-	0	0
SA-0308-WAL	-	--	0	0	0	0	-	0	-
SA-0315-WAL	+/-	0	0	0	0	0	0	0	0
<b>Walsall Carried Forward Residential Sites</b>									
HO0016	+/-	0	0	0	0	0	0	0	0
HO0020	+/-	0	0	0	0	0	0	0	0
HO0023b	+/-	0	0	0	0	0	0	0	0
HO0027	-	-	0	0	0	0	-	0	0
HO0029	-	-	0	0	0	0	-	0	0
HO0037	+/-	0	0	0	0	0	0	0	0
HO0039a	+/-	0	0	0	0	0	0	0	0
HO0039b	+/-	0	0	0	0	0	0	0	0
HO0040	-	-	0	0	0	0	-	0	0
HO0041a	-	-	0	0	0	0	0	0	0
HO0041b	-	-	0	0	0	0	0	0	0
HO0043	-	-	0	0	0	-	0	0	0
HO0044	-	-	0	0	0	0	-	0	0
HO0046	+/-	0	0	0	-	-	0	0	0
HO0053	-	-	0	0	0	0	0	0	0
HO0060a	+/-	0	0	0	0	0	-	0	0
HO0060b	+/-	0	0	0	0	0	-	0	0
HO0060c	+/-	0	0	0	0	0	-	0	0
HO0060d	+/-	0	0	0	0	0	0	0	0
HO0062	-	-	0	0	0	0	-	0	0
HO0065	+/-	0	0	0	0	0	0	0	0
HO0066b	+/-	0	0	0	0	0	0	0	0
HO0071	+/-	0	0	0	0	0	0	0	0
HO0072	+/-	0	0	0	0	0	0	0	0
HO0093	+/-	0	0	0	0	0	-	0	0
HO0117	-	-	0	0	0	0	-	0	0
HO0124	-	-	0	0	0	0	0	0	0
HO0125	-	-	0	0	0	0	0	0	0
HO0126	-	-	0	0	0	0	0	0	0
HO0137a	+/-	0	0	0	0	0	0	0	0
HO0137b	+/-	0	0	0	0	0	0	0	0
HO0137c	+/-	0	0	0	0	0	0	0	0

Site Ref	European Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRs	SINGs	SLINCs	Geological Sites	Priority Habitats
HO0147	-	-	0	0	0	0	0	0	0
HO0150	-	-	0	0	0	0	0	0	0
HO0150a	-	-	0	0	0	0	0	0	0
HO0154	-	-	0	0	0	0	0	0	0
HO0157a	-	-	0	0	0	0	-	0	0
HO0157b	-	-	0	0	0	0	-	0	0
HO0157c	-	-	0	0	0	0	-	0	0
HO0162a	+/-	0	0	0	0	0	0	0	0
HO0162b	+/-	0	0	0	0	0	0	0	0
HO0163	-	-	0	0	0	0	-	0	0
HO0168a	-	-	0	0	0	0	-	0	0
HO0168b	-	-	0	0	0	0	0	0	0
HO0176	+/-	0	0	0	0	0	0	0	0
HO0180	-	-	0	0	0	0	-	0	0
HO0181	-	-	0	0	0	0	-	0	0
HO0185	+/-	0	0	0	0	0	0	0	0
HO0194	-	-	0	0	0	0	-	0	0
HO0195	-	-	0	0	0	0	0	0	0
HO0201	+/-	0	0	0	0	0	0	0	0
HO0205	-	-	0	0	0	0	0	0	0
HO0217a	+/-	0	0	0	0	0	0	0	0
HO0217b	+/-	0	0	0	0	0	0	0	0
HO0304	-	-	0	0	0	0	0	0	0
HO0305	+/-	0	0	0	0	0	0	0	0
HO0307	-	-	0	0	0	0	0	0	0
HO0308	+/-	0	0	0	0	0	0	0	0
HO0310	+/-	0	0	0	0	0	0	0	0
HO0312	+/-	0	0	0	0	0	0	0	0
HO0313	-	-	0	0	0	0	0	0	0
HO0316	+/-	0	0	0	0	0	0	0	0
HO0317	-	-	0	0	0	0	0	0	0
HO0318	-	-	0	0	0	0	0	0	0
HO0320	+/-	0	0	0	0	0	0	0	0
HO0321	+/-	0	0	0	0	0	0	0	0
HO0322a	+/-	0	0	0	0	0	0	0	0
HO0322b	+/-	0	0	0	0	0	0	0	0
HO1314	+/-	0	0	0	0	0	-	0	-
LC02B	-	-	0	0	0	0	0	0	0
LC08A	-	-	0	0	0	0	0	0	0
LC14A	+/-	0	0	0	0	0	0	0	0
LC18A	-	-	0	0	0	0	0	0	0
LC30A	+/-	0	0	0	0	0	0	0	0



Site Ref	European Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRs	SINGs	SLINCs	Geological Sites	Priority Habitats
LC30C	+/-	0	0	0	0	0	0	0	0
LC31A	-	-	0	0	0	0	0	0	0
<b>Walsall Carried Forward Employment Sites</b>									
IN0002.1	-	-	0	0	0	0	0	0	0
IN0005.1	-	0	0	0	0	0	0	0	0
IN0009.12	-	0	0	0	0	0	0	0	0
IN0009.13	-	0	0	0	0	0	0	0	0
IN0009.14	-	0	0	0	0	0	0	0	0
IN0010.2	-	0	0	0	0	0	0	0	0
IN0012.5	-	0	0	0	0	0	-	0	-
IN0012.6	-	0	0	0	0	0	-	0	0
IN0012.8	-	0	0	0	0	0	-	0	0
IN0017.1	-	0	0	0	-	0	-	0	0
IN0017.2	-	0	0	0	-	0	-	0	0
IN0018.2	-	0	0	0	0	0	0	0	0
IN0027.1	-	0	0	0	0	0	0	0	0
IN0027.2	-	0	0	0	0	0	0	0	0
IN0032.2	-	0	0	0	0	0	0	0	0
IN0052.2	+/-	0	0	0	0	0	-	0	0
IN0056.2	+/-	0	0	0	0	0	0	0	0
IN0058	-	0	0	0	0	0	0	0	0
IN0063	+/-	0	0	0	0	0	-	0	0
IN0064	+/-	0	0	0	0	0	-	0	0
IN0068.1	-	0	0	0	0	0	0	0	0
IN0069.3	-	0	0	0	0	0	0	0	0
IN0069.42	-	0	0	0	0	0	0	0	0
IN0070.2	+/-	0	0	0	0	0	0	0	0
IN0070.4	+/-	0	0	0	0	0	0	0	0
IN0071.2	+/-	0	0	0	-	--	0	0	-
IN0072.2	+/-	0	0	0	0	0	0	0	0
IN0078.12	+/-	0	0	0	0	0	0	0	0
IN0078.2	+/-	0	0	0	0	0	0	0	-
IN0084	+/-	0	0	0	0	0	-	0	0
IN0093.2	+/-	0	0	0	0	0	-	0	0
IN0099.2	+/-	0	0	0	0	0	0	0	0
IN0103.2	+/-	0	0	0	0	0	-	0	0
IN0104.1	+/-	0	0	0	0	0	-	0	0
IN0104.4	+/-	0	0	0	0	0	0	0	-
IN0105	+/-	0	0	0	0	0	-	0	-
IN0109	+/-	0	0	0	0	0	0	0	0
IN0110	+/-	0	0	0	0	0	-	0	-
IN0118.2	+/-	0	0	0	0	0	0	0	0

Site Ref	European Sites	SSSIs and IRZs	NNRS	Ancient Woodland	LNRS	SINCS	SLINCS	Geological Sites	Priority Habitats
IN0120.5	+/-	0	0	0	0	0	0	0	0
IN0122	+/-	0	0	0	0	-	-	0	0
IN0205	+/-	0	0	0	0	0	-	0	0
IN0315	+/-	0	0	0	0	0	0	0	-
IN0317	+/-	0	0	0	0	0	0	0	0
IN0328	-	0	0	0	0	0	-	0	0
IN0333	+/-	0	0	0	0	0	-	0	-
IN0341	+/-	0	0	0	0	0	-	0	0

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

### H.5.1 Potential Increase in Carbon Footprint

H.5.1.1 Residential-led development is likely to result in an increase in carbon emissions, to some extent. 131 sites are proposed for the development of 116 dwellings or less. The proposed development at these sites would be likely to result in a negligible contribution to Walsall's total carbon emissions.

H.5.1.2 51 sites are proposed for the development of between 117 and 1,165 dwellings. The proposed development at these sites could potentially increase local carbon emissions, as a proportion of Walsall's total, by more than 0.1%. Therefore, a minor negative impact on Walsall's carbon emissions would be expected at these 51 sites.

H.5.1.3 Nine sites are proposed for the development of 1,165 dwellings or more. The proposed development at these sites could potentially increase local carbon emissions, as a proportion of Walsall's total, by more than 1%. Therefore, a major negative impact on Walsall's carbon emissions would be expected.

H.5.1.4 The housing capacity at three residential sites in Walsall is unknown at the time of writing, and therefore, the impact of the proposed development at these sites is uncertain.

H.5.1.5 The carbon emissions likely to be generated as a result of non-residential development is uncertain. This would be entirely dependent on the nature and scale of the employment land proposed, which is unknown at present.

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

Site Ref	Potential Increase in Carbon Footprint	Site Ref	Potential Increase in Carbon Footprint
<b>Walsall Residential Sites</b>		SA-0163-WAL	0
SA-0001-WAL	0	SA-0167-WAL	+/-
SA-0006-WAL	0	SA-0172-WAL	0
SA-0010-WAL	-	SA-0174-WAL	0
SA-0012-WAL	-	SA-0183-WAL	+/-
SA-0014-WAL	-	SA-0186-WAL	-
SA-0015-WAL	-	SA-0187-WAL	-
SA-0016-WAL	0	SA-0188-WAL	0
SA-0017-WAL	--	SA-0195-WAL	-
SA-0018-WAL	-	SA-0196-WAL	0
SA-0019-WAL	-	SA-0197-WAL	-
SA-0020-WAL	-	SA-0199-WAL	0
SA-0022-WAL	--	SA-0201-WAL	0
SA-0029-WAL	-	SA-0202-WAL	--
SA-0030-WAL	-	SA-0204-WAL	-
SA-0032-WAL	0	SA-0205-WAL	0
SA-0034-WAL	-	SA-0206-WAL	0
SA-0035-WAL	0	SA-0207-WAL	0
SA-0036-WAL	0	SA-0208-WAL	0
SA-0037-WAL	-	SA-0211-WAL	-
SA-0038-WAL	-	SA-0212-WAL	-
SA-0045-WAL	0	SA-0213-WAL	-
SA-0047-WAL	--	SA-0215-WAL	-
SA-0048-WAL	-	SA-0216-WAL	-
SA-0050-WAL	0	SA-0220-WAL	0
SA-0051-WAL	0	SA-0222-WAL	0
SA-0052-WAL	0	SA-0223-WAL	-
SA-0053-WAL	0	SA-0224-WAL	0
SA-0054-WAL	-	SA-0225-WAL	0
SA-0056-WAL	-	SA-0226-WAL	-
SA-0059-WAL	0	SA-0227-WAL	0
SA-0061-WAL	--	SA-0228-WAL	--
SA-0062-WAL	0	SA-0229-WAL	-
SA-0064-WAL	0	SA-0230-WAL	-
SA-0066-WAL	-	SA-0231-WAL	-
SA-0071-WAL	0	SA-0232-WAL	--
SA-0078-WAL	-	SA-0233-WAL	0
SA-0085-WAL	0	SA-0235-WAL	-
SA-0102-WAL	+/-	SA-0236-WAL	-
SA-0138-WAL	0	SA-0237-WAL	--
SA-0149-WAL	-	SA-0238-WAL	--
SA-0153-WAL	0	SA-0239-WAL	-

Site Ref	Potential Increase in Carbon Footprint
SA-0240-WAL	-
SA-0241-WAL	-
SA-0244-WAL	-
SA-0245-WAL	0
SA-0248-WAL	0
SA-0250-WAL	0
SA-0251-WAL	0
SA-0252-WAL	0
SA-0257-WAL	0
SA-0264-WAL	-
SA-0265-WAL	0
SA-0266-WAL	-
SA-0267-WAL	0
SA-0269-WAL	0
SA-0272-WAL	0
SA-0274-WAL	-
SA-0278-WAL	0
SA-0280-WAL	0
SA-0284-WAL	-
SA-0288-WAL	-
SA-0289-WAL	-
SA-0291-WAL	-
SA-0292-WAL	0
SA-0294-WAL	0
SA-0295-WAL	0
SA-0296-WAL	0
SA-0297-WAL	0
SA-0301-WAL	0
SA-0302-WAL	-
SA-0304-WAL	0
SA-0305-WAL	0
SA-0309-WAL	0
SA-0312-WAL	0
SA-0313-WAL	0
SA-0317-WAL	0
<b>Walsall Employment Sites</b>	
SA-0001-WAL	+/-
SA-0007-WAL	+/-
SA-0008-WAL	+/-
SA-0015-WAL	+/-
SA-0020-WAL	+/-
SA-0030-WAL	+/-
SA-0045-WAL	+/-
SA-0047-WAL	+/-
SA-0054-WAL	+/-

Site Ref	Potential Increase in Carbon Footprint
SA-0057-WAL	+/-
SA-0061-WAL	+/-
SA-0167-WAL	+/-
SA-0183-WAL	+/-
SA-0186-WAL	+/-
SA-0195-WAL	+/-
SA-0196-WAL	+/-
SA-0197-WAL	+/-
SA-0200-WAL	+/-
SA-0201-WAL	+/-
SA-0202-WAL	+/-
SA-0204-WAL	+/-
SA-0205-WAL	+/-
SA-0211-WAL	+/-
SA-0212-WAL	+/-
SA-0213-WAL	+/-
SA-0215-WAL	+/-
SA-0216-WAL	+/-
SA-0223-WAL	+/-
SA-0227-WAL	+/-
SA-0230-WAL	+/-
SA-0231-WAL	+/-
SA-0232-WAL	+/-
SA-0235-WAL	+/-
SA-0237-WAL	+/-
SA-0238-WAL	+/-
SA-0239-WAL	+/-
SA-0242-WAL	+/-
SA-0243-WAL	+/-
SA-0244-WAL	+/-
SA-0245-WAL	+/-
SA-0248-WAL	+/-
SA-0257-WAL	+/-
SA-0274-WAL	+/-
SA-0275-WAL	+/-
SA-0276-WAL	+/-
SA-0284-WAL	+/-
SA-0286-WAL	+/-
SA-0288-WAL	+/-
SA-0301-WAL	+/-
SA-0302-WAL	+/-
SA-0304-WAL	+/-
SA-0308-WAL	+/-
SA-0315-WAL	+/-

Site Ref	Potential Increase in Carbon Footprint
<b>Walsall Carried Forward Residential Sites</b>	
HO0016	0
HO0020	0
HO0023b	0
HO0027	-
HO0029	-
HO0037	0
HO0039a	0
HO0039b	0
HO0040	0
HO0041a	0
HO0041b	0
HO0043	0
HO0044	0
HO0046	0
HO0053	0
HO0060a	0
HO0060b	0
HO0060c	0
HO0060d	0
HO0062	0
HO0065	0
HO0066b	0
HO0071	0
HO0072	0
HO0093	0
HO0117	0
HO0124	0
HO0125	0
HO0126	0
HO0137a	0
HO0137b	0
HO0137c	0
HO0147	0
HO0150	0
HO0150a	0
HO0154	0
HO0157a	0
HO0157b	0
HO0157c	0
HO0162a	0
HO0162b	0
HO0163	0

Site Ref	Potential Increase in Carbon Footprint
HO0168a	0
HO0168b	0
HO0176	-
HO0180	0
HO0181	-
HO0185	0
HO0194	0
HO0195	0
HO0201	0
HO0205	0
HO0217a	0
HO0217b	0
HO0304	0
HO0305	0
HO0307	0
HO0308	0
HO0310	0
HO0312	0
HO0313	0
HO0316	0
HO0317	0
HO0318	0
HO0320	0
HO0321	0
HO0322a	0
HO0322b	0
HO1314	0
LC02B	0
LC08A	0
LC14A	0
LC18A	0
LC30A	0
LC30C	0
LC31A	0
<b>Walsall Carried Forward Employment Sites</b>	
IN0002.1	+/-
IN0005.1	+/-
IN0009.12	+/-
IN0009.13	+/-
IN0009.14	+/-
IN0010.2	+/-
IN0012.5	+/-
IN0012.6	+/-

Site Ref	Potential Increase in Carbon Footprint
IN0012.8	+/-
IN0017.1	+/-
IN0017.2	+/-
IN0018.2	+/-
IN0027.1	+/-
IN0027.2	+/-
IN0032.2	+/-
IN0052.2	+/-
IN0056.2	+/-
IN0058	+/-
IN0063	+/-
IN0064	+/-
IN0068.1	+/-
IN0069.3	+/-
IN0069.42	+/-
IN0070.2	+/-
IN0070.4	+/-
IN0071.2	+/-
IN0072.2	+/-
IN0078.12	+/-

Site Ref	Potential Increase in Carbon Footprint
IN0078.2	+/-
IN0084	+/-
IN0093.2	+/-
IN0099.2	+/-
IN0103.2	+/-
IN0104.1	+/-
IN0104.4	+/-
IN0105	+/-
IN0109	+/-
IN0110	+/-
IN0118.2	+/-
IN0120.5	+/-
IN0122	+/-
IN0205	+/-
IN0315	+/-
IN0317	+/-
IN0328	+/-
IN0333	+/-
IN0341	+/-

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

### H.6.1 Flood Zones

H.6.1.1 Flood Zones 2, 3a and 3b within Walsall are most prevalent within the centre and south west of the borough, associated with watercourses such as the River Tame. 25 of the proposed sites in Walsall partially coincide with Flood Zone 3a and/or 3b, and therefore, the proposed development at these sites could potentially have a major negative impact on flooding in the area and exacerbate existing issues of flooding in Walsall. A further ten sites are located wholly or partially with Flood Zone 2, and therefore, the proposed development at these sites could potentially have a minor negative impact on flooding.

H.6.1.2 The majority of proposed sites in Walsall, totalling 257 sites, are located wholly within Flood Zone 1 and would be expected to have a minor positive impact on flooding, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

### H.6.2 Indicative Flood Zone 3b

H.6.2.1 Indicative Flood Zone 3b is present in areas where flooding will potentially worsen in the future due to climate change. In Walsall this covers existing areas of Flood Zone 3a but is also shown to affect some areas within or close to the existing built-up settlements where flood risk is not currently significant. 31 sites in Walsall are identified to wholly or partially coincide with Indicative Flood Zone 3b, and as such, the proposed development at these sites could potentially have a major negative impact on flooding and may exacerbate existing issues of flooding in the future.

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

### H.6.3 Surface Water Flood Risk

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



H.6.3.2 The proposed development at 72 sites in Walsall which coincide with areas of high SWFR could potentially have a major negative impact, as development would be likely to locate site end users in areas at high risk of surface water flooding as well as exacerbate pluvial flood risk in surrounding locations. A further 128 sites in Walsall coincide with areas of low and/or medium SWFR, and therefore, the proposed development at these sites could potentially have a minor negative impact on surface water flooding in the area. The remaining 23 sites which do not coincide with any significant areas of SWFR would be expected to have a negligible effect on surface water flooding.

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

Site Ref	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
<b>Walsall Residential Sites</b>			
SA-0001-WAL	+	0	-
SA-0006-WAL	+	0	-
SA-0010-WAL	+	0	--
SA-0012-WAL	+	0	--
SA-0014-WAL	+	0	--
SA-0015-WAL	+	0	--
SA-0016-WAL	+	0	0
SA-0017-WAL	+	0	-
SA-0018-WAL	+	0	-
SA-0019-WAL	+	0	--
SA-0020-WAL	+	0	-
SA-0022-WAL	+	0	--
SA-0029-WAL	+	--	--
SA-0030-WAL	+	0	--
SA-0032-WAL	+	0	-
SA-0034-WAL	+	0	-
SA-0035-WAL	+	0	-
SA-0036-WAL	+	0	--
SA-0037-WAL	+	0	--
SA-0038-WAL	+	0	0
SA-0045-WAL	+	0	--
SA-0047-WAL	+	0	--
SA-0048-WAL	--	--	--
SA-0050-WAL	+	0	-
SA-0051-WAL	+	0	-
SA-0052-WAL	+	0	-
SA-0053-WAL	+	0	-
SA-0054-WAL	+	0	-
SA-0056-WAL	+	0	-
SA-0059-WAL	+	0	0
SA-0061-WAL	+	0	--
SA-0062-WAL	+	0	0
SA-0064-WAL	+	0	-
SA-0066-WAL	+	0	--

Site Ref	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
SA-0071-WAL	--	0	-
SA-0078-WAL	+	0	--
SA-0085-WAL	+	0	0
SA-0102-WAL	+	0	0
SA-0138-WAL	+	0	0
SA-0149-WAL	+	0	-
SA-0153-WAL	+	0	0
SA-0163-WAL	+	0	-
SA-0167-WAL	+	0	0
SA-0172-WAL	+	0	-
SA-0174-WAL	+	0	-
SA-0183-WAL	+	0	0
SA-0186-WAL	+	0	-
SA-0187-WAL	+	0	--
SA-0188-WAL	+	0	-
SA-0195-WAL	+	--	--
SA-0196-WAL	+	0	0
SA-0197-WAL	+	--	-
SA-0199-WAL	+	0	-
SA-0201-WAL	+	0	-
SA-0202-WAL	--	--	--
SA-0204-WAL	+	0	-
SA-0205-WAL	+	0	0
SA-0206-WAL	+	0	0
SA-0207-WAL	+	0	-
SA-0208-WAL	+	0	0
SA-0211-WAL	+	0	0
SA-0212-WAL	+	0	-
SA-0213-WAL	+	0	0
SA-0215-WAL	+	0	-
SA-0216-WAL	+	0	-
SA-0220-WAL	+	0	-
SA-0222-WAL	+	0	-
SA-0223-WAL	+	0	-
SA-0224-WAL	+	0	-
SA-0225-WAL	+	0	0
SA-0226-WAL	+	0	0
SA-0227-WAL	+	0	0
SA-0228-WAL	+	0	--
SA-0229-WAL	+	0	0
SA-0230-WAL	+	0	0
SA-0231-WAL	+	0	0
SA-0232-WAL	+	0	--
SA-0233-WAL	+	0	0
SA-0235-WAL	+	0	-
SA-0236-WAL	+	0	0

Site Ref	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
SA-0237-WAL	+	0	--
SA-0238-WAL	--	--	--
SA-0239-WAL	+	0	0
SA-0240-WAL	+	0	0
SA-0241-WAL	+	0	-
SA-0244-WAL	+	0	0
SA-0245-WAL	+	0	--
SA-0248-WAL	+	0	-
SA-0250-WAL	+	0	-
SA-0251-WAL	+	0	-
SA-0252-WAL	+	0	0
SA-0257-WAL	+	0	0
SA-0264-WAL	+	0	-
SA-0265-WAL	+	0	-
SA-0266-WAL	+	0	-
SA-0267-WAL	+	0	--
SA-0269-WAL	+	0	--
SA-0272-WAL	+	0	-
SA-0274-WAL	--	--	--
SA-0278-WAL	--	--	-
SA-0280-WAL	-	0	0
SA-0284-WAL	+	0	--
SA-0288-WAL	+	0	--
SA-0289-WAL	+	--	-
SA-0291-WAL	+	0	--
SA-0292-WAL	+	0	--
SA-0294-WAL	+	0	0
SA-0295-WAL	+	0	0
SA-0296-WAL	+	0	0
SA-0297-WAL	+	0	0
SA-0301-WAL	+	0	-
SA-0302-WAL	+	0	-
SA-0304-WAL	+	0	-
SA-0305-WAL	+	0	0
SA-0309-WAL	+	0	-
SA-0312-WAL	+	--	-
SA-0313-WAL	+	0	--
SA-0317-WAL	+	--	-
<b>Walsall Employment Sites</b>			
SA-0001-WAL	+	0	-
SA-0007-WAL	+	0	-
SA-0008-WAL	+	--	-
SA-0015-WAL	+	0	--
SA-0020-WAL	+	0	-
SA-0030-WAL	+	0	--
SA-0045-WAL	+	0	--

Site Ref	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
SA-0047-WAL	+	0	--
SA-0054-WAL	+	0	-
SA-0057-WAL	+	0	0
SA-0061-WAL	+	0	--
SA-0167-WAL	+	0	0
SA-0183-WAL	+	0	0
SA-0186-WAL	+	0	-
SA-0195-WAL	+	--	--
SA-0196-WAL	+	0	0
SA-0197-WAL	+	--	-
SA-0200-WAL	+	0	-
SA-0201-WAL	+	0	-
SA-0202-WAL	--	--	--
SA-0204-WAL	+	0	-
SA-0205-WAL	+	0	0
SA-0211-WAL	+	0	0
SA-0212-WAL	+	0	-
SA-0213-WAL	+	0	0
SA-0215-WAL	+	0	-
SA-0216-WAL	+	0	-
SA-0223-WAL	+	0	-
SA-0227-WAL	+	0	0
SA-0230-WAL	+	0	0
SA-0231-WAL	+	0	0
SA-0232-WAL	+	0	--
SA-0235-WAL	+	0	-
SA-0237-WAL	+	0	--
SA-0238-WAL	--	--	--
SA-0239-WAL	+	0	0
SA-0242-WAL	+	0	--
SA-0243-WAL	+	0	-
SA-0244-WAL	+	0	0
SA-0245-WAL	+	0	--
SA-0248-WAL	+	0	-
SA-0257-WAL	+	0	0
SA-0274-WAL	--	--	--
SA-0275-WAL	+	--	--
SA-0276-WAL	+	0	-
SA-0284-WAL	+	0	--
SA-0286-WAL	+	0	-
SA-0288-WAL	+	0	--
SA-0301-WAL	+	0	-
SA-0302-WAL	+	0	-
SA-0304-WAL	+	0	-
SA-0308-WAL	--	0	--
SA-0315-WAL	+	0	-

Site Ref	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
<b>Walsall Carried Forward Residential Sites</b>			
HO0016	-	0	0
HO0020	+	0	--
HO0023b	+	0	-
HO0027	+	0	-
HO0029	+	0	-
HO0037	+	0	0
HO0039a	+	0	0
HO0039b	+	0	-
HO0040	+	0	0
HO0041a	+	0	0
HO0041b	+	0	0
HO0043	+	0	-
HO0044	+	0	0
HO0046	-	0	-
HO0053	+	0	-
HO0060a	+	0	0
HO0060b	+	0	0
HO0060c	+	0	-
HO0060d	+	0	--
HO0062	+	0	-
HO0065	+	0	-
HO0066b	+	0	0
HO0071	+	0	--
HO0072	+	0	-
HO0093	+	0	-
HO0117	+	0	0
HO0124	+	0	-
HO0125	+	0	0
HO0126	+	0	-
HO0137a	--	0	-
HO0137b	+	0	0
HO0137c	+	0	0
HO0147	+	0	0
HO0150	+	0	0
HO0150a	+	0	0
HO0154	+	0	0
HO0157a	+	0	0
HO0157b	+	0	0
HO0157c	+	0	0
HO0162a	+	0	0
HO0162b	+	0	0
HO0163	+	0	0
HO0168a	+	0	--
HO0168b	+	0	0
HO0176	-	0	-

Site Ref	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
HO0180	+	0	-
HO0181	+	0	-
HO0185	+	0	-
HO0194	+	0	0
HO0195	+	0	-
HO0201	-	0	--
HO0205	+	0	0
HO0217a	+	0	0
HO0217b	+	0	0
HO0304	+	0	0
HO0305	+	--	-
HO0307	+	0	0
HO0308	+	0	-
HO0310	+	0	--
HO0312	+	0	-
HO0313	+	0	-
HO0316	+	0	0
HO0317	+	0	0
HO0318	+	0	-
HO0320	+	0	0
HO0321	+	0	-
HO0322a	+	0	-
HO0322b	+	0	-
HO1314	+	0	-
LC02B	+	0	-
LC08A	+	0	0
LC14A	+	0	-
LC18A	+	0	0
LC30A	+	0	0
LC30C	+	0	0
LC31A	+	0	--
<b>Walsall Carried Forward Employment Sites</b>			
IN0002.1	+	0	--
IN0005.1	+	0	-
IN0009.12	+	0	-
IN0009.13	+	0	0
IN0009.14	+	0	0
IN0010.2	+	--	--
IN0012.5	+	0	-
IN0012.6	+	--	-
IN0012.8	+	--	--
IN0017.1	+	0	--
IN0017.2	+	0	-
IN0018.2	+	0	0
IN0027.1	+	0	-
IN0027.2	+	0	-

Site Ref	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
IN0032.2	+	0	-
IN0052.2	+	0	0
IN0056.2	--	0	-
IN0058	+	0	-
IN0063	--	0	-
IN0064	--	--	--
IN0068.1	--	0	--
IN0069.3	--	0	-
IN0069.42	--	0	-
IN0070.2	+	0	-
IN0070.4	+	0	-
IN0071.2	-	0	--
IN0072.2	--	0	-
IN0078.12	+	0	0
IN0078.2	--	0	-
IN0084	-	0	--
IN0093.2	--	--	-
IN0099.2	-	0	0
IN0103.2	+	0	-
IN0104.1	+	0	--
IN0104.4	+	0	--
IN0105	-	--	--
IN0109	--	--	-
IN0110	--	--	--
IN0118.2	+	0	--
IN0120.5	+	0	0
IN0122	-	0	-
IN0205	--	--	--
IN0315	-	--	-
IN0317	-	--	0
IN0328	+	0	-
IN0333	--	0	--
IN0341	--	--	--

## H.7 SA Objective 6: Natural Resources

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

H.7.1.1 Walsall has the largest proportion of Green Belt land out of all of the four BCA, and consequently contains a large proportion of previously undeveloped land. The majority of the proposed sites are located either wholly or partially on previously undeveloped land and/or contain areas likely to be of environmental value such as hedgerows, trees and scrub that may be lost or further fragmented if developed.

H.7.1.2 The proposed development at 37 sites in Walsall would be expected to have a major negative impact on natural resources, due to the loss of 20ha or more of previously undeveloped land. Furthermore, the proposed development at 214 sites in Walsall could potentially have a minor negative impact on natural resources, due to the loss of less than 20ha of previously undeveloped land.

H.7.1.3 43 sites comprise previously developed land which would be likely to have little or no environmental value. The proposed development at these sites would be expected to have a minor positive impact on natural resources as development would be classed as an efficient use of land.

### H.7.2 Agricultural Land Classification

H.7.2.1 In relation to Agricultural Land Classification (ALC) within Walsall, the borough is largely 'Urban' and 'Non-Agricultural' however there are also some significant areas of Grade 3 and 4 land towards the west in particular, with a very small area of Grade 2 land at the eastern edge. Grade 2, and potentially Grade 3, land represents some of the 'best and most versatile' (BMV) land within Walsall. 123 sites are located wholly or partially on ALC Grades 2 and 3 land, and therefore, the proposed development at these sites could potentially have a minor negative impact due to the loss of this important natural resource.

H.7.2.2 128 proposed sites are located on areas of less agriculturally important Grade 4, 'Urban' and/or 'Non-Agricultural' land, and therefore, the proposed development at these sites could potentially have a minor positive impact on natural resources as development at these sites would help to prevent the loss of BMV land across the Plan area.

H.7.2.3 The proposed development at the 43 sites which are located wholly on previously developed land would be likely to have a negligible impact on agricultural land.



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

H.7.3.1 The Black Country contains potentially important mineral resources, which should be safeguarded against loss or sterilisation by non-mineral development<sup>5</sup>. The mineral resources of local and national importance in accordance with the definition set out in the NPPF include sand, gravel, brick clay and fireclay. The Review of the Evidence Base for Minerals<sup>6</sup> recommended the BCA to adopt more tightly defined MSAs focused on these resources.

H.7.3.2 Mineral Safeguarding Areas (MSAs) have been proposed across a large proportion of Walsall borough, in the east. These include sand and gravel, brick clay and fireclay resources. Development proposals that are located within an MSA may therefore result in a minor negative impact on the accessibility of the mineral resources they contain. This includes 145 of the proposed sites in Walsall.

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

Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Area / Area of Search
<b>Walsall Residential Sites</b>			
SA-0001-WAL	-	+	0
SA-0006-WAL	-	-	-
SA-0010-WAL	-	+	0
SA-0012-WAL	-	-	0
SA-0014-WAL	--	-	0
SA-0015-WAL	-	-	-
SA-0016-WAL	-	+	0
SA-0017-WAL	--	-	-
SA-0018-WAL	--	-	0
SA-0019-WAL	--	-	0
SA-0020-WAL	-	-	-
SA-0022-WAL	--	-	-
SA-0029-WAL	-	-	-
SA-0030-WAL	-	-	-
SA-0032-WAL	-	+	-
SA-0034-WAL	-	-	-
SA-0035-WAL	-	-	-
SA-0036-WAL	-	-	-
SA-0037-WAL	--	-	-

<sup>5</sup> wood (2020) Review of the Evidence Base for Minerals to support preparation of the Black Country Plan. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4f/> [Date Accessed: 11/06/21]

<sup>6</sup> “Minerals resources of local and national importance: Minerals which are necessary to meet society’s needs, including aggregates, brickclay (especially Etruria Marl and fireclay), silica sand (including high grade silica sands), cement raw materials, gypsum, salt, fluorspar, shallow and deep-mined coal, oil and gas (including conventional and unconventional hydrocarbons), tungsten, kaolin, ball clay, potash, polyhalite and local minerals of importance to heritage assets and local distinctiveness”.

Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Area / Area of Search
SA-0038-WAL	-	-	-
SA-0045-WAL	-	+	-
SA-0047-WAL	--	-	-
SA-0048-WAL	--	-	-
SA-0050-WAL	-	-	0
SA-0051-WAL	-	+	-
SA-0052-WAL	-	+	-
SA-0053-WAL	-	-	-
SA-0054-WAL	-	-	-
SA-0056-WAL	-	-	-
SA-0059-WAL	-	-	-
SA-0061-WAL	--	-	-
SA-0062-WAL	-	+	-
SA-0064-WAL	-	+	-
SA-0066-WAL	--	-	0
SA-0071-WAL	-	+	0
SA-0078-WAL	-	-	0
SA-0085-WAL	+	0	0
SA-0102-WAL	-	-	-
SA-0138-WAL	-	-	-
SA-0149-WAL	-	-	-
SA-0153-WAL	-	+	-
SA-0163-WAL	-	+	0
SA-0167-WAL	-	-	0
SA-0172-WAL	-	+	0
SA-0174-WAL	-	+	0
SA-0183-WAL	+	0	0
SA-0186-WAL	-	+	-
SA-0187-WAL	-	-	-
SA-0188-WAL	-	+	0
SA-0195-WAL	-	+	-
SA-0196-WAL	-	+	0
SA-0197-WAL	-	-	-
SA-0199-WAL	-	-	-
SA-0201-WAL	-	-	-
SA-0202-WAL	--	-	-
SA-0204-WAL	--	-	-
SA-0205-WAL	-	+	-
SA-0206-WAL	-	-	-
SA-0207-WAL	-	-	-
SA-0208-WAL	-	-	-
SA-0211-WAL	--	-	-
SA-0212-WAL	--	-	-
SA-0213-WAL	-	-	-

Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Area / Area of Search
SA-0215-WAL	--	-	-
SA-0216-WAL	-	-	-
SA-0220-WAL	-	-	-
SA-0222-WAL	-	-	-
SA-0223-WAL	--	-	-
SA-0224-WAL	-	-	-
SA-0225-WAL	-	-	-
SA-0226-WAL	-	-	-
SA-0227-WAL	-	-	-
SA-0228-WAL	--	-	-
SA-0229-WAL	--	-	-
SA-0230-WAL	-	-	-
SA-0231-WAL	--	-	-
SA-0232-WAL	--	-	-
SA-0233-WAL	+	0	-
SA-0235-WAL	-	-	-
SA-0236-WAL	--	-	-
SA-0237-WAL	--	-	-
SA-0238-WAL	--	-	-
SA-0239-WAL	-	-	-
SA-0240-WAL	-	-	-
SA-0241-WAL	-	-	-
SA-0244-WAL	-	-	-
SA-0245-WAL	-	-	-
SA-0248-WAL	-	-	-
SA-0250-WAL	-	+	-
SA-0251-WAL	-	-	-
SA-0252-WAL	-	+	0
SA-0257-WAL	-	+	-
SA-0264-WAL	-	+	-
SA-0265-WAL	-	+	0
SA-0266-WAL	-	-	-
SA-0267-WAL	-	+	0
SA-0269-WAL	-	+	0
SA-0272-WAL	-	-	0
SA-0274-WAL	-	+	0
SA-0278-WAL	-	+	0
SA-0280-WAL	-	+	0
SA-0284-WAL	-	-	0
SA-0288-WAL	-	-	0
SA-0289-WAL	-	-	0
SA-0291-WAL	-	-	0
SA-0292-WAL	-	-	0
SA-0294-WAL	-	-	-

Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Area / Area of Search
SA-0295-WAL	-	-	0
SA-0296-WAL	-	-	-
SA-0297-WAL	-	-	0
SA-0301-WAL	-	-	-
SA-0302-WAL	--	-	-
SA-0304-WAL	-	-	-
SA-0305-WAL	-	-	-
SA-0309-WAL	-	-	-
SA-0312-WAL	-	-	-
SA-0313-WAL	-	-	-
SA-0317-WAL	-	+	-
<b>Walsall Employment Sites</b>			
SA-0001-WAL	-	+	0
SA-0007-WAL	-	-	-
SA-0008-WAL	-	+	-
SA-0015-WAL	-	-	-
SA-0020-WAL	-	-	-
SA-0030-WAL	-	-	-
SA-0045-WAL	-	+	-
SA-0047-WAL	--	-	-
SA-0054-WAL	-	-	-
SA-0057-WAL	-	+	0
SA-0061-WAL	--	-	-
SA-0167-WAL	-	-	0
SA-0183-WAL	+	0	0
SA-0186-WAL	-	+	-
SA-0195-WAL	-	+	-
SA-0196-WAL	-	+	0
SA-0197-WAL	-	-	-
SA-0200-WAL	-	-	-
SA-0201-WAL	-	-	-
SA-0202-WAL	--	-	-
SA-0204-WAL	--	-	-
SA-0205-WAL	-	+	-
SA-0211-WAL	--	-	-
SA-0212-WAL	--	-	-
SA-0213-WAL	-	-	-
SA-0215-WAL	--	-	-
SA-0216-WAL	-	-	-
SA-0223-WAL	--	-	-
SA-0227-WAL	-	-	-
SA-0230-WAL	-	-	-
SA-0231-WAL	--	-	-
SA-0232-WAL	--	-	-

Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Area / Area of Search
SA-0235-WAL	-	-	-
SA-0237-WAL	--	-	-
SA-0238-WAL	--	-	-
SA-0239-WAL	-	-	-
SA-0242-WAL	-	+	-
SA-0243-WAL	-	+	-
SA-0244-WAL	-	-	-
SA-0245-WAL	-	-	-
SA-0248-WAL	-	-	-
SA-0257-WAL	+	0	-
SA-0274-WAL	-	+	0
SA-0275-WAL	-	+	-
SA-0276-WAL	-	+	0
SA-0284-WAL	-	-	0
SA-0286-WAL	-	-	0
SA-0288-WAL	-	-	0
SA-0301-WAL	-	-	-
SA-0302-WAL	--	-	-
SA-0304-WAL	-	-	-
SA-0308-WAL	-	+	-
SA-0315-WAL	+	0	0
<b>Walsall Carried Forward Residential Sites</b>			
HO0016	+	0	0
HO0020	-	+	0
HO0023b	-	+	0
HO0027	-	+	0
HO0029	+	0	0
HO0037	-	+	0
HO0039a	-	+	0
HO0039b	-	+	0
HO0040	-	+	0
HO0041a	-	+	0
HO0041b	-	+	0
HO0043	-	+	-
HO0044	-	+	0
HO0046	-	+	0
HO0053	+	0	0
HO0060a	+	0	0
HO0060b	+	0	0
HO0060c	-	+	0
HO0060d	+	0	0
HO0062	-	+	0
HO0065	+	0	0
HO0066b	+	0	0

Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Area / Area of Search
HO0071	-	+	0
HO0072	-	+	0
HO0093	-	+	0
HO0117	-	+	0
HO0124	-	+	0
HO0125	-	+	0
HO0126	-	+	0
HO0137a	+	0	0
HO0137b	+	0	0
HO0137c	+	0	0
HO0147	+	0	0
HO0150	+	0	0
HO0150a	+	0	0
HO0154	-	-	0
HO0157a	-	+	-
HO0157b	+	0	-
HO0157c	-	+	-
HO0162a	+	0	0
HO0162b	+	0	0
HO0163	+	0	0
HO0168a	-	+	-
HO0168b	-	+	-
HO0176	-	+	0
HO0180	-	+	0
HO0181	-	+	0
HO0185	-	+	0
HO0194	+	0	0
HO0195	+	0	0
HO0201	-	+	0
HO0205	-	+	0
HO0217a	-	+	0
HO0217b	-	+	0
HO0304	-	+	-
HO0305	-	+	0
HO0307	-	+	0
HO0308	+	0	0
HO0310	-	+	0
HO0312	+	0	0
HO0313	-	-	0
HO0316	+	0	0
HO0317	-	+	-
HO0318	-	+	0
HO0320	+	0	0

Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Area / Area of Search
HO0321	-	+	0
HO0322a	-	+	0
HO0322b	+	0	0
HO1314	-	+	0
LC02B	-	+	0
LC08A	-	+	0
LC14A	-	+	-
LC18A	-	+	-
LC30A	+	0	0
LC30C	+	0	0
LC31A	-	+	0
<b>Walsall Carried Forward Employment Sites</b>			
IN0002.1	-	+	-
IN0005.1	+	0	-
IN0009.12	-	+	-
IN0009.13	-	+	-
IN0009.14	-	+	-
IN0010.2	-	+	-
IN0012.5	-	+	-
IN0012.6	+	0	-
IN0012.8	+	0	-
IN0017.1	+	0	0
IN0017.2	-	+	0
IN0018.2	+	0	0
IN0027.1	-	+	0
IN0027.2	-	+	0
IN0032.2	-	+	0
IN0052.2	-	+	0
IN0056.2	-	+	0
IN0058	-	+	0
IN0063	-	+	0
IN0064	-	+	0
IN0068.1	-	+	0
IN0069.3	-	+	0
IN0069.42	+	0	0
IN0070.2	+	0	0
IN0070.4	-	+	0
IN0071.2	-	+	0
IN0072.2	-	+	0
IN0078.12	-	+	0
IN0078.2	-	+	0
IN0084	-	+	0
IN0093.2	-	+	0

Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Area / Area of Search
IN0099.2	-	+	0
IN0103.2	+	0	0
IN0104.1	+	0	0
IN0104.4	-	+	0
IN0105	-	+	0
IN0109	-	+	0
IN0110	-	+	0
IN0118.2	-	+	0
IN0120.5	-	+	0
IN0122	-	+	0
IN0205	-	+	0
IN0315	-	+	0
IN0317	+	0	0
IN0328	-	+	0
IN0333	-	+	0
IN0341	-	+	0

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## H.8 SA Objective 7: Pollution

### H.8.1 Air Quality Management Area

H.8.1.1 The entirety of Walsall is classed as ‘Walsall Air Quality Management Area’ (AQMA). All of the proposed sites in Walsall are located wholly within this AQMA, and several sites are also partially located within 200m of neighbouring AQMAs including ‘Birmingham AQMA’, ‘CCDC AQMA 2’, ‘Sandwell AQMA’ and ‘Wolverhampton AQMA’. The proposed development at all sites would be likely to locate site end users in areas of existing poor air quality and have a minor negative impact on air pollution.

### H.8.2 Main Road

H.8.2.1 Walsall’s major road network includes the A461, A452 and the M6 Motorway which passes through the west of the borough. 139 proposed sites are located partially or wholly within 200m of a major road and could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using these main roads would be expected to have a minor negative impact on air quality and noise at these sites.

H.8.2.2 The proposed development at 155 sites within Walsall which are over 200m from a main road would be expected to have a negligible impact on transport associated air and noise pollution associated with main roads.

### H.8.3 Watercourse

H.8.3.1 There are many watercourses within Walsall, including the River Tame, Ford Brook and various canals and smaller watercourses. 66 of the proposed sites within Walsall coincide with or are located within 10m of various watercourses. The proposed development at these sites could potentially increase the risk of contamination of these watercourses, and therefore have a minor negative impact on water quality. Sites which are located over 10m from watercourses are less likely to have a significant impact on the quality of watercourses however each site would need to be evaluated according to land use type, size of development and exact location.

H.8.3.2 Site IN0058 has been identified as coinciding with an underground portion of the Sneyd Brook. It is uncertain if the development at this site would increase the risk of contamination of this watercourse.

### H.8.4 Groundwater Source Protection Zone

H.8.4.1 Source Protection Zones (SPZs) for groundwater within Walsall are located to the east of the borough and are grouped from 1 to 3 based on the level of protection that the groundwater requires. 68 sites coincide with SPZ 1, 2 and/or 3, and therefore, the proposed

development at these sites could potentially increase the risk of groundwater contamination within the SPZ and have a minor negative impact on the quality or status of groundwater resources. The remaining sites do not coincide with the catchment of on any SPZ, and therefore, the proposed development at these sites may have a negligible impact on groundwater quality.

### H.8.5 Potential Increase in Air Pollution

- H.8.5.1 63 sites are proposed for the development of 100 or more dwellings, and 28 sites are proposed for non-residential end use and comprise more than 1ha. The proposed development at these 91 sites could potentially result in a significant increase in local air pollution; therefore, a major negative impact would be expected.
- H.8.5.2 105 sites are proposed for the development of between ten and 99 dwellings, and 49 sites are proposed for non-residential end use and comprise between one and 10ha. Therefore, the proposed development at these 154 sites could potentially have a minor negative impact on air pollution in the local area.
- H.8.5.3 23 sites are proposed for the development of less than ten dwellings, and 23 sites are proposed for non-residential end use and comprise less than 1ha. The proposed development at these 46 sites would be expected to have a negligible impact on local air pollution.
- H.8.5.4 The housing capacity at three residential sites in Walsall is unknown at the time of writing, and therefore, the impact of the proposed development at these sites is uncertain.

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

Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
<b>Walsall Residential Sites</b>					
SA-0001-WAL	-	-	0	0	0
SA-0006-WAL	-	-	0	-	-
SA-0010-WAL	-	0	-	0	--
SA-0012-WAL	-	0	-	0	--
SA-0014-WAL	-	-	0	0	--
SA-0015-WAL	-	-	0	-	--
SA-0016-WAL	-	0	0	0	-
SA-0017-WAL	-	-	0	0	--
SA-0018-WAL	-	-	-	0	--
SA-0019-WAL	-	-	-	0	--
SA-0020-WAL	-	0	0	0	--
SA-0022-WAL	-	-	-	-	--
SA-0029-WAL	-	0	0	0	--
SA-0030-WAL	-	-	-	0	--
SA-0032-WAL	-	0	0	0	-

Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
SA-0034-WAL	-	0	0	-	--
SA-0035-WAL	-	0	0	0	-
SA-0036-WAL	-	0	0	0	--
SA-0037-WAL	-	-	0	-	--
SA-0038-WAL	-	-	0	-	--
SA-0045-WAL	-	0	0	0	-
SA-0047-WAL	-	0	0	0	--
SA-0048-WAL	-	0	-	0	--
SA-0050-WAL	-	0	0	0	-
SA-0051-WAL	-	-	0	0	-
SA-0052-WAL	-	0	-	0	-
SA-0053-WAL	-	0	0	-	-
SA-0054-WAL	-	0	0	-	--
SA-0056-WAL	-	0	0	0	--
SA-0059-WAL	-	0	0	-	-
SA-0061-WAL	-	-	0	0	--
SA-0062-WAL	-	0	0	0	-
SA-0064-WAL	-	-	0	0	-
SA-0066-WAL	-	-	-	0	--
SA-0071-WAL	-	0	-	0	-
SA-0078-WAL	-	-	0	0	--
SA-0085-WAL	-	-	0	0	-
SA-0102-WAL	-	0	0	-	+/-
SA-0138-WAL	-	-	0	-	-
SA-0149-WAL	-	0	0	-	--
SA-0153-WAL	-	-	0	0	-
SA-0163-WAL	-	-	0	0	-
SA-0167-WAL	-	0	0	0	+/-
SA-0172-WAL	-	-	-	0	-
SA-0174-WAL	-	-	0	0	-
SA-0183-WAL	-	0	0	0	+/-
SA-0186-WAL	-	0	0	0	--
SA-0187-WAL	-	-	0	-	--
SA-0188-WAL	-	-	0	0	-
SA-0195-WAL	-	-	-	0	--
SA-0196-WAL	-	-	0	0	-
SA-0197-WAL	-	0	-	0	--
SA-0199-WAL	-	0	-	-	-
SA-0201-WAL	-	-	0	-	-
SA-0202-WAL	-	0	-	0	--
SA-0204-WAL	-	-	0	-	--
SA-0205-WAL	-	0	0	-	-
SA-0206-WAL	-	0	0	-	-
SA-0207-WAL	-	-	0	-	-

Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
SA-0208-WAL	-	-	0	-	0
SA-0211-WAL	-	-	0	-	--
SA-0212-WAL	-	0	0	-	--
SA-0213-WAL	-	0	0	-	--
SA-0215-WAL	-	0	0	-	--
SA-0216-WAL	-	-	0	-	--
SA-0220-WAL	-	0	0	-	-
SA-0222-WAL	-	0	0	-	-
SA-0223-WAL	-	0	0	-	--
SA-0224-WAL	-	0	0	-	-
SA-0225-WAL	-	0	0	-	-
SA-0226-WAL	-	0	0	-	--
SA-0227-WAL	-	0	0	-	-
SA-0228-WAL	-	0	0	-	--
SA-0229-WAL	-	0	0	-	--
SA-0230-WAL	-	0	0	-	--
SA-0231-WAL	-	0	0	-	--
SA-0232-WAL	-	0	0	0	--
SA-0233-WAL	-	-	0	0	-
SA-0235-WAL	-	0	0	0	--
SA-0236-WAL	-	0	0	0	--
SA-0237-WAL	-	0	0	0	--
SA-0238-WAL	-	0	-	0	--
SA-0239-WAL	-	0	0	0	--
SA-0240-WAL	-	0	0	0	--
SA-0241-WAL	-	0	0	0	--
SA-0244-WAL	-	-	0	-	--
SA-0245-WAL	-	-	0	-	0
SA-0248-WAL	-	-	0	-	-
SA-0250-WAL	-	-	-	0	-
SA-0251-WAL	-	-	0	-	-
SA-0252-WAL	-	0	0	0	-
SA-0257-WAL	-	0	0	0	-
SA-0264-WAL	-	0	0	0	--
SA-0265-WAL	-	0	0	0	-
SA-0266-WAL	-	-	0	-	--
SA-0267-WAL	-	-	0	0	0
SA-0269-WAL	-	-	0	0	--
SA-0272-WAL	-	0	0	0	0
SA-0274-WAL	-	-	-	0	--
SA-0278-WAL	-	0	-	0	-
SA-0280-WAL	-	-	0	0	0
SA-0284-WAL	-	-	-	0	--
SA-0288-WAL	-	-	0	0	--

Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
SA-0289-WAL	-	0	0	0	--
SA-0291-WAL	-	0	0	0	--
SA-0292-WAL	-	0	0	0	-
SA-0294-WAL	-	0	0	0	-
SA-0295-WAL	-	0	0	0	0
SA-0296-WAL	-	0	0	-	-
SA-0297-WAL	-	0	0	0	-
SA-0301-WAL	-	0	0	0	-
SA-0302-WAL	-	0	0	0	--
SA-0304-WAL	-	0	0	0	-
SA-0305-WAL	-	0	0	0	0
SA-0309-WAL	-	0	0	-	--
SA-0312-WAL	-	-	0	-	-
SA-0313-WAL	-	0	0	-	-
SA-0317-WAL	-	0	0	0	-
<b>Walsall Employment Sites</b>					
SA-0001-WAL	-	-	0	0	0
SA-0007-WAL	-	-	-	-	-
SA-0008-WAL	-	-	0	0	-
SA-0015-WAL	-	-	0	-	--
SA-0020-WAL	-	0	0	0	--
SA-0030-WAL	-	-	-	0	--
SA-0045-WAL	-	0	0	0	-
SA-0047-WAL	-	0	0	0	--
SA-0054-WAL	-	0	0	-	--
SA-0057-WAL	-	-	0	0	--
SA-0061-WAL	-	-	0	0	--
SA-0167-WAL	-	0	0	0	-
SA-0183-WAL	-	0	0	0	0
SA-0186-WAL	-	0	0	0	-
SA-0195-WAL	-	-	-	0	--
SA-0196-WAL	-	-	0	0	-
SA-0197-WAL	-	0	-	0	-
SA-0200-WAL	-	-	0	-	-
SA-0201-WAL	-	-	0	-	-
SA-0202-WAL	-	0	-	0	--
SA-0204-WAL	-	-	0	-	--
SA-0205-WAL	-	0	0	-	-
SA-0211-WAL	-	-	0	-	--
SA-0212-WAL	-	0	0	-	--
SA-0213-WAL	-	0	0	-	-
SA-0215-WAL	-	0	0	-	--
SA-0216-WAL	-	-	0	-	--
SA-0223-WAL	-	0	0	-	--

Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
SA-0227-WAL	-	0	0	-	-
SA-0230-WAL	-	0	0	-	-
SA-0231-WAL	-	0	0	-	--
SA-0232-WAL	-	0	0	0	--
SA-0235-WAL	-	0	0	0	--
SA-0237-WAL	-	0	0	0	--
SA-0238-WAL	-	0	-	0	--
SA-0239-WAL	-	0	0	0	--
SA-0242-WAL	-	-	0	0	0
SA-0243-WAL	-	-	0	0	0
SA-0244-WAL	-	-	0	-	--
SA-0245-WAL	-	-	0	-	0
SA-0248-WAL	-	-	0	-	-
SA-0257-WAL	-	0	0	0	0
SA-0274-WAL	-	-	-	0	--
SA-0275-WAL	-	-	-	0	-
SA-0276-WAL	-	0	0	0	-
SA-0284-WAL	-	-	-	0	--
SA-0286-WAL	-	-	-	0	-
SA-0288-WAL	-	-	0	0	--
SA-0301-WAL	-	0	0	0	-
SA-0302-WAL	-	0	0	0	--
SA-0304-WAL	-	0	0	0	0
SA-0308-WAL	-	0	-	0	--
SA-0315-WAL	-	-	0	0	-
<b>Walsall Carried Forward Residential Sites</b>					
HO0016	-	0	0	0	0
HO0020	-	0	0	0	-
HO0023b	-	-	0	0	-
HO0027	-	0	0	0	--
HO0029	-	0	-	0	--
HO0037	-	-	0	0	-
HO0039a	-	0	0	0	-
HO0039b	-	0	0	0	0
HO0040	-	-	-	0	-
HO0041a	-	0	0	0	0
HO0041b	-	0	0	0	-
HO0043	-	-	0	-	-
HO0044	-	-	0	0	-
HO0046	-	0	-	0	-
HO0053	-	-	0	0	-
HO0060a	-	-	-	0	-
HO0060b	-	-	-	0	-
HO0060c	-	-	-	0	-

Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
HO0060d	-	-	0	0	0
HO0062	-	-	-	0	-
HO0065	-	-	0	0	-
HO0066b	-	-	0	0	-
HO0071	-	-	0	0	-
HO0072	-	-	0	0	-
HO0093	-	-	-	0	-
HO0117	-	-	0	0	-
HO0124	-	0	0	0	-
HO0125	-	-	0	0	-
HO0126	-	0	0	0	-
HO0137a	-	-	0	0	-
HO0137b	-	-	0	0	0
HO0137c	-	-	0	0	0
HO0147	-	0	0	0	-
HO0150	-	0	-	0	-
HO0150a	-	0	-	0	0
HO0154	-	0	0	0	-
HO0157a	-	-	-	0	-
HO0157b	-	-	-	0	0
HO0157c	-	-	-	0	-
HO0162a	-	0	0	0	-
HO0162b	-	0	0	0	0
HO0163	-	-	-	0	-
HO0168a	-	0	0	-	-
HO0168b	-	0	0	-	0
HO0176	-	-	0	0	--
HO0180	-	-	0	0	-
HO0181	-	-	-	0	--
HO0185	-	-	0	0	-
HO0194	-	-	0	0	-
HO0195	-	-	0	0	-
HO0201	-	0	0	0	-
HO0205	-	0	0	0	-
HO0217a	-	-	0	0	-
HO0217b	-	-	0	0	-
HO0304	-	-	0	-	-
HO0305	-	-	-	0	-
HO0307	-	0	0	0	-
HO0308	-	0	0	0	-
HO0310	-	-	0	0	-
HO0312	-	-	0	0	-
HO0313	-	0	0	0	-
HO0316	-	-	0	0	-

Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
HO0317	-	-	0	0	-
HO0318	-	0	0	0	0
HO0320	-	0	0	0	-
HO0321	-	0	0	0	-
HO0322a	-	-	0	0	-
HO0322b	-	-	0	0	-
HO1314	-	-	0	0	-
LC02B	-	0	0	0	0
LC08A	-	0	0	0	-
LC14A	-	-	0	0	-
LC18A	-	-	0	0	0
LC30A	-	0	0	0	-
LC30C	-	0	0	0	0
LC31A	-	0	0	0	0
<b>Walsall Carried Forward Employment Sites</b>					
IN0002.1	-	-	0	0	-
IN0005.1	-	0	0	0	-
IN0009.12	-	0	0	0	-
IN0009.13	-	0	0	0	0
IN0009.14	-	0	0	0	0
IN0010.2	-	0	0	0	0
IN0012.5	-	0	0	0	-
IN0012.6	-	0	0	0	-
IN0012.8	-	0	-	0	-
IN0017.1	-	0	-	0	-
IN0017.2	-	0	-	0	-
IN0018.2	-	0	0	0	0
IN0027.1	-	-	0	0	-
IN0027.2	-	0	0	0	-
IN0032.2	-	-	0	0	0
IN0052.2	-	-	0	0	0
IN0056.2	-	-	0	0	0
IN0058	-	0	+/-	0	-
IN0063	-	-	-	0	-
IN0064	-	-	-	0	-
IN0068.1	-	0	0	0	-
IN0069.3	-	0	0	0	0
IN0069.42	-	-	0	0	-
IN0070.2	-	0	0	0	-
IN0070.4	-	0	0	0	0
IN0071.2	-	0	0	0	0
IN0072.2	-	-	-	0	-
IN0078.12	-	0	0	0	0
IN0078.2	-	-	-	0	0



Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
IN0084	-	-	-	0	-
IN0093.2	-	0	-	0	-
IN0099.2	-	0	0	0	0
IN0103.2	-	-	-	0	0
IN0104.1	-	-	-	0	-
IN0104.4	-	-	0	0	-
IN0105	-	-	-	0	-
IN0109	-	-	-	0	-
IN0110	-	-	-	0	-
IN0118.2	-	0	0	0	-
IN0120.5	-	-	0	0	0
IN0122	-	-	-	0	--
IN0205	-	-	-	0	-
IN0315	-	-	-	0	-
IN0317	-	-	0	0	0
IN0328	-	0	-	0	-
IN0333	-	-	-	0	-
IN0341	-	-	0	0	-

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## H.9 SA Objective 8: Waste

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

- H.9.1.1 Residential-led development is likely to result in an increase in household waste generation, to some extent. 129 sites are proposed for the development of 108 dwellings or less. The proposed development at these sites would be expected to have a negligible impact on household waste generation in comparison to current levels.
- H.9.1.2 53 sites are proposed for the development of between 108 and 1,089 dwellings. The proposed development at these sites would be expected to increase household waste generation by more than 0.1% in comparison to current levels. Therefore, the proposed development at these sites could potentially result in a minor negative impact on household waste generation.
- H.9.1.3 Nine sites are proposed for the development of 1,089 dwellings or more. The proposed development at these sites could potentially increase household waste generation by more than 1% in comparison to current levels. Therefore, the proposed development at these sites could potentially result in a major negative impact on household waste generation.
- H.9.1.4 The housing capacity at three residential sites in Walsall is unknown at the time of writing, and therefore, the impact of the proposed development at these sites is uncertain.
- H.9.1.5 The waste likely to be generated as a result of non-residential development is uncertain.

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

Site Ref	Increase in household waste generation	Site Ref	Increase in household waste generation
<b>Walsall Residential Sites</b>		SA-0167-WAL	+/-
SA-0001-WAL	0	SA-0172-WAL	0
SA-0006-WAL	0	SA-0174-WAL	0
SA-0010-WAL	-	SA-0183-WAL	+/-
SA-0012-WAL	-	SA-0186-WAL	-
SA-0014-WAL	-	SA-0187-WAL	-
SA-0015-WAL	-	SA-0188-WAL	0
SA-0016-WAL	0	SA-0195-WAL	-
SA-0017-WAL	--	SA-0196-WAL	0
SA-0018-WAL	-	SA-0197-WAL	-
SA-0019-WAL	-	SA-0199-WAL	0
SA-0020-WAL	-	SA-0201-WAL	0
SA-0022-WAL	--	SA-0202-WAL	--
SA-0029-WAL	-	SA-0204-WAL	-
SA-0030-WAL	-	SA-0205-WAL	0
SA-0032-WAL	0	SA-0206-WAL	0
SA-0034-WAL	-	SA-0207-WAL	0
SA-0035-WAL	0	SA-0208-WAL	0
SA-0036-WAL	-	SA-0211-WAL	-
SA-0037-WAL	-	SA-0212-WAL	-
SA-0038-WAL	-	SA-0213-WAL	-
SA-0045-WAL	0	SA-0215-WAL	-
SA-0047-WAL	--	SA-0216-WAL	-
SA-0048-WAL	-	SA-0220-WAL	0
SA-0050-WAL	0	SA-0222-WAL	0
SA-0051-WAL	0	SA-0223-WAL	-
SA-0052-WAL	0	SA-0224-WAL	0
SA-0053-WAL	0	SA-0225-WAL	0
SA-0054-WAL	-	SA-0226-WAL	-
SA-0056-WAL	-	SA-0227-WAL	0
SA-0059-WAL	0	SA-0228-WAL	--
SA-0061-WAL	--	SA-0229-WAL	-
SA-0062-WAL	0	SA-0230-WAL	-
SA-0064-WAL	0	SA-0231-WAL	-
SA-0066-WAL	-	SA-0232-WAL	--
SA-0071-WAL	0	SA-0233-WAL	0
SA-0078-WAL	-	SA-0235-WAL	-
SA-0085-WAL	0	SA-0236-WAL	-
SA-0102-WAL	+/-	SA-0237-WAL	--
SA-0138-WAL	0	SA-0238-WAL	--
SA-0149-WAL	-	SA-0239-WAL	-
SA-0153-WAL	0	SA-0240-WAL	-
SA-0163-WAL	0	SA-0241-WAL	-

Site Ref	Increase in household waste generation
SA-0244-WAL	-
SA-0245-WAL	0
SA-0248-WAL	0
SA-0250-WAL	0
SA-0251-WAL	0
SA-0252-WAL	0
SA-0257-WAL	0
SA-0264-WAL	-
SA-0265-WAL	0
SA-0266-WAL	-
SA-0267-WAL	0
SA-0269-WAL	-
SA-0272-WAL	0
SA-0274-WAL	-
SA-0278-WAL	0
SA-0280-WAL	0
SA-0284-WAL	-
SA-0288-WAL	-
SA-0289-WAL	-
SA-0291-WAL	-
SA-0292-WAL	0
SA-0294-WAL	0
SA-0295-WAL	0
SA-0296-WAL	0
SA-0297-WAL	0
SA-0301-WAL	0
SA-0302-WAL	-
SA-0304-WAL	0
SA-0305-WAL	0
SA-0309-WAL	0
SA-0312-WAL	0
SA-0313-WAL	0
SA-0317-WAL	0
<b>Walsall Employment Sites</b>	
SA-0001-WAL	+/-
SA-0007-WAL	+/-
SA-0008-WAL	+/-
SA-0015-WAL	+/-
SA-0020-WAL	+/-
SA-0030-WAL	+/-
SA-0045-WAL	+/-
SA-0047-WAL	+/-
SA-0054-WAL	+/-
SA-0057-WAL	+/-

Site Ref	Increase in household waste generation
SA-0061-WAL	+/-
SA-0167-WAL	+/-
SA-0183-WAL	+/-
SA-0186-WAL	+/-
SA-0195-WAL	+/-
SA-0196-WAL	+/-
SA-0197-WAL	+/-
SA-0200-WAL	+/-
SA-0201-WAL	+/-
SA-0202-WAL	+/-
SA-0204-WAL	+/-
SA-0205-WAL	+/-
SA-0211-WAL	+/-
SA-0212-WAL	+/-
SA-0213-WAL	+/-
SA-0215-WAL	+/-
SA-0216-WAL	+/-
SA-0223-WAL	+/-
SA-0227-WAL	+/-
SA-0230-WAL	+/-
SA-0231-WAL	+/-
SA-0232-WAL	+/-
SA-0235-WAL	+/-
SA-0237-WAL	+/-
SA-0238-WAL	+/-
SA-0239-WAL	+/-
SA-0242-WAL	+/-
SA-0243-WAL	+/-
SA-0244-WAL	+/-
SA-0245-WAL	+/-
SA-0248-WAL	+/-
SA-0257-WAL	+/-
SA-0274-WAL	+/-
SA-0275-WAL	+/-
SA-0276-WAL	+/-
SA-0284-WAL	+/-
SA-0286-WAL	+/-
SA-0288-WAL	+/-
SA-0301-WAL	+/-
SA-0302-WAL	+/-
SA-0304-WAL	+/-
SA-0308-WAL	+/-
SA-0315-WAL	+/-

Site Ref	Increase in household waste generation
<b>Walsall Carried Forward Residential Sites</b>	
HO0016	0
HO0020	0
HO0023b	0
HO0027	-
HO0029	-
HO0037	0
HO0039a	0
HO0039b	0
HO0040	0
HO0041a	0
HO0041b	0
HO0043	0
HO0044	0
HO0046	0
HO0053	0
HO0060a	0
HO0060b	0
HO0060c	0
HO0060d	0
HO0062	0
HO0065	0
HO0066b	0
HO0071	0
HO0072	0
HO0093	0
HO0117	0
HO0124	0
HO0125	0
HO0126	0
HO0137a	0
HO0137b	0
HO0137c	0
HO0147	0
HO0150	0
HO0150a	0
HO0154	0
HO0157a	0
HO0157b	0
HO0157c	0
HO0162a	0
HO0162b	0
HO0163	0

Site Ref	Increase in household waste generation
HO0168a	0
HO0168b	0
HO0176	-
HO0180	0
HO0181	-
HO0185	0
HO0194	0
HO0195	0
HO0201	0
HO0205	0
HO0217a	0
HO0217b	0
HO0304	0
HO0305	0
HO0307	0
HO0308	0
HO0310	0
HO0312	0
HO0313	0
HO0316	0
HO0317	0
HO0318	0
HO0320	0
HO0321	0
HO0322a	0
HO0322b	0
HO1314	0
LC02B	0
LC08A	0
LC14A	0
LC18A	0
LC30A	0
LC30C	0
LC31A	0
<b>Walsall Carried Forward Employment Sites</b>	
IN0002.1	+/-
IN0005.1	+/-
IN0009.12	+/-
IN0009.13	+/-
IN0009.14	+/-
IN0010.2	+/-
IN0012.5	+/-
IN0012.6	+/-

Site Ref	Increase in household waste generation
IN0012.8	+/-
IN0017.1	+/-
IN0017.2	+/-
IN0018.2	+/-
IN0027.1	+/-
IN0027.2	+/-
IN0032.2	+/-
IN0052.2	+/-
IN0056.2	+/-
IN0058	+/-
IN0063	+/-
IN0064	+/-
IN0068.1	+/-
IN0069.3	+/-
IN0069.42	+/-
IN0070.2	+/-
IN0070.4	+/-
IN0071.2	+/-
IN0072.2	+/-
IN0078.12	+/-

Site Ref	Increase in household waste generation
IN0078.2	+/-
IN0084	+/-
IN0093.2	+/-
IN0099.2	+/-
IN0103.2	+/-
IN0104.1	+/-
IN0104.4	+/-
IN0105	+/-
IN0109	+/-
IN0110	+/-
IN0118.2	+/-
IN0120.5	+/-
IN0122	+/-
IN0205	+/-
IN0315	+/-
IN0317	+/-
IN0328	+/-
IN0333	+/-
IN0341	+/-

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

### H.10.1 Bus Stop

H.10.1.1 Within Walsall, bus stops are regularly distributed throughout the built-up areas and would generally be expected to provide good public transport access. However, some areas of the borough would be likely to have more restricted access to bus services, particularly in the eastern outskirts of the borough and the Green Belt where several of the largest proposed sites are located.

H.10.1.2 The 43 sites which are located wholly or partially outside of the sustainable distance of 400m from a bus stop could potentially have a minor negative impact on site end users' access to sustainable transport. On the other hand, the majority of sites (251 in total) which are located amongst existing settlements and are within 400m of a bus stop would be expected to have a minor positive impact on access to sustainable transport.

### H.10.2 Railway Station

H.10.2.1 Within Walsall, there are three railway stations: Walsall Station, Bloxwich Station and Bloxwich North Station. All three stations are located towards the west of the borough. Reflecting on this, many of the proposed sites are situated outside of the sustainable distance of 2km from a railway station, and therefore, the proposed development at these 230 sites could potentially have a minor negative impact on site end users' access to rail services. However, 64 sites, including a large proportion of the 'carried forward' sites are located within 2km of a railway station; therefore, the proposed development at these sites would be expected to have a minor positive impact on access to rail services.

### H.10.3 Pedestrian Access

H.10.3.1 Sites with good pedestrian access can be described as those with existing pavements or pathways which are segregated from traffic use in the area, which as to be expected, are found in most of the built-up areas of Walsall but are more sparse towards the Green Belt and undeveloped areas. 223 sites in Walsall are well connected to the existing footpath networks, and therefore, the proposed development at these sites would be likely to have a minor positive impact on local transport and accessibility, by encouraging travel by foot and reducing the requirement for new pedestrian access to be created. Conversely, the remainder of the proposed sites currently have poor access to the surrounding footpath network. Therefore, the proposed development at these 71 sites could potentially have a minor negative impact on local accessibility, and pedestrian access to the wider community would need improvement to be considered a viable transport option.

## **H.10.4 Road Access**

H.10.4.1 There are many major and minor roads which run through Walsall allowing for generally good road transport and accessibility in the local area and nationally. The majority of the proposed sites in Walsall are adjacent to or coincide with existing roads, and therefore these 285 sites would be expected to provide site end users with good access to the existing road network, resulting in a minor positive impact on transport and accessibility. However, nine sites are not accessible from the current road network, and therefore, the proposed development at these sites could potentially have a minor negative impact on transport and accessibility.

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

H.10.5.1 Accessibility modelling data indicates the distribution of local fresh food and services within Walsall and considers sustainable pedestrian access to these services to be within a 15-minute walking distance. The data shows that most of the western side of the borough would be expected to have good pedestrian access to services, whereas a large proportion in the east has more limited access. As such, the majority of the sites (159 in total) are located over 15 minutes walking distance to local services, and therefore, the proposed development at these sites could potentially have a minor negative impact on transport and accessibility, based on current infrastructure. 135 sites are identified to be within a 15-minute walking distance to services, and therefore, the proposed development at these sites would be expected to have a minor positive impact on pedestrian access to local services.

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

H.10.6.1 Although pedestrian access to local services in Walsall is limited in some areas as discussed above, in general public transport access to these services is good. Only small sections of the borough are situated over a 15-minute travel time via public transport to local services. The majority of sites are within a 15-minute travel time, and therefore, the proposed development at these 280 sites could potentially have a minor positive impact on the sustainable access of site end users to local services, based on existing infrastructure. The 14 sites which are identified to be wholly or partially outside of the sustainable travel time to these local services may therefore potentially have a minor negative impact on sustainable access to these services, based on current infrastructure.



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

Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
<b>Walsall Residential Sites</b>						
SA-0001-WAL	+	-	+	+	-	+
SA-0006-WAL	-	-	+	+	-	+
SA-0010-WAL	+	-	+	+	+	-
SA-0012-WAL	+	-	+	+	-	+
SA-0014-WAL	-	+	+	+	-	+
SA-0015-WAL	-	-	-	+	-	-
SA-0016-WAL	+	-	+	+	-	+
SA-0017-WAL	+	-	+	+	-	+
SA-0018-WAL	+	-	+	+	-	+
SA-0019-WAL	+	-	+	+	-	+
SA-0020-WAL	+	-	+	+	+	+
SA-0022-WAL	+	-	+	+	-	+
SA-0029-WAL	+	-	+	+	+	+
SA-0030-WAL	+	-	-	+	-	+
SA-0032-WAL	-	-	-	+	-	+
SA-0034-WAL	+	-	-	+	+	+
SA-0035-WAL	+	-	-	+	+	+
SA-0036-WAL	+	-	-	+	-	+
SA-0037-WAL	+	-	-	+	-	-
SA-0038-WAL	+	-	-	+	-	+
SA-0045-WAL	+	-	+	+	-	+
SA-0047-WAL	-	-	-	+	-	+
SA-0048-WAL	+	-	+	+	+	+
SA-0050-WAL	+	-	+	+	-	+
SA-0051-WAL	+	-	+	+	-	+
SA-0052-WAL	+	-	+	+	+	+
SA-0053-WAL	+	-	-	-	-	+
SA-0054-WAL	+	-	+	+	-	+
SA-0056-WAL	+	-	+	+	+	+
SA-0059-WAL	+	-	+	+	+	+
SA-0061-WAL	-	-	+	+	-	+
SA-0062-WAL	+	-	+	+	+	+
SA-0064-WAL	+	-	-	-	+	+
SA-0066-WAL	+	-	+	+	-	+
SA-0071-WAL	+	-	+	+	-	-
SA-0078-WAL	+	+	+	+	-	+
SA-0085-WAL	+	+	+	+	+	+
SA-0102-WAL	+	-	+	+	-	+
SA-0138-WAL	-	-	-	+	-	+
SA-0149-WAL	+	-	-	+	-	+

Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
SA-0153-WAL	+	-	+	+	+	+
SA-0163-WAL	+	+	+	+	+	+
SA-0167-WAL	+	-	-	+	-	+
SA-0172-WAL	+	+	+	+	+	+
SA-0174-WAL	+	+	+	+	+	+
SA-0183-WAL	+	-	-	+	-	+
SA-0186-WAL	+	-	+	+	+	+
SA-0187-WAL	-	-	+	+	-	-
SA-0188-WAL	+	-	+	+	-	+
SA-0195-WAL	-	-	+	+	+	+
SA-0196-WAL	+	-	+	+	-	+
SA-0197-WAL	-	-	-	+	+	+
SA-0199-WAL	+	-	+	+	-	+
SA-0201-WAL	+	-	+	+	-	+
SA-0202-WAL	-	-	+	+	-	+
SA-0204-WAL	+	-	-	+	-	+
SA-0205-WAL	+	-	+	+	+	+
SA-0206-WAL	+	-	-	+	+	+
SA-0207-WAL	+	-	+	+	-	+
SA-0208-WAL	+	-	+	+	-	+
SA-0211-WAL	-	-	-	+	-	+
SA-0212-WAL	-	-	-	+	-	+
SA-0213-WAL	-	-	-	+	-	+
SA-0215-WAL	-	-	-	+	-	+
SA-0216-WAL	+	-	-	+	-	+
SA-0220-WAL	+	-	-	+	-	+
SA-0222-WAL	+	-	-	+	-	+
SA-0223-WAL	+	-	+	+	-	+
SA-0224-WAL	+	-	+	+	-	+
SA-0225-WAL	+	-	+	+	-	+
SA-0226-WAL	+	-	+	+	-	+
SA-0227-WAL	+	-	+	+	-	+
SA-0228-WAL	-	-	-	+	-	+
SA-0229-WAL	+	-	-	+	-	+
SA-0230-WAL	+	-	+	+	-	+
SA-0231-WAL	+	-	-	+	-	+
SA-0232-WAL	-	-	+	+	-	+
SA-0233-WAL	+	-	+	+	-	+
SA-0235-WAL	+	-	-	+	-	+
SA-0236-WAL	-	-	-	+	-	+
SA-0237-WAL	-	-	-	+	-	+
SA-0238-WAL	-	-	-	+	-	+
SA-0239-WAL	+	-	+	+	-	+

Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
SA-0240-WAL	+	-	-	+	+	+
SA-0241-WAL	-	-	-	+	-	+
SA-0244-WAL	-	-	-	+	-	-
SA-0245-WAL	-	-	-	+	-	+
SA-0248-WAL	+	-	-	+	-	+
SA-0250-WAL	+	-	+	+	-	+
SA-0251-WAL	+	-	+	+	-	+
SA-0252-WAL	+	-	+	+	-	+
SA-0257-WAL	+	-	+	+	+	+
SA-0264-WAL	+	-	+	+	-	+
SA-0265-WAL	+	-	-	+	-	+
SA-0266-WAL	+	-	-	+	-	+
SA-0267-WAL	+	-	+	+	+	+
SA-0269-WAL	+	-	+	+	+	+
SA-0272-WAL	+	-	+	+	+	+
SA-0274-WAL	+	-	+	+	-	+
SA-0278-WAL	+	-	+	+	-	-
SA-0280-WAL	+	-	-	-	+	+
SA-0284-WAL	+	-	+	+	-	+
SA-0288-WAL	+	-	+	+	-	+
SA-0289-WAL	-	-	-	+	-	+
SA-0291-WAL	-	-	-	+	-	+
SA-0292-WAL	+	-	-	+	-	+
SA-0294-WAL	+	-	+	+	-	+
SA-0295-WAL	+	-	+	+	-	+
SA-0296-WAL	+	-	-	+	-	+
SA-0297-WAL	+	-	+	+	-	+
SA-0301-WAL	+	-	+	+	+	+
SA-0302-WAL	+	-	+	+	-	+
SA-0304-WAL	+	-	-	+	+	+
SA-0305-WAL	+	-	+	+	+	+
SA-0309-WAL	+	-	+	+	+	+
SA-0312-WAL	-	-	+	+	-	-
SA-0313-WAL	+	-	+	+	+	-
SA-0317-WAL	+	-	+	+	+	+
<b>Walsall Employment Sites</b>						
SA-0001-WAL	+	-	+	+	-	+
SA-0007-WAL	+	-	+	+	-	+
SA-0008-WAL	+	-	-	-	+	+
SA-0015-WAL	-	-	-	+	-	-
SA-0020-WAL	+	-	+	+	+	+
SA-0030-WAL	+	-	-	+	-	+
SA-0045-WAL	+	-	+	+	-	+

Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
SA-0047-WAL	-	-	-	+	-	+
SA-0054-WAL	+	-	+	+	-	+
SA-0057-WAL	+	-	+	+	+	+
SA-0061-WAL	-	-	+	+	-	+
SA-0167-WAL	+	-	-	+	-	+
SA-0183-WAL	+	-	-	+	-	+
SA-0186-WAL	+	-	+	+	+	+
SA-0195-WAL	-	-	+	+	+	+
SA-0196-WAL	+	-	+	+	-	+
SA-0197-WAL	-	-	-	+	+	+
SA-0200-WAL	+	-	-	+	-	+
SA-0201-WAL	+	-	+	+	-	+
SA-0202-WAL	-	-	+	+	-	+
SA-0204-WAL	+	-	-	+	-	+
SA-0205-WAL	+	-	+	+	+	+
SA-0211-WAL	-	-	-	+	-	+
SA-0212-WAL	-	-	-	+	-	+
SA-0213-WAL	-	-	-	+	-	+
SA-0215-WAL	-	-	-	+	-	+
SA-0216-WAL	+	-	-	+	-	+
SA-0223-WAL	+	-	+	+	-	+
SA-0227-WAL	+	-	+	+	-	+
SA-0230-WAL	+	-	+	+	-	+
SA-0231-WAL	+	-	-	+	-	+
SA-0232-WAL	-	-	+	+	-	+
SA-0235-WAL	+	-	-	+	-	+
SA-0237-WAL	-	-	-	+	-	+
SA-0238-WAL	-	-	-	+	-	+
SA-0239-WAL	+	-	+	+	-	+
SA-0242-WAL	+	-	+	+	-	+
SA-0243-WAL	+	-	+	-	-	+
SA-0244-WAL	-	-	-	+	-	-
SA-0245-WAL	-	-	-	+	-	+
SA-0248-WAL	+	-	-	+	-	+
SA-0257-WAL	+	-	+	+	+	+
SA-0274-WAL	+	-	+	+	-	+
SA-0275-WAL	+	-	+	-	+	+
SA-0276-WAL	+	-	-	+	-	-
SA-0284-WAL	+	-	+	+	-	+
SA-0286-WAL	+	-	+	+	-	+
SA-0288-WAL	+	-	+	+	-	+
SA-0301-WAL	+	-	+	+	+	+
SA-0302-WAL	+	-	+	+	-	+

Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
SA-0304-WAL	+	-	-	+	+	+
SA-0308-WAL	+	-	+	+	-	+
SA-0315-WAL	+	-	+	+	-	+
<b>Walsall Carried Forward Residential Sites</b>						
HO0016	+	-	+	+	+	+
HO0020	+	-	+	+	+	+
HO0023b	+	+	+	+	+	+
HO0027	+	-	+	+	+	+
HO0029	+	-	+	+	-	+
HO0037	+	-	+	+	+	+
HO0039a	+	+	+	+	+	+
HO0039b	+	+	+	+	+	+
HO0040	+	-	+	+	+	+
HO0041a	+	+	+	+	+	+
HO0041b	+	+	+	+	+	+
HO0043	+	-	+	+	-	+
HO0044	+	-	+	+	+	+
HO0046	+	-	+	+	-	+
HO0053	+	-	+	+	+	+
HO0060a	+	+	+	+	+	+
HO0060b	+	+	+	+	+	+
HO0060c	+	+	+	+	+	+
HO0060d	+	+	+	+	+	+
HO0062	+	+	+	+	+	+
HO0065	+	+	+	+	+	+
HO0066b	+	+	+	+	+	+
HO0071	+	+	+	+	+	+
HO0072	+	+	+	+	+	+
HO0093	+	+	+	+	+	+
HO0117	+	+	+	+	+	+
HO0124	+	+	+	+	+	+
HO0125	+	+	+	+	+	+
HO0126	+	+	+	+	+	+
HO0137a	+	-	+	+	-	+
HO0137b	+	-	+	+	+	+
HO0137c	+	-	+	+	+	+
HO0147	+	+	+	+	+	+
HO0150	+	-	+	+	+	+
HO0150a	+	-	+	+	+	+
HO0154	+	+	+	+	+	+
HO0157a	+	-	+	+	+	+
HO0157b	+	-	+	+	+	+
HO0157c	+	-	+	+	+	+

Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
HO0162a	+	-	+	+	+	+
HO0162b	+	-	+	+	+	+
HO0163	+	-	+	+	+	+
HO0168a	+	-	+	+	-	+
HO0168b	+	-	+	+	-	+
HO0176	+	-	+	+	+	+
HO0180	+	-	+	+	+	+
HO0181	+	+	+	+	+	+
HO0185	+	+	+	+	+	+
HO0194	+	+	+	+	+	+
HO0195	+	+	+	+	+	+
HO0201	+	-	-	-	+	+
HO0205	+	+	+	+	+	+
HO0217a	+	-	+	+	+	+
HO0217b	+	-	+	+	+	+
HO0304	+	-	+	+	-	+
HO0305	+	-	+	+	-	+
HO0307	+	+	+	+	+	+
HO0308	+	+	+	+	+	+
HO0310	+	+	+	+	+	+
HO0312	+	+	+	+	+	+
HO0313	+	+	+	+	+	+
HO0316	+	-	+	+	+	+
HO0317	+	-	+	+	+	+
HO0318	+	-	+	+	+	+
HO0320	+	-	+	+	+	+
HO0321	+	-	+	+	+	+
HO0322a	+	+	+	+	+	+
HO0322b	+	+	+	+	+	+
HO1314	+	+	+	+	-	+
LC02B	+	-	+	+	+	+
LC08A	+	+	+	+	+	+
LC14A	+	-	+	+	+	+
LC18A	+	-	+	+	+	+
LC30A	+	+	+	+	+	+
LC30C	+	+	+	+	+	+
LC31A	+	+	+	+	+	+
<b>Walsall Carried Forward Employment Sites</b>						
IN0002.1	+	-	+	+	-	+
IN0005.1	+	-	+	+	+	+
IN0009.12	+	-	+	+	+	+
IN0009.13	+	-	+	+	+	+
IN0009.14	+	-	+	+	+	+

Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
IN0010.2	+	-	+	+	-	+
IN0012.5	+	-	+	+	-	+
IN0012.6	+	-	+	+	-	+
IN0012.8	+	-	+	+	-	+
IN0017.1	+	+	+	+	+	+
IN0017.2	+	+	+	+	+	+
IN0018.2	+	+	+	+	-	+
IN0027.1	+	+	+	+	+	+
IN0027.2	+	-	+	+	+	+
IN0032.2	+	+	+	+	+	+
IN0052.2	+	+	+	+	+	+
IN0056.2	+	+	+	+	+	+
IN0058	+	+	+	+	+	+
IN0063	+	+	+	+	-	+
IN0064	+	+	+	+	-	-
IN0068.1	+	-	+	+	-	+
IN0069.3	+	-	+	+	+	+
IN0069.42	+	-	+	+	+	+
IN0070.2	+	-	+	+	+	+
IN0070.4	+	-	-	-	+	+
IN0071.2	+	-	+	+	-	+
IN0072.2	+	+	+	+	+	+
IN0078.12	+	-	+	+	+	+
IN0078.2	+	+	+	+	+	+
IN0084	+	-	+	+	+	+
IN0093.2	+	-	+	+	-	+
IN0099.2	+	-	+	+	-	+
IN0103.2	+	-	+	+	-	+
IN0104.1	+	+	+	+	-	+
IN0104.4	+	+	+	-	-	-
IN0105	+	-	+	+	-	+
IN0109	+	-	+	+	-	+
IN0110	+	+	+	+	-	+
IN0118.2	+	+	+	+	-	+
IN0120.5	+	+	+	+	+	+
IN0122	+	+	+	+	+	+
IN0205	+	-	+	+	-	+
IN0315	-	-	+	+	-	+
IN0317	-	-	+	+	-	+
IN0328	+	+	+	+	+	+
IN0333	+	-	-	+	-	+
IN0341	+	+	+	+	+	+

# H.11 SA Objective 10: Housing

## H.11.1 Housing Provision

H.11.1.1 Residential-led development is likely to result in a net gain in housing. The sites in Walsall proposed for residential use would therefore be expected to result in positive impacts under this objective. Sites which have been identified as having capacity for 100 or more dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision. Sites which have been identified as having capacity for 99 dwellings or less would be expected to result in a minor positive impact on housing provision. This includes the majority of carried forward residential sites which are generally smaller sites within the existing urban area.

H.11.1.2 However, the housing capacity at three of the residential sites is unknown at the time of writing; therefore, the impact of the proposed development at these sites is uncertain although it is likely there would be a net gain to some extent.

H.11.1.3 Employment-led sites would not be expected to result in a net change in housing provision and therefore a negligible impact would be likely.

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

Site Ref	Housing Provision	Site Ref	Housing Provision
<b>Walsall Residential Sites</b>		SA-0048-WAL	++
SA-0001-WAL	+	SA-0050-WAL	+
SA-0006-WAL	+	SA-0051-WAL	+
SA-0010-WAL	++	SA-0052-WAL	+
SA-0012-WAL	++	SA-0053-WAL	+
SA-0014-WAL	++	SA-0054-WAL	++
SA-0015-WAL	++	SA-0056-WAL	++
SA-0016-WAL	+	SA-0059-WAL	+
SA-0017-WAL	++	SA-0061-WAL	++
SA-0018-WAL	++	SA-0062-WAL	+
SA-0019-WAL	++	SA-0064-WAL	+
SA-0020-WAL	++	SA-0066-WAL	++
SA-0022-WAL	++	SA-0071-WAL	+
SA-0029-WAL	++	SA-0078-WAL	++
SA-0030-WAL	++	SA-0085-WAL	+
SA-0032-WAL	+	SA-0102-WAL	+/-
SA-0034-WAL	++	SA-0138-WAL	+
SA-0035-WAL	+	SA-0149-WAL	++
SA-0036-WAL	++	SA-0153-WAL	+
SA-0037-WAL	++	SA-0163-WAL	+
SA-0038-WAL	++	SA-0167-WAL	+/-
SA-0045-WAL	+	SA-0172-WAL	+
SA-0047-WAL	++	SA-0174-WAL	+



Site Ref	Housing Provision
SA-0183-WAL	+/-
SA-0186-WAL	++
SA-0187-WAL	++
SA-0188-WAL	+
SA-0195-WAL	++
SA-0196-WAL	+
SA-0197-WAL	++
SA-0199-WAL	+
SA-0201-WAL	+
SA-0202-WAL	++
SA-0204-WAL	++
SA-0205-WAL	+
SA-0206-WAL	+
SA-0207-WAL	+
SA-0208-WAL	+
SA-0211-WAL	++
SA-0212-WAL	++
SA-0213-WAL	++
SA-0215-WAL	++
SA-0216-WAL	++
SA-0220-WAL	+
SA-0222-WAL	+
SA-0223-WAL	++
SA-0224-WAL	+
SA-0225-WAL	+
SA-0226-WAL	++
SA-0227-WAL	+
SA-0228-WAL	++
SA-0229-WAL	++
SA-0230-WAL	++
SA-0231-WAL	++
SA-0232-WAL	++
SA-0233-WAL	+
SA-0235-WAL	++
SA-0236-WAL	++
SA-0237-WAL	++
SA-0238-WAL	++
SA-0239-WAL	++
SA-0240-WAL	++
SA-0241-WAL	++
SA-0244-WAL	++
SA-0245-WAL	+
SA-0248-WAL	+
SA-0250-WAL	+
SA-0251-WAL	+
SA-0252-WAL	+

Site Ref	Housing Provision
SA-0257-WAL	+
SA-0264-WAL	++
SA-0265-WAL	+
SA-0266-WAL	++
SA-0267-WAL	+
SA-0269-WAL	++
SA-0272-WAL	+
SA-0274-WAL	++
SA-0278-WAL	+
SA-0280-WAL	+
SA-0284-WAL	++
SA-0288-WAL	++
SA-0289-WAL	++
SA-0291-WAL	++
SA-0292-WAL	+
SA-0294-WAL	+
SA-0295-WAL	+
SA-0296-WAL	+
SA-0297-WAL	+
SA-0301-WAL	+
SA-0302-WAL	++
SA-0304-WAL	+
SA-0305-WAL	+
SA-0309-WAL	++
SA-0312-WAL	+
SA-0313-WAL	+
SA-0317-WAL	+
Walsall Employment Sites	
SA-0001-WAL	0
SA-0007-WAL	0
SA-0008-WAL	0
SA-0015-WAL	0
SA-0020-WAL	0
SA-0030-WAL	0
SA-0045-WAL	0
SA-0047-WAL	0
SA-0054-WAL	0
SA-0057-WAL	0
SA-0061-WAL	0
SA-0167-WAL	0
SA-0183-WAL	0
SA-0186-WAL	0
SA-0195-WAL	0
SA-0196-WAL	0
SA-0197-WAL	0
SA-0200-WAL	0

Site Ref	Housing Provision
SA-0201-WAL	0
SA-0202-WAL	0
SA-0204-WAL	0
SA-0205-WAL	0
SA-0211-WAL	0
SA-0212-WAL	0
SA-0213-WAL	0
SA-0215-WAL	0
SA-0216-WAL	0
SA-0223-WAL	0
SA-0227-WAL	0
SA-0230-WAL	0
SA-0231-WAL	0
SA-0232-WAL	0
SA-0235-WAL	0
SA-0237-WAL	0
SA-0238-WAL	0
SA-0239-WAL	0
SA-0242-WAL	0
SA-0243-WAL	0
SA-0244-WAL	0
SA-0245-WAL	0
SA-0248-WAL	0
SA-0257-WAL	0
SA-0274-WAL	0
SA-0275-WAL	0
SA-0276-WAL	0
SA-0284-WAL	0
SA-0286-WAL	0
SA-0288-WAL	0
SA-0301-WAL	0
SA-0302-WAL	0
SA-0304-WAL	0
SA-0308-WAL	0
SA-0315-WAL	0
<b>Walsall Carried Forward Residential Sites</b>	
HO0016	+
HO0020	+
HO0023b	+
HO0027	++
HO0029	++
HO0037	+
HO0039a	+
HO0039b	+
HO0040	+

Site Ref	Housing Provision
HO0041a	+
HO0041b	+
HO0043	+
HO0044	+
HO0046	+
HO0053	+
HO0060a	+
HO0060b	+
HO0060c	+
HO0060d	+
HO0062	+
HO0065	+
HO0066b	+
HO0071	+
HO0072	+
HO0093	+
HO0117	+
HO0124	+
HO0125	+
HO0126	+
HO0137a	+
HO0137b	+
HO0137c	+
HO0147	+
HO0150	+
HO0150a	+
HO0154	+
HO0157a	+
HO0157b	+
HO0157c	+
HO0162a	+
HO0162b	+
HO0163	+
HO0168a	+
HO0168b	+
HO0176	++
HO0180	+
HO0181	++
HO0185	+
HO0194	+
HO0195	+
HO0201	+
HO0205	+
HO0217a	+
HO0217b	+
HO0304	+

Site Ref	Housing Provision
HO0305	+
HO0307	+
HO0308	+
HO0310	+
HO0312	+
HO0313	+
HO0316	+
HO0317	+
HO0318	+
HO0320	+
HO0321	+
HO0322a	+
HO0322b	+
HO1314	+
LC02B	+
LC08A	+
LC14A	+
LC18A	+
LC30A	+
LC30C	+
LC31A	+
<b>Walsall Carried Forward Employment Sites</b>	
IN0002.1	0
IN0005.1	0
IN0009.12	0
IN0009.13	0
IN0009.14	0
IN0010.2	0
IN0012.5	0
IN0012.6	0
IN0012.8	0
IN0017.1	0
IN0017.2	0
IN0018.2	0

Site Ref	Housing Provision
IN0027.1	0
IN0027.2	0
IN0032.2	0
IN0052.2	0
IN0056.2	0
IN0058	0
IN0063	0
IN0064	0
IN0068.1	0
IN0069.3	0
IN0069.42	0
IN0070.2	0
IN0070.4	0
IN0071.2	0
IN0072.2	0
IN0078.12	0
IN0078.2	0
IN0084	0
IN0093.2	0
IN0099.2	0
IN0103.2	0
IN0104.1	0
IN0104.4	0
IN0105	0
IN0109	0
IN0110	0
IN0118.2	0
IN0120.5	0
IN0122	0
IN0205	0
IN0315	0
IN0317	0
IN0328	0
IN0333	0
IN0341	0

## H.12 SA Objective 11: Equality

### H.12.1 Index of Multiple Deprivation

- H.12.1.1 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England<sup>7</sup>. Out of 317 Local Authorities in England, Walsall is ranked as the 25<sup>th</sup> most deprived<sup>8</sup>. Overall deprivation is relatively high across the Black Country, with 42 of the LSOAs in Walsall ranked among the 10% most deprived in England.
- H.12.1.2 Deprivation levels within the borough of Walsall varies throughout the community, although generally the more deprived areas are within the central and western parts of the borough, such as Walsall and Bloxwich town centres.
- H.12.1.3 60 sites are located wholly or partially within the 10% most deprived LSOAs, and therefore development at these sites could potentially have a minor negative impact on equality by exacerbating existing social pressures faced by current residents and place increased pressure on local services. The majority of sites within Walsall are located outside of the most deprived 10% LSOAs, and therefore, the proposed development at these 234 sites may have a negligible impact on equality.
- H.12.1.4 It should be noted that there is a degree of uncertainty in regard to the impacts of each site on equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.

<sup>7</sup> Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date Accessed: 06/05/21]

<sup>8</sup> Black Country Consortium (2019) The English Indices of Deprivation 2019. Available at: <https://www.the-blackcountry.com/upload/BC%20IMD%202019.pdf> [Date Accessed: 06/05/21]

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

Site Ref	IMD 10% Most Deprived	Site Ref	IMD 10% Most Deprived
<b>Walsall Residential Sites</b>		SA-0172-WAL	0
SA-0001-WAL	0	SA-0174-WAL	0
SA-0006-WAL	0	SA-0183-WAL	0
SA-0010-WAL	-	SA-0186-WAL	0
SA-0012-WAL	0	SA-0187-WAL	0
SA-0014-WAL	0	SA-0188-WAL	0
SA-0015-WAL	0	SA-0195-WAL	0
SA-0016-WAL	0	SA-0196-WAL	0
SA-0017-WAL	0	SA-0197-WAL	0
SA-0018-WAL	0	SA-0199-WAL	0
SA-0019-WAL	0	SA-0201-WAL	0
SA-0020-WAL	0	SA-0202-WAL	0
SA-0022-WAL	0	SA-0204-WAL	0
SA-0029-WAL	0	SA-0205-WAL	0
SA-0030-WAL	0	SA-0206-WAL	0
SA-0032-WAL	0	SA-0207-WAL	0
SA-0034-WAL	0	SA-0208-WAL	0
SA-0035-WAL	0	SA-0211-WAL	0
SA-0036-WAL	0	SA-0212-WAL	0
SA-0037-WAL	0	SA-0213-WAL	0
SA-0038-WAL	0	SA-0215-WAL	0
SA-0045-WAL	0	SA-0216-WAL	0
SA-0047-WAL	0	SA-0220-WAL	0
SA-0048-WAL	0	SA-0222-WAL	0
SA-0050-WAL	0	SA-0223-WAL	0
SA-0051-WAL	0	SA-0224-WAL	0
SA-0052-WAL	0	SA-0225-WAL	0
SA-0053-WAL	0	SA-0226-WAL	0
SA-0054-WAL	0	SA-0227-WAL	0
SA-0056-WAL	0	SA-0228-WAL	0
SA-0059-WAL	0	SA-0229-WAL	0
SA-0061-WAL	0	SA-0230-WAL	0
SA-0062-WAL	0	SA-0231-WAL	0
SA-0064-WAL	0	SA-0232-WAL	0
SA-0066-WAL	0	SA-0233-WAL	0
SA-0071-WAL	0	SA-0235-WAL	0
SA-0078-WAL	0	SA-0236-WAL	0
SA-0085-WAL	-	SA-0237-WAL	0
SA-0102-WAL	0	SA-0238-WAL	0
SA-0138-WAL	0	SA-0239-WAL	0
SA-0149-WAL	0	SA-0240-WAL	0
SA-0153-WAL	0	SA-0241-WAL	0
SA-0163-WAL	0	SA-0244-WAL	0
SA-0167-WAL	0	SA-0245-WAL	0

Site Ref	IMD 10% Most Deprived
SA-0248-WAL	0
SA-0250-WAL	0
SA-0251-WAL	0
SA-0252-WAL	0
SA-0257-WAL	0
SA-0264-WAL	0
SA-0265-WAL	0
SA-0266-WAL	0
SA-0267-WAL	0
SA-0269-WAL	0
SA-0272-WAL	0
SA-0274-WAL	0
SA-0278-WAL	0
SA-0280-WAL	0
SA-0284-WAL	0
SA-0288-WAL	0
SA-0289-WAL	0
SA-0291-WAL	0
SA-0292-WAL	0
SA-0294-WAL	0
SA-0295-WAL	0
SA-0296-WAL	0
SA-0297-WAL	0
SA-0301-WAL	0
SA-0302-WAL	0
SA-0304-WAL	0
SA-0305-WAL	0
SA-0309-WAL	0
SA-0312-WAL	0
SA-0313-WAL	0
SA-0317-WAL	0
<b>Walsall Employment Sites</b>	
SA-0001-WAL	0
SA-0007-WAL	0
SA-0008-WAL	0
SA-0015-WAL	0
SA-0020-WAL	0
SA-0030-WAL	0
SA-0045-WAL	0
SA-0047-WAL	0
SA-0054-WAL	0
SA-0057-WAL	0
SA-0061-WAL	0
SA-0167-WAL	0
SA-0183-WAL	0

Site Ref	IMD 10% Most Deprived
SA-0186-WAL	0
SA-0195-WAL	0
SA-0196-WAL	0
SA-0197-WAL	0
SA-0200-WAL	0
SA-0201-WAL	0
SA-0202-WAL	0
SA-0204-WAL	0
SA-0205-WAL	0
SA-0211-WAL	0
SA-0212-WAL	0
SA-0213-WAL	0
SA-0215-WAL	0
SA-0216-WAL	0
SA-0223-WAL	0
SA-0227-WAL	0
SA-0230-WAL	0
SA-0231-WAL	0
SA-0232-WAL	0
SA-0235-WAL	0
SA-0237-WAL	0
SA-0238-WAL	0
SA-0239-WAL	0
SA-0242-WAL	0
SA-0243-WAL	0
SA-0244-WAL	0
SA-0245-WAL	0
SA-0248-WAL	0
SA-0257-WAL	0
SA-0274-WAL	0
SA-0275-WAL	0
SA-0276-WAL	-
SA-0284-WAL	0
SA-0286-WAL	0
SA-0288-WAL	0
SA-0301-WAL	0
SA-0302-WAL	0
SA-0304-WAL	0
SA-0308-WAL	0
SA-0315-WAL	0
<b>Walsall Carried Forward Residential Sites</b>	
HO0016	-
HO0020	-
HO0023b	0
HO0027	-

Site Ref	IMD 10% Most Deprived
HO0029	-
HO0037	0
HO0039a	-
HO0039b	-
HO0040	0
HO0041a	-
HO0041b	-
HO0043	0
HO0044	0
HO0046	-
HO0053	0
HO0060a	-
HO0060b	-
HO0060c	-
HO0060d	-
HO0062	-
HO0065	-
HO0066b	-
HO0071	0
HO0072	0
HO0093	-
HO0117	-
HO0124	0
HO0125	0
HO0126	-
HO0137a	0
HO0137b	0
HO0137c	0
HO0147	-
HO0150	-
HO0150a	-
HO0154	-
HO0157a	0
HO0157b	0
HO0157c	0
HO0162a	-
HO0162b	-
HO0163	0
HO0168a	0
HO0168b	0
HO0176	0
HO0180	0
HO0181	-
HO0185	0
HO0194	0

Site Ref	IMD 10% Most Deprived
HO0195	-
HO0201	-
HO0205	-
HO0217a	0
HO0217b	0
HO0304	0
HO0305	0
HO0307	-
HO0308	0
HO0310	-
HO0312	-
HO0313	0
HO0316	0
HO0317	-
HO0318	0
HO0320	-
HO0321	0
HO0322a	0
HO0322b	0
HO1314	0
LC02B	0
LC08A	-
LC14A	0
LC18A	0
LC30A	-
LC30C	-
LC31A	-
<b>Walsall Carried Forward Employment Sites</b>	
IN0002.1	0
IN0005.1	0
IN0009.12	0
IN0009.13	0
IN0009.14	0
IN0010.2	0
IN0012.5	0
IN0012.6	0
IN0012.8	0
IN0017.1	-
IN0017.2	-
IN0018.2	-
IN0027.1	-
IN0027.2	-
IN0032.2	-
IN0052.2	-
IN0056.2	0

Site Ref	IMD 10% Most Deprived
IN0058	0
IN0063	0
IN0064	0
IN0068.1	-
IN0069.3	0
IN0069.42	0
IN0070.2	0
IN0070.4	0
IN0071.2	-
IN0072.2	-
IN0078.12	-
IN0078.2	-
IN0084	0
IN0093.2	0
IN0099.2	0

Site Ref	IMD 10% Most Deprived
IN0103.2	-
IN0104.1	-
IN0104.4	0
IN0105	-
IN0109	-
IN0110	-
IN0118.2	0
IN0120.5	0
IN0122	0
IN0205	-
IN0315	0
IN0317	0
IN0328	-
IN0333	0
IN0341	0

DRAFT



## H.13 SA Objective 12: Health

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

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

H.13.1.2 A large proportion of the proposed sites in Walsall are located within the Green Belt in the east of the borough and are over 5km from these hospitals. Therefore, the proposed development at these 141 sites could potentially have more restricted sustainable access to emergency healthcare and result in a minor negative impact. The remaining 153 sites are located within 5km of Manor Hospital, and therefore, the proposed development at these sites could potentially have a minor positive impact on access to emergency healthcare due being within a sustainable distance to the services.

### H.13.2 Pedestrian Access to GP Surgery

H.13.2.1 There are 68 GP Surgeries within Walsall serving the existing local communities, although the distribution of these facilities is mainly towards the western half of the borough. Accessibility modelling data has been provided to Lepus by the BCA, mapping the location of GP surgeries and areas within a sustainable travel time to these facilities for pedestrians. A large proportion of the built-up areas are located within a 15-minute walk to a GP surgery, however, some areas are likely to have more restricted access, such as in the outskirts of the borough and the Green Belt, and some central areas where existing development is mainly industrial.

H.13.2.2 A large proportion of the sites are located outside of this distance, and therefore, the proposed development at these 174 sites could potentially have a minor negative impact on sustainable access to healthcare. On the other hand, 120 sites in Walsall are within a 15-minute walking to a GP surgery, and therefore, the proposed development at these sites would be expected to have a minor positive impact on sustainable access to healthcare, based on existing infrastructure.

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

H.13.3.1 Sustainable public transport access to a local GP surgery is identified to be within a 15-minute journey. Accessibility modelling data indicates that the majority of Walsall falls within this

distance, except some small pockets within the Green Belt in the east where accessibility is likely to be somewhat restricted.

- H.13.3.2 According to the accessibility data, the majority of sites within Walsall are within this travel time to a GP surgery, and therefore, the proposed development at these 274 sites would be expected to have a minor positive impact on sustainable access to healthcare. However, 20 of the sites within Walsall are identified to be outside of a 15-minute public transport journey to a GP surgery, and therefore, the proposed development at these sites could potentially have a minor negative impact on sustainable access to healthcare, based on current infrastructure.

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

- H.13.4.1 The entirety of Walsall is classed as 'Walsall AQMA'. All of the proposed sites in Walsall are located wholly within this AQMA, and several sites are also partially located within 200m of neighbouring AQMAs including 'Birmingham AQMA', 'CCDC AQMA 2', 'Sandwell AQMA' and 'Wolverhampton AQMA'. The proposed development at all sites in Walsall would be likely to expose site end users to poor air quality associated with these AQMAs, and therefore, have a minor negative impact on health.

#### **H.13.5 Main Road**

- H.13.5.1 Walsall's major road network includes the A461, A452 and the M6 Motorway which passes through the west of the borough. 139 sites are located partially or wholly within 200m of a major road, and therefore, the proposed development at these sites could potentially have a minor negative impact on site end users' health, due to the vicinity of the main road and potentially higher levels of transport associated air pollution levels.
- H.13.5.2 The proposed development at the 155 sites within Walsall which are over 200m from a main road would be expected to have a minor positive impact on health, as site end users would be located away from major sources of traffic related air pollution.

#### **H.13.6 Access to Greenspace**

- H.13.6.1 Greenspaces are distributed throughout Walsall, including parks, allotments and playing field, as well as Roughwood Country Park in the north west of the borough. The majority of sites in Walsall, totalling 267, are located within 600m of one or more greenspaces. Therefore, a minor positive impact would be expected at these sites, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits. 26 sites are located over 600m from a greenspace, and therefore, the proposed development at these sites could potentially have a minor negative impact on the access of site end users to outdoor space.

### H.13.7 Net Loss of Greenspace

H.13.7.1 12 proposed sites coincide wholly or partially with greenspaces, including Site SA-0061-WAL which coincides with playing fields and Site SA-0172-WAL which is located wholly within Reedswood Park. The proposed development at these 12 sites would be likely to result in the net loss of greenspace, and therefore, have a minor negative impact on the provision of greenspace across the Plan area.

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

H.13.8.1 The majority of sites in Walsall are located within 600m of the PRow and/or cycle network. The proposed development at these 243 sites would be likely to provide site end users with good pedestrian and/or cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents. 51 sites are located wholly or partially over 600m from the PRow and cycle network, and therefore the proposed development at these sites could potentially have a minor negative impact on pedestrian and cycle access.

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

Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PRow/ Cycle Path
<b>Walsall Residential Sites</b>								
SA-0001-WAL	+	+	+	-	-	+	-	+
SA-0006-WAL	-	-	+	-	-	+	0	+
SA-0010-WAL	+	+	+	-	+	+	0	+
SA-0012-WAL	+	-	+	-	+	+	0	+
SA-0014-WAL	-	-	+	-	-	+	-	-
SA-0015-WAL	-	-	-	-	-	+	0	+
SA-0016-WAL	+	-	+	-	+	+	0	+
SA-0017-WAL	-	-	+	-	-	+	0	-
SA-0018-WAL	+	-	+	-	-	+	0	+
SA-0019-WAL	+	-	+	-	-	+	0	+
SA-0020-WAL	+	-	-	-	+	+	0	+
SA-0022-WAL	-	-	+	-	-	-	0	-
SA-0029-WAL	-	-	+	-	+	+	0	-
SA-0030-WAL	-	-	+	-	-	+	0	+
SA-0032-WAL	-	-	+	-	+	+	0	+
SA-0034-WAL	-	-	+	-	+	+	0	-
SA-0035-WAL	+	-	-	-	+	+	0	+
SA-0036-WAL	+	-	+	-	+	+	0	+
SA-0037-WAL	-	-	-	-	-	+	0	+
SA-0038-WAL	-	-	+	-	-	+	0	+

Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
SA-0045-WAL	-	-	+	-	+	+	0	+
SA-0047-WAL	-	-	+	-	+	+	0	+
SA-0048-WAL	-	-	+	-	+	+	0	+
SA-0050-WAL	+	-	+	-	+	+	0	+
SA-0051-WAL	-	-	+	-	-	+	0	+
SA-0052-WAL	-	+	+	-	+	+	0	+
SA-0053-WAL	-	-	+	-	+	+	0	-
SA-0054-WAL	-	-	-	-	+	+	0	-
SA-0056-WAL	-	-	+	-	+	+	0	+
SA-0059-WAL	-	-	-	-	+	+	0	-
SA-0061-WAL	-	-	+	-	-	+	-	+
SA-0062-WAL	-	+	+	-	+	+	0	-
SA-0064-WAL	-	+	+	-	-	-	0	-
SA-0066-WAL	+	-	+	-	-	+	0	+
SA-0071-WAL	+	+	+	-	+	+	0	+
SA-0078-WAL	+	-	+	-	-	+	-	+
SA-0085-WAL	+	+	+	-	-	+	0	+
SA-0102-WAL	-	-	+	-	+	+	0	-
SA-0138-WAL	-	-	+	-	-	-	0	-
SA-0149-WAL	-	-	+	-	+	+	0	+
SA-0153-WAL	-	+	+	-	-	-	0	-
SA-0163-WAL	+	-	+	-	-	+	0	+
SA-0167-WAL	+	-	+	-	+	+	0	+
SA-0172-WAL	+	+	+	-	-	+	-	+
SA-0174-WAL	+	+	+	-	-	+	0	+
SA-0183-WAL	+	-	+	-	+	+	0	+
SA-0186-WAL	-	-	+	-	+	+	0	-
SA-0187-WAL	-	-	-	-	-	+	0	+
SA-0188-WAL	-	-	+	-	-	+	0	+
SA-0195-WAL	-	+	+	-	-	+	0	+
SA-0196-WAL	-	-	+	-	-	+	0	+
SA-0197-WAL	-	-	+	-	+	+	0	+
SA-0199-WAL	-	-	+	-	+	+	0	-
SA-0201-WAL	-	-	+	-	-	-	0	-
SA-0202-WAL	-	-	+	-	+	+	0	+
SA-0204-WAL	-	-	+	-	-	-	0	-
SA-0205-WAL	-	-	-	-	+	+	0	-
SA-0206-WAL	-	-	+	-	+	+	0	-
SA-0207-WAL	-	-	+	-	-	-	0	-
SA-0208-WAL	-	-	+	-	-	+	0	-
SA-0211-WAL	-	-	+	-	-	-	0	-

Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
SA-0212-WAL	-	-	+	-	+	+	0	+
SA-0213-WAL	-	-	+	-	+	+	0	+
SA-0215-WAL	-	-	+	-	+	+	0	+
SA-0216-WAL	-	-	+	-	-	+	0	+
SA-0220-WAL	-	-	+	-	+	+	0	+
SA-0222-WAL	-	-	+	-	+	+	0	+
SA-0223-WAL	-	-	+	-	+	+	0	-
SA-0224-WAL	-	-	+	-	+	+	0	+
SA-0225-WAL	-	-	+	-	+	+	0	+
SA-0226-WAL	-	-	+	-	+	+	0	+
SA-0227-WAL	-	-	+	-	+	+	0	-
SA-0228-WAL	-	-	+	-	+	-	0	+
SA-0229-WAL	-	+	+	-	+	+	0	-
SA-0230-WAL	-	-	+	-	+	+	0	-
SA-0231-WAL	-	-	+	-	+	+	0	-
SA-0232-WAL	+	-	+	-	+	-	0	+
SA-0233-WAL	-	-	+	-	-	+	0	-
SA-0235-WAL	-	-	+	-	+	-	0	+
SA-0236-WAL	-	-	+	-	+	+	0	-
SA-0237-WAL	-	-	+	-	+	+	0	+
SA-0238-WAL	-	-	-	-	+	+	-	+
SA-0239-WAL	-	-	+	-	+	+	0	+
SA-0240-WAL	-	-	+	-	+	+	0	+
SA-0241-WAL	-	-	+	-	+	+	0	+
SA-0244-WAL	-	-	-	-	-	+	0	+
SA-0245-WAL	-	-	+	-	-	+	0	+
SA-0248-WAL	-	-	+	-	-	+	0	+
SA-0250-WAL	-	-	+	-	-	-	0	+
SA-0251-WAL	-	-	+	-	-	+	0	+
SA-0252-WAL	+	-	+	-	+	+	0	+
SA-0257-WAL	-	+	+	-	+	+	0	-
SA-0264-WAL	+	-	+	-	+	+	0	+
SA-0265-WAL	+	-	+	-	+	+	0	+
SA-0266-WAL	-	-	+	-	-	+	0	+
SA-0267-WAL	+	-	+	-	-	+	0	+
SA-0269-WAL	+	-	+	-	-	+	0	+
SA-0272-WAL	-	-	+	-	+	+	0	+
SA-0274-WAL	+	+	+	-	-	+	0	+
SA-0278-WAL	+	-	+	-	+	+	0	+
SA-0280-WAL	+	+	+	-	-	+	0	+
SA-0284-WAL	+	-	+	-	-	+	0	+

Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
SA-0288-WAL	+	-	+	-	-	+	0	+
SA-0289-WAL	+	-	+	-	+	+	0	+
SA-0291-WAL	+	-	+	-	+	+	0	-
SA-0292-WAL	+	-	+	-	+	+	0	+
SA-0294-WAL	+	-	+	-	+	-	0	+
SA-0295-WAL	+	-	+	-	+	-	0	+
SA-0296-WAL	-	-	+	-	+	+	0	-
SA-0297-WAL	+	-	+	-	+	-	0	+
SA-0301-WAL	+	-	+	-	+	+	0	+
SA-0302-WAL	-	-	+	-	+	-	0	+
SA-0304-WAL	+	-	-	-	+	+	0	+
SA-0305-WAL	+	-	-	-	+	+	0	+
SA-0309-WAL	-	-	+	-	+	+	0	-
SA-0312-WAL	-	-	-	-	-	+	0	+
SA-0313-WAL	-	+	+	-	+	+	0	-
SA-0317-WAL	-	-	+	-	+	+	0	+
<b>Walsall Employment Sites</b>								
SA-0001-WAL	+	+	+	-	-	+	-	+
SA-0007-WAL	-	-	+	-	-	-	0	-
SA-0008-WAL	-	+	+	-	-	+	0	+
SA-0015-WAL	-	-	-	-	-	+	0	+
SA-0020-WAL	+	-	-	-	+	+	0	+
SA-0030-WAL	-	-	+	-	-	+	0	+
SA-0045-WAL	-	-	+	-	+	+	0	+
SA-0047-WAL	-	-	+	-	+	+	0	+
SA-0054-WAL	-	-	-	-	+	+	0	-
SA-0057-WAL	+	+	+	-	-	+	0	+
SA-0061-WAL	-	-	+	-	-	+	-	+
SA-0167-WAL	+	-	+	-	+	+	0	+
SA-0183-WAL	+	-	+	-	+	+	0	+
SA-0186-WAL	-	-	+	-	+	+	0	-
SA-0195-WAL	-	+	+	-	-	+	0	+
SA-0196-WAL	-	-	+	-	-	+	0	+
SA-0197-WAL	-	-	+	-	+	+	0	+
SA-0200-WAL	-	-	+	-	-	-	0	-
SA-0201-WAL	-	-	+	-	-	-	0	-
SA-0202-WAL	-	-	+	-	+	+	0	+
SA-0204-WAL	-	-	+	-	-	-	0	-
SA-0205-WAL	-	-	-	-	+	+	0	-
SA-0211-WAL	-	-	+	-	-	-	0	-
SA-0212-WAL	-	-	+	-	+	+	0	+

Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
SA-0213-WAL	-	-	+	-	+	+	0	+
SA-0215-WAL	-	-	+	-	+	+	0	+
SA-0216-WAL	-	-	+	-	-	+	0	+
SA-0223-WAL	-	-	+	-	+	+	0	-
SA-0227-WAL	-	-	+	-	+	+	0	-
SA-0230-WAL	-	-	+	-	+	+	0	-
SA-0231-WAL	-	-	+	-	+	+	0	-
SA-0232-WAL	+	-	+	-	+	-	0	+
SA-0235-WAL	-	-	+	-	+	-	0	+
SA-0237-WAL	-	-	+	-	+	+	0	+
SA-0238-WAL	-	-	-	-	+	+	-	+
SA-0239-WAL	-	-	+	-	+	+	0	+
SA-0242-WAL	-	-	+	-	-	-	0	+
SA-0243-WAL	-	-	+	-	-	+	0	+
SA-0244-WAL	-	-	-	-	-	+	0	+
SA-0245-WAL	-	-	+	-	-	+	0	+
SA-0248-WAL	-	-	+	-	-	+	0	+
SA-0257-WAL	-	+	+	-	+	+	0	-
SA-0274-WAL	+	+	+	-	-	+	0	+
SA-0275-WAL	-	+	+	-	-	+	0	+
SA-0276-WAL	+	+	+	-	+	+	0	+
SA-0284-WAL	+	-	+	-	-	+	0	+
SA-0286-WAL	+	-	+	-	-	+	0	+
SA-0288-WAL	+	-	+	-	-	+	0	+
SA-0301-WAL	+	-	+	-	+	+	0	+
SA-0302-WAL	-	-	+	-	+	+	-	+
SA-0304-WAL	+	-	-	-	+	+	0	+
SA-0308-WAL	-	-	+	-	+	-	0	+
SA-0315-WAL	+	+	+	-	-	+	0	+
<b>Walsall Carried Forward Residential Sites</b>								
HO0016	+	+	+	-	+	+	0	+
HO0020	+	+	+	-	+	+	0	+
HO0023b	+	+	+	-	-	+	0	+
HO0027	+	-	+	-	+	+	0	+
HO0029	+	+	+	-	+	+	0	+
HO0037	+	+	+	-	-	+	0	+
HO0039a	+	+	+	-	+	+	0	+
HO0039b	+	+	+	-	+	+	0	+
HO0040	+	+	+	-	-	+	0	+
HO0041a	+	+	+	-	+	+	0	+
HO0041b	+	+	+	-	+	+	0	+

Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
HO0043	-	+	+	-	-	+	0	+
HO0044	+	+	+	-	-	+	0	+
HO0046	+	-	+	-	+	+	0	+
HO0053	+	+	+	-	-	+	0	+
HO0060a	+	+	+	-	-	+	0	+
HO0060b	+	+	+	-	-	+	0	+
HO0060c	+	+	+	-	-	+	0	+
HO0060d	+	+	+	-	-	+	0	+
HO0062	+	+	+	-	-	+	0	+
HO0065	+	+	+	-	-	+	0	+
HO0066b	+	+	+	-	-	+	0	+
HO0071	+	+	+	-	-	+	0	+
HO0072	+	+	+	-	-	+	0	+
HO0093	+	+	+	-	-	+	0	+
HO0117	+	+	+	-	-	+	-	+
HO0124	+	+	+	-	+	+	0	+
HO0125	+	+	+	-	-	+	0	+
HO0126	+	+	+	-	+	+	0	+
HO0137a	+	+	+	-	-	+	0	+
HO0137b	+	+	+	-	-	+	0	+
HO0137c	+	+	+	-	-	+	0	+
HO0147	+	+	+	-	+	+	0	+
HO0150	+	+	+	-	+	+	0	+
HO0150a	+	+	+	-	+	+	0	+
HO0154	-	+	+	-	+	+	0	+
HO0157a	-	+	+	-	-	+	0	+
HO0157b	-	+	+	-	-	+	0	+
HO0157c	-	+	+	-	-	+	0	+
HO0162a	+	+	+	-	+	+	0	+
HO0162b	+	+	+	-	+	+	0	+
HO0163	-	+	+	-	-	+	0	+
HO0168a	-	-	+	-	+	+	0	+
HO0168b	-	+	+	-	+	+	0	+
HO0176	+	+	+	-	-	+	0	+
HO0180	+	+	+	-	-	+	0	+
HO0181	+	+	+	-	-	+	0	+
HO0185	+	+	+	-	-	+	0	+
HO0194	+	+	+	-	-	+	0	+
HO0195	+	+	+	-	-	+	0	+
HO0201	+	+	+	-	+	+	0	+
HO0205	+	+	+	-	+	+	0	+



Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
HO0217a	+	+	+	-	-	+	0	+
HO0217b	+	+	+	-	-	+	0	+
HO0304	-	+	+	-	-	+	0	+
HO0305	+	+	+	-	-	+	-	+
HO0307	+	+	+	-	+	+	0	+
HO0308	+	+	+	-	+	+	0	+
HO0310	+	+	+	-	-	+	0	+
HO0312	+	+	+	-	-	+	0	+
HO0313	+	+	+	-	+	+	0	+
HO0316	+	+	+	-	-	+	0	+
HO0317	-	-	+	-	-	+	0	+
HO0318	-	+	+	-	+	+	0	+
HO0320	+	+	+	-	+	+	0	+
HO0321	+	+	+	-	+	+	0	+
HO0322a	+	+	+	-	-	+	0	+
HO0322b	+	+	+	-	-	+	0	+
HO1314	+	+	+	-	-	+	0	+
LC02B	-	+	+	-	+	+	0	+
LC08A	+	+	+	-	+	+	0	+
LC14A	-	+	+	-	-	+	0	-
LC18A	-	+	+	-	-	+	0	+
LC30A	+	+	+	-	+	+	0	+
LC30C	+	+	+	-	+	+	0	+
LC31A	+	+	+	-	+	+	0	+
<b>Walsall Carried Forward Employment Sites</b>								
IN0002.1	-	+	+	-	-	+	0	+
IN0005.1	-	-	+	-	+	+	0	+
IN0009.12	-	-	+	-	+	+	0	+
IN0009.13	-	-	+	-	+	+	0	-
IN0009.14	-	-	+	-	+	+	0	-
IN0010.2	-	-	+	-	+	+	0	+
IN0012.5	-	+	+	-	+	+	0	+
IN0012.6	-	+	+	-	+	+	0	+
IN0012.8	-	-	+	-	+	+	0	+
IN0017.1	+	-	+	-	+	+	0	-
IN0017.2	+	-	+	-	+	+	0	+
IN0018.2	+	-	+	-	+	+	0	+
IN0027.1	+	+	+	-	-	+	0	+
IN0027.2	+	+	+	-	+	-	0	+
IN0032.2	+	+	+	-	-	+	0	+
IN0052.2	+	+	+	-	-	+	0	+

Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
IN0056.2	+	-	+	-	-	+	0	+
IN0058	+	+	+	-	+	+	0	+
IN0063	+	-	+	-	-	+	0	+
IN0064	+	-	+	-	-	+	0	+
IN0068.1	+	+	+	-	+	+	0	+
IN0069.3	+	+	+	-	+	+	0	+
IN0069.42	+	+	+	-	-	+	0	+
IN0070.2	+	+	+	-	+	+	0	+
IN0070.4	+	+	+	-	+	+	0	+
IN0071.2	+	-	+	-	+	+	0	+
IN0072.2	+	+	+	-	-	+	0	+
IN0078.12	+	+	+	-	+	+	0	+
IN0078.2	+	+	+	-	-	+	0	+
IN0084	+	+	+	-	-	+	0	+
IN0093.2	+	-	+	-	+	+	0	+
IN0099.2	+	-	+	-	+	+	0	+
IN0103.2	+	-	+	-	-	+	0	+
IN0104.1	+	+	+	-	-	+	0	+
IN0104.4	+	+	+	-	-	+	0	+
IN0105	+	-	+	-	-	+	0	+
IN0109	+	-	+	-	-	+	0	+
IN0110	+	-	+	-	-	+	0	+
IN0118.2	+	-	+	-	+	+	0	+
IN0120.5	+	+	+	-	-	+	0	+
IN0122	+	+	+	-	-	+	0	+
IN0205	+	-	+	-	-	+	0	+
IN0315	+	-	+	-	-	+	0	+
IN0317	+	-	+	-	-	+	0	+
IN0328	+	+	+	-	+	+	0	+
IN0333	+	-	+	-	-	+	0	+
IN0341	+	+	+	-	-	+	0	+

## H.14 SA Objective 13: Economy

### H.14.1 Employment Floorspace Provision

H.14.1.1 Employment floorspace provision has been assessed with consideration of current land use and the proposed development at each site.

H.14.1.2 100 sites in Walsall are proposed for employment development, 93 of which comprise (either wholly or the majority of the site) previously undeveloped land. Therefore, the proposed development at these sites would be expected to result in a significant net gain in employment floorspace and have a major positive impact on providing local employment opportunities. Seven sites proposed for employment use (SA-0301-WAL, SA-0315-WAL, IN0012.8, IN0068.1, IN0120.5, IN0315 and IN0317) currently coincide with employment areas or existing businesses. At this stage, it is uncertain whether the proposed development at these seven sites would result in a net change in employment floorspace.

H.14.1.3 34 sites in Walsall proposed for residential development coincide with existing employment areas which may provide existing employment opportunities. Development at these sites could potentially result in a net loss of employment floorspace. The proposed development at 33 sites could potentially have a minor negative impact on employment floorspace provision due to the possible loss of small areas of employment land or businesses. For example, Site SA-0235-WAL which coincides with some small businesses such as 'Beacon Bikes' and 'Chrysallis Gifts', and Site SA-0289-WAL which coincides with 'Hayhead Farm Shop'. Site SA-0010-WAL comprises approximately 6.92ha, and coincides with 'Walsall Hospice', 'Housing & Care 21 – The Watermill' and 'Community Palliative Care Centre'; therefore, the proposed residential development at this site could potentially result in a major negative impact due to the possible loss of a large area of employment land.

H.14.1.4 The remaining 160 residential sites are located primarily on previously undeveloped land and would not be expected to result in a net change in employment floorspace; therefore, the proposed developments at these sites are likely to have a negligible impact on employment opportunities.

### H.14.2 Pedestrian Access to Employment Opportunities

H.14.2.1 There are many employment opportunities currently within Walsall. Accessibility modelling data has been provided to Lepus by the BCA, mapping 286 key employment locations and areas within a sustainable travel time. The majority of employment locations are clustered in the south west and north east of the borough. According to the modelling data, almost the entirety of the borough is within a 30-minute walk to an employment location, however, some small areas located within Green Belt areas in the south eastern corner of the borough are outside of this.

H.14.2.2 The majority of the proposed residential sites in Walsall, totalling 188 sites, could potentially have a minor positive impact on pedestrian access to employment due to being within this sustainable travel time. However, six sites (SA-0006-WAL, SA-0015-WAL, SA-0064-WAL, SA-0153-WAL, SA-0187-WAL and LC14A) are located wholly or partially outside of this travel time, and therefore, the proposed development at these sites could potentially have a minor negative impact on pedestrian access to employment opportunities, based on current infrastructure.

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

H.14.3.1 Accessibility modelling data indicates that the majority of the borough, except for a very small area in the east, is located within a sustainable travel time via public transport to employment opportunities, identified as being within a 30-minute journey. All of the proposed residential sites in Walsall would be expected to have a minor positive impact on public transport access to employment due to being within this travel time.

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

Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
<b>Walsall Residential Sites</b>			
SA-0001-WAL	0	+	+
SA-0006-WAL	0	-	+
SA-0010-WAL	--	+	+
SA-0012-WAL	0	+	+
SA-0014-WAL	-	+	+
SA-0015-WAL	0	-	+
SA-0016-WAL	0	+	+
SA-0017-WAL	0	+	+
SA-0018-WAL	-	+	+
SA-0019-WAL	0	+	+
SA-0020-WAL	0	+	+
SA-0022-WAL	0	+	+
SA-0029-WAL	0	+	+
SA-0030-WAL	0	+	+
SA-0032-WAL	0	+	+
SA-0034-WAL	0	+	+
SA-0035-WAL	0	+	+
SA-0036-WAL	0	+	+
SA-0037-WAL	0	+	+
SA-0038-WAL	0	+	+
SA-0045-WAL	0	+	+
SA-0047-WAL	0	+	+
SA-0048-WAL	0	+	+
SA-0050-WAL	0	+	+

Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
SA-0051-WAL	0	+	+
SA-0052-WAL	0	+	+
SA-0053-WAL	0	+	+
SA-0054-WAL	0	+	+
SA-0056-WAL	0	+	+
SA-0059-WAL	0	+	+
SA-0061-WAL	0	+	+
SA-0062-WAL	0	+	+
SA-0064-WAL	0	-	+
SA-0066-WAL	0	+	+
SA-0071-WAL	0	+	+
SA-0078-WAL	-	+	+
SA-0085-WAL	-	+	+
SA-0102-WAL	0	+	+
SA-0138-WAL	0	+	+
SA-0149-WAL	0	+	+
SA-0153-WAL	0	-	+
SA-0163-WAL	0	+	+
SA-0167-WAL	0	+	+
SA-0172-WAL	0	+	+
SA-0174-WAL	0	+	+
SA-0183-WAL	+/-	+	+
SA-0186-WAL	0	+	+
SA-0187-WAL	0	-	+
SA-0188-WAL	0	+	+
SA-0195-WAL	0	+	+
SA-0196-WAL	0	+	+
SA-0197-WAL	0	+	+
SA-0199-WAL	0	+	+
SA-0201-WAL	0	+	+
SA-0202-WAL	0	+	+
SA-0204-WAL	-	+	+
SA-0205-WAL	0	+	+
SA-0206-WAL	0	+	+
SA-0207-WAL	0	+	+
SA-0208-WAL	0	+	+
SA-0211-WAL	0	+	+
SA-0212-WAL	0	+	+
SA-0213-WAL	0	+	+
SA-0215-WAL	0	+	+
SA-0216-WAL	0	+	+
SA-0220-WAL	0	+	+
SA-0222-WAL	0	+	+
SA-0223-WAL	0	+	+

Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
SA-0224-WAL	0	+	+
SA-0225-WAL	0	+	+
SA-0226-WAL	0	+	+
SA-0227-WAL	0	+	+
SA-0228-WAL	0	+	+
SA-0229-WAL	0	+	+
SA-0230-WAL	0	+	+
SA-0231-WAL	0	+	+
SA-0232-WAL	-	+	+
SA-0233-WAL	0	+	+
SA-0235-WAL	-	+	+
SA-0236-WAL	0	+	+
SA-0237-WAL	-	+	+
SA-0238-WAL	0	+	+
SA-0239-WAL	0	+	+
SA-0240-WAL	0	+	+
SA-0241-WAL	0	+	+
SA-0244-WAL	0	+	+
SA-0245-WAL	0	+	+
SA-0248-WAL	0	+	+
SA-0250-WAL	0	+	+
SA-0251-WAL	0	+	+
SA-0252-WAL	0	+	+
SA-0257-WAL	0	+	+
SA-0264-WAL	0	+	+
SA-0265-WAL	0	+	+
SA-0266-WAL	0	+	+
SA-0267-WAL	0	+	+
SA-0269-WAL	0	+	+
SA-0272-WAL	0	+	+
SA-0274-WAL	0	+	+
SA-0278-WAL	0	+	+
SA-0280-WAL	0	+	+
SA-0284-WAL	0	+	+
SA-0288-WAL	0	+	+
SA-0289-WAL	-	+	+
SA-0291-WAL	0	+	+
SA-0292-WAL	0	+	+
SA-0294-WAL	0	+	+
SA-0295-WAL	0	+	+
SA-0296-WAL	0	+	+
SA-0297-WAL	0	+	+
SA-0301-WAL	-	+	+
SA-0302-WAL	-	+	+

Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
SA-0304-WAL	0	+	+
SA-0305-WAL	0	+	+
SA-0309-WAL	0	+	+
SA-0312-WAL	-	+	+
SA-0313-WAL	0	+	+
SA-0317-WAL	0	+	+
<b>Walsall Employment Sites</b>			
SA-0001-WAL	++	0	0
SA-0007-WAL	++	0	0
SA-0008-WAL	++	0	0
SA-0015-WAL	++	0	0
SA-0020-WAL	++	0	0
SA-0030-WAL	++	0	0
SA-0045-WAL	++	0	0
SA-0047-WAL	++	0	0
SA-0054-WAL	++	0	0
SA-0057-WAL	++	0	0
SA-0061-WAL	++	0	0
SA-0167-WAL	++	0	0
SA-0183-WAL	+/-	0	0
SA-0186-WAL	++	0	0
SA-0195-WAL	++	0	0
SA-0196-WAL	++	0	0
SA-0197-WAL	++	0	0
SA-0200-WAL	++	0	0
SA-0201-WAL	++	0	0
SA-0202-WAL	++	0	0
SA-0204-WAL	++	0	0
SA-0205-WAL	++	0	0
SA-0211-WAL	++	0	0
SA-0212-WAL	++	0	0
SA-0213-WAL	++	0	0
SA-0215-WAL	++	0	0
SA-0216-WAL	++	0	0
SA-0223-WAL	++	0	0
SA-0227-WAL	++	0	0
SA-0230-WAL	++	0	0
SA-0231-WAL	++	0	0
SA-0232-WAL	++	0	0
SA-0235-WAL	++	0	0
SA-0237-WAL	++	0	0
SA-0238-WAL	++	0	0
SA-0239-WAL	++	0	0

Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
SA-0242-WAL	++	0	0
SA-0243-WAL	++	0	0
SA-0244-WAL	++	0	0
SA-0245-WAL	++	0	0
SA-0248-WAL	++	0	0
SA-0257-WAL	++	0	0
SA-0274-WAL	++	0	0
SA-0275-WAL	++	0	0
SA-0276-WAL	++	0	0
SA-0284-WAL	++	0	0
SA-0286-WAL	++	0	0
SA-0288-WAL	++	0	0
SA-0301-WAL	+/-	0	0
SA-0302-WAL	++	0	0
SA-0304-WAL	++	0	0
SA-0308-WAL	++	0	0
SA-0315-WAL	+/-	0	0
<b>Walsall Carried Forward Residential Sites</b>			
HO0016	-	+	+
HO0020	-	+	+
HO0023b	0	+	+
HO0027	0	+	+
HO0029	0	+	+
HO0037	0	+	+
HO0039a	0	+	+
HO0039b	0	+	+
HO0040	0	+	+
HO0041a	0	+	+
HO0041b	0	+	+
HO0043	0	+	+
HO0044	0	+	+
HO0046	0	+	+
HO0053	-	+	+
HO0060a	-	+	+
HO0060b	-	+	+
HO0060c	0	+	+
HO0060d	0	+	+
HO0062	0	+	+
HO0065	-	+	+
HO0066b	0	+	+
HO0071	0	+	+
HO0072	0	+	+
HO0093	0	+	+



Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
HO0117	0	+	+
HO0124	0	+	+
HO0125	-	+	+
HO0126	-	+	+
HO0137a	0	+	+
HO0137b	0	+	+
HO0137c	0	+	+
HO0147	0	+	+
HO0150	0	+	+
HO0150a	0	+	+
HO0154	0	+	+
HO0157a	-	+	+
HO0157b	-	+	+
HO0157c	-	+	+
HO0162a	0	+	+
HO0162b	0	+	+
HO0163	-	+	+
HO0168a	0	+	+
HO0168b	0	+	+
HO0176	0	+	+
HO0180	0	+	+
HO0181	0	+	+
HO0185	0	+	+
HO0194	-	+	+
HO0195	-	+	+
HO0201	0	+	+
HO0205	0	+	+
HO0217a	0	+	+
HO0217b	0	+	+
HO0304	0	+	+
HO0305	0	+	+
HO0307	0	+	+
HO0308	-	+	+
HO0310	0	+	+
HO0312	0	+	+
HO0313	0	+	+
HO0316	0	+	+
HO0317	-	+	+
HO0318	+/-	+	+
HO0320	-	+	+
HO0321	-	+	+
HO0322a	0	+	+
HO0322b	0	+	+

Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
HO1314	-	+	+
LC02B	0	+	+
LC08A	0	+	+
LC14A	0	-	+
LC18A	-	+	+
LC30A	0	+	+
LC30C	0	+	+
LC31A	0	+	+
<b>Walsall Carried Forward Employment Sites</b>			
IN0002.1	++	0	0
IN0005.1	++	0	0
IN0009.12	++	0	0
IN0009.13	++	0	0
IN0009.14	++	0	0
IN0010.2	++	0	0
IN0012.5	++	0	0
IN0012.6	++	0	0
IN0012.8	+/-	0	0
IN0017.1	++	0	0
IN0017.2	++	0	0
IN0018.2	++	0	0
IN0027.1	++	0	0
IN0027.2	++	0	0
IN0032.2	++	0	0
IN0052.2	++	0	0
IN0056.2	++	0	0
IN0058	++	0	0
IN0063	++	0	0
IN0064	++	0	0
IN0068.1	+/-	0	0
IN0069.3	++	0	0
IN0069.42	++	0	0
IN0070.2	++	0	0
IN0070.4	++	0	0
IN0071.2	++	0	0
IN0072.2	++	0	0
IN0078.12	++	0	0
IN0078.2	++	0	0
IN0084	++	0	0
IN0093.2	++	0	0
IN0099.2	++	0	0
IN0103.2	++	0	0
IN0104.1	++	0	0

Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
IN0104.4	++	0	0
IN0105	++	0	0
IN0109	++	0	0
IN0110	++	0	0
IN0118.2	++	0	0
IN0120.5	+/-	0	0
IN0122	++	0	0
IN0205	++	0	0
IN0315	+/-	0	0
IN0317	+/-	0	0
IN0328	++	0	0
IN0333	++	0	0
IN0341	++	0	0

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

### H.15.1 Pedestrian Access to Primary School

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

H.15.1.2 113 of the sites proposed for residential use are located within a 15-minute walk to a primary school, and therefore, the proposed development at these sites could potentially have a minor positive impact on pedestrian access to primary schools. On the other hand, 81 residential sites are located outside of this walking distance to a primary school, and therefore, the proposed development at these sites could potentially have a minor negative impact on pedestrian access to primary schools, based on current infrastructure. Residents in these areas may be reliant on less sustainable travel methods to reach primary schools.

### H.15.2 Pedestrian Access to Secondary School

H.15.2.1 Accessibility modelling data has been provided to Lepus by the BCA, mapping the location of 24 secondary schools and areas within a sustainable travel time to these schools. Most secondary schools within Walsall are located within the built-up areas in the west of the borough, and therefore serve those communities well. Sites within existing settlements are likely to have better pedestrian access compared to the outskirts of settlements or Green Belt.

H.15.2.2 72 of the residential sites in Walsall are outside of a 25-minute walk to a secondary school, and therefore, the proposed development at these sites could potentially have a minor negative impact on pedestrian access to secondary schools, based on current infrastructure. Conversely, the majority of proposed residential sites in Walsall, totalling 122 sites, are within a 25-minute walk to a secondary school; therefore, the proposed development at these sites would be expected to encourage pedestrian access to secondary schools and have a minor positive impact on education, skills and training.

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

H.15.3.1 Public transport provision within Walsall is extensive and would be likely to ensure that the majority of residents have sustainable travel options to secondary schools in the local and

wider area. Accessibility modelling data indicates only localised pockets of the borough where public transport access to secondary schools is limited, for example in Shortheath in the west, and Druid’s Heath in the east.

H.15.3.2 The majority of residential sites in Walsall are located within a 25-minute public transport journey to a secondary school, and therefore, the proposed development at these sites would be expected to have a minor positive impact on new residents’ sustainable access to secondary education.

H.15.3.3 However, seven residential sites (SA-0211-WAL, SA-0244-WAL, HO0040, HO0046, HO0053, HO0071 and HO0072) are situated in areas outside of this sustainable travel time to a secondary school via public transport, and therefore, the proposed development at these seven sites would be expected to have a minor negative impact on new residents’ access to secondary education, based on current infrastructure.

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

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
<b>Walsall Residential Sites</b>			
SA-0001-WAL	+	+	+
SA-0006-WAL	-	-	+
SA-0010-WAL	+	-	+
SA-0012-WAL	-	-	+
SA-0014-WAL	-	-	+
SA-0015-WAL	-	-	+
SA-0016-WAL	-	+	+
SA-0017-WAL	+	+	+
SA-0018-WAL	-	+	+
SA-0019-WAL	-	-	+
SA-0020-WAL	-	-	+
SA-0022-WAL	-	+	+
SA-0029-WAL	+	+	+
SA-0030-WAL	+	-	+
SA-0032-WAL	+	+	+
SA-0034-WAL	-	-	+
SA-0035-WAL	-	-	+
SA-0036-WAL	-	-	+
SA-0037-WAL	-	-	+
SA-0038-WAL	+	+	+
SA-0045-WAL	+	+	+
SA-0047-WAL	-	+	+
SA-0048-WAL	-	+	+
SA-0050-WAL	-	-	+
SA-0051-WAL	+	+	+
SA-0052-WAL	+	-	+
SA-0053-WAL	-	-	+

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
SA-0054-WAL	-	+	+
SA-0056-WAL	-	+	+
SA-0059-WAL	-	-	+
SA-0061-WAL	-	+	+
SA-0062-WAL	+	+	+
SA-0064-WAL	-	+	+
SA-0066-WAL	-	-	+
SA-0071-WAL	+	-	+
SA-0078-WAL	-	+	+
SA-0085-WAL	+	+	+
SA-0102-WAL	-	-	+
SA-0138-WAL	-	+	+
SA-0149-WAL	+	+	+
SA-0153-WAL	-	+	+
SA-0163-WAL	+	+	+
SA-0167-WAL	-	+	+
SA-0172-WAL	+	+	+
SA-0174-WAL	+	+	+
SA-0183-WAL	-	+	+
SA-0186-WAL	-	-	+
SA-0187-WAL	-	-	+
SA-0188-WAL	+	+	+
SA-0195-WAL	-	+	+
SA-0196-WAL	+	+	+
SA-0197-WAL	-	+	+
SA-0199-WAL	-	+	+
SA-0201-WAL	-	+	+
SA-0202-WAL	-	-	+
SA-0204-WAL	-	-	+
SA-0205-WAL	-	-	+
SA-0206-WAL	-	-	+
SA-0207-WAL	-	+	+
SA-0208-WAL	-	+	+
SA-0211-WAL	-	-	-
SA-0212-WAL	+	-	+
SA-0213-WAL	+	+	+
SA-0215-WAL	-	-	+
SA-0216-WAL	-	-	+
SA-0220-WAL	+	+	+
SA-0222-WAL	+	+	+
SA-0223-WAL	-	+	+
SA-0224-WAL	+	+	+
SA-0225-WAL	+	+	+
SA-0226-WAL	+	+	+
SA-0227-WAL	-	+	+

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
SA-0228-WAL	-	-	+
SA-0229-WAL	-	-	+
SA-0230-WAL	-	-	+
SA-0231-WAL	-	+	+
SA-0232-WAL	-	-	+
SA-0233-WAL	+	+	+
SA-0235-WAL	-	+	+
SA-0236-WAL	-	+	+
SA-0237-WAL	-	+	+
SA-0238-WAL	-	+	+
SA-0239-WAL	-	+	+
SA-0240-WAL	-	+	+
SA-0241-WAL	-	+	+
SA-0244-WAL	-	-	-
SA-0245-WAL	-	-	+
SA-0248-WAL	-	-	+
SA-0250-WAL	+	-	+
SA-0251-WAL	-	-	+
SA-0252-WAL	-	-	+
SA-0257-WAL	+	+	+
SA-0264-WAL	+	-	+
SA-0265-WAL	-	-	+
SA-0266-WAL	-	+	+
SA-0267-WAL	-	+	+
SA-0269-WAL	-	+	+
SA-0272-WAL	+	+	+
SA-0274-WAL	+	+	+
SA-0278-WAL	+	-	+
SA-0280-WAL	+	+	+
SA-0284-WAL	-	+	+
SA-0288-WAL	-	-	+
SA-0289-WAL	-	-	+
SA-0291-WAL	-	-	+
SA-0292-WAL	-	-	+
SA-0294-WAL	-	-	+
SA-0295-WAL	-	-	+
SA-0296-WAL	-	-	+
SA-0297-WAL	-	-	+
SA-0301-WAL	-	-	+
SA-0302-WAL	-	+	+
SA-0304-WAL	-	-	+
SA-0305-WAL	+	-	+
SA-0309-WAL	-	-	+
SA-0312-WAL	-	-	+
SA-0313-WAL	+	-	+

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
SA-0317-WAL	+	+	+
<b>Walsall Employment Sites</b>			
SA-0001-WAL	0	0	0
SA-0007-WAL	0	0	0
SA-0008-WAL	0	0	0
SA-0015-WAL	0	0	0
SA-0020-WAL	0	0	0
SA-0030-WAL	0	0	0
SA-0045-WAL	0	0	0
SA-0047-WAL	0	0	0
SA-0054-WAL	0	0	0
SA-0057-WAL	0	0	0
SA-0061-WAL	0	0	0
SA-0167-WAL	0	0	0
SA-0183-WAL	0	0	0
SA-0186-WAL	0	0	0
SA-0195-WAL	0	0	0
SA-0196-WAL	0	0	0
SA-0197-WAL	0	0	0
SA-0200-WAL	0	0	0
SA-0201-WAL	0	0	0
SA-0202-WAL	0	0	0
SA-0204-WAL	0	0	0
SA-0205-WAL	0	0	0
SA-0211-WAL	0	0	0
SA-0212-WAL	0	0	0
SA-0213-WAL	0	0	0
SA-0215-WAL	0	0	0
SA-0216-WAL	0	0	0
SA-0223-WAL	0	0	0
SA-0227-WAL	0	0	0
SA-0230-WAL	0	0	0
SA-0231-WAL	0	0	0
SA-0232-WAL	0	0	0
SA-0235-WAL	0	0	0
SA-0237-WAL	0	0	0
SA-0238-WAL	0	0	0
SA-0239-WAL	0	0	0
SA-0242-WAL	0	0	0
SA-0243-WAL	0	0	0
SA-0244-WAL	0	0	0
SA-0245-WAL	0	0	0
SA-0248-WAL	0	0	0



Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
SA-0257-WAL	0	0	0
SA-0274-WAL	0	0	0
SA-0275-WAL	0	0	0
SA-0276-WAL	0	0	0
SA-0284-WAL	0	0	0
SA-0286-WAL	0	0	0
SA-0288-WAL	0	0	0
SA-0301-WAL	0	0	0
SA-0302-WAL	0	0	0
SA-0304-WAL	0	0	0
SA-0308-WAL	0	0	0
SA-0315-WAL	0	0	0
<b>Walsall Carried Forward Residential Sites</b>			
HO0016	+	+	+
HO0020	+	+	+
HO0023b	+	+	+
HO0027	+	-	+
HO0029	+	+	+
HO0037	+	-	+
HO0039a	+	-	+
HO0039b	+	-	-
HO0040	+	+	+
HO0041a	+	+	+
HO0041b	+	+	+
HO0043	+	+	+
HO0044	+	+	+
HO0046	+	+	-
HO0053	+	+	-
HO0060a	+	+	+
HO0060b	+	+	+
HO0060c	+	+	+
HO0060d	+	+	+
HO0062	+	+	+
HO0065	+	+	+
HO0066b	+	+	+
HO0071	+	+	-
HO0072	+	+	-
HO0093	+	+	+
HO0117	+	+	+
HO0124	+	+	+
HO0125	+	+	+
HO0126	+	+	+
HO0137a	+	-	+

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
HO0137b	+	-	+
HO0137c	+	-	+
HO0147	+	-	+
HO0150	+	-	+
HO0150a	+	-	+
HO0154	+	-	+
HO0157a	+	+	+
HO0157b	+	+	+
HO0157c	+	+	+
HO0162a	+	+	+
HO0162b	+	+	+
HO0163	+	+	+
HO0168a	+	+	+
HO0168b	+	+	+
HO0176	+	-	+
HO0180	+	+	+
HO0181	+	+	+
HO0185	+	+	+
HO0194	+	+	+
HO0195	+	+	+
HO0201	+	+	+
HO0205	+	+	+
HO0217a	+	-	+
HO0217b	+	-	+
HO0304	+	+	+
HO0305	+	+	+
HO0307	+	+	+
HO0308	+	+	+
HO0310	+	+	+
HO0312	+	+	+
HO0313	+	+	+
HO0316	+	+	+
HO0317	+	+	+
HO0318	+	+	+
HO0320	+	+	+
HO0321	+	+	+
HO0322a	+	+	+
HO0322b	+	-	+
HO1314	+	+	+
LC02B	+	+	+
LC08A	+	-	+
LC14A	+	+	+
LC18A	+	+	+

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
LC30A	+	+	+
LC30C	+	+	+
LC31A	+	+	+
<b>Walsall Carried Forward Employment Sites</b>			
IN0002.1	0	0	0
IN0005.1	0	0	0
IN0009.12	0	0	0
IN0009.13	0	0	0
IN0009.14	0	0	0
IN0010.2	0	0	0
IN0012.5	0	0	0
IN0012.6	0	0	0
IN0012.8	0	0	0
IN0017.1	0	0	0
IN0017.2	0	0	0
IN0018.2	0	0	0
IN0027.1	0	0	0
IN0027.2	0	0	0
IN0032.2	0	0	0
IN0052.2	0	0	0
IN0056.2	0	0	0
IN0058	0	0	0
IN0063	0	0	0
IN0064	0	0	0
IN0068.1	0	0	0
IN0069.3	0	0	0
IN0069.42	0	0	0
IN0070.2	0	0	0
IN0070.4	0	0	0
IN0071.2	0	0	0
IN0072.2	0	0	0
IN0078.12	0	0	0
IN0078.2	0	0	0
IN0084	0	0	0
IN0093.2	0	0	0
IN0099.2	0	0	0
IN0103.2	0	0	0
IN0104.1	0	0	0
IN0104.4	0	0	0
IN0105	0	0	0
IN0109	0	0	0
IN0110	0	0	0
IN0118.2	0	0	0

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
IN0120.5	0	0	0
IN0122	0	0	0
IN0205	0	0	0
IN0315	0	0	0
IN0317	0	0	0
IN0328	0	0	0
IN0333	0	0	0
IN0341	0	0	0

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# Appendix I: Wolverhampton Reasonable Alternative Site Assessments

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# I.1 Introduction

## I.1.1 Overview

I.1.1.1 A total of 78 reasonable alternative sites have been identified within Wolverhampton (see **Table I.1.1**). This includes 48 sites proposed for residential use (20 of which are ‘carried forward’ (CF) from existing development plans), and 30 sites proposed for employment use (19 of which are ‘carried forward’ from existing development plans).

I.1.1.2 Each of the sites appraised within this report have been assessed for likely impacts on each of the 14 SA Objectives, as outlined in the SA Framework (see **Appendix A**). Likely sustainability impacts have been set out in **Tables I.2.1 – I.14.1** within each SA Objective chapter, in accordance with the methodology set out in **Chapter 5** of the main SA Report.

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

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

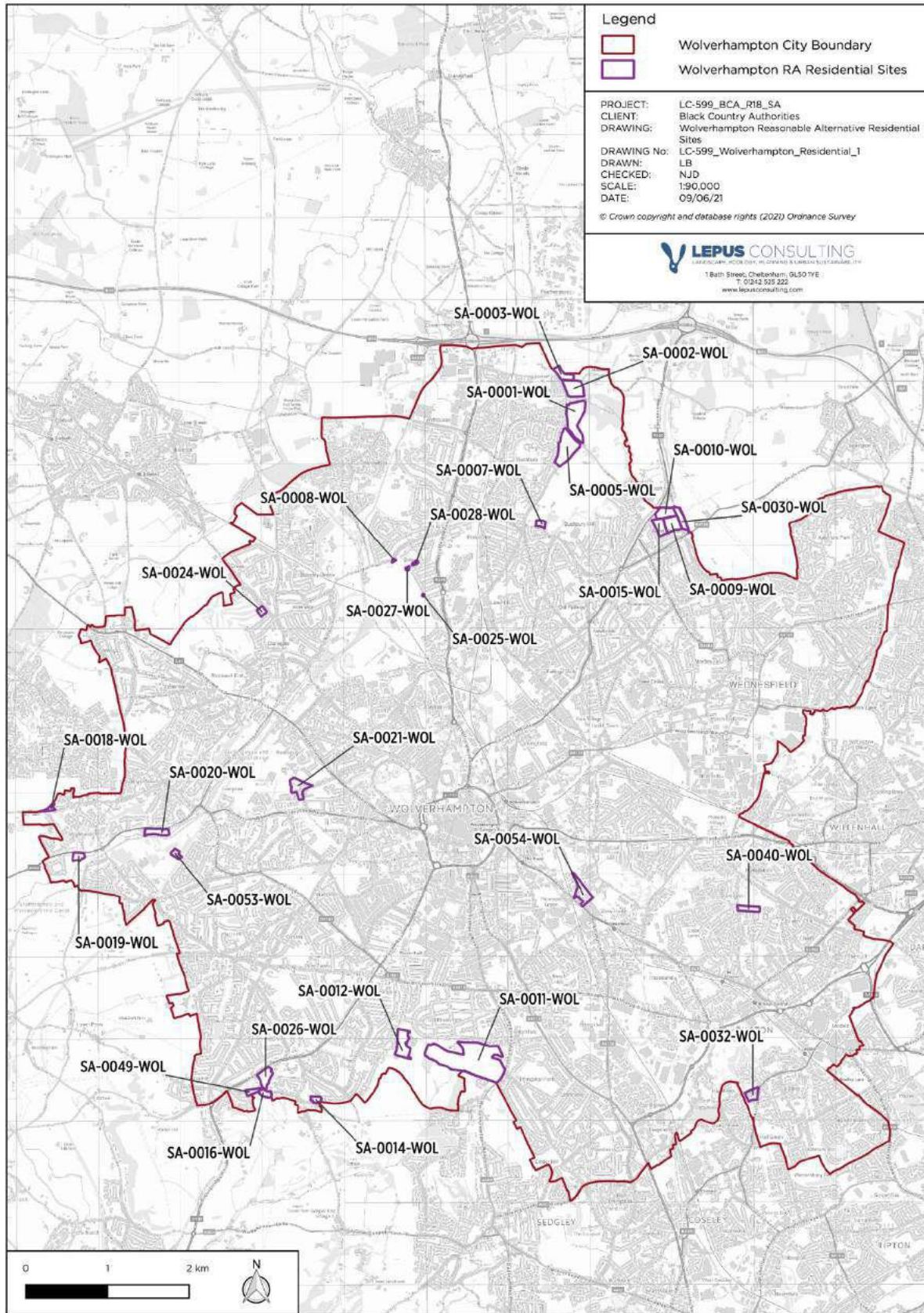


Figure I.1.1: Reasonable alternative sites proposed for residential use in Wolverhampton



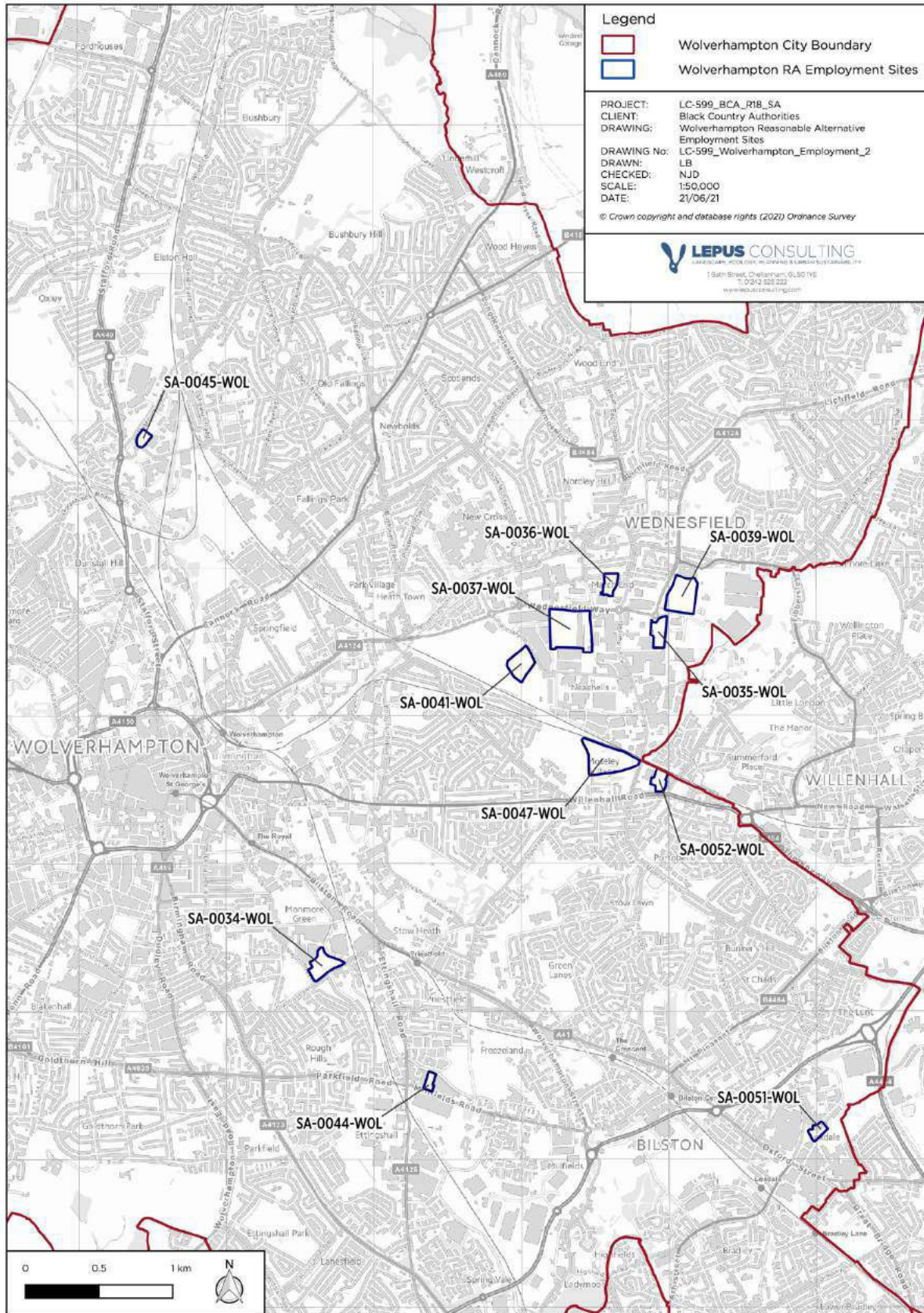


Figure I.1.2: Reasonable alternative sites proposed for employment use in Wolverhampton

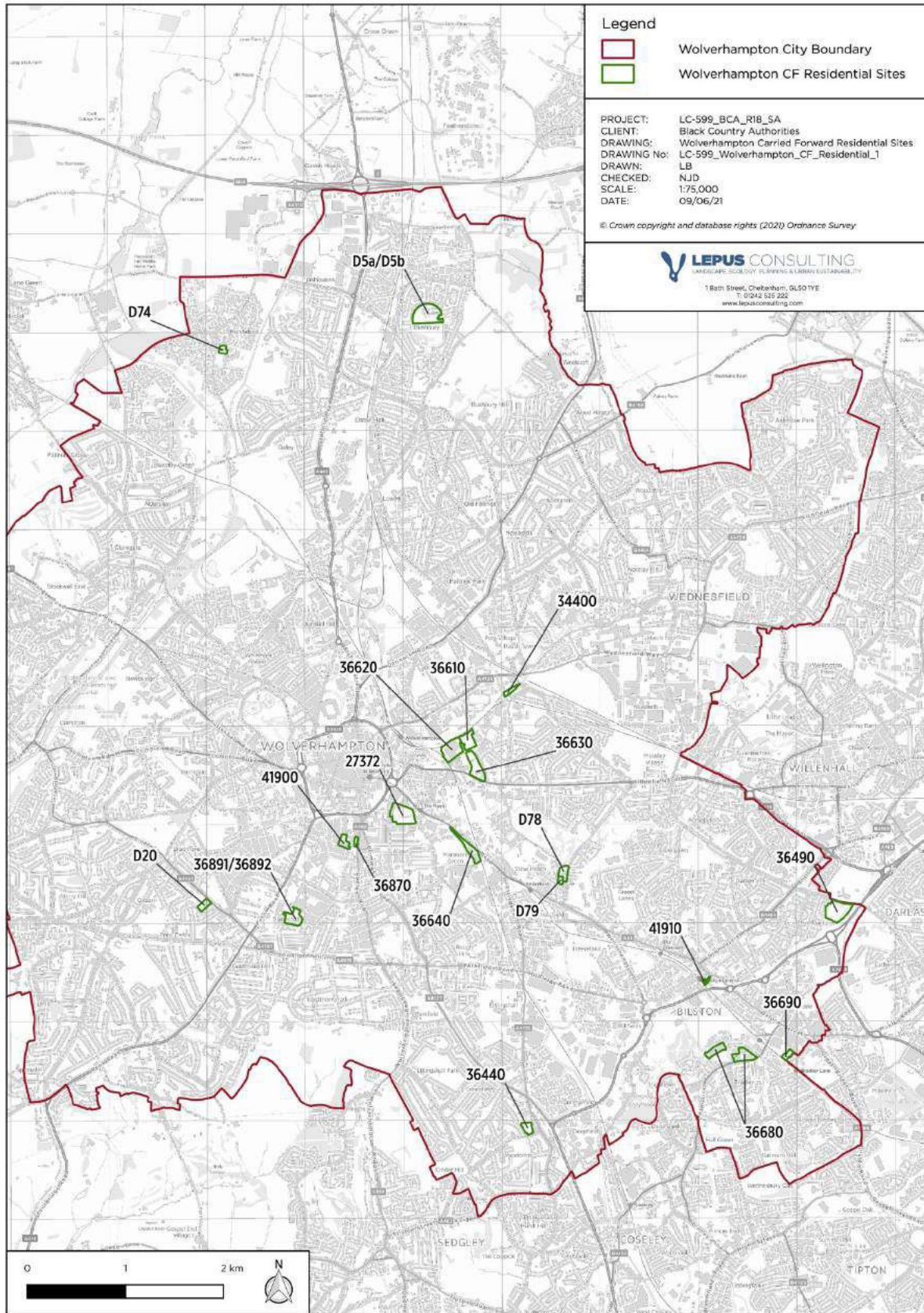


Figure I.1.3: Carried forward sites proposed for residential use in Wolverhampton

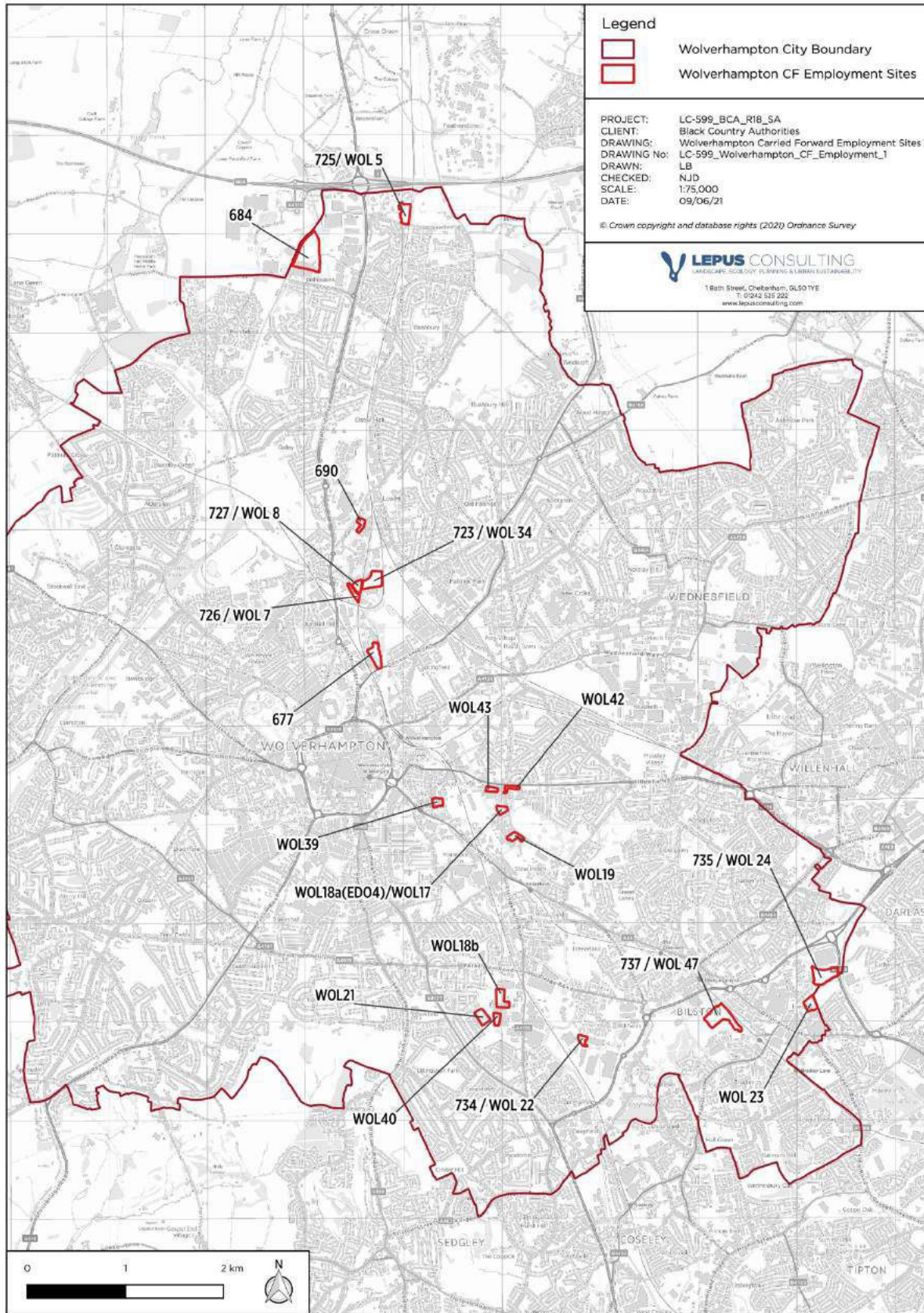


Figure I.1.4: Carried forward sites proposed for employment use in Wolverhampton

**Table I.1.1: Reasonable alternative sites in Wolverhampton**

Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
SA-0001-WOL	Northcote Lane, Bushbury, Wolverhampton	Housing	7.44	4.56	182
SA-0002-WOL	South of Moseley Road, Bushbury, Wolverhampton	Housing	4.26	3.10	124
SA-0003-WOL	North of Moseley Road, Bushbury, Wolverhampton	Housing	2.01	1.95	78
SA-0005-WOL	Land at Bushbury Lane/ Legs Lane, Bushbury, Wolverhampton	Housing	7.3	3.7	148
SA-0007-WOL	Former Bushbury Swimming Baths	Housing	0.83	Unknown	Unknown
SA-0008-WOL	Oxley Park Golf Club land adjacent to 139 Oxley Moor Road	Housing	0.13	0.13	3
SA-0009-WOL	Open Space at Grassy Lane, Fallings Park, Wolverhampton	Housing	3.2	2.2	88
SA-0010-WOL	Land North of Grassy Lane	Housing	2.70	2.00	80
SA-0011-WOL	Land at Pennwood Farm (part) - North	Housing	35.3	16.6	600
SA-0012-WOL	Colton Hills School Playing Field (part) - North	Housing	4.55	Unknown	20
SA-0014-WOL	Mount Farm, Pennwood Lane	Housing	0.85	Unknown	Unknown
SA-0015-WOL	Land at Grassy Lane, Fallings Park, Wolverhampton	Housing	2.38	2.38	95
SA-0016-WOL	Land South of Vicarage Road, Penn	Housing	1.00	Unknown	Unknown
SA-0018-WOL	Land West of 74 Perton Road, Wightwick, Wolverhampton	Housing	0.60	0.60	4
SA-0019-WOL	Land between 301 and 302 Bridgnorth Road	Housing	1.00	Unknown	Unknown
SA-0020-WOL	Wightwick Mill Field, Bridgnorth Road, Compton	Housing	2.00	Unknown	Unknown
SA-0021-WOL	City of Wolverhampton College, Paget Road, Compton Park, Wolverhampton	Housing	3.52	3.52	140
SA-0024-WOL	South Staffordshire Golf Course Land at Codsall Road, Wolverhampton	Housing	0.85	0.85	8
SA-0025-WOL	Oxley Park Golf Club land adjacent to 1A Ribbesford Avenue	Housing	0.06	0.06	3
SA-0026-WOL	Land off 385 Penn Road and Vicarage Road	Housing	2.00	Unknown	Unknown
SA-0027-WOL	Oxley Park Golf Club land adjacent to 21 Oxley Links Road	Housing	0.14	0.14	3
SA-0028-WOL	Oxley Park Golf Club land adjacent to 10 Oxley Links Road	Housing	0.23	0.23	4
SA-0030-WOL	Land east of Wood Hayes Road	Housing	2.04	2.04	40

Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
SA-0032-WOL	Lane Street/Highfields Road	Housing	1.79	1.79	72
SA-0040-WOL	Moseley Road Open Space (part), Langdale Drive, Bilston	Housing	1.89	1.89	85
SA-0049-WOL	Land South of Vicarage Road Cemetery	Housing	0.97	Unknown	Unknown
SA-0053-WOL	Former Wolverhampton Environment Centre, Westacre Crescent, Finchfield	Housing	0.83	0.45	14
SA-0054-WOL	Sites at Sutherland Avenue/Cooper Street	Housing	3.65	Unknown	Unknown
SA-0034-WOL	Former MEB Site, North of Dixon Street	Employment	2.53	Unknown	N/A
SA-0035-WOL	Land at Wednesfield Way (Wednesfield 9)	Employment	1.77	1.77	N/A
SA-0036-WOL	Land at Well Lane (Wednesfield 12)	Employment	1.24	1.24	N/A
SA-0037-WOL	Glynweds	Employment	7.22	7.22	N/A
SA-0039-WOL	Steelpark Way (Tata Steel)	Employment	4.26	4.26	N/A
SA-0041-WOL	Bowmans Harbour, Planetary Road	Employment	2.63	2.63	N/A
SA-0044-WOL	Land at Millfields Road	Employment	0.70	0.70	N/A
SA-0045-WOL	Former Strykers, Bushbury Lane	Employment	0.77	Unknown	N/A
SA-0047-WOL	Dean's Road/ Neachells Lane	Employment	5.49	Unknown	N/A
SA-0051-WOL	Fmr Starr Rd Transport Depot, Dale Street	Employment	0.91	0.91	N/A
SA-0052-WOL	Land rear of Key Line Builders Merchants, Willenhall Road	Employment	1.21	1.21	N/A
27372	Fmr Royal Hospital, Royal Hospital Development Area, All Saints	CF Housing	4.11	4.11	192
34400	Former G & P Batteries Site, Grove Street, Heath Town	CF Housing	0.79	0.79	56
36440	Fmr Rookery Lodge, Woodcross Lane	CF Housing	1.04	0.25	16
36490	Alexander Metals Open Space	CF Housing	4.08	1.75	70
36610	East of Qualcast Road	CF Housing	2.40	2.00	101
36620	West of Qualcast Road	CF Housing	3.40	3.00	119
36630	West of Colliery Road	CF Housing	2.94	2.00	90
36640	Delta Trading Estate, Bilston Road	CF Housing	2.00	2.00	80
36680	Greenway Road	CF Housing	4.00	4.00	180
36690	South of Oxford Street	CF Housing	0.62	0.45	20
36870	Dudley Road/Bell Place, Blakenhall Character Area	CF Housing	0.36	0.36	100
36891/36892	Former St Luke's Junior School, Goldthorn Road	CF Housing	2.21	2.21	89
40530	Land at Hall Street/The Orchard	CF Housing	0.12	0.12	21

Site Reference	Site Address	Site use	Gross Area (ha)	Net Area (ha)	Housing Capacity (if applicable)
41900	Dobbs Street	CF Housing	0.96	0.96	266
41910	Fmr Pipe Hall, The Orchard, Bilston	CF Housing	0.13	0.13	20
D5a/D5b	Former Northcote Secondary School, Northwood Park Road, Wolverhampton	CF Housing	4.94	4.94	178
D20	Beckminster House, Beckminster Road	CF Housing	0.86	0.25	15
D74	Fmr Nelson Mandela House, Whitburn Close	CF Housing	0.60	0.60	20
D78	Stowheath Day/Childrens Centres, Stowheath Lane, WV1 2TW	CF Housing	1.13	1.13	45
D79	Land to rear Stowheath Day Centre, Stowheath Lane, WV1 2TW	CF Housing	0.39	0.39	16
677	Crown St/Cross St North	CF Employment	2.13	Unknown	N/A
684	Rear of IMI Marstons	CF Employment	7.22	Unknown	N/A
690	Shaw Road (north of Civic Amenity Site)	CF Employment	0.76	Unknown	N/A
723/WOL34	WSP - Gas Holders	CF Employment	2.58	2.58	N/A
725/WOL5	Wolverhampton Business Park	CF Employment	1.87	1.87	N/A
726/WOL7	WSP - Stratosphere	CF Employment	0.74	0.74	N/A
727/WOL8	WSP Mammoth Drive	CF Employment	0.83	0.83	N/A
734/WOL22	Springvale Avenue	CF Employment	0.71	0.71	N/A
735/WOL24	South of Citadel Junction	CF Employment	3.24	3.24	N/A
737/WOL47	Bilston Urban Village	CF Employment	4.41	4.41	N/A
WOL18a(EDO4)/WOL17	Hickman Avenue	CF Employment	0.69	0.69	N/A
WOL18b	Rolls Royce Playing Fields, Spring Road	CF Employment	1.76	1.76	N/A
WOL19	Purbrook Road Industrial Estate	CF Employment	0.92	0.92	N/A
WOL21	South of Inverclyde Drive	CF Employment	1.44	1.44	N/A
WOL23	Rear of Dale Street (Vulcan Road)	CF Employment	1.42	1.42	N/A
WOL39	Powerhouse	CF Employment	0.85	0.85	N/A
WOL40	Rear of Spring Road	CF Employment	0.72	0.72	N/A
WOL42	Chillington Fields	CF Employment	0.56	0.56	N/A
WOL43	St Matthews Street	CF Employment	0.54	0.54	N/A

## I.2 SA Objective 1: Cultural Heritage

### I.2.1 Grade I Listed Buildings

I.2.1.1 There are two Grade I Listed Buildings in Wolverhampton, 'Wightwick Manor' and 'Church of St Peter'. Site SA-0019-WOL is located approximately 220m from 'Wightwick Manor'. The proposed development at this site could potentially have a minor negative impact on the setting on this Grade I Listed Building. The remaining proposed sites in Wolverhampton would be unlikely to significantly impact either of the Grade I Listed Buildings, therefore a negligible impact has been identified for these sites.

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

I.2.2.1 There is a relatively small number of Grade II\* Listed Buildings within Wolverhampton, mostly concentrated in Wolverhampton city centre, with fewer located towards the outer edges of the city. The proposed development at Sites SA-0001-WOL, SA-0002-WOL, SA-0003-WOL, SA-0007-WOL, SA-0016-WOL, SA-0019-WOL, SA-0026-WOL and SA-0049-WOL could potentially have a minor negative impact on Grade II\* Listed Buildings such as 'Moseley Hall', 'Church of St Mary' and 'Penn Hall', due to their close proximity to the Listed Buildings. The remaining sites within Wolverhampton are separated from Listed Buildings by existing built form and therefore are unlikely to significantly impact any Grade II\* Listed Buildings. A negligible impact has been identified for these sites.

### I.2.3 Grade II Listed Buildings

I.2.3.1 There are many Grade II Listed Buildings throughout Wolverhampton, generally clustered within the built-up areas and particularly within the city centre and Tettenhall, and along the canal network. 'Carried forward' Sites 27372, 41910 and D20 coincide with Grade II Listed Buildings 'Royal Hospital', 'Top Cats Night Spot' and 'Beckminster House and Gateway' respectively. The proposed development at these three sites could potentially have a direct major negative impact on these Grade II Listed Buildings. A further 18 proposed sites within Wolverhampton are either adjacent to or in close proximity to various Grade II Listed Buildings. The proposed development at these 18 sites could potentially have a minor negative impact on the settings of these Grade II Listed Buildings. The remaining proposed sites within Wolverhampton are likely to have a negligible impact on the setting of Grade II Listed Buildings, primarily due to being separated by existing built form.

### I.2.4 Conservation Area

I.2.4.1 Wolverhampton contains 31 Conservation Areas (CAs), the majority of which cover sections of the urban area, as well as portions of the canal network and historic open spaces. The proposed development at the majority of the sites within Wolverhampton are unlikely to

significantly impact any of these CAs, as the sites are separated from nearby CAs by existing built form. However, eleven sites are located wholly or partially within one of these CAs, such as Site SA-0007-WOL which is located wholly within 'Bushbury Hill' CA, Site SA-0016-WOL which is located wholly within 'Vicarage Road, Penn' CA and Site 27372 which is wholly within 'Cleveland Road' CA. A further 16 sites are located adjacent or in close proximity to a CA. Therefore, the proposed development at these 27 sites could potentially result in a minor negative impact on the setting of CAs in Wolverhampton.

## **I.2.5 Scheduled Monument**

I.2.5.1 There are four Scheduled Monuments (SMs) within Wolverhampton, all of which cover small historical features. Site SA-0007-WOL is located approximately 140m from 'Cross in St Mary's Churchyard' SM. The proposed development at this site could potentially have a minor negative impact on the setting of this SM. The remaining sites are separated from nearby SMs by existing built form, and therefore, would be expected to result in a negligible impact on the setting of SMs.

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

I.2.6.1 Two Registered Parks and Gardens (RPGs) can be found within Wolverhampton: 'West Park' and 'Wightwick Manor' RPGs. Site SA-0019-WOL is located approximately 20m from 'Wightwick Manor' RPG separated by the A454 road. Therefore, the proposed development at this site could potentially affect views of or from the RPG and have a minor negative impact on the setting of this RPG. The remaining sites are separated from nearby RPGs by existing built form, and therefore, would be expected to result in a negligible impact on the setting of RPGs.

## **I.2.7 Archaeological Priority Area**

I.2.7.1 Archaeological Priority Areas (APAs) have been identified throughout Wolverhampton, mainly found in the urban areas. Eight sites within Wolverhampton coincide wholly or partially with APAs, and a further two sites (SA-0016-WOL and SA-0026-WOL) are adjacent to an APA, namely 'Penn Historic Settlement'. The proposed development at these ten sites could potentially alter the setting of APAs, and as a result have a minor negative impact. The remaining sites are not located in close proximity to APAs, and therefore, would be expected to have a negligible impact on the setting of APAs.



## Historic Landscape Characterisation

I.2.7.2 The Black Country Historic Landscape Characterisation (HLC) Study<sup>1</sup> has identified a range of Historic Environment Area Designations within the Black Country. In Wolverhampton, these designations are mainly restricted to the small parcels of Green Belt as well as a number of features within the urban areas.

I.2.7.3 A total of four sites are located wholly or partially within an area of High Historic Landscape Value (HHLV) or High Historic Townscape Value (HHTV): Sites SA-0011-WOL, SA-0032-WOL, SA-0053-WOL and 41900. Therefore, the proposed development at these four sites could potentially result in a minor negative impact on the surrounding historic environment. The remaining sites do not coincide with any identified areas of high historic value, and therefore, would be expected to have a negligible impact on the local historic environment.

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

Site Ref	Grade I Listed Building	Grade II * Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
<b>Wolverhampton Residential Sites</b>								
SA-0001-WOL	0	-	-	-	0	0	0	0
SA-0002-WOL	0	-	-	0	0	0	0	0
SA-0003-WOL	0	-	-	0	0	0	0	0
SA-0005-WOL	0	0	-	-	0	0	0	0
SA-0007-WOL	0	-	-	-	-	0	0	0
SA-0008-WOL	0	0	0	0	0	0	0	0
SA-0009-WOL	0	0	0	0	0	0	0	0
SA-0010-WOL	0	0	0	0	0	0	0	0
SA-0011-WOL	0	0	-	0	0	0	0	-
SA-0012-WOL	0	0	0	0	0	0	0	0
SA-0014-WOL	0	0	0	-	0	0	-	0
SA-0015-WOL	0	0	0	0	0	0	0	0
SA-0016-WOL	0	-	-	-	0	0	-	0
SA-0018-WOL	0	0	0	0	0	0	0	0
SA-0019-WOL	-	-	-	-	0	-	-	0
SA-0020-WOL	0	0	-	-	0	0	-	0
SA-0021-WOL	0	0	0	0	0	0	-	0
SA-0024-WOL	0	0	0	0	0	0	0	0
SA-0025-WOL	0	0	0	0	0	0	0	0
SA-0026-WOL	0	-	-	-	0	0	-	0

<sup>1</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-1r\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-1r_redacted.pdf) [Date Accessed: 20/04/21]

Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
SA-0027-WOL	0	0	0	0	0	0	0	0
SA-0028-WOL	0	0	0	0	0	0	0	0
SA-0030-WOL	0	0	0	0	0	0	0	0
SA-0032-WOL	0	0	0	-	0	0	0	-
SA-0040-WOL	0	0	0	0	0	0	0	0
SA-0049-WOL	0	-	-	-	0	0	0	0
SA-0053-WOL	0	0	0	0	0	0	0	-
SA-0054-WOL	0	0	0	0	0	0	0	0
<b>Wolverhampton Sites – Employment</b>								
SA-0034-WOL	0	0	0	-	0	0	0	0
SA-0035-WOL	0	0	0	0	0	0	0	0
SA-0036-WOL	0	0	0	0	0	0	0	0
SA-0037-WOL	0	0	0	0	0	0	0	0
SA-0039-WOL	0	0	0	0	0	0	-	0
SA-0041-WOL	0	0	0	0	0	0	0	0
SA-0044-WOL	0	0	0	-	0	0	0	0
SA-0045-WOL	0	0	0	0	0	0	0	0
SA-0047-WOL	0	0	0	0	0	0	0	0
SA-0051-WOL	0	0	0	0	0	0	0	0
SA-0052-WOL	0	0	0	0	0	0	0	0
<b>Wolverhampton Carried Forward Residential Sites</b>								
27372	0	0	--	-	0	0	0	0
34400	0	0	0	0	0	0	0	0
36440	0	0	0	0	0	0	0	0
36490	0	0	0	0	0	0	0	0
36610	0	0	0	-	0	0	0	0
36620	0	0	0	-	0	0	0	0
36630	0	0	0	-	0	0	0	0
36640	0	0	0	-	0	0	0	0
36680	0	0	0	-	0	0	0	0
36690	0	0	0	0	0	0	0	0
36870	0	0	0	0	0	0	0	0
36891/36892	0	0	-	-	0	0	0	0
40530	0	0	-	-	0	0	-	0
41900	0	0	-	0	0	0	0	-
41910	0	0	--	-	0	0	-	0
D5a/D5b	0	0	0	0	0	0	0	0
D20	0	0	--	0	0	0	0	0
D74	0	0	0	0	0	0	0	0
D78	0	0	0	0	0	0	0	0
D79	0	0	0	0	0	0	0	0

Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
<b>Wolverhampton Carried Forward Employment Sites</b>								
677	0	0	-	-	0	0	0	0
684	0	0	0	-	0	0	0	0
690	0	0	0	0	0	0	0	0
723/WOL34	0	0	-	0	0	0	0	0
725/WOL5	0	0	0	0	0	0	0	0
726/WOL7	0	0	-	-	0	0	0	0
727/WOL8	0	0	-	-	0	0	0	0
734/WOL22	0	0	0	0	0	0	0	0
735/WOL24	0	0	0	0	0	0	0	0
737/WOL47	0	0	0	-	0	0	0	0
WOL18a(EDO4)/WOL17	0	0	0	0	0	0	-	0
WOL18b	0	0	0	0	0	0	0	0
WOL19	0	0	0	0	0	0	0	0
WOL21	0	0	0	0	0	0	0	0
WOL23	0	0	0	0	0	0	0	0
WOL39	0	0	0	-	0	0	0	0
WOL40	0	0	0	0	0	0	0	0
WOL42	0	0	0	0	0	0	0	0
WOL43	0	0	0	0	0	0	0	0

## I.3 SA Objective 2: Landscape

### I.3.1 Cannock Chase AONB

I.3.1.1 Cannock Chase AONB is located at its closest point approximately 7km to the north east of Wolverhampton. The proposed development at sites in Wolverhampton would be unlikely to significantly impact the AONB, in terms of altering views of/from the AONB or altering the setting of the AONB. Therefore, a negligible impact has been identified across all sites.

### I.3.2 Landscape Sensitivity

I.3.2.1 The Black Country Landscape Sensitivity Assessment<sup>2</sup> identified the extent to which the character and quality of Black Country Green Belt land is susceptible to change as a result of future development. In Wolverhampton, Green Belt is generally restricted to the outskirts of the city. The majority of sites in Wolverhampton, including all ‘carried forward’ sites and all sites proposed for employment use, are located in the existing urban area and would be expected to result in a negligible impact on the local landscape. A total of eight sites (SA-0007-WOL, SA-0011-WOL, SA-0014-WOL, SA-0016-WOL, SA-0019-WOL, SA-0020-WOL, SA-0026-WOL and SA-0049-WOL) are located within areas of ‘Moderate-High’ and/or ‘High’ landscape sensitivity, and therefore, could potentially result in major negative impacts on the local landscape if developed. A further 16 sites are located within areas of ‘Low-Moderate’ and/or ‘Moderate’ landscape sensitivity, and therefore, the proposed development at these sites could potentially have minor negative impacts on the local landscape.

### I.3.3 Alter Views for PRow Network Users

I.3.3.1 The PRow network in Wolverhampton is fragmented, with the majority of remaining footpaths found in the Green Belt parcels. 19 proposed development sites, the majority of which are located within or in the vicinity of Green Belt parcels in Wolverhampton, could potentially alter the views of open space currently experienced by users of the PRow network, and result in a minor negative impact on the landscape. Sites which contain existing development, or are separated from PRow by existing built form, would be unlikely to significantly alter views and are assessed as negligible.

### I.3.4 Alter Views for Local Residents

I.3.4.1 The development proposed at a large proportion of sites in Wolverhampton are considered to have the potential to alter the views currently experienced by local residents primarily due

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<sup>2</sup> LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: [https://blackcountryplan.dudlev.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr\\_redacted.pdf](https://blackcountryplan.dudlev.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf) [Date Accessed: 20/04/21]

to their location with respect to existing residential zones. Therefore, a minor negative impact on the local landscape could be expected at these 49 sites. The remaining sites comprise previously developed land and/or are located away from existing residential zones; therefore, the proposed development at these 29 sites would be unlikely to result in a significant impact on views.

### I.3.5 Green Belt Harm

I.3.5.1 The Green Belt Study<sup>3</sup> classified parcels of Green Belt land into different ‘harm’ ratings, based on the assessment of potential harm caused by removing each parcel from the Green Belt based on a range of criteria. The majority of sites within Wolverhampton, including all of the ‘carried forward’ sites, and all sites proposed for employment use, are located in the existing urban area and would be expected to result in a negligible impact. According to the Green Belt Study, seven sites (SA-0001-WOL, SA-0002-WOL, SA-0003-WOL, SA-0005-WOL, SA-0007-WOL, SA-0011-WOL and SA-0024-WOL) are located within areas where ‘Moderate-High’ and/or ‘High’ Green Belt harm could be expected if developed. Therefore, the proposed development at these seven sites could potentially result in a major negative impact on the landscape objective. Additionally, if developed, a further 12 sites could potentially result in ‘Low-Moderate’ and/or ‘Moderate’ Green Belt harm, and therefore would be expected to have a minor negative impact on the landscape objective.

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

Site Ref	Cannock Chase AONB	Landscape Sensitivity	Alter Views for PRow Network Users	Alter Views for Local Residents	Green Belt Harm
<b>Wolverhampton Residential Sites</b>					
SA-0001-WOL	0	-	-	-	--
SA-0002-WOL	0	-	-	-	--
SA-0003-WOL	0	-	-	-	--
SA-0005-WOL	0	-	-	-	--
SA-0007-WOL	0	--	-	-	--
SA-0008-WOL	0	-	0	-	0
SA-0009-WOL	0	-	0	-	-
SA-0010-WOL	0	-	0	-	-
SA-0011-WOL	0	--	-	-	--
SA-0012-WOL	0	-	-	-	-
SA-0014-WOL	0	--	0	-	0
SA-0015-WOL	0	-	0	-	-
SA-0016-WOL	0	--	-	-	-
SA-0018-WOL	0	-	0	-	-
SA-0019-WOL	0	--	0	-	-
SA-0020-WOL	0	--	-	-	-

<sup>3</sup> LUC (2019) Black Country Green Belt Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13882/bcab-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13882/bcab-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced_redacted.pdf) [Date Accessed: 20/04/21]

Site Ref	Cannock Chase AONB	Landscape Sensitivity	Alter Views for PROW Network Users	Alter Views for Local Residents	Green Belt Harm
SA-0021-WOL	0	-	0	0	0
SA-0024-WOL	0	-	0	-	--
SA-0025-WOL	0	-	0	-	0
SA-0026-WOL	0	--	-	-	-
SA-0027-WOL	0	-	0	-	0
SA-0028-WOL	0	-	0	-	0
SA-0030-WOL	0	-	0	-	-
SA-0032-WOL	0	0	0	0	0
SA-0040-WOL	0	0	-	-	0
SA-0049-WOL	0	--	-	-	-
SA-0053-WOL	0	0	0	-	-
SA-0054-WOL	0	0	0	0	0
<b>Wolverhampton Sites – Employment</b>					
SA-0034-WOL	0	0	0	-	0
SA-0035-WOL	0	0	0	0	0
SA-0036-WOL	0	0	0	-	0
SA-0037-WOL	0	0	0	0	0
SA-0039-WOL	0	0	0	0	0
SA-0041-WOL	0	0	-	0	0
SA-0044-WOL	0	0	0	0	0
SA-0045-WOL	0	0	0	-	0
SA-0047-WOL	0	0	-	-	0
SA-0051-WOL	0	0	0	0	0
SA-0052-WOL	0	0	0	-	0
<b>Wolverhampton Carried Forward Residential Sites</b>					
27372	0	0	0	-	0
34400	0	0	-	-	0
36440	0	0	0	-	0
36490	0	0	0	-	0
36610	0	0	0	-	0
36620	0	0	0	0	0
36630	0	0	0	0	0
36640	0	0	0	0	0
36680	0	0	0	0	0
36690	0	0	0	0	0
36870	0	0	0	0	0
36891/36892	0	0	0	-	0
40530	0	0	0	-	0
41900	0	0	0	0	0
41910	0	0	0	0	0
D5a/D5b	0	0	-	-	0
D20	0	0	0	-	0
D74	0	0	-	-	0
D78	0	0	0	-	0

Site Ref	Cannock Chase AONB	Landscape Sensitivity	Alter Views for PRoW Network Users	Alter Views for Local Residents	Green Belt Harm
D79	0	0	0	-	0
<b>Wolverhampton Carried Forward Employment Sites</b>					
677	0	0	0	0	0
684	0	0	0	0	0
690	0	0	0	0	0
723/WOL34	0	0	-	0	0
725/WOL5	0	0	0	-	0
726/WOL7	0	0	0	0	0
727/WOL8	0	0	0	0	0
734/WOL22	0	0	0	-	0
735/WOL24	0	0	-	-	0
737/WOL47	0	0	0	-	0
WOL18a(EDO4)/WOL17	0	0	0	0	0
WOL18b	0	0	0	-	0
WOL19	0	0	0	0	0
WOL21	0	0	0	0	0
WOL23	0	0	0	-	0
WOL39	0	0	0	0	0
WOL40	0	0	0	0	0
WOL42	0	0	0	-	0
WOL43	0	0	0	0	0

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

### I.4.1 European Sites

I.4.1.1 European sites are a network of nature protection areas which include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). There are no European sites located within Wolverhampton, with the nearest being ‘Fens Pools’ SAC located approximately 5km to the south of the city, and ‘Cannock Chase’ SAC located approximately 12km to the north east. A small proportion in the north of the city lies within the identified 15km Zone of Influence (Zoi) where recreational impacts to Cannock Chase SAC may arise as a result of new development. No Zoi has currently been identified for Fens Pools SAC or other surrounding European sites.

I.4.1.2 Within Wolverhampton, 17 proposed development sites are located within the 15km Zoi for Cannock Chase SAC, and therefore, the proposed development at these sites could potentially have a minor negative impact on the designated features of this European site. At the time of writing, the likely impact of development at the remaining sites on other European sites, including Fens Pools SAC, is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

### I.4.2 Sites of Special Scientific Interest

I.4.2.1 There are no Sites of Special Scientific Interest (SSSI) within Wolverhampton, with the nearest being ‘Wren’s Nest’ SSSI located approximately 1.4km south of the city in Dudley.

I.4.2.2 Within Wolverhampton, there are 13 sites which are located within IRZs which state that “*any residential developments with a total net gain in residential units*” should consult Natural England. Therefore, the proposed development at these sites could potentially result in a minor negative impact on nearby SSSIs. The remaining sites within Wolverhampton are located within IRZs which do not indicate the proposed use as a threat to nearby SSSIs, and as such, would be likely to have a negligible impact.

### I.4.3 National Nature Reserves

I.4.3.1 There are no National Nature Reserves (NNR) within Wolverhampton city, with the nearest being ‘Wren’s Nest’ NNR located approximately 1.4km south of the city in Dudley. There are no sites within Wolverhampton located within close proximity to this NNR, and therefore the proposed development at all sites within Wolverhampton would be expected to have a negligible impact.



#### **I.4.4 Ancient Woodland**

I.4.4.1 There are four areas of ancient woodland within Wolverhampton: ‘Tettenhall Wood’, ‘Ashen Coppice’, ‘Park Coppice’ and one unnamed stand of woodland, all of which are found in the south west of the city. Site SA-0011-WOL is located adjacent to ‘Park Coppice’ and approximately 60m from ‘Ashen Coppice’. Site SA-0012-WOL is also located approximately 290m from ‘Park Coppice’. Both sites are located in close proximity to ancient woodlands and currently comprise relatively large areas of undeveloped land. Therefore, the proposed development at these two sites could potentially have a minor negative impact on these ancient woodlands, due to an increased risk of disturbance. The remaining proposed sites within Wolverhampton are not in close proximity to any areas of ancient woodland, and therefore a negligible impact could be expected.

#### **I.4.5 Local Nature Reserves**

I.4.5.1 Within Wolverhampton, ‘Smestow Valley’ is the only Local Nature Reserve (LNR), although other nearby LNRs include ‘Waddens Brook, Noose Lane’ LNR which is located adjacent to the north eastern city boundary, in Walsall. A small proportion of Site SA-0053-WOL coincides with ‘Smestow Valley’ LNR. Furthermore, Sites SA-0019-WOL and SA-0020-WOL are located approximately 280m and 40m respectively from this LNR. The proposed development at these three sites could potentially result in a minor negative impact on this LNR, due to an increased risk of development related threats and pressures. The majority of sites in Wolverhampton are deemed unlikely to significantly impact these LNRs, primarily due to being separated by existing built form.

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

I.4.6.1 There are 42 Sites of Importance for Nature Conservation (SINCs) found throughout Wolverhampton, including ‘Birmingham Canal, Wolverhampton Level’ SINC which runs throughout the central city area. A small proportion of Site SA-0054-WOL coincides with ‘Monmore Green Disused Railway’ SINC. A small proportion of Site SA-0011-WOL coincides with ‘Park Hill’ SINC, and a small proportion of Site SA-0034-WOL coincides with ‘Birmingham Canal, Wolverhampton Level’ SINC. The proposed development at these three sites could potentially have direct major negative impacts on these SINCs.

I.4.6.2 Additionally, 18 sites are located adjacent to SINCs, including Site SA-0020-WOL which is adjacent to ‘Smestow Valley’ SINC and Site 34400 which is adjacent to ‘Wyrley and Essington Canal’ SINC. The proposed development at these 18 sites could potentially have a minor negative impact on these SINCs, due to an increased risk of development related threats and pressures. None of the remaining sites coincide with or are located adjacent to SINCs, and therefore, the proposed development at these sites would be unlikely to significantly impact any SINC.

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

I.4.7.1 A total of 49 Sites of Local Importance for Nature Conservation (SLINCs) can be found throughout Wolverhampton, many of which comprise semi-natural open spaces within the highly urbanised area.

I.4.7.2 Sites SA-0011-WOL, SA-0019-WOL, SA-0047-WOL, 726/WOL7 and 735/WOL24 coincide with the following SLINCs, respectively: ‘Jeremy Road’, ‘Smestow Valley’, ‘Neachells Lane Open Space’, ‘Land at Wolverhampton Science Park’ and ‘Land East of Dale Street’. Additionally, Site SA-0032-WOL is located adjacent to ‘Dudley to Priestfield Disused Railway’ SLINC and Sites WOL21 and WOL40 are adjacent to ‘Taylor Road’ SLINC. The proposed development at these eight sites could potentially result in a minor negative impact on SLINCs, due to an increased risk of development related threats and pressures. The remaining sites are located further away from SLINCs, and as such, the proposed development at these sites would be less likely to significantly impact any SLINC.

## **I.4.8 Geological Sites**

I.4.8.1 Geological sites have been identified throughout the city, which form part of the Black Country Global Geopark<sup>4</sup>. These sites include a range of notable geological features and formations. In Wolverhampton, these include ‘Stafford Road Cutting SINC’, ‘Wightwick Manor and Smestow Valley’ and ‘Northcote Farm’. None of the proposed sites in Wolverhampton are located in close proximity to any identified areas of geological importance, and therefore, the proposed development at all sites would be expected to have a negligible impact.

## **I.4.9 Priority Habitats**

I.4.9.1 Despite being largely urbanised, there are a range of priority habitats present within Wolverhampton, with ‘deciduous woodland’ in particular found along the canals, as well as ‘coastal and floodplain grazing marsh’ with a smaller proportion of ‘good quality semi-improved grassland’ in the north east.

I.4.9.2 Sites SA-0015-WOL, SA-0019-WOL, SA-0020-WOL, SA-0053-WOL, 684, 723/WOL34, 725/WOL5 and 737/WOL47 coincide with areas of priority habitat. The proposed development at these eight sites could potentially result in the loss or degradation of these habitats, and therefore result in a minor negative impact on the overall presence of priority habitats across the Plan area. The sites which do not coincide with any identified priority habitat are likely to have a negligible impact.

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<sup>4</sup> Black Country Geopark (2021) Black Country Geopark. Available at: <https://blackcountrygeopark.dudley.gov.uk/bcg/> [Date Accessed: 07/05/21]

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

Site Ref	European Sites	SSSIs and IRZs	NNRS	Ancient Woodland	LNRS	SINCS	SLINCS	Geological Sites	Priority Habitats
<b>Wolverhampton Residential Sites</b>									
SA-0001-WOL	-	-	0	0	0	-	0	0	0
SA-0002-WOL	-	-	0	0	0	-	0	0	0
SA-0003-WOL	-	-	0	0	0	0	0	0	0
SA-0005-WOL	-	-	0	0	0	0	0	0	0
SA-0007-WOL	-	-	0	0	0	-	0	0	0
SA-0008-WOL	+/-	0	0	0	0	0	0	0	0
SA-0009-WOL	-	-	0	0	0	0	0	0	0
SA-0010-WOL	-	-	0	0	0	0	0	0	0
SA-0011-WOL	+/-	0	0	-	0	--	-	0	0
SA-0012-WOL	+/-	0	0	-	0	-	0	0	0
SA-0014-WOL	+/-	0	0	0	0	0	0	0	0
SA-0015-WOL	-	-	0	0	0	0	0	0	-
SA-0016-WOL	+/-	0	0	0	0	0	0	0	0
SA-0018-WOL	+/-	0	0	0	0	0	0	0	0
SA-0019-WOL	+/-	0	0	0	-	0	-	0	-
SA-0020-WOL	+/-	0	0	0	-	-	0	0	-
SA-0021-WOL	+/-	0	0	0	0	0	0	0	0
SA-0024-WOL	+/-	0	0	0	0	0	0	0	0
SA-0025-WOL	+/-	0	0	0	0	0	0	0	0
SA-0026-WOL	+/-	0	0	0	0	-	0	0	0
SA-0027-WOL	-	-	0	0	0	0	0	0	0
SA-0028-WOL	-	-	0	0	0	0	0	0	0
SA-0030-WOL	-	-	0	0	0	0	0	0	0
SA-0032-WOL	+/-	0	0	0	0	0	-	0	0
SA-0040-WOL	+/-	0	0	0	0	0	0	0	0
SA-0049-WOL	+/-	0	0	0	0	0	0	0	0
SA-0053-WOL	+/-	0	0	0	-	-	0	0	-
SA-0054-WOL	+/-	0	0	0	0	--	0	0	0
<b>Wolverhampton Sites – Employment</b>									
SA-0034-WOL	+/-	0	0	0	0	--	0	0	0
SA-0035-WOL	+/-	0	0	0	0	0	0	0	0
SA-0036-WOL	-	0	0	0	0	0	0	0	0
SA-0037-WOL	+/-	0	0	0	0	0	0	0	0
SA-0039-WOL	-	0	0	0	0	0	0	0	0
SA-0041-WOL	+/-	0	0	0	0	0	0	0	0
SA-0044-WOL	+/-	0	0	0	0	-	0	0	0
SA-0045-WOL	+/-	0	0	0	0	0	0	0	0
SA-0047-WOL	+/-	0	0	0	0	0	-	0	0
SA-0051-WOL	+/-	0	0	0	0	0	0	0	0
SA-0052-WOL	+/-	0	0	0	0	0	0	0	0

Site Ref	European Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRS	SINCs	SLINCs	Geological Sites	Priority Habitats
<b>Wolverhampton Carried Forward Residential Sites</b>									
27372	+/-	0	0	0	0	0	0	0	0
34400	+/-	0	0	0	0	-	0	0	0
36440	+/-	0	0	0	0	0	0	0	0
36490	+/-	0	0	0	0	0	0	0	0
36610	+/-	0	0	0	0	-	0	0	0
36620	+/-	0	0	0	0	-	0	0	0
36630	+/-	0	0	0	0	-	0	0	0
36640	+/-	0	0	0	0	-	0	0	0
36680	+/-	0	0	0	0	-	0	0	0
36690	+/-	0	0	0	0	0	0	0	0
36870	+/-	0	0	0	0	0	0	0	0
36891/36892	+/-	0	0	0	0	0	0	0	0
40530	+/-	0	0	0	0	0	0	0	0
41900	+/-	0	0	0	0	0	0	0	0
41910	+/-	0	0	0	0	0	0	0	0
D5a/D5b	-	-	0	0	0	0	0	0	0
D20	+/-	0	0	0	0	0	0	0	0
D74	-	-	0	0	0	0	0	0	0
D78	+/-	0	0	0	0	0	0	0	0
D79	+/-	0	0	0	0	0	0	0	0
<b>Wolverhampton Carried Forward Employment Sites</b>									
677	+/-	0	0	0	0	-	0	0	0
684	-	0	0	0	0	-	0	0	-
690	+/-	0	0	0	0	0	0	0	0
723/WOL34	+/-	0	0	0	0	0	0	0	-
725/WOL5	-	0	0	0	0	0	0	0	-
726/WOL7	+/-	0	0	0	0	-	-	0	0
727/WOL8	+/-	0	0	0	0	0	0	0	0
734/WOL22	+/-	0	0	0	0	0	0	0	0
735/WOL24	+/-	0	0	0	0	0	-	0	0
737/WOL47	+/-	0	0	0	0	0	0	0	-
WOL18a(EDO4)/WOL17	+/-	0	0	0	0	0	0	0	0
WOL18b	+/-	0	0	0	0	0	0	0	0
WOL19	+/-	0	0	0	0	0	0	0	0
WOL21	+/-	0	0	0	0	0	-	0	0
WOL23	+/-	0	0	0	0	0	0	0	0
WOL39	+/-	0	0	0	0	-	0	0	0
WOL40	+/-	0	0	0	0	0	-	0	0
WOL42	+/-	0	0	0	0	0	0	0	0
WOL43	+/-	0	0	0	0	0	0	0	0

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

### I.5.1 Potential Increase in Carbon Footprint

- I.5.1.1 Residential-led development is likely to result in an increase in carbon emissions, to some extent. 30 sites are proposed for the development of 109 dwellings or less. The proposed development at these sites would be likely to result in a negligible contribution towards Wolverhampton's total carbon emissions.
- I.5.1.2 Ten sites are proposed for the development of 110 dwellings or more. The proposed development at these sites could potentially increase local carbon emissions, as a proportion of Wolverhampton's total, by more than 0.1%. Therefore, a minor negative impact on Wolverhampton's carbon emissions would be expected at these ten sites.
- I.5.1.3 The housing capacity at eight residential sites in Wolverhampton is unknown at the time of writing, and therefore, the impact of the proposed development at these sites is uncertain.
- I.5.1.4 The carbon emissions likely to be generated as a result of non-residential development is uncertain. This would be entirely dependent on the nature and scale of the employment land proposed, which is unknown at present.

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

Site Ref	Potential Increase in Carbon Footprint	Site Ref	Potential Increase in Carbon Footprint
<b>Wolverhampton Residential Sites</b>		<b>Wolverhampton Carried Forward Residential Sites</b>	
SA-0001-WOL	-	27372	-
SA-0002-WOL	-	34400	0
SA-0003-WOL	0	36440	0
SA-0005-WOL	-	36490	0
SA-0007-WOL	+/-	36610	0
SA-0008-WOL	0	36620	-
SA-0009-WOL	0	36630	0
SA-0010-WOL	0	36640	0
SA-0011-WOL	-	36680	-
SA-0012-WOL	0	36690	0
SA-0014-WOL	+/-	36870	0
SA-0015-WOL	0	36891/36892	0
SA-0016-WOL	+/-	40530	0
SA-0018-WOL	0	41900	-
SA-0019-WOL	+/-	41910	0
SA-0020-WOL	+/-	D5a/D5b	-
SA-0021-WOL	-	D20	0
SA-0024-WOL	0	D74	0
SA-0025-WOL	0	D78	0
SA-0026-WOL	+/-	D79	0
SA-0027-WOL	0	<b>Wolverhampton Carried Forward Employment Sites</b>	
SA-0028-WOL	0	677	+/-
SA-0030-WOL	0	684	+/-
SA-0032-WOL	0	690	+/-
SA-0040-WOL	0	723/WOL34	+/-
SA-0049-WOL	+/-	725/WOL5	+/-
SA-0053-WOL	0	726/WOL7	+/-
SA-0054-WOL	+/-	727/WOL8	+/-
<b>Wolverhampton Employment Sites</b>		734/WOL22	+/-
SA-0034-WOL	+/-	735/WOL24	+/-
SA-0035-WOL	+/-	737/WOL47	+/-
SA-0036-WOL	+/-	WOL18a(EDO4)/WOL17	+/-
SA-0037-WOL	+/-	WOL18b	+/-
SA-0039-WOL	+/-	WOL19	+/-
SA-0041-WOL	+/-	WOL21	+/-
SA-0044-WOL	+/-	WOL23	+/-
SA-0045-WOL	+/-	WOL39	+/-
SA-0047-WOL	+/-	WOL40	+/-
SA-0051-WOL	+/-	WOL42	+/-
SA-0052-WOL	+/-	WOL43	+/-

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

### I.6.1 Flood Zones

I.6.1.1 Flood Zones 2, 3a and 3b within Wolverhampton occur alongside the Smestow Brook in the west, the Waterhead Brook in the north and also a significant area in the south east of the city covering some existing residential areas, close to the River Tame and Walsall Canal.

I.6.1.2 Seven sites in Wolverhampton are located partially within Flood Zone 3a and/or 3b, and therefore, the proposed development at these sites could potentially have a major negative impact on flooding in the area and exacerbate existing issues of flooding in Wolverhampton. A small proportion of Site 36490 is located within Flood Zone 2, and therefore, the proposed development at this site could potentially have a minor negative impact on flooding. The remaining 70 sites which are located wholly within Flood Zone 1 would be expected to have a minor positive impact on flooding, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

### I.6.2 Indicative Flood Zone 3b

I.6.2.1 Indicative Flood Zone 3b is present in areas where flooding will potentially worsen due to climate change, areas of which have been identified in the north and the south east of Wolverhampton. Five 'carried forward' sites (D74, 684, 735/WOL24, 737/WOL47 and WOL23) partially coincide with Indicative Flood Zone 3b. Therefore, the proposed development at these sites could potentially have a major negative impact on flooding and may exacerbate existing issues of flooding in Wolverhampton. The remaining sites which do not coincide with Indicative Flood Zone 3b may have a negligible impact on contributing to flooding issues in the future, although further site-specific assessments and reference to emerging data would help to provide a more accurate picture of changing flood risk due to climate change.

### I.6.3 Surface Water Flood Risk

I.6.3.1 Surface Water Flood Risk (SWFR) is categorised into low (1/1000), medium (1/100) and high (1/30) in relation to the probability of surface water flooding occurring in a given area. SWFR in Wolverhampton is prevalent, and in particular affects roads and pathways within the urban area. The proposed development at 12 sites within Wolverhampton which coincide with areas of high SWFR could potentially have a major negative impact on flooding, as development would be likely to locate site end users in areas at high risk of surface water flooding as well as exacerbate pluvial flood risk in surrounding locations. The proposed development at 38 sites in Wolverhampton which coincide with areas of low and/or medium

SWFR could potentially have a minor negative impact on surface water flooding. The remaining sites which do not coincide with any significant areas of SWFR would be expected to have a negligible impact on surface water flooding.

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

Site Ref	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
<b>Wolverhampton Residential Sites</b>			
SA-0001-WOL	+	0	0
SA-0002-WOL	+	0	0
SA-0003-WOL	+	0	0
SA-0005-WOL	+	0	0
SA-0007-WOL	+	0	0
SA-0008-WOL	+	0	-
SA-0009-WOL	+	0	-
SA-0010-WOL	+	0	--
SA-0011-WOL	+	0	-
SA-0012-WOL	+	0	-
SA-0014-WOL	+	0	0
SA-0015-WOL	+	0	--
SA-0016-WOL	+	0	0
SA-0018-WOL	+	0	-
SA-0019-WOL	+	0	--
SA-0020-WOL	--	0	--
SA-0021-WOL	+	0	0
SA-0024-WOL	+	0	-
SA-0025-WOL	+	0	0
SA-0026-WOL	+	0	0
SA-0027-WOL	+	0	0
SA-0028-WOL	+	0	--
SA-0030-WOL	+	0	-
SA-0032-WOL	+	0	-
SA-0040-WOL	+	0	0
SA-0049-WOL	+	0	0
SA-0053-WOL	+	0	0
SA-0054-WOL	+	0	-
<b>Wolverhampton Sites – Employment</b>			
SA-0034-WOL	+	0	-
SA-0035-WOL	+	0	0
SA-0036-WOL	+	0	-
SA-0037-WOL	+	0	--
SA-0039-WOL	+	0	--
SA-0041-WOL	+	0	--
SA-0044-WOL	+	0	-
SA-0045-WOL	+	0	0
SA-0047-WOL	+	0	-
SA-0051-WOL	+	0	0



SA-0052-WOL	+	0	0
<b>Wolverhampton Carried Forward Residential Sites</b>			
27372	+	0	-
34400	+	0	-
36440	+	0	-
36490	-	0	-
36610	+	0	-
36620	+	0	-
36630	+	0	-
36640	+	0	0
36680	+	0	-
36690	+	0	-
36870	+	0	0
36891/36892	+	0	-
40530	+	0	0
41900	+	0	-
41910	+	0	0
D5a/D5b	+	0	-
D20	+	0	0
D74	--	--	-
D78	--	0	-
D79	+	0	-
<b>Wolverhampton Carried Forward Employment Sites</b>			
677	+	0	-
684	--	--	-
690	+	0	0
723/WOL34	+	0	-
725/WOL5	+	0	-
726/WOL7	+	0	--
727/WOL8	+	0	-
734/WOL22	+	0	-
735/WOL24	--	--	-
737/WOL47	--	--	--
WOL18a(EDO4)/WOL17	+	0	0
WOL18b	+	0	0
WOL19	+	0	0
WOL21	+	0	-
WOL23	--	--	--
WOL39	+	0	-
WOL40	+	0	--
WOL42	+	0	-
WOL43	+	0	0

## I.7 SA Objective 6: Natural Resources

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

I.7.1.1 Wolverhampton is predominately urban with pockets of undeveloped land and greenspace scattered throughout the communities, including areas of Green Belt in the south and north west of the city.

I.7.1.2 21 sites in Wolverhampton comprise previously developed land which would be likely to have little or no environmental value. The proposed development at these sites would be expected to have a minor positive impact on natural resources as development would be classed as an efficient use of land.

I.7.1.3 The majority of proposed sites in Wolverhampton wholly or partially comprise undeveloped land, and/or contain areas likely to be of environmental value such as hedgerows, trees and scrub that may be lost or further fragmented if developed. The proposed development at these 57 sites would be expected to have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land.

### I.7.2 Agricultural Land Classification

I.7.2.1 Within Wolverhampton, Agricultural Land Classification (ALC) indicates largely 'Urban' land, with some areas of Grade 2, 3 and 4 land found in the southern and northern sections of the city. ALC Grade 2, and potentially Grade 3, represents some of Wolverhampton's 'best and most versatile' (BMV) land. 17 sites within Wolverhampton are located wholly or partially upon Grade 2 and/or 3 land, and therefore, the proposed development at these sites could potentially have a minor negative impact due to the loss of this important natural resource.

I.7.2.2 39 proposed sites are located on areas of 'Urban' land, and therefore, the proposed development at these sites could potentially have a minor positive impact on natural resources as development at these sites would help to prevent the loss of BMV land across the Plan area.

I.7.2.3 The proposed development at the 21 sites which are located wholly on previously developed land would be likely to have a negligible impact on agricultural land.

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

I.7.3.1 There are no Mineral Safeguarding Areas (MSAs) or Areas of Search (AOS) identified within Wolverhampton, therefore all of the proposed sites would be expected to result in a negligible impact on mineral resources.

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

Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Areas / Areas of Search
<b>Wolverhampton Residential Sites</b>			
SA-0001-WOL	-	-	0
SA-0002-WOL	-	-	0
SA-0003-WOL	-	-	0
SA-0005-WOL	-	-	0
SA-0007-WOL	-	-	0
SA-0008-WOL	-	+	0
SA-0009-WOL	-	-	0
SA-0010-WOL	-	-	0
SA-0011-WOL	-	-	0
SA-0012-WOL	-	-	0
SA-0014-WOL	-	+	0
SA-0015-WOL	-	-	0
SA-0016-WOL	-	-	0
SA-0018-WOL	-	-	0
SA-0019-WOL	-	+	0
SA-0020-WOL	-	+	0
SA-0021-WOL	-	+	0
SA-0024-WOL	-	+	0
SA-0025-WOL	-	+	0
SA-0026-WOL	-	+	0
SA-0027-WOL	-	-	0
SA-0028-WOL	-	+	0
SA-0030-WOL	-	-	0
SA-0032-WOL	+	0	0
SA-0040-WOL	-	+	0
SA-0049-WOL	-	-	0
SA-0053-WOL	+	0	0
SA-0054-WOL	+	0	0
<b>Wolverhampton Employment Sites</b>			
SA-0034-WOL	-	+	0
SA-0035-WOL	-	+	0
SA-0036-WOL	-	+	0
SA-0037-WOL	+	0	0
SA-0039-WOL	+	0	0
SA-0041-WOL	+	0	0
SA-0044-WOL	+	0	0
SA-0045-WOL	-	+	0
SA-0047-WOL	-	+	0
SA-0051-WOL	+	0	0
SA-0052-WOL	-	+	0
<b>Wolverhampton Carried Forward Residential Sites</b>			
27372	+	0	0

Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Areas / Areas of Search
34400	-	+	0
36440	-	+	0
36490	-	+	0
36610	-	+	0
36620	+	0	0
36630	+	0	0
36640	+	0	0
36680	+	0	0
36690	-	+	0
36870	+	0	0
36891/36892	-	+	0
40530	-	+	0
41900	+	0	0
41910	+	0	0
D5a/D5b	-	+	0
D20	-	+	0
D74	-	-	0
D78	-	+	0
D79	-	+	0
<b>Wolverhampton Carried Forward Employment Sites</b>			
677	-	+	0
684	-	+	0
690	+	0	0
723/WOL34	-	+	0
725/WOL5	-	-	0
726/WOL7	-	+	0
727/WOL8	-	+	0
734/WOL22	-	+	0
735/WOL24	-	+	0
737/WOL47	-	+	0
WOL18a(EDO4)/WOL17	-	+	0
WOL18b	-	+	0
WOL19	+	0	0
WOL21	+	0	0
WOL23	-	+	0
WOL39	+	0	0
WOL40	-	+	0
WOL42	-	+	0
WOL43	+	0	0

## I.8 SA Objective 7: Pollution

### I.8.1 Air Quality Management Area

I.8.1.1 Wolverhampton city is wholly designated as ‘Wolverhampton Air Quality Management Area’ (AQMA). All of the proposed sites within Wolverhampton are located wholly within this AQMA. Several of the sites are also located within 200m of neighbouring AQMAs including ‘Walsall AQMA’ to the east, ‘Sandwell AQMA’ to the south east and ‘Dudley AQMA’ to the south. The proposed development at all sites would be likely to locate site end users in areas of existing poor air quality and have a minor negative impact on air pollution.

### I.8.2 Main Road

I.8.2.1 Wolverhampton contains many major roads, including a large ring road in the city centre, where several main roads meet such as the A41, A449 and A454. The M54 motorway passes adjacent to the city in the north. 41 sites are located partially or wholly within 200m of a major road, and therefore, the proposed development at these sites could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using these main roads would be expected to have a minor negative impact on air quality and noise at these sites. On the other hand, the proposed development at the remaining sites which are over 200m from a main road would be expected to have a negligible impact on transport associated air and noise pollution associated with main roads.

### I.8.3 Watercourse

I.8.3.1 Wolverhampton contains a less extensive network of watercourses compared to the other BCA, however, notable watercourses include the Smestow Brook, Waterhead Brook and the River Tame, as well as sections of the Staffordshire and Worcestershire Canal and Birmingham to Wolverhampton Canal. 17 sites coincide with or are located within 10m of various watercourses. The proposed development at these sites could potentially increase the risk of contamination of these watercourses, and therefore have a minor negative impact on water quality. Sites which are located over 10m from watercourses are less likely to have a significant impact on the quality of watercourses however each site would need to be evaluated according to land use type, size of development and exact location.

I.8.3.2 Site D78 has been identified as partially coinciding with an underground portion of the River Tame. It is uncertain if the development at this site would increase the risk of contamination of this watercourse.

### I.8.4 Groundwater Source Protection Zone

I.8.4.1 Source Protection Zones (SPZs) for groundwater within Wolverhampton are located to the west and covering a large area of the city. SPZs are grouped from 1 to 3 based on the level

of protection that the groundwater requires. 31 sites in Wolverhampton are located wholly or partially within the total catchment (zone 3) of this SPZ. The proposed development at these sites could potentially increase the risk of groundwater contamination within the SPZ and have a minor negative impact on the quality or status of groundwater resources. The remaining sites do not coincide with the catchment of on any SPZ, and therefore, the proposed development at these sites may have a negligible impact on groundwater quality.

## **I.8.5 Potential Increase in Air Pollution**

- I.8.5.1 12 sites are proposed for the development of 100 or more dwellings. The proposed development at these sites could potentially result in a significant increase in local air pollution; therefore, a major negative impact would be expected.
- I.8.5.2 22 sites are proposed for the development of between ten and 99 dwellings, and 17 sites are proposed for non-residential end use and comprise between one and 10ha. Therefore, the proposed development at these 39 sites could potentially have a minor negative impact on air pollution in the local area.
- I.8.5.3 Six sites are proposed for the development of less than ten dwellings, and 13 sites are proposed for non-residential end use and comprise less than 1ha. The proposed development at these 19 sites would be expected to have a negligible impact on local air pollution.
- I.8.5.4 The housing capacity at eight residential sites in Wolverhampton is unknown at the time of writing, and therefore, the impact of the proposed development at these sites is uncertain.

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

Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
<b>Wolverhampton Residential Sites</b>					
SA-0001-WOL	-	0	0	-	--
SA-0002-WOL	-	0	0	-	--
SA-0003-WOL	-	0	0	-	-
SA-0005-WOL	-	0	0	-	--
SA-0007-WOL	-	0	0	-	+/-
SA-0008-WOL	-	0	0	-	0
SA-0009-WOL	-	-	0	0	-
SA-0010-WOL	-	-	-	0	-
SA-0011-WOL	-	-	0	0	--
SA-0012-WOL	-	0	0	-	0
SA-0014-WOL	-	0	0	-	+/-
SA-0015-WOL	-	-	0	0	-
SA-0016-WOL	-	0	0	-	+/-
SA-0018-WOL	-	0	0	-	0
SA-0019-WOL	-	-	-	-	+/-
SA-0020-WOL	-	-	-	-	+/-
SA-0021-WOL	-	-	0	-	--
SA-0024-WOL	-	0	0	-	0
SA-0025-WOL	-	0	0	-	0
SA-0026-WOL	-	-	0	-	+/-
SA-0027-WOL	-	0	0	-	0
SA-0028-WOL	-	0	0	-	0
SA-0030-WOL	-	-	-	0	-
SA-0032-WOL	-	0	0	0	-
SA-0040-WOL	-	0	0	0	-
SA-0049-WOL	-	-	0	-	+/-
SA-0053-WOL	-	0	0	-	-
SA-0054-WOL	-	-	0	0	+/-
<b>Wolverhampton Sites – Employment</b>					
SA-0034-WOL	-	0	-	0	-
SA-0035-WOL	-	-	0	0	-
SA-0036-WOL	-	-	0	0	-
SA-0037-WOL	-	-	0	0	-
SA-0039-WOL	-	-	0	0	-
SA-0041-WOL	-	0	0	0	-
SA-0044-WOL	-	-	-	0	0
SA-0045-WOL	-	-	0	-	0
SA-0047-WOL	-	-	0	0	-
SA-0051-WOL	-	0	0	0	0
SA-0052-WOL	-	-	0	0	-
<b>Wolverhampton Carried Forward Residential Sites</b>					
27372	-	-	0	0	--

Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
34400	-	-	-	0	-
36440	-	-	0	0	-
36490	-	-	-	0	-
36610	-	0	-	0	--
36620	-	-	-	0	--
36630	-	-	-	0	-
36640	-	-	-	0	-
36680	-	0	-	0	--
36690	-	-	0	0	-
36870	-	-	0	0	--
36891/36892	-	-	0	-	-
40530	-	-	0	0	-
41900	-	-	0	0	--
41910	-	-	0	0	-
D5a/D5b	-	0	0	-	--
D20	-	0	0	-	-
D74	-	0	0	-	-
D78	-	0	+/-	0	-
D79	-	0	0	0	-
<b>Wolverhampton Carried Forward Employment Sites</b>					
677	-	-	-	0	-
684	-	0	-	-	-
690	-	0	0	-	0
723/WOL34	-	0	0	-	-
725/WOL5	-	-	0	-	-
726/WOL7	-	-	-	-	0
727/WOL8	-	0	0	-	0
734/WOL22	-	0	0	0	0
735/WOL24	-	-	0	0	-
737/WOL47	-	-	0	0	-
WOL18a(EDO4)/WOL17	-	0	0	0	0
WOL18b	-	-	0	0	-
WOL19	-	0	0	0	0
WOL21	-	0	0	0	-
WOL23	-	0	0	0	-
WOL39	-	-	-	0	0
WOL40	-	0	0	0	0
WOL42	-	-	0	0	0
WOL43	-	-	0	0	0



## I.9 SA Objective 8: Waste

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

- I.9.1.1 Residential-led development is likely to result in an increase in household waste generation, to some extent. 30 sites are proposed for the development of 107 dwellings or less. The proposed development at these sites would be expected to have a negligible impact on household waste generation in comparison to current levels.
- I.9.1.2 Ten sites are proposed for the development of 108 dwellings or more. The proposed development at these sites would be expected to increase household waste generation by more than 0.1% in comparison to current levels. Therefore, the proposed development at these sites could potentially result in a minor negative impact on household waste generation.
- I.9.1.3 The housing capacity at eight residential sites in Wolverhampton is unknown at the time of writing, and therefore, the impact of the proposed development at these sites is uncertain.
- I.9.1.4 The waste likely to be generated as a result of non-residential development is uncertain.

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

Site Ref	Increase in household waste generation
<b>Wolverhampton Residential Sites</b>	
SA-0001-WOL	-
SA-0002-WOL	-
SA-0003-WOL	0
SA-0005-WOL	-
SA-0007-WOL	+/-
SA-0008-WOL	0
SA-0009-WOL	0
SA-0010-WOL	0
SA-0011-WOL	-
SA-0012-WOL	0
SA-0014-WOL	+/-
SA-0015-WOL	0
SA-0016-WOL	+/-
SA-0018-WOL	0
SA-0019-WOL	+/-
SA-0020-WOL	+/-
SA-0021-WOL	-
SA-0024-WOL	0
SA-0025-WOL	0
SA-0026-WOL	+/-
SA-0027-WOL	0
SA-0028-WOL	0
SA-0030-WOL	0
SA-0032-WOL	0
SA-0040-WOL	0
SA-0049-WOL	+/-
SA-0053-WOL	0
SA-0054-WOL	+/-
<b>Wolverhampton Employment Sites</b>	
SA-0034-WOL	+/-
SA-0035-WOL	+/-
SA-0036-WOL	+/-
SA-0037-WOL	+/-
SA-0039-WOL	+/-
SA-0041-WOL	+/-
SA-0044-WOL	+/-
SA-0045-WOL	+/-
SA-0047-WOL	+/-
SA-0051-WOL	+/-
SA-0052-WOL	+/-

Site Ref	Increase in household waste generation
<b>Wolverhampton Carried Forward Residential Sites</b>	
27372	-
34400	0
36440	0
36490	0
36610	0
36620	-
36630	0
36640	0
36680	-
36690	0
36870	0
36891/36892	0
40530	0
41900	-
41910	0
D5a/D5b	-
D20	0
D74	0
D78	0
D79	0
<b>Wolverhampton Carried Forward Employment Sites</b>	
677	+/-
684	+/-
690	+/-
723/WOL34	+/-
725/WOL5	+/-
726/WOL7	+/-
727/WOL8	+/-
734/WOL22	+/-
735/WOL24	+/-
737/WOL47	+/-
WOL18a(EDO4)/WOL17	+/-
WOL18b	+/-
WOL19	+/-
WOL21	+/-
WOL23	+/-
WOL39	+/-
WOL40	+/-
WOL42	+/-
WOL43	+/-

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

### I.10.1 Bus Stop

I.10.1.1 Throughout Wolverhampton, there are many bus stops which would be expected to provide good public transport access to the local and wider community, especially throughout the city centre. Site 734/WOL22 is located wholly outside of the sustainable distance of 400m from a bus stop providing regular services, and therefore, the proposed development at this site could potentially have a minor negative impact on site end users' access to sustainable transport. The remaining 77 sites within Wolverhampton are largely located amongst existing settlements and are all situated within 400m of a bus stop; therefore, the proposed development at these sites would be expected to have a minor positive impact on access to sustainable transport.

### I.10.2 Railway Station

I.10.2.1 Wolverhampton Station is located in the city centre, providing access to rail services as well as the West Midlands Metro Line, of which there are six stations located in the south eastern area providing tram services towards Birmingham. Access to rail and metro services in the outer areas of the city is likely to be more restricted. 37 sites are situated wholly or partially outside of the sustainable distance of 2km from a railway station, and therefore, the proposed development at these sites could potentially have a minor negative impact on site end users' access to rail services. The remaining 41 sites are located within 2km of a railway station and are therefore identified as having a minor positive impact on access to rail services.

### I.10.3 Pedestrian Access

I.10.3.1 Sites with good pedestrian access can be described as those with connections to existing pavements or pathways which are segregated from traffic use in the area, which is likely to be the case for most sites within the built-up areas of Wolverhampton. The majority of sites are well connected to the existing footpath network, and therefore, the proposed development at these 68 sites would be likely to have a minor positive impact on local transport and accessibility, by encouraging travel by foot and reducing the requirement for new pedestrian access to be created. However, ten sites currently have poor access to the existing footpath network. Therefore, the proposed development at these sites could potentially have a minor negative impact on local accessibility, and pedestrian access to the wider community would need improvement to be considered a viable transport option.

## **I.10.4 Road Access**

I.10.4.1 There are many major and minor roads which run through Wolverhampton allowing for good access for road traffic in the local area and nationally. The majority of sites in Wolverhampton are adjacent to or coincide with existing roads, and therefore the proposed development at the majority of sites would be expected to provide site end users with good access to the existing road network, resulting in a minor positive impact on transport and accessibility. Only Sites SA-0012-WOL and D79 are not accessible from the current road network. The proposed development at these two sites could potentially result in a minor negative impact on accessibility.

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

I.10.5.1 Sustainable pedestrian access to local fresh food and services in Wolverhampton can be attributed to being within a 15-minute walking distance, according to accessibility modelling data. Within Wolverhampton, a total of 45 local services have been identified. The areas with the best pedestrian access to services are generally found towards the north west, with somewhat restricted access in the south east and in the outskirts of the city. 31 sites are located outside of a 15-minute walking distance to these services, and therefore, the proposed development at these sites could potentially have a minor negative impact on the access of site end users to local services, based on current infrastructure. Whereas, the remaining 47 sites are identified to be within 15-minute walking distance, and therefore, the proposed development at these sites would be expected to have a minor positive impact on sustainable access to local services.

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

I.10.6.1 Accessibility modelling data shows that almost the entirety of Wolverhampton is located within a sustainable travel time of 15 minutes via public transport to local fresh food and services. The majority of sites meet these criteria, and therefore the proposed development at these 76 sites would be expected to have a minor positive impact on the access of site end users to local services, based on existing infrastructure. However, Site D78 and the majority of Site D79 are located outside of this sustainable travel time via public transport to these local services, and therefore, the proposed development at these two sites could potentially have a minor negative impact on transport and accessibility.

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

Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
<b>Wolverhampton Residential Sites</b>						
SA-0001-WOL	+	-	-	+	+	+
SA-0002-WOL	+	-	-	+	-	+
SA-0003-WOL	+	-	-	+	-	+
SA-0005-WOL	+	-	+	+	+	+
SA-0007-WOL	+	-	+	+	+	+
SA-0008-WOL	+	-	-	+	+	+
SA-0009-WOL	+	-	-	+	+	+
SA-0010-WOL	+	-	+	+	+	+
SA-0011-WOL	+	-	+	+	-	+
SA-0012-WOL	+	-	-	-	+	+
SA-0014-WOL	+	-	-	+	+	+
SA-0015-WOL	+	-	+	+	+	+
SA-0016-WOL	+	-	+	+	+	+
SA-0018-WOL	+	-	-	+	-	+
SA-0019-WOL	+	-	+	+	-	+
SA-0020-WOL	+	-	+	+	+	+
SA-0021-WOL	+	-	+	+	-	+
SA-0024-WOL	+	-	+	+	+	+
SA-0025-WOL	+	-	+	+	+	+
SA-0026-WOL	+	-	+	+	+	+
SA-0027-WOL	+	-	+	+	+	+
SA-0028-WOL	+	-	+	+	+	+
SA-0030-WOL	+	-	-	+	+	+
SA-0032-WOL	+	+	+	+	-	+
SA-0040-WOL	+	+	+	+	-	+
SA-0049-WOL	+	-	+	+	+	+
SA-0053-WOL	+	-	+	+	+	+
SA-0054-WOL	+	+	+	+	-	+
<b>Wolverhampton Sites – Employment</b>						
SA-0034-WOL	+	+	+	+	-	+
SA-0035-WOL	+	-	+	+	-	+
SA-0036-WOL	+	-	+	+	+	+
SA-0037-WOL	+	-	+	+	-	+
SA-0039-WOL	+	-	+	+	+	+
SA-0041-WOL	+	-	+	+	+	+
SA-0044-WOL	+	+	+	+	-	+
SA-0045-WOL	+	-	+	+	+	+
SA-0047-WOL	+	+	+	+	-	+
SA-0051-WOL	+	+	+	+	+	+
SA-0052-WOL	+	+	+	+	+	+

Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
<b>Wolverhampton Carried Forward Residential Sites</b>						
27372	+	+	+	+	+	+
34400	+	+	+	+	+	+
36440	+	+	+	+	-	+
36490	+	+	+	+	-	+
36610	+	+	+	+	+	+
36620	+	+	+	+	+	+
36630	+	+	+	+	+	+
36640	+	+	+	+	-	+
36680	+	+	+	+	+	+
36690	+	+	+	+	+	+
36870	+	+	+	+	+	+
36891/36892	+	+	+	+	+	+
40530	+	+	+	+	+	+
41900	+	+	+	+	+	+
41910	+	+	+	+	+	+
D5a/D5b	+	-	+	+	+	+
D20	+	-	+	+	+	+
D74	+	-	+	+	+	+
D78	+	+	+	+	-	-
D79	+	+	+	-	-	-
<b>Wolverhampton Carried Forward Employment Sites</b>						
677	+	+	+	+	+	+
684	+	-	+	+	-	+
690	+	-	+	+	+	+
723/WOL34	+	+	+	+	-	+
725/WOL5	+	-	+	+	-	+
726/WOL7	+	+	+	+	+	+
727/WOL8	+	+	+	+	-	+
734/WOL22	-	+	+	+	-	+
735/WOL24	+	+	+	+	+	+
737/WOL47	+	+	+	+	+	+
WOL18a(EDO4)/WOL17	+	+	+	+	-	+
WOL18b	+	+	+	+	-	+
WOL19	+	+	+	+	-	+
WOL21	+	+	+	+	-	+
WOL23	+	+	-	+	+	+
WOL39	+	+	+	+	+	+
WOL40	+	+	+	+	-	+
WOL42	+	+	+	+	-	+
WOL43	+	+	+	+	-	+

## I.11 SA Objective 10: Housing

### I.11.1 Housing Provision

- I.11.1.1 Residential-led development is likely to result in a net gain in housing. Sites which have been identified as having capacity for 100 or more dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision. Sites which have been identified as having capacity for 99 dwellings or less would be expected to result in a minor positive impact on housing provision. This includes the majority of carried forward residential sites which are generally smaller sites within the existing urban area.
- I.11.1.2 However, the housing capacity at eight of the residential sites is unknown at the time of writing; therefore, the impact of the proposed development at these sites is uncertain although it is likely there would be a net gain to some extent.
- I.11.1.3 Employment-led sites in Wolverhampton would not be expected to result in a net change in housing provision and therefore a negligible impact has been identified for these sites.

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

Site Ref	Housing Provision
<b>Wolverhampton Residential Sites</b>	
SA-0001-WOL	++
SA-0002-WOL	++
SA-0003-WOL	+
SA-0005-WOL	++
SA-0007-WOL	+/-
SA-0008-WOL	+
SA-0009-WOL	+
SA-0010-WOL	+
SA-0011-WOL	++
SA-0012-WOL	+
SA-0014-WOL	+/-
SA-0015-WOL	+
SA-0016-WOL	+/-
SA-0018-WOL	+
SA-0019-WOL	+/-
SA-0020-WOL	+/-
SA-0021-WOL	++
SA-0024-WOL	+
SA-0025-WOL	+
SA-0026-WOL	+/-
SA-0027-WOL	+
SA-0028-WOL	+
SA-0030-WOL	+
SA-0032-WOL	+
SA-0040-WOL	+
SA-0049-WOL	+/-
SA-0053-WOL	+
SA-0054-WOL	+/-
<b>Wolverhampton Employment Sites</b>	
SA-0034-WOL	0
SA-0035-WOL	0
SA-0036-WOL	0
SA-0037-WOL	0
SA-0039-WOL	0
SA-0041-WOL	0
SA-0044-WOL	0
SA-0045-WOL	0
SA-0047-WOL	0
SA-0051-WOL	0
SA-0052-WOL	0

Site Ref	Housing Provision
<b>Wolverhampton Carried Forward Residential Sites</b>	
27372	++
34400	+
36440	+
36490	+
36610	++
36620	++
36630	+
36640	+
36680	++
36690	+
36870	++
36891/36892	+
40530	+
41900	++
41910	+
D5a/D5b	++
D20	+
D74	+
D78	+
D79	+
<b>Wolverhampton Carried Forward Employment Sites</b>	
677	0
684	0
690	0
723/WOL34	0
725/WOL5	0
726/WOL7	0
727/WOL8	0
734/WOL22	0
735/WOL24	0
737/WOL47	0
WOL18a(EDO4)/WOL17	0
WOL18b	0
WOL19	0
WOL21	0
WOL23	0
WOL39	0
WOL40	0
WOL42	0
WOL43	0



## I.12 SA Objective 11: Equality

### I.12.1 Index of Multiple Deprivation

I.12.1.1 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England<sup>5</sup>. Out of 317 Local Authorities in England, Wolverhampton is ranked as the 24<sup>th</sup> most deprived<sup>6</sup>. Overall deprivation is relatively high across the Black Country, with 33 of the LSOAs in Wolverhampton ranked among the 10% most deprived in England. In general, the most deprived areas of Wolverhampton are those surrounding the city centre and particularly towards the north around Bushbury South and Low Hill.

I.12.1.2 24 sites are located wholly or partially within the 10% most deprived LSOAs, and therefore development at these sites could potentially have a minor negative impact on equality by exacerbating existing social pressures faced by current residents and place increased pressure on local services. The remaining sites are located outside of the most deprived 10% LSOAs, and therefore, the proposed development at the majority of sites in Wolverhampton may have a negligible impact on equality.

I.12.1.3 It should be noted that there is a degree of uncertainty in regard to the impacts of each site on equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.

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<sup>5</sup> Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date Accessed: 07/05/21]

<sup>6</sup> Black Country Consortium (2019) The English Indices of Deprivation 2019. Available at: <https://www.the-blackcountry.com/upload/BC%20IMD%202019.pdf> [Date Accessed: 07/05/21]

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

Site Ref	IMD 10% Most Deprived
<b>Wolverhampton Residential Sites</b>	
SA-0001-WOL	0
SA-0002-WOL	0
SA-0003-WOL	0
SA-0005-WOL	0
SA-0007-WOL	0
SA-0008-WOL	0
SA-0009-WOL	0
SA-0010-WOL	0
SA-0011-WOL	0
SA-0012-WOL	0
SA-0014-WOL	0
SA-0015-WOL	0
SA-0016-WOL	0
SA-0018-WOL	0
SA-0019-WOL	0
SA-0020-WOL	0
SA-0021-WOL	0
SA-0024-WOL	0
SA-0025-WOL	0
SA-0026-WOL	0
SA-0027-WOL	0
SA-0028-WOL	0
SA-0030-WOL	0
SA-0032-WOL	-
SA-0040-WOL	0
SA-0049-WOL	0
SA-0053-WOL	0
SA-0054-WOL	0
<b>Wolverhampton Employment Sites</b>	
SA-0034-WOL	0
SA-0035-WOL	0
SA-0036-WOL	0
SA-0037-WOL	0
SA-0039-WOL	0
SA-0041-WOL	0
SA-0044-WOL	-
SA-0045-WOL	-
SA-0047-WOL	0
SA-0051-WOL	-
SA-0052-WOL	0

Site Ref	IMD 10% Most Deprived
<b>Wolverhampton Carried Forward Residential Sites</b>	
27372	-
34400	-
36440	0
36490	-
36610	-
36620	-
36630	-
36640	0
36680	-
36690	0
36870	-
36891/36892	0
40530	-
41900	-
41910	-
D5a/D5b	-
D20	0
D74	0
D78	0
D79	0
<b>Wolverhampton Carried Forward Employment Sites</b>	
677	0
684	0
690	-
723/WOL34	0
725/WOL5	0
726/WOL7	0
727/WOL8	0
734/WOL22	0
735/WOL24	-
737/WOL47	-
WOL18a(EDO4)/WOL17	-
WOL18b	0
WOL19	0
WOL21	0
WOL23	-
WOL39	-
WOL40	0
WOL42	-
WOL43	-

## I.13 SA Objective 12: Health

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

I.13.1.1 New Cross Hospital is located within Wolverhampton, to the north east, and provides an Accident and Emergency (A&E) department. Other nearby hospitals with A&E departments include Manor Hospital, situated approximately 3.7km to the east of the city, in Walsall. 67 sites are located within 5km of these hospitals and could therefore potentially have a minor positive impact on access to emergency healthcare due being within a sustainable distance to the services. However, eleven sites are located over 5km from a hospital, and therefore the proposed development at these sites could potentially have a minor negative effect on access to emergency healthcare.

### I.13.2 Pedestrian Access to GP Surgery

I.13.2.1 There are 72 GP Surgeries within Wolverhampton serving the local communities, although certain areas of the city (such as Finchfield and Wergs, in the west) have less coverage of GP surgeries, and as such these areas could potentially have somewhat restricted access to healthcare. Accessibility modelling data has been provided to Lepus by the BCA, mapping the location of GP surgeries and areas within a sustainable travel time to these facilities for pedestrians. Sustainable pedestrian access to these services is considered to be that under a 15-minute travel time.

I.13.2.2 18 sites in Wolverhampton are located outside of this travel time to a GP and are therefore identified as potentially having a minor negative impact on sustainable access to healthcare. On the other hand, 60 sites in Wolverhampton are located within a 15-minute walking distance to a GP surgery; therefore, the proposed development at these sites would be expected to have a minor positive impact on access to healthcare, based on existing infrastructure.

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

I.13.3.1 Sustainable public transport access to a local GP surgery is identified to be within a 15-minute journey, and according to accessibility modelling data, there are only small pockets of the city where these criteria would not be met. The majority of sites within Wolverhampton are located in areas within this travel time to a GP surgery via public transport, and therefore, the proposed development at these 73 sites would be expected to have a minor positive impact on sustainable access to healthcare. However, five sites (SA-0018-WOL, SA-0019-WOL, SA-0020-WOL, SA-0030-WOL and WOL19) are located outside of a 15-minute public transport journey to a GP surgery, and therefore, the proposed development at these sites could potentially have a minor negative impact on sustainable access to healthcare.

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

I.13.4.1 Wolverhampton city is wholly designated as ‘Wolverhampton Air Quality Management Area’ (AQMA). All of the sites within Wolverhampton are located wholly within this AQMA. Several of the sites are also located within 200m of neighbouring AQMAs including ‘Walsall AQMA’ to the east, ‘Sandwell AQMA’ to the south east and ‘Dudley AQMA’ to the south. The proposed development at all sites would be likely to locate site end users in areas of existing poor air quality and have a minor negative impact on health.

### **I.13.5 Main Road**

I.13.5.1 Wolverhampton contains many major roads, including a large ring road in the city centre, where several main roads meet such as the A41, A449 and A454. The M54 motorway passes adjacent to the city in the north. 41 sites are located partially or wholly within 200m of a major road, and therefore could potentially have a minor negative impact on site end users’ health, due to the vicinity of the main roads and likely higher levels of transport associated air pollution. On the other hand, the proposed development at the remaining sites which are over 200m from a main road would be expected to have a minor positive impact on health as site end users in these locations would be situated away from major sources of traffic related air pollution.

### **I.13.6 Access to Greenspace**

I.13.6.1 Greenspaces are distributed throughout the city, including parks, allotments, playing fields and sports facilities. All sites in Wolverhampton are located within 600m of one or more greenspaces. Therefore, a minor positive impact would be expected at these sites, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.

### **I.13.7 Net Loss of Greenspace**

I.13.7.1 Eight proposed sites coincide wholly or partially with greenspaces, including Site SA-0008-WOL which wholly coincides with ‘Oxley Park Golf Course’. The proposed development at these eight sites could potentially result in the net loss of greenspace, and therefore, have a minor negative impact on the provision of greenspace across the Plan area.

### **I.13.8 Public Right of Way/Cycle Path**

I.13.8.1 The majority of sites in Wolverhampton are located within 600m of the PRow and/or cycle network. The proposed development at these 74 sites would be likely to provide site end users with good pedestrian and/or cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

I.13.8.2 Conversely, four sites (SA-0021-WOL, SA-0030-WOL, 36490 and 734/WOL22) are located mostly or wholly over 600m from the PRow and cycle network. Therefore, the proposed development at these sites could have a minor negative impact on pedestrian and cycle access.

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

Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PRow/ Cycle Path
<b>Wolverhampton Residential Sites</b>								
SA-0001-WOL	+	+	+	-	+	+	0	+
SA-0002-WOL	+	+	+	-	+	+	0	+
SA-0003-WOL	+	+	+	-	+	+	0	+
SA-0005-WOL	+	+	+	-	+	+	0	+
SA-0007-WOL	+	+	+	-	+	+	0	+
SA-0008-WOL	+	+	+	-	+	+	-	+
SA-0009-WOL	+	+	+	-	-	+	0	+
SA-0010-WOL	+	+	+	-	-	+	0	+
SA-0011-WOL	+	+	+	-	-	+	0	+
SA-0012-WOL	-	+	+	-	+	+	0	+
SA-0014-WOL	-	+	+	-	+	+	0	+
SA-0015-WOL	+	+	+	-	-	+	0	+
SA-0016-WOL	-	-	+	-	+	+	0	+
SA-0018-WOL	-	-	-	-	+	+	0	+
SA-0019-WOL	-	+	-	-	-	+	0	+
SA-0020-WOL	-	+	-	-	-	+	0	+
SA-0021-WOL	+	+	+	-	-	+	-	-
SA-0024-WOL	+	-	+	-	+	+	-	+
SA-0025-WOL	+	+	+	-	+	+	-	+
SA-0026-WOL	-	+	+	-	-	+	0	+
SA-0027-WOL	+	+	+	-	+	+	-	+
SA-0028-WOL	+	+	+	-	+	+	-	+
SA-0030-WOL	+	-	-	-	-	+	0	-
SA-0032-WOL	-	+	+	-	+	+	0	+
SA-0040-WOL	+	+	+	-	+	+	0	+
SA-0049-WOL	-	-	+	-	-	+	0	+
SA-0053-WOL	-	-	+	-	+	+	0	+
SA-0054-WOL	+	+	+	-	-	+	0	+
<b>Wolverhampton Employment Sites</b>								
SA-0034-WOL	+	+	+	-	+	+	0	+
SA-0035-WOL	+	+	+	-	-	+	0	+
SA-0036-WOL	+	+	+	-	-	+	0	+
SA-0037-WOL	+	-	+	-	-	+	0	+

Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
SA-0039-WOL	+	+	+	-	-	+	0	+
SA-0041-WOL	+	-	+	-	+	+	0	+
SA-0044-WOL	+	+	+	-	-	+	0	+
SA-0045-WOL	+	+	+	-	-	+	0	+
SA-0047-WOL	+	+	+	-	-	+	0	+
SA-0051-WOL	+	-	+	-	+	+	0	+
SA-0052-WOL	+	-	+	-	-	+	0	+
<b>Wolverhampton Carried Forward Residential Sites</b>								
27372	+	+	+	-	-	+	0	+
34400	+	+	+	-	-	+	0	+
36440	-	+	+	-	-	+	0	+
36490	+	+	+	-	-	+	0	-
36610	+	+	+	-	+	+	0	+
36620	+	+	+	-	-	+	0	+
36630	+	+	+	-	-	+	0	+
36640	+	+	+	-	-	+	0	+
36680	+	+	+	-	+	+	0	+
36690	+	+	+	-	-	+	0	+
36870	+	+	+	-	-	+	0	+
36891/36892	+	+	+	-	-	+	-	+
40530	+	+	+	-	-	+	0	+
41900	+	+	+	-	-	+	0	+
41910	+	+	+	-	-	+	0	+
D5a/D5b	+	+	+	-	+	+	0	+
D20	+	+	+	-	+	+	0	+
D74	+	+	+	-	+	+	0	+
D78	+	+	+	-	+	+	0	+
D79	+	+	+	-	+	+	0	+
<b>Wolverhampton Carried Forward Employment Sites</b>								
677	+	+	+	-	-	+	0	+
684	+	+	+	-	+	+	0	+
690	+	+	+	-	+	+	0	+
723/WOL34	+	-	+	-	+	+	0	+
725/WOL5	+	+	+	-	-	+	0	+
726/WOL7	+	-	+	-	-	+	0	+
727/WOL8	+	-	+	-	+	+	0	+
734/WOL22	+	-	+	-	+	+	0	-
735/WOL24	+	-	+	-	-	+	0	+
737/WOL47	+	+	+	-	-	+	0	+
WOL18a(EDO4)/WOL17	+	+	+	-	+	+	0	+
WOL18b	+	-	+	-	-	+	-	+

Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
WOL19	+	+	-	-	+	+	0	+
WOL21	+	+	+	-	+	+	0	+
WOL23	+	-	+	-	+	+	0	+
WOL39	+	+	+	-	-	+	0	+
WOL40	+	-	+	-	+	+	0	+
WOL42	+	+	+	-	-	+	0	+
WOL43	+	+	+	-	-	+	0	+

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## I.14 SA Objective 13: Economy

### I.14.1 Employment Floorspace Provision

I.14.1.1 Employment floorspace provision has been assessed with consideration of current land use and the proposed development at each site.

I.14.1.2 There are 30 sites in Wolverhampton which are proposed for employment use, 26 of which currently comprise areas of undeveloped land. Therefore, the proposed development at these 26 sites would be expected to result in a net gain in employment floorspace and have a major positive impact on providing local employment opportunities. Sites 690, WOL19, WOL39 and WOL43 currently coincide with various employment sites including 'SB Waste Management & Recycling' and 'ADT Furnishings'. At this stage, it is uncertain whether the proposed development at these four sites would result in a net change in employment floorspace.

I.14.1.3 Nine sites proposed for residential use coincide with existing employment areas, and therefore, development at these sites could potentially result in a net loss of employment floorspace. The proposed development at two of these sites (41900 and D78) could potentially have a minor negative impact on employment floorspace provision due to the possible loss of small areas of employment land or small businesses, whereas the proposed development at seven of these sites could potentially have a major negative impact due to the possible loss of a large area of employment land.

I.14.1.4 Two residential sites (Sites 36690 and D20) currently contain some existing development which may provide employment opportunities, as well as undeveloped areas. It is uncertain whether the proposed development at these two sites would result in a net change in employment floorspace.

I.14.1.5 The remaining 37 residential sites are located on previously undeveloped land and would not be expected to result in a net change in employment floorspace; therefore, the proposed development at these sites would be likely to have a negligible impact on the provision of employment opportunities.

### I.14.2 Pedestrian Access to Employment Opportunities

I.14.2.1 Wolverhampton would be expected to provide a range of employment opportunities for new and current residents. Accessibility modelling data shows the distribution of employment locations, with a total of 136 mapped locations, generally clustered within the city centre and the large industrial/retail estates in the south, north and east of the city. According to the data, sustainable pedestrian access to employment opportunities (within a 30-minute walk) can be expected throughout the city, with the exception of a small proportion close to the western boundary. 42 residential sites in Wolverhampton could potentially have a minor



positive impact on pedestrian access to employment due to being situated within this identified sustainable travel time to employment opportunities. However, Sites SA-0016-WOL, SA-0018-WOL, SA-0019-WOL, SA-0020-WOL, SA-0026-WOL and SA-0049-WOL are located outside of this travel time, and therefore, the proposed development at these six sites could potentially have a minor negative impact on pedestrian access to employment opportunities, based on current infrastructure.

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

I.14.3.1 Accessibility modelling data indicates that the whole of Wolverhampton is located within a sustainable travel time via public transport to employment opportunities, identified as being within a 30-minute journey. Therefore, all 48 proposed residential sites in Wolverhampton are wholly within this distance, and development at these sites would be expected to have a minor positive impact on sustainable access to employment opportunities.

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

Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
<b>Wolverhampton Residential Sites</b>			
SA-0001-WOL	0	+	+
SA-0002-WOL	0	+	+
SA-0003-WOL	0	+	+
SA-0005-WOL	0	+	+
SA-0007-WOL	0	+	+
SA-0008-WOL	0	+	+
SA-0009-WOL	0	+	+
SA-0010-WOL	0	+	+
SA-0011-WOL	0	+	+
SA-0012-WOL	0	+	+
SA-0014-WOL	0	+	+
SA-0015-WOL	0	+	+
SA-0016-WOL	0	-	+
SA-0018-WOL	0	-	+
SA-0019-WOL	0	-	+
SA-0020-WOL	0	-	+
SA-0021-WOL	--	+	+
SA-0024-WOL	0	+	+
SA-0025-WOL	0	+	+
SA-0026-WOL	0	-	+
SA-0027-WOL	0	+	+
SA-0028-WOL	0	+	+
SA-0030-WOL	0	+	+
SA-0032-WOL	--	+	+
SA-0040-WOL	0	+	+

Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
SA-0049-WOL	0	-	+
SA-0053-WOL	0	+	+
SA-0054-WOL	--	+	+
<b>Wolverhampton Employment Sites</b>			
SA-0034-WOL	++	0	0
SA-0035-WOL	++	0	0
SA-0036-WOL	++	0	0
SA-0037-WOL	++	0	0
SA-0039-WOL	++	0	0
SA-0041-WOL	++	0	0
SA-0044-WOL	++	0	0
SA-0045-WOL	++	0	0
SA-0047-WOL	++	0	0
SA-0051-WOL	++	0	0
SA-0052-WOL	++	0	0
<b>Wolverhampton Carried Forward Residential Sites</b>			
27372	0	+	+
34400	0	+	+
36440	0	+	+
36490	0	+	+
36610	0	+	+
36620	--	+	+
36630	--	+	+
36640	--	+	+
36680	--	+	+
36690	+/-	+	+
36870	0	+	+
36891/36892	0	+	+
40530	0	+	+
41900	-	+	+
41910	0	+	+
D5a/D5b	0	+	+
D20	+/-	+	+
D74	0	+	+
D78	-	+	+
D79	0	+	+
<b>Wolverhampton Carried Forward Employment Sites</b>			
677	++	0	0
684	++	0	0
690	+/-	0	0
723/WOL34	++	0	0
725/WOL5	++	0	0
726/WOL7	++	0	0

Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
727/WOL8	++	0	0
734/WOL22	++	0	0
735/WOL24	++	0	0
737/WOL47	++	0	0
WOL18a(EDO4)/WOL17	++	0	0
WOL18b	++	0	0
WOL19	+/-	0	0
WOL21	++	0	0
WOL23	++	0	0
WOL39	+/-	0	0
WOL40	++	0	0
WOL42	++	0	0
WOL43	+/-	0	0

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

### I.15.1 Pedestrian Access to Primary School

I.15.1.1 There are 94 primary schools distributed throughout Wolverhampton. Accessibility modelling data has been provided to Lepus by the BCA, mapping the location of primary schools and areas within a sustainable travel time to these schools for pedestrians. Some small areas of the city lie outside of the sustainable 15-minute walk to a primary school, whereas the majority of the city would be expected to meet these criteria.

I.15.1.2 There are six sites (SA-0001-WOL, SA-0002-WOL, SA-0003-WOL, SA-0012-WOL, SA-0018-WOL and SA-0019-WOL) proposed for residential use where the entirety or majority of the site is located outside of a 15-minute walk to a primary school. Therefore, the proposed development at these sites could potentially have a minor negative impact on access to primary schools due to the likely increased reliance on less sustainable travel methods. On the other hand, 42 sites proposed for residential use are located within a 15-minute walking distance to a primary school. Therefore, the proposed development at these sites could potentially have a minor positive impact on pedestrian access to primary schools.

### I.15.2 Pedestrian Access to Secondary School

I.15.2.1 There are 22 secondary schools in Wolverhampton, and similarly to primary schools, almost the entirety of the city is identified as being within a sustainable travel time for pedestrians.

I.15.2.2 Five of the residential sites (SA-0002-WOL, SA-0003-WOL, SA-0025-WOL, SA-0054-WOL and 36640) in Wolverhampton are situated in the areas of the city outside of a 25-minute walk to a secondary school, and as such, the proposed development at these sites could potentially have a minor negative impact on sustainable access to education. Conversely, 43 residential sites in Dudley are within a 25-minute walk to a secondary school, and therefore, the proposed development at these sites could be expected to encourage pedestrian access to secondary schools and have a minor positive impact on education, skills and training.

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

I.15.3.1 Existing public transport within Wolverhampton is widespread and would be likely to provide current and future residents in most areas with suitable access to secondary schools in the local and surrounding area, according to the accessibility modelling data.

I.15.3.2 The majority of proposed residential sites are located within a 25-minute public transport journey to a secondary school, and therefore, the proposed development at these 43 sites

would be expected to have a minor positive impact on sustainable access to education, based on current infrastructure. However, five sites (SA-0001-WOL, SA-0005-WOL, SA-0018-WOL, SA-0024-WOL and 36440) are located outside of this sustainable travel time to a secondary school, and therefore, the proposed development at these sites could potentially have a minor negative impact on new residents’ access to education, based on current infrastructure.

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

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
<b>Wolverhampton Residential Sites</b>			
SA-0001-WOL	-	+	-
SA-0002-WOL	-	-	+
SA-0003-WOL	-	-	+
SA-0005-WOL	+	+	-
SA-0007-WOL	+	+	+
SA-0008-WOL	+	+	+
SA-0009-WOL	+	+	+
SA-0010-WOL	+	+	+
SA-0011-WOL	+	+	+
SA-0012-WOL	-	+	+
SA-0014-WOL	+	+	+
SA-0015-WOL	+	+	+
SA-0016-WOL	+	+	+
SA-0018-WOL	-	+	-
SA-0019-WOL	-	+	+
SA-0020-WOL	+	+	+
SA-0021-WOL	+	+	+
SA-0024-WOL	+	+	-
SA-0025-WOL	+	-	+
SA-0026-WOL	+	+	+
SA-0027-WOL	+	+	+
SA-0028-WOL	+	+	+
SA-0030-WOL	+	+	+
SA-0032-WOL	+	+	+
SA-0040-WOL	+	+	+
SA-0049-WOL	+	+	+
SA-0053-WOL	+	+	+
SA-0054-WOL	+	-	+
<b>Wolverhampton Employment Sites</b>			
SA-0034-WOL	0	0	0
SA-0035-WOL	0	0	0
SA-0036-WOL	0	0	0
SA-0037-WOL	0	0	0
SA-0039-WOL	0	0	0
SA-0041-WOL	0	0	0

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
SA-0044-WOL	0	0	0
SA-0045-WOL	0	0	0
SA-0047-WOL	0	0	0
SA-0051-WOL	0	0	0
SA-0052-WOL	0	0	0
<b>Wolverhampton Carried Forward Residential Sites</b>			
27372	+	+	+
34400	+	+	+
36440	+	+	-
36490	+	+	+
36610	+	+	+
36620	+	+	+
36630	+	+	+
36640	+	-	+
36680	+	+	+
36690	+	+	+
36870	+	+	+
36891/36892	+	+	+
40530	+	+	+
41900	+	+	+
41910	+	+	+
D5a/D5b	+	+	+
D20	+	+	+
D74	+	+	+
D78	+	+	+
D79	+	+	+
<b>Wolverhampton Carried Forward Employment Sites</b>			
677	0	0	0
684	0	0	0
690	0	0	0
723/WOL34	0	0	0
725/WOL5	0	0	0
726/WOL7	0	0	0
727/WOL8	0	0	0
734/WOL22	0	0	0
735/WOL24	0	0	0
737/WOL47	0	0	0
WOL18a(EDO4)/WOL17	0	0	0
WOL18b	0	0	0
WOL19	0	0	0
WOL21	0	0	0
WOL23	0	0	0
WOL39	0	0	0
WOL40	0	0	0
WOL42	0	0	0

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
WOL43	0	0	0

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# Appendix J: Policy Assessments

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# J.1 Overview

## J.1.1 Introduction

J.1.1.1 This appendix provides an assessment of draft policies proposed by the Black Country Authorities (BCA) at the Regulation 18 stage of the preparation of the Black Country Plan (BCP).

J.1.1.2 Lepus provided an assessment of draft BCP policies in September 2020 as part of the iterative plan making process.

J.1.1.3 The policy assessments within this report are based on policies within version 4.3 of the Draft BCP, dated 10<sup>th</sup> May 2021 and subsequently updated with the Draft BCP Consultation Draft dated 14<sup>th</sup> June 2021.

J.1.1.4 Each policy appraised in this report has been assessed for its likely impacts on each SA Objective of the SA Framework (see Appendix A) and are in accordance with the methodology as set out in the SA Main Report.

J.1.1.5 For ease of reference the scoring system is summarised below.

*Table J1.1: Presenting likely impacts*

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

J.1.1.6 Each appraisal in the following sections of this report includes an SA impact matrix that provides an indication of the nature and magnitude of effects. Assessment narratives follow the impact matrices for each policy, within which the findings of the appraisal and the rationale for the recorded impacts are described.

## J.1.2 Overview of Policy Assessments

J.1.2.1 The impact matrices for all draft policy assessments are presented in Table J.1.2 below. These impacts should be read in conjunction with the assessment text narratives which follow in the subsequent sections of this appendix.

J.1.2.2 Within these policy assessments, where relevant, some recommendations for enhancement or improvement of the draft policies have been suggested. Further detailed recommendations are presented in Table J.14.1.

Table J.1.2: Summary of policy assessments

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP1	0	+/-	+/-	+	0	+	-	--	+	+	+	+	+	+
CSP2	0	+	+	+	0	+	0	0	+	+	+	+	+	0
CSP3	0	-	+/-	0	0	-	0	0	+	+	+	+	+	0
CSP4	+	+	+	+	+	0	+	0	+	0	+	+	0	0
CSP5	+	+	0	+	0	0	0	0	+	0	+	+	+	0
GB1	+/-	-	-	+/-	+/-	-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
GB2	0	0	0	0	0	0	0	0	0	0	+	0	+	0
DEL1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DEL2	0	0	0	0	0	+	0	0	+	+	0	0	+	0
DEL3	0	0	0	+	0	0	0	0	+	0	+	0	+	0
HW1	0	+	+	+	+	0	+	0	+	+	+	++	+	+
HW2	0	0	0	+	0	0	+	0	+	0	+	++	0	0
HW3	0	0	0	+	0	0	+	0	+	0	+	++	0	0
HOU1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-
HOU2	0	0	0	+	0	0	+	0	+	+	+	+	0	0
HOU3	0	0	0	0	0	0	0	0	0	+	+	+	0	0
HOU4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+	+	+	+/-	+
HOU5	0	0	0	+	0	0	+	0	+	0	0	+	+	++
HOU6	0	0	0	0	0	0	0	0	+	+	+	+	0	0
EMP1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-
EMP2	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-
EMP3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-
EMP4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+	+/-

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP5	0	0	0	0	0	0	0	0	0	0	+	+	+	+
CEN1	+/-	+/-	+/-	+	+/-	+	+/-	+/-	+	+/-	+	+	+	+/-
CEN2	0	0	0	0	0	0	0	0	+	0	+	+	+	+
CEN3	0	0	0	0	0	+	0	0	+	0	+	+	+	0
CEN4	0	0	0	0	0	0	0	0	+	0	+	0	+	0
CEN5	0	0	0	0	0	0	+	0	+	0	+	+	+	0
CEN6	0	0	0	+	0	0	+	0	+	0	0	+	+	0
TRAN1	0	0	0	+	0	0	+	0	++	0	0	+	0	0
TRAN2	0	0	0	0	0	0	0	0	+	0	0	0	0	0
TRAN3	0	0	0	+	0	0	0	0	+	0	0	0	0	0
TRAN4	0	0	-	0	0	0	0	0	+	0	0	0	+	0
TRAN5	0	0	0	0	0	0	0	0	++	0	+	+	0	0
TRAN6	0	0	0	+	0	0	+	0	+	0	0	0	0	0
TRAN7	0	0	0	0	0	0	0	0	+	0	0	0	+	0
TRAN8	0	0	0	+	0	0	+	0	+	0	0	0	0	0
ENV1	0	+	++	+	+	0	+	0	0	0	0	+	0	0
ENV2	0	0	++	+	0	0	+	0	0	0	0	+	+	0
ENV3	0	+	++	+	+	0	+	0	0	0	0	+	0	0
ENV4	+	+	+	+	+	+	+	0	0	0	0	+	0	0
ENV5	++	+	+	0	0	0	0	0	0	0	+	0	+	0
ENV6	+	+	+	0	0	0	0	0	0	0	0	0	+	+
ENV7	+	+	+	0	0	0	+	0	+	+	0	+	+	0
ENV8	+	+	+	+	+	0	+	0	+	0	+	++	0	0
ENV9	+	+	+	+	+	+	+	0	+	0	+	+	0	0

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
CC1	+	+	+	++	+	+	+	0	+	0	0	+	0	0
CC2	0	0	0	+	+	0	+	0	0	0	0	+	0	0
CC3	0	0	+	+	+	0	+	0	0	0	0	0	0	0
CC4	0	0	+	+	0	0	++	0	+	0	0	+	+	0
CC5	0	0	+	0	++	0	+	0	0	0	0	+	0	0
CC6	0	0	0	0	+	0	0	0	0	0	0	0	0	0
CC7	0	0	0	+	0	0	+	0	0	0	0	0	0	0
W1	0	0	0	0	0	0	0	++	0	0	0	0	0	0
W2	0	0	0	0	0	0	0	+	0	0	0	0	0	0
W3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0
W4	0	0	0	0	0	0	0	+	0	0	0	0	0	0
W5	0	0	0	0	0	+	0	++	0	0	0	0	0	0
MIN1	0	0	0	0	0	+	0	0	0	0	0	0	+	0
MIN2	0	0	0	0	0	+	0	0	0	0	0	0	0	0
MIN3	0	+/-	+/-	0	0	+	+/-	0	0	0	0	0	+	0
MIN4	0	0	0	0	0	+	0	+	0	0	0	0	0	0



## J.2 Spatial Strategy

### J.2.1 Policy CSP1 – Development Strategy

#### Policy CSP1- Development Strategy

- 1) To support sustainable economic growth and meet people’s needs, the Councils, working with local communities, partners and key stakeholders, will:
  - a) Deliver at least 47,837 net new homes and create sustainable mixed communities that are supported by adequate infrastructure.
  - b) Deliver the development of at least 353ha of employment land.
  - c) Ensure that sufficient physical, social, and environmental infrastructure is delivered to meet identified needs.
- 2) The spatial strategy seeks to deliver this growth and sustainable patterns of development by:
  - a) Delivering the majority of development in the existing urban area.
  - b) Supporting and enhancing the sustainability of existing communities through the focussing of growth and regeneration into the Strategic Centres and Core Regeneration Areas;
  - c) Protecting and enhancing the quality of existing Neighbourhood Areas and re-balancing the housing stock by delivering homes supported by jobs and local services;
  - d) Delivering a limited number of Town and Neighbourhood Growth Areas in highly sustainable locations on the edge of the Urban Area;
  - e) Protecting the openness of the Black Country Green Belt by resisting inappropriate development;
  - f) Protecting the Black Country’s character and environmental assets including heritage assets, natural habitats and open spaces;
  - g) Minimising and mitigating the likely effects of climate change

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
CSP1	0	+/-	+/-	+	0	+	-	--	+	+	+	+	+	+

J.2.1.1 Policy CSP1 provides the overarching spatial strategy for the Black Country, setting out the scale and distribution of new development for the plan period to 2039. The overall spatial approach has evolved from consideration of a number of spatial and growth options for development. These have been informed by the evidence base underpinning the Draft BCP and were subjected to SA (see SA **Appendices C to E**). The most sustainable option was considered to be ‘balanced growth’ with the spatial strategy focusing growth within

the existing Strategic Centres, Core Regeneration Areas and Town and Neighbourhood Areas in the sub-region and taking advantage of their existing infrastructure capacity, alongside a limited number of new Neighbourhood Growth Areas near to the edge of settlements that takes account of environmental, climate change, accessibility and socio-economic requirements. Overall, this option is considered to perform the best, as it strikes a balance between retaining valuable environmental assets whilst also prioritising development in the most accessible locations.

- J.2.1.2 Part 2(a) of Policy CSP1 sets out that the majority of development will be located within the existing urban areas (i.e. the Strategic Centres, Core Regeneration Areas and existing Town and Neighbourhood Areas). For housing growth it is understood that approximately 40,117 homes of the total projected housing need of 76,076 homes would be located in the existing urban areas. Approximately 7,720 homes within the plan period to 2039 would be located on greenfield land<sup>[1]</sup> the majority of which comprises green belt release land located in a limited number of Neighbourhood Growth Areas on the edge of settlements (CPS1 Part 2(d)).
- J.2.1.3 For employment growth approximately 307 ha of the projected employment land requirements of 565 ha would be met within the existing built-up areas and approximately 48 ha via greenbelt release. Policy CSP1 supports the redevelopment of brownfield land within the BCA which represents an efficient use of land in accordance with the NPPF by locating the majority of housing within the existing urban areas. A smaller proportion of growth would be located in open countryside at the edge of settlements which could lead to the loss of ecologically, and potentially agriculturally, important soils and sterilisation of mineral resources. Mixed positive and negative impacts could therefore be experienced in terms of natural resources (SA objective 6), with a minor positive impact assessed on balance owing to the overall distribution of growth between brownfield and greenbelt land.
- J.2.1.4 For housing growth, approximately 63% (47,835 homes) of the overall projected housing need of 76,076 homes for the plan period up to 2039 would be met within the Black Country administrative authorities, leaving a shortfall of 37% which would need to be explored through potential contributions through Duty to Co-operate. For employment growth, approximately 63% of the 565 ha of identified employment land requirements would be provided within the Black Country authority administrative areas, with a shortfall of 211 ha or 37% of employment land which would need to be explored via a Duty to Co-operate, particularly where there is a strong existing or potential functional economic relationship with the Black Country, for example in terms of migration patterns, commuting links and / or connectivity through physical infrastructure such as rail and motorway. A minor positive impact is therefore predicted in relation to Housing (SA Objective 10) and

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<sup>[1]</sup> A further housing capacity of 1,715 homes has been identified post 2039 (beyond the plan period) on two large green belt release sites, due to housing market delivery constraints. These sites have still been subject to sustainability appraisal.

- the Economy (SA Objective 13) as the proposed options would lead to achievement of these SA objectives to some extent, but are subject to constraints in terms of meeting the total identified local need.
- J.2.1.5 The balanced approach to growth proposed in Policy CSP1 would be likely to have a minor positive impact on equality (SA Objective 11) in terms of accessibility to key services and facilities, employment opportunities and access to housing, including affordable housing, distributed in an inclusive manner across the BCA area.
- J.2.1.6 The BCA are aiming to utilise land efficiently through the use of previously developed land, vacant properties and surplus industrial land, and maximising housing densities where appropriate, but there is a shortage of deliverable sites to meet housing and economic growth needs. In order to help meet objectively assessed needs for housing and employment land development, exceptional circumstances to alter green belt boundaries need to be established.
- J.2.1.7 The BCA have undertaken an extensive Green Belt and landscape sensitivity assessment to identify land that, if developed, would cause the least harm to the purposes of the Green Belt and to landscape character, as identified through the site assessment process. The overall effect of this strategy as set out in Para 3.17 is that *"most housing growth and employment land development will be located in the existing built-up area; this will include approximately 40,117 new homes and 307 ha of employment land. An additional 7,720 homes and 48 ha of employment land are allocated on sites that have been removed from the Green Belt. The majority of these homes are provided in the Neighbourhood Growth Areas and the remainder on smaller sites at the edge of the Towns and Neighbourhoods Area in the form of rounding-off or through the redevelopment of previously developed land."* A further housing capacity of 1,715 homes has been identified post 2039 (beyond the plan period) on two large green belt release sites, due to housing market delivery constraints. These sites have still been subject to sustainability appraisal.
- J.2.1.8 The spatial strategy seeks to protect green spaces within the Black Country, the extensive green belt on the edges of the urban area and the 'wedges' of open land providing both valuable open breaks between settlements and access to the wider countryside, including for wildlife and vegetation. These provisions are encapsulated in CPS1 Part 2 (e) and (f). On balance, it is considered that mixed effects on the landscape (SA Objective 2) would be achieved through this policy.
- J.2.1.9 Development in the urban areas would help to minimise the overall vegetation cover lost to development. Nevertheless, the development of new Neighbourhood Growth Areas would result in a loss of previously undeveloped land, would involve the loss of natural habitat and soil resources which provide an important ecosystem service. The extent of impacts on habitats, species and habitat connectivity will depend on location and contextual factors. The construction of a new dwellings would be expected to result in

the loss of some biodiversity features, however adhering to net gain principles and a commitment could also deliver positive effects in the long term. The development strategy also provides opportunities to benefit biodiversity and geodiversity due to the protection of sensitive features, and delivery of development in the existing urban area. Mixed effects are therefore recorded on SA Objective 3 overall.

- J.2.1.10 With the addition of 49,552 homes (including 1,715 homes likely to be delivered after 2039) this policy would be expected to increase waste generation. Overall, a major negative impact on waste would be expected (SA Objective 8). It is however noted that waste generation would be likely to increase with any population increases (either in existing or new homes) and also if development was to be exported elsewhere. Provisions for waste management are set out in other policies of the BCP.
- J.2.1.11 The addition of 47,835 homes and 354 ha of employment land would be expected to increase carbon emissions through construction and operation. The construction, occupation and operation of development would be expected to exacerbate air pollution, including greenhouse gas (GHG) emissions and particulate matter (PM). However, by directing development towards the Strategic Centres and Town and Neighbourhood Areas, Policy CSP1 would be likely to facilitate more sustainable communities, by locating residents in close proximity to services, facilities and public transport. This could potentially help to improve the sustainability of development (in terms of carbon footprint) in some locations through reducing the need to travel by private car. In determining potential allocations, sites have been assessed in terms of their accessibility by all modes of transport as part of the evidence base for the draft BCP. This strategy is expected to have a minor positive impact on climate change mitigation overall (SA objective 4) and transport and accessibility (SA Objective 9). A minor negative impact is also identified in terms of pollution (SA Objective 7), taking the balance of these considerations into account.
- J.2.1.12 By directing development toward existing urban areas and at the edge of urban areas, this policy would be likely to locate new residents in areas with good access to existing health care facilities, including hospitals and GP surgeries. The proposed new developments would also potentially provide new healthcare facilities as part of the development, increasing the provision and accessibility of these health facilities across the Plan area. Part 2(f) of this policy also aims to ensure residents retain good access to natural habitats and open spaces, with benefits to mental wellbeing. Therefore, this policy would be expected to have a minor positive impact on human health overall (SA Objective 8). Whilst higher density development in urban areas would help to minimise effects on natural resources, this needs to be carefully planned and designed to ensure that there are no adverse impacts on health and wellbeing. The ratio of greenspace per capita is important and some expansion into greenbelt would also help to strike a balance in ensuring new

development is of an appropriate density and residents have access to greenspaces for mental and physical wellbeing.

- J.2.1.13 By directing the majority of development towards existing urban settlements, it would be expected that a large proportion of new residents would be situated in close proximity to a choice of educational facilities, with potential for new provision where need is identified within the new Neighbourhood Growth Areas. In addition, there would be expected to be opportunities to provide sustainable transport modes to assist travelling to these facilities compared to a more dispersed spatial approach. Overall, a minor positive impact on education would be expected (SA Objective 11).
- J.2.1.14 Neutral effects on the cultural heritage resource of the Black Country (SA Objective 1) and climate change adaption (SA Objective 5) have been identified on balance where it is considered that the proposed distribution of development would help to avoid or mitigate harm to the historic environment and locate development in lower areas of flood risk, as identified through the Flood Risk Assessment and subsequent policies in the Draft BCP.

## J.2.2 Policy CSP2 – The Strategic Centres and Core Growth Areas

### Policy CSP2 – The Strategic Centres and Core Growth Areas

- 1) The Growth Network, consisting of the Strategic Centres and Core Regeneration Areas, is the primary focus for regeneration and infrastructure investment to support the delivery of regionally significant growth and promote wider benefits to Black Country communities.
- 2) The Strategic Centres and Core Regeneration Areas are the primary focus for new development, regeneration, and infrastructure investment.
- 3) The Strategic Centres of Brierley Hill, Walsall, West Bromwich and Wolverhampton will provide:
  - a) Re-energised core commercial areas providing a rich mix of uses and facilities, set in a high quality built and natural environment;
  - b) The principal locations for major commercial, cultural, leisure, entertainment and community facilities, providing the widest possible range of such facilities appropriate for their catchments;
  - c) 9,561 new homes<sup>1</sup> of mixed type and tenure - the majority built at high densities as part of mixed-use developments;
  - d) Excellent public transport links, making the centres highly accessible to their catchment areas;
  - e) Green infrastructure
- 4) The Core Regeneration Areas Linking the Strategic Centres will provide:
  - a) The principal concentrations of strategic employment areas. These are high-quality employment areas that will be safeguarded and enhanced for manufacturing and logistics activity to support the long-term success of the Black Country's economy (see Policy EMP2);
  - b) The main clusters of local employment land that are vital in providing for local jobs (see Policy EMP3);
  - c) The principal locations for new industrial and logistics development - providing 192ha of developable employment land to meet growth needs;

### Policy CSP2 – The Strategic Centres and Core Growth Areas

- d) 11,208 new homes in sustainable communities well-supported by community services and local shops, set within and linked by comprehensive networks of attractive green infrastructure with cycling and pedestrian routes;
- e) The focus for investment in existing, new, and improved transportation infrastructure with a focus on public transport routes and hubs which will maximise use of the public transport network by residents, workers and visitors;
- f) Strong links with the surrounding communities and the network of centres and spread the regeneration benefits by knitting together old and new to create a richer, varied, and integrated sense of place;
- g) Green infrastructure.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP2	0	+	+	+	0	+	0	0	+	+	+	+	+	0

J.2.2.1 The Growth Network – made up of the four Strategic Centres Brierley Hill, Walsall, West Bromwich and Wolverhampton and Core Regeneration Areas is the primary focus for co-ordinated and sustained regeneration and infrastructure investment to support the delivery of regionally significant growth and promote wider benefits to local communities. The Growth Network is the focus for the delivery of these objectives and contains the majority of areas where regeneration and land-use change will be concentrated over the plan period. Although the Draft BCP does not make development allocations within the Strategic Centres, it sets out deliverable development targets for each centre, based on up-to-date evidence, which will be met through other Local Plan documents to be prepared alongside or immediately following adoption of this plan.

J.2.2.2 The Draft BCP sets out that the strategy for the Core Regeneration Areas reflects two key issues arising from the evidence base – firstly, the need to provide for economic growth through the protection and enhancement of sustainable employment land and premises; and secondly, delivering housing growth through the release of poor quality and underused land to support the ongoing regeneration of the Black Country.

J.2.2.3 It is anticipated that Policy CSP2 would have a minor positive effect on Housing (SA Objective 10) and the Economy (SA Objective 13) as the Strategic Centres and Core

- Regeneration Areas will accommodate the highest proportion of housing, employment and job growth and have been designed to respond to locally identified needs and encourage continued investment, taking into account the findings of the Black Country Economic Development Needs Assessment (EDNA) and Black Country Employment Area Review (BEAR).
- J.2.2.4 A minor positive effect is anticipated in terms of natural resources (SA Objective 6) and landscape (SA Objective 2), owing to the primary focus on regeneration of existing urban areas and high-quality design.
- J.2.2.5 The four Strategic centres and the Core Regeneration Areas are already served by an extensive transport system and therefore provide the most suitable locations for economic and housing growth, although improvements are required to enhance connectivity, accessibility and environmental quality. Part 3(d) of this policy states that this will be delivered through "*Excellent public transport links, making the centres highly accessible to their catchment areas*" in the Strategic Centres and Parts 4(d) and 4(e) of Policy CPS 2 sets out the vision for the Core Regeneration Areas in providing "*...sustainable communities well-supported by community services and local shops, set within and linked by comprehensive networks of attractive green infrastructure with cycling and pedestrian routes*" and a "*focus for investment in existing, new, and improved transportation infrastructure with a focus on public transport routes and hubs which will maximise use of the public transport network by residents, workers and visitors.*" By placing a large proportion of new residents in these areas, it would be expected that residents would have good access to employment by foot, bike or public transport. A minor positive effect on Transport and Accessibility (SA Objective 9), Health (SA Objective 12) and Climate Change Mitigation (SA Objective 4) is therefore considered likely under these provisions of Policy CPS2.
- J.2.2.6 Policy CSP2 seeks to provide "*cultural, leisure, entertainment and community facilities, providing the widest possible range of such facilities appropriate for their catchments*" and "*Strong links with the surrounding communities and the network of centres and spread the regeneration benefits by knitting together old and new to create a richer, varied, and integrated sense of place.*" This is anticipated to have a positive impact on Equality (SA Objective 11) through increased employment opportunities, access to services and community cohesion.
- J.2.2.7 Reference is made to the provision of Green Infrastructure through parts 3(e) and 3(g) of this policy, which is anticipated to have a minor positive impact on biodiversity (SA Objective 3), however this could be strengthened through further specification of GI measures in this policy, links to other relevant policies and / or GI strategies, potentially in the supporting text.
- J.2.2.8 A neutral effect is recorded for the remaining SA objectives under Policy CSP2.

DRAFT



### J.2.3 Policy CSP3 – Towns and Neighbourhood Areas and the Green Belt

#### Policy CSP3 – Towns and Neighbourhood Areas and the Green Belt

- 1) The areas outside the Strategic Centres and Regeneration Corridors will provide:
  - a) A mix of good quality residential areas where people choose to live;
  - b) 27,068 new homes through:
    - i. A network of new Neighbourhood Growth Areas providing 6,792 homes in highly sustainable locations on the edge of the Urban Area;
    - ii. A limited supply of large-scale brownfield sites providing new homes within the urban area through the repurposing of redundant employment sites and other surplus land;
    - iii. A supply of small-scale residential development opportunities;
    - iv. Housing renewal areas;
  - c) Clusters of Local Employment Land that provide an important source of land and premises to meet more localised business needs.
  - d) 89ha of additional employment land to meet employment needs, of which 36ha will be provide on sites within Neighbourhood Growth Areas.
  - e) An integrated and continuous (where possible) network of green infrastructure, walking and cycling routes, as well as a network of centres, health, leisure and community facilities;
  - f) Strong and seamless links to regenerated areas in Core Regeneration Areas and Strategic Centres, via access and design improvements to spread regeneration benefits and ensure integration of existing and new communities;
  - g) A defensible green belt to help promote urban renaissance within the urban area and that provides easy access to the countryside for local residents; with the landscape safeguarded and enhanced where possible for its heritage, recreation, agricultural and nature conservation value.

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
CSP3	0	-	+/-	0	0	-	0	0	+	+	+	+	+	0

J.2.3.1 The Draft BCP notes that the Towns and Neighbourhoods Areas make up most of the existing urban area and are where the majority of residents live. The overall land use-pattern within the Towns and Neighbourhoods Areas is not expected to alter greatly by 2039, but there will be some incremental change through a mix of permitted and allocated sites, windfall developments and town centre regeneration activity.

- J.2.3.2 The development of new housing and employment sites would be expected to result in the loss of previously undeveloped land and result in the loss of soil (and potentially mineral) resources. Therefore, this policy would be likely to result in a minor negative impact on the Plan area's natural resources (SA Objective 6). Similarly, the loss of greenfield land would be likely to have an adverse effect on biodiversity to some extent. The supporting text to this policy notes that the site selection process has sought to identify sites that can be delivered without adverse impacts on Sites of Importance for Nature Conservation or other significant high-quality habitat areas. The extent of impacts on biodiversity features is dependent on the development location and ecological characteristics of the area in question, as well as the potential for mitigation to avoid or minimise impacts as well as enhancement. This option does however have the potential to deliver strategic GI alongside development although the extent to which this may be achieved is uncertain at this stage. Part (e) of Policy CPS3 makes provision for "*a strong network of green infrastructure, centres, and community facilities*". Overall, mixed positive and negative effects are therefore identified in relation to biodiversity (SA Objective 3). Neutral effects are identified in relation to climate change adaptation (SA Objective 5) due to the approach to avoiding areas at significant risk from fluvial flooding in the site selection process.
- J.2.3.3 The Draft BCP seeks to provide strong links between the Growth Network and the Towns and Neighbourhoods Areas, through high-quality design and transport investment. By supporting "*access and design improvements to spread regeneration benefits and ensure integration of existing and new communities*" this Policy would be expected to improve residents' access to services and facilities. In addition, this policy aims to promote "a strong network of green infrastructure, centres, and community facilities." Overall, this policy would be expected to have minor positive impacts in regard to Transport and Accessibility, Equality and Health (SA Objectives 9, 11 and 12).
- J.2.3.4 Policy CSP3 would lead to some loss of open countryside and therefore a degree of adverse impacts on existing landscape resources are likely, although there is some potential to integrate development into the existing built form and to locate development in areas of lower landscape sensitivity where-ever possible, taking a balance of sustainability considerations into account. Such areas have been identified through the Landscape Sensitivity Study. Strategic site allocations for housing (i.e. new Neighbourhood Growth Areas) are set out in Policies WSA1-WSA9, DSA1-4, CSA1-2 in Chapter 13 of the Draft BCP and discussed in greater detail at the end of this Appendix. Employment allocations are not subject to individual site allocation policies and are covered under the 'umbrella' of Policy E2 (Strategic Employment Areas) as well as the overarching Spatial Strategy Policies (CSP1-5, GB1-2) and Employment Policies.
- J.2.3.5 A number of the proposed strategic housing allocations are located within areas predicted to have a negligible or minor adverse effect on landscape sensitivity (including sites SA-

0004-DUD, SA0017-DUD, SA-0025-DUD, SA-0014-WAL, SA-0022-WAL, SA-0048-WAL, SA-0187-WAL, SA-0009-WOL, SA-0010-WOL, SA-0015-WOL, SA-0030-WOL), which relate to areas of low, low-moderate or moderate landscape sensitivity as identified in the Landscape Sensitivity Study. A number of the proposed strategic allocations are located within areas predicted to have a negligible or minor impact on the Greenbelt (including sites SA-0004-DUD, SA-0017-DUD, SA-0009-WOL, SA-0010-WOL, SA-0015-WOL, SA-0030-WOL). Many of the proposed strategic housing allocations in Walsall (in addition to a high proportion of other identified reasonable alternatives) are located in more sensitive areas with respect to landscape sensitivity and greenbelt harm which needs to be weighed in the planning balance. In taking forward development plans, it is envisaged that opportunities would be sought to integrate high quality multi-functional GI into the designs and strengthen a wider GI network for all developments. This would also be beneficial to the local landscape by providing distinctive views of green space and natural features, which help to define local character whilst also delivering benefits to mental health and wellbeing. The provision of new open and green spaces can also help create attractive places to live and strengthen sense of place. Policy provision 1(e) of Policy CPS3 seeks to facilitate "A strong network of green infrastructure, centres, and community facilities." And Policy provision 1(g) of Policy CPS3 seeks to provide "*A strong Green Belt to promote urban renaissance within the urban area and provide easy access to the countryside for local residents; the landscape, nature conservation and agricultural land will be protected and enhanced where practical and possible.*" A minor adverse impact on landscape resources (SA objective 2) is predicted, taking the balance of these considerations into account overall.

#### J.2.4 Policy CSP4 - Achieving well-designed places

##### Policy CSP4 - Achieving well-designed places

- 1) The Black Country's ongoing transformation will be supported by the development of places and buildings providing a range of functions, tenures, facilities and services, intended to support the needs of diverse local communities. The design of spaces and buildings will be influenced by their context; development should enhance the unique attributes of the Black Country's character and heritage whilst responding to locally identified community needs, changes in society and cultural diversity.
- 2) Building designs will be sought that are appropriate to the Black Country, of a size, scale and type to integrate into their neighbourhood. Wherever possible, development proposals will employ sustainable modern technologies to help climate change mitigation and adaptation. The use of carbon-based products, energy and non-renewable resources will be minimised through the efficient design of buildings, choice of materials, layout and site orientation.
- 3) All development will be required to demonstrate a clear understanding of the historic character and local distinctiveness of its location and show how proposals make a positive contribution to Black Country place-making and environmental improvement.

### Policy CSP4 - Achieving well-designed places

- 4) The Black Country will move through a permeable street network that gives maximum freedom of movement and a choice of means of transport, including ongoing support for the provision and extension of walking and cycling infrastructure. To facilitate this, transport proposals of a high design quality and utility will be sought. These should, among other aspects, include connections to and between transport hubs, ensure that interventions make a positive contribution to place-making and increase accessibility and connectivity.
- 5) The Black Country will be a safe and secure place to live and work in, through organising the urban environment in ways that encourage people to act in a civil and responsible manner. Development proposals will be required to provide active frontages, well-located, safe and accessible pedestrian and cycle infrastructure and an appropriate intensity of use in centres and elsewhere. Designs should promote natural surveillance and defensible spaces.
- 6) An integrated and well-connected multifunctional open space network will be pursued throughout the Black Country, including through the design and layout of new residential and employment developments. This will deliver opportunities for sport and recreation and will help establish and support a strong natural environment. Properly designed and well-located open spaces will help mitigate flood risk, provide space for wildlife and encourage informal recreation for local people.
- 7) The protection and enhancement of the Black Country’s historic canal network and the area’s natural waterways will be sought wherever possible through the design and layout of appropriately located housing and employment development and wherever possible by the integration of waterways into those proposals to create attractive waterside development. This will act as a unifying characteristic within the Black Country’s urban structure and landscape.

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
CSP4	+	+	+	+	+	0	+	0	+	0	+	+	0	0

J.2.4.1 Policy CSP4 seeks to ensure that all new developments within the Plan area are of high-quality design and have regard for the natural, built and historic environment.

J.2.4.2 Policy CSP4 states that *"all development will be required to demonstrate a clear understanding of the historic character and local distinctiveness"*. The policy also seeks to *"enhance the unique attributes of the Black Country’s character and heritage"* and ensure the *"protection and enhancement of the Black Country’s historic canal network"*. The implementation of high-quality design would help to ensure that new development does not have an adverse impact on, and where possible enhances, any surrounding

- heritage assets. Therefore, a minor positive impact on cultural heritage would be expected (SA Objective 1).
- J.2.4.3 This policy seeks to ensure *"building designs will be sought that are appropriate to the Black Country, of a size, scale and type to integrate into their neighbourhood"* and protect *"local distinctiveness"*. This would be likely to help reduce potential adverse impacts of new development and ensure development is in keeping with the existing landscape character. A minor positive impact in relation to landscape would be expected (SA Objective 2).
- J.2.4.4 The policy seeks to support *"the protection and enhancement of the Black Country's historic canal network and the area's natural waterways"*. This would be likely to help protect biodiversity features associated with the canals. The policy would also *"provide space for wildlife"* through the promotion of a multifunctional open space network alongside development. Overall, a minor positive impact on biodiversity would be expected (SA Objective 3).
- J.2.4.5 This policy would be likely to encourage climate change resilience and help reduce carbon emissions associated with development, due to the promotion of energy efficient design. The use of modern and sustainable technologies would be likely to have minor positive impacts on carbon emissions and flood risk (SA Objectives 4 and 5).
- J.2.4.6 Under this policy, well-connected layouts would be provided, ensuring *"freedom of movement"* throughout neighbourhoods. The policy also seeks to encourage use of public transport, which would be likely to help reduce personal car use, having benefits to carbon emissions, air pollution and congestion. This would be expected to result in a minor positive impact on climate change mitigation, pollution, transport and accessibility (SA Objectives 4, 7 and 9).
- J.2.4.7 The policy seeks to ensure the Black Country is a *"safe and secure place"* and *"designs should promote natural surveillance and defensible spaces"*. This policy would be expected to help reduce the fear of crime and encourage social interaction within the local community. Therefore, a minor positive impact on equality would be expected (SA Objective 11).
- J.2.4.8 The policy seeks to support the provision of pedestrian and cycling routes within developments, and *"an integrated and well-connected multifunctional open space network"*. The policy would be likely to facilitate active travel and provide open space for outdoor exercise and personal reflection. Furthermore, the policy's focus on providing high quality development and incorporating climate change adapted buildings could potentially result in improved living conditions with benefits to human health. Policy CSP4 would help to encourage residents to live healthy lifestyles, and therefore, a minor positive impact on health would be expected (SA Objective 12).

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## J.2.5 Policy CSP5 – Cultural Facilities and the Visitor Economy

### Policy CSP5 – Cultural Facilities and the Visitor Economy

#### Development proposals

- 1) Major cultural, tourist and leisure facilities within the Black Country will be protected, enhanced and expanded (where appropriate) in partnership with key delivery partners and stakeholders.
- 2) Proposals for new development or uses that contribute to the attractiveness of the Black Country as a visitor destination will be supported in principle, subject to national guidance and policy requirements elsewhere in this Plan.
- 3) Proposals for new or expanded facilities or uses should: -
  - I. be of a high-quality design,
  - II. be highly accessible, particularly within centres,
  - III. not adversely impact on residential amenity or the operation of existing businesses,
  - IV. be designed to be flexible, adaptable, and where possible be capable of alternative or community use.
- 4) Well-designed and accessible ancillary facilities will be supported in appropriate locations. Additional facilities that support the visitor economy and business tourism sectors will be encouraged and promoted within centres, in line with policies CEN1 - CEN4
- 5) Development that would lead to the loss of an existing cultural / tourism facility in the Black Country will be resisted unless:
  - I. the intention is to replace it with a facility that will provide an improved cultural or tourist offer; or,
  - II. it can be demonstrated that there would be significant benefits to the local and wider community in removing the use and / or redeveloping the site.

#### The Visitor Economy

- 6) Improvement and further development of visitor attractions will be supported where appropriate, to ensure that accessibility is maximised and to continue to raise the quality of the visitor experience throughout the Black Country. This can be achieved by: -
  - I. enhancing / extending current attractions,
  - II. providing inclusive access, particularly within centres,
  - III. enhancing the visitor experience, and
  - IV. delivering necessary infrastructure.
- 7) Links should be made to centres and those parts of the Black Country and beyond that are well-connected by public transport, considering the needs of business as well as leisure visitors, to encourage more local use of cultural and tourist attractions.
- 8) The canal network is also a significant visitor attraction for the Black Country, providing waterway links to Birmingham, Staffordshire, Worcestershire and beyond. Facilities adjoining and serving the canal network should be maintained and expanded to help provide a network of linked amenities and visitor hubs (see also Policy ENV7 - Canals).

## Policy CSP5 – Cultural Facilities and the Visitor Economy

9) Physical and promotional links to visitor attractions close to the Black Country will be enhanced and encouraged, particularly in relation to Birmingham as a Global City and a business economy destination.

### Cultural facilities and events

10) The Black Country has a significant cultural history of performance art, especially in relation to live music. To ensure it remains a fertile and thriving location for associated cultural and economic growth opportunities, the retention and protection of venues providing performance spaces, recording facilities and practice amenities will be sought. The provision of new venues and facilities will also be welcomed and supported, particularly within centres.

11) In cases where adjacent new development would prejudice the ongoing operation of a successful cultural / performance venue, the “agents of change” principle will be applied<sup>3</sup>. This will protect the amenities of incoming residents while at the same time it will preserve and protect the existing adjacent use / activity.

12) The promotion and protection of attractions and events that represent and celebrate the wide cultural and ethnic diversity across the Black Country will be encouraged, including spectator sports such as football and other activities. This will include the protection of valuable cultural and religious buildings and the promotion of cultural, religious and community festivals on a Black Country-wide basis in a range of suitable locations.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP5	+	+	0	+	0	0	0	0	+	0	+	+	+	0

J.2.5.1 This policy aims to provide for the protection, enhancement, promotion and expansion of cultural, tourist and leisure facilities within the Black Country. Policy CSP5 would be likely to have a minor positive impact on the economy through the safeguarding and promotion of such sites and by enhancing the tourism potential of the Black Country. Provisions in Part 3 of Policy CSP5 seeks to ensure that adjacent amenities, including residential amenity and business activities are not adversely impacted which would help to minimise potential impacts in relation to Pollution (SA Objective 7).

J.2.5.2 A minor positive impact on Climate Change Mitigation, Transport and Accessibility and Health (SA objectives 4, 9 and 12) would be anticipated through provisions in Part 6 and Part 7 of this policy which include reference to maximising accessibility and securing necessary supporting infrastructure, facilitating linkages to “centres and those parts of the Black Country and beyond that are well-connected by public transport, considering the needs of business as well as leisure visitors, to encourage more local use of cultural and



*tourist attractions” and “maintaining and expanding facilities to the canal network to help provide a network of linked amenities”.*

J.2.5.3 The policy text states that development proposals should *“enhance existing cultural and tourist facilities and that contribute to the attractiveness of the Black Country”*. This would be likely to help ensure development are of high-quality design, create attractive areas, and promote the use of the local canals. Therefore, Policy CSP5 would be likely to have minor positive impacts in relation to landscape (SA Objective 2). In addition, this policy aims to ensure cultural facilities are protected and enhanced in a way that could potentially facilitate engagement and local awareness of the areas heritage resources and cultural history. This would be likely to have a minor positive impact on cultural heritage (SA Objective 12).

J.2.5.4 Alongside the delivery of highly accessible facilities and provision of local employment opportunities, various provisions within this policy would be expected to have benefits to the community and promote social inclusion. These include *“promotion and protection of attractions and events that represent and celebrate the wide cultural and ethnic diversity across the Black Country”, “protection of valuable cultural and religious buildings” and “the promotion of cultural, religious and community festivals on a Black Country-wide basis in a range of suitable locations.”* A minor positive impact on equality would therefore be expected (SA Objective 11).

## J.2.6 Policy GB1 - The Black Country Green Belt

### Policy GB1 - The Black Country Green Belt

- 1) The boundary of the Black Country Green Belt (within the four Black Country authorities of City of Wolverhampton, Dudley, Sandwell, and Walsall) is as defined on the Policies Map for each authority.
- 2) For sites that are removed from the Black Country Green Belt and allocated to meet housing, employment, or other needs through this Plan (as listed in Chapter 13):
  - a) the design of development will include physical features that define the new green belt boundary in a readily recognisable and permanent way; and
  - b) compensatory improvements to the environmental quality, biodiversity and accessibility of remaining green belt land will be secured to offset the impact of removing the land from the green belt, in accordance with national policy.
- 3) The Black Country Green Belt will be preserved from inappropriate development so that it continues to maintain its openness and serve its key functions.
- 4) Opportunities will be taken to enhance the value and function of the green belt, including through improving footpath and cycleway networks, and retaining and enhancing landscapes, visual amenity, biodiversity and protecting tranquil areas.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
GB1	+/-	-	-	+/-	+/-	-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-

J.2.6.1 Policy GB1 sets out criteria for housing and employment allocations within the Green Belt. Paragraph 133 of the NPPF<sup>1</sup> states *"The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence"*.

J.2.6.2 Development within the Green Belt is likely to result in the loss of previously undeveloped land and the permanent and irreversible loss of ecologically valuable soils, to some extent. The majority of the Black Country is identified as 'urban' Agricultural Land Classification (ALC), however, some areas of the Black Country Green Belt have been identified as Grade 3 ALC, which could potentially represent some of the Black Country's 'best and most versatile' (BMV) agricultural land (as current broad-scale regional mapping does not distinguish between Grade 3a and Grade 3b land). At present, the quantity of development that would be directed to BMV land or any Green Belt land is unknown. Furthermore, the allocation of land previously designated as Green Belt could include land that has been identified as being of low value or could contain previously developed land. Nevertheless, as Policy GB1 would direct some development to the Green Belt and would be expected to result in the loss of some previously undeveloped land and associated soils, a minor negative impact would be anticipated (SA Objective 6).

J.2.6.3 Biodiversity and landscape value do not form part of the reasons for Green Belt designation under national policy (NPPF paragraph 134), however it is considered development of green belt land would be likely to lead to adverse impacts on biodiversity and landscape to some extent. The extent of these impacts will vary depending on site characteristics as well as the nature, scale and design of development proposed. Biodiversity features such as trees, hedgerows and field margins could potentially be impacted upon by development and proposals should have regard to the objectives set out in the Birmingham and Black

<sup>1</sup> MHCLG (2019) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 19/08/20]

Country Nature Recovery Network<sup>2</sup>. Policy GB1 states that “*compensatory improvements to the environmental quality, biodiversity and accessibility of remaining green belt land will be secured to offset the impact of removing the land from the green belt, in accordance with national policy*”. This phrasing in terms of ‘compensatory measures’ under this policy derives from the NPPF Para 138. Compensatory measures under this policy would not be expected to fully prevent the loss of biodiversity features on site or result in biodiversity net gain which will be guided by other policy provisions in the BCP and emerging national policy. A minor negative impact on biodiversity is therefore anticipated overall (SA objective 3). It is considered that there is potential to strengthen this policy in terms of the compensatory measures that may be required to compensate for Green Belt loss.

- J.2.6.4 The Black Country Green Belt primarily comprises open countryside surrounding the urban area. The loss of Green Belt under this policy could potentially result in adverse impacts on the surrounding landscape and alter existing views. Development to the edge of the urban area in the Green Belt could also potentially increase the risk of coalescence between settlements. The policy text states that “*The Black Country Green Belt will be preserved from inappropriate development so that it continues to maintain its openness and serve its key functions.*” In addition, the policy provides that “*Opportunities will be taken to enhance the value and function of the green belt, including through improving footpath and cycleway networks, and retaining and enhancing landscapes, visual amenity, biodiversity and protecting tranquil areas.*” This would likely provide a degree of mitigation as well as enhancements, including access to areas which may currently not be accessible to the public. Overall it is considered likely that development under this policy would have a minor negative impact on the landscape to some extent (SA Objective 2).
- J.2.6.5 At present, an uncertain impact has been identified on the remaining (SA Objectives 1, 4, 5, 7, 8, 9, 10, 11, 12, 13 and 14). The extent of impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics.

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<sup>2</sup> Wildlife Trust for Birmingham and Black Country (2017) Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017 – 2022. Available at: <https://www.bbcwildlife.org.uk/sites/default/files/2018-10/NIA%20Ecological%20Strategy%202017-22%20Summary.pdf> [Date Accessed: 26/08/20]

## J.2.7 Policy GB2 - Extensions and Replacement Buildings in the Green Belt

### Policy GB2 - Extensions and Replacement Buildings in the Green Belt

- 1) When considering proposals for proposed alterations and additions to buildings within the green belt, in addition to the relevant provisions of the NPPF, regard should be had to the following considerations:
- a) Within the Black Country a number of commercial, educational and community uses that provide local employment opportunities or important community facilities are located in the green belt. To allow for their continued operation, limited, small-scale development will be permitted providing the following criteria are met:
- (1) Proposals for redeveloping existing uses within the green belt will only be permitted if very special circumstances can be demonstrated or the proposal meets the criteria set out in national planning policy.
  - (2) Extensions to buildings or new freestanding buildings within an existing developed site and extensions or alterations to existing dwellings may be appropriate where:
    - i. Extensions are not disproportionately over and above the size of the existing building(s) as originally constructed;
    - ii. The scale, materials and general design are in keeping with the character of the buildings and their surroundings; and
    - iii. It does not lead to a major increase in the developed proportion of the site.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
GB2	0	0	0	0	0	0	0	0	0	0	+	0	+	0

J.2.7.1 Paragraph 145 of the NPPF<sup>3</sup> states "a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are ... c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; d) the

<sup>3</sup> MHCLG (2019) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 19/08/20]

*replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces".* In accordance with the NPPF, Policy GB3 would support the extension or replacement of existing buildings in the Green Belt where appropriate. Extension should be of the same scale and design of the surrounding built environment and in keeping with the local character.

- J.2.7.2 The policy seeks to ensure that commercial, educational and community uses located within the Green Belt can continue grow and support the local community and economy. As local businesses and facilities with value to the community would be supported under this policy, including opportunities for their extension or renewal, minor positive impacts would be likely in relation to equality of the local community and the local economy (SA Objectives 11 and 13).
- J.2.7.3 The policy also states that development under these circumstances should ensure "*the scale, materials and general design are in keeping with the character of the buildings and their surroundings*". Development under this policy would not be expected to adversely impact the local landscape or historic environment due to the small scale of development proposed. Therefore, negligible impacts in regard to cultural heritage and landscape would be expected (SA Objectives 1 and 2).

## J.3 Delivery

### J.3.1 Policy DEL1 – Infrastructure Provision

#### Policy DEL1 - Infrastructure

- 1) All new developments should be supported by the necessary on and off-site infrastructure to serve its needs, mitigate its impacts on the environment and ensure that it is sustainable and contributes to the proper planning of the wider area.
- 2) Unless material circumstances or considerations indicate otherwise, development proposals will only be permitted if all necessary infrastructure improvements, mitigation measures and sustainable design requirements and proposals are provided and /or can be phased to support the requirements of the proposed development. These will be secured through planning obligations, the Community Infrastructure Levy, planning conditions or other relevant means or mechanisms, to an appropriate timetable that is prioritised, resourced, managed, delivered and co-ordinated across the sub-region, where appropriate.
- 3) The BCA will set out in Development Plan Documents, Infrastructure Delivery Plans, Supplementary Planning Documents, and where appropriate, masterplans:
  - a) The infrastructure that is to be provided or supported;
  - b) The prioritisation of and resources for infrastructure provision;
  - c) The scale and form of obligation or levy to be applied to each type of infrastructure;
  - d) Guidance for integration with adjoining local authority areas;
  - e) The procedure for maintenance payments and charges for preparing agreements;
  - f) The defined circumstances and procedure for negotiation regarding infrastructure provision.
- 4) The BCP has been subject to a Viability Assessment to ensure the policies are deliverable. In the exceptional circumstances where site-specific issues generate viability concerns, applicants should discuss these with the relevant Council at the earliest possible stage in the development process.
- 5) Proposals that are unable to comply with BCP policies on viability grounds must be accompanied by a detailed Financial Viability Assessment.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DEL1	0	0	0	0	0	0	0	0	0	0	0	0	0	0

J.3.1.1 Policy DEL1 states that *"all new developments should be supported by the necessary on and off-site infrastructure to serve the development, mitigate its impacts on the environment, and ensure that the development is sustainable and contributes to the proper planning of the wider area"*. This policy seeks to ensure development proposals do not result in adverse impacts on environmental features and are situated in sustainable locations. However, this is a vague statement which does not provide specific details of how development proposals will meet these criteria. Therefore, whilst this policy would not be expected to result in any direct positive impacts on any of the SA objectives, this policy would prevent development proposals resulting in adverse impacts. Overall, negligible impacts would be likely for all of the SA objectives.

### J.3.2 Policy DEL2 –Balance between employment land and housing

#### Policy DEL2 - Balance between employment land and housing

- 1) Development of housing or employment (E(g) (ii) (iii), B2 or B8 uses) on previously developed land that is not allocated for these uses ("windfall sites") will be permitted where the proposals accord with the other BCP and local plan policies and strategic priorities, and subject to meeting all the following criteria:
  - a) They are in sustainable locations and that are suitable for the proposed use;
  - b) They must demonstrate a comprehensive approach, by making best use of available land and infrastructure;
  - c) Incremental development will only be allowed where it would not prejudice the master planning of the wider area; and
  - d) Proposals for new development must take account of existing adjacent activities where the proposed development could have an adverse effect on or be affected by neighbouring uses. Mitigation of the impact of noise and other potential nuisances will need to be demonstrated.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DEL2	0	0	0	0	0	+	0	0	+	+	0	0	+	0

J.3.2.1 Policy DEL2 aims to support the development of windfall sites on previously developed land. This policy would be likely to have a minor positive impact on the provision of housing and employment land within the Black Country (SA Objectives 10 and 13).

J.3.2.2 Development directed toward brownfield land would be classed as an efficient use of land and would help to prevent the unnecessary loss of soil within the Black Country.

Therefore, Policy DEL2 would be likely to have a minor positive impact on natural resources (SA Objective 6).

J.3.2.3 In accordance with Policy DEL2, windfall development should be situated in sustainable locations, and therefore, this would be expected to ensure site end users have good access to sustainable transport options. This would be likely to have a minor positive impact in relation to transport and accessibility (SA Objective 9).

### J.3.3 Policy DEL3 – Promotion of Fibre to the Premise and 5G Networks

#### Policy DEL3 - Promotion of Fibre to the Premise and 5G Networks

##### Fibre to the Premise

- 1) Fibre to the Premise (FTTP) is essential infrastructure and vital to the delivery of sustainable development. Therefore, all major developments, which provide 10 or more new homes or more than 1,000 sqm of non-residential floorspace, will be required to deliver FTTP to all individual properties. This requirement will only be reduced where it can be clearly demonstrated that it is not practical or viable to deliver FTTP.
- 2) Where FTTP cannot be delivered, non-Next Generation Access technologies that can provide speeds in excess of 30MB per second should be provided as an alternative.
- 3) All eligible proposals should be supported by an FTTP Statement which details how FTTP will be provided to serve the development and confirms that FTTP will be available at first occupation.

##### 5G Networks

- 4) Any proposals for infrastructure to support the delivery of 5G networks will be supported in principle, subject to meeting the requirements of other local policies and national guidance.
- 5) Proposals should be sensitively sited and designed to minimise impacts on the environment, amenity and character of the surrounding area. Proposals should not have an adverse impact on areas of ecological interest, areas of landscape importance, heritage assets or conservation areas. Proposals should demonstrate that proper regard has been given to location and landscaping requirements, including the potential for innovative solutions complimentary to the immediate surroundings.
- 6) Operators proposing 5G network infrastructure are strongly recommended to enter into early discussions with the relevant local planning authority.

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DEL3	0	0	0	+	0	0	0	0	+	0	+	0	+	0



- J.3.3.1 Policy DEL3 supports the provision of Fibre to the Premise (FTTP) for development of ten or more dwellings and 5G networks in principle. The promotion of such infrastructure would be likely to help ensure that development proposals can meet the needs of current and future populations.
- J.3.3.2 With the development of FTTP and 5G within the Black Country under this policy, residents would be likely to have greater access to essential services from home and the workplace. This would provide increased opportunities to work from home and access to a wider range of employment opportunities, resulting in a minor positive impact on the local community and economy (SA Objective 13). By ensuring all development of ten or more homes incorporates FTTP, this policy would be likely to ensure the majority of new residents across the Plan area have access to this service, with a likely minor positive impact on equality (SA Objective 11).
- J.3.3.3 In addition, with improved access to online facilities and home working, this policy could potentially help to reduce reliance on personal car use such as for commuting to workplaces, and in turn, reduce local congestion. This would be expected to have a minor positive impact on climate change and transport, due to reduced emissions and congestion associated with less traffic (SA Objectives 4 and 9).

## J.4 Health and Wellbeing

### J.4.1 Policy HW1 – Health and Wellbeing

#### Policy HW1 – Health and Wellbeing

- 1) The regeneration and transformation of the Black Country will create an environment that protects and improves the physical, social and mental health and wellbeing of its residents, employees and visitors and reduces health inequalities through ensuring that all new developments, where relevant:
  - a) are inclusive, safe, and attractive, with a strong sense of place; encourage social interaction; and provide for all age groups and abilities as set out in Policies CSP4, ENV5, ENV6, ENV8 and ENV9;
  - b) are designed to enable active and healthy lives through prioritising access by inclusive, active, and environmentally sustainable form of travel and through promoting road safety and managing the negative effects of road traffic as set out in Policies CSP4 and TRAN2, TRAN4 and TRAN5;
  - c) provide a range of housing types and tenures that meet the needs of all sectors of the population including for older people and those with disabilities requiring varying degrees of care; extended families; low income households; and those seeking to self-build as set out in Policies HOU2 and HOU3;
  - d) are energy efficient and achieve affordable warmth; provide good standards of indoor air quality and ventilation; are low carbon; mitigate against climate change; and are adapted to the effects of climate change as set out in Policies CSP4, ENV9, CC1, CC2, CC3 and CC7;
  - e) are designed and located to achieve acceptable impacts by developments on residential amenity and health and wellbeing arising from: noise; ground and water contamination; flood risk; vibration; and poor indoor and outdoor air quality as set out in Policies CSP4, ENV9, CC4, CC5, MIN4 and TRAN7;
  - f) provide a range of quality employment opportunities for all skillsets and abilities along with the education and training facilities to enable residents to fulfil their potential and support initiatives to promote local employment and procurement during construction as set out in Policies HOU5, EMP2, EMP3 and EMP5;
  - g) protect and include a range of social infrastructure such as social care, health, leisure, sport and recreation, retail and education facilities close to where people

### Policy HW1 – Health and Wellbeing

- live, which are accessible by means of inclusive, active and environmentally sustainable forms of travel as set out in Policy HOU5;
- h) protect, enhance, and provide new green and blue infrastructure, sports facilities, play and recreation opportunities to support access for all and meet identified needs as set out in Policies CSP4 and ENV4, ENV6, ENV7 and ENV8;
  - i) protect, enhance, and provide allotments and gardens for physical activity, mental wellbeing, recreation and for healthy locally-produced food as set out in Policy ENV8;
  - j) provide high-quality broadband and other digital services to homes, educational facilities, employers, and social infrastructure, to support digital inclusion and the application of new technology to improved health care as set out in Policy DEL3;
  - k) support vibrant centres and local facilities, which offer services and retail facilities that promote choice, enable and encourage healthy choices and protect children, other young people, and vulnerable adults. Where national and local evidence exist, this will include managing the location, concentration of and operation (including opening hours) of businesses which contain uses running contrary to these aims including (but not restricted to) establishments selling hot food, shisha bars, drinking establishments, amusement arcades, betting shops and payday loan outlets as set out in Policies CEN1 - CEN6 (inclusive).

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HW1	0	+	+	+	+	0	+	0	+	+	+	++	+	+

J.4.1.1 Policy HW1 outlines the strategic approach to promoting health and wellbeing across all new development proposed within the BCP.

J.4.1.2 The policy aims to "protect, enhance, and provide new green and blue infrastructure " and provide development which is "inclusive, safe and attractive, with a strong sense of place". These measures would be expected to have a minor positive impact on the quality and

- character of the landscape (SA Objective 2). Furthermore, the protection and enhancement of green and blue spaces would be likely result in a minor positive impact in regard to biodiversity through the potential provision of wildlife habitats and improved connectivity (SA Objective 3).
- J.4.1.3 Enhanced green and blue infrastructure can have many benefits in helping communities adapt to the changing climate. This can include mitigation of extreme temperatures and flooding, as well as carbon storage and filtration of pollutants due to enhanced vegetation coverage. Therefore, the policy could potentially result in a minor positive impact on climate change adaptation (SA Objective 5).
- J.4.1.4 The policy seeks to ensure future developments are *"energy efficient and achieve affordable warmth; provide good standards of indoor air quality and ventilation; are low carbon; mitigate against climate change; and are adapted to the effects of climate change"*. If all new homes are energy efficient, the implementation of this policy would decrease the volume of greenhouse gases (GHGs) emitted, including carbon, and as such, have a minor positive impact on climate change mitigation (SA Objective 4).
- J.4.1.5 The policy seeks to improve the health of residents by reducing the impact of *"noise; ground and water contamination; vibration; and poor indoor and outdoor air quality"* on new development. This policy would be likely to help reduce exposure to pollution of this nature within the Black Country, and therefore, a minor positive impact would be expected (SA Objective 7).
- J.4.1.6 The policy also seeks to promote active travel for site end users and encourage the use sustainable transport options. This would help to reduce reliance on personal car use, and subsequently, reduce transport-associated air pollution. This would be likely to have minor positive impacts in relation to climate change, pollution and transport (SA Objectives 4, 7 and 9).
- J.4.1.7 The policy states that development should *"provide a range of housing types and tenures"* and *"self-build"* opportunities. This would be likely to have a minor positive impact on housing across the Black Country (SA Objective 10).
- J.4.1.8 *Policy HW1 aims to "encourage social interaction; and provide for all age groups and abilities" and "reduce health inequalities"*. The policy would seek to bring residents together and promote community cohesion. The policy also seeks to ensure development proposals provide *"affordable warmth"*, which would help reduce fuel poverty and facilitate *"digital inclusion"*, ensuring site end users have access to all digital services. Therefore, this policy would be likely to have a minor positive impact for equality (SA Objective 11).
- J.4.1.9 This policy would be likely to provide residents with access to a diverse range of natural habitats. Access to open and natural spaces would be expected to have benefits to mental and physical wellbeing. Facilitating active travel would be expected to encourage residents

to live healthier lifestyles and provide opportunities for outdoor exercise, resulting in benefits to health and wellbeing. This policy would be likely to reduce air and noise pollution, and as such, could potentially help to protect residents within the Black Country from health problems associated with pollution. Overall, a major positive impact in relation to human health would be expected (SA Objective 12).

- J.4.1.10 The policy states that development should “*provide a range of quality employment opportunities for all skillsets and abilities along with ... education and training*” in combination with protecting and enhancing social infrastructure including education facilities. In addition, the policy seeks to provide high quality broadband for all development. This would ensure site end users have good internet access. Home broadband would be likely to have benefits to the local economy, by enabling home working. Further collective benefits to the economy could potentially be achieved by facilitating a healthier workforce and by promoting an attractive urban environment, leading to improvements in productivity. These factors would be expected to result in a minor positive impact in relation to the economy and education (SA Objectives 13 and 14).

## J.4.2 Policy HW2 - Healthcare Infrastructure

### Policy HW2 - Healthcare Infrastructure

- 1) New health care facilities should be:
  - a) Well-designed and complement and enhance neighbourhood services and amenities;
  - b) Well-served by public transport infrastructure, walking and cycling facilities and directed to a centre appropriate in role and scale to the proposed development, and its intended catchment area, in accordance with Policies CEN1, CEN2, CEN3 and CEN4. Proposals located outside centres must be justified in terms of relevant BCP policies such as CEN5 and CEN6, where applicable;
  - c) Wherever possible, located to address accessibility gaps in terms of the standards set out in Policy HOU2, particularly where a significant amount of new housing is proposed;
  - d) Where possible, co-located with a mix of compatible community services on a single site.
- 2) Existing primary and secondary healthcare infrastructure and services will be protected, and new or improved healthcare facilities and services will be provided, in accordance with requirements agreed between the Local Planning Authorities and local health organisations, which will be contained in local development documents.
- 3) Proposals for major residential developments of ten units or more must be assessed against the capacity of existing healthcare facilities and/or services as set out in local development documents. Where the demand generated by the residents of the new development would have unacceptable impacts upon the capacity of these facilities, developers will be required to contribute to the provision or improvement of such services, in line with the requirements and calculation methods set out in local development documents.
- 4) Where it is not possible to address such provision through planning conditions, a planning agreement or planning obligation may be required.

### Policy HW2 - Healthcare Infrastructure

- 5) In the first instance, infrastructure contributions will be sought to deal with relevant issues on the site or in its immediate vicinity. Where this is not possible, however, or the sequential test is not met by the site, an offsite (commuted) contribution will be negotiated. Other contributions may include for offsite provision of health or related services.
- 6) The effects of the obligations on the financial viability of development may be a relevant consideration.
- 7) For strategic sites, the likely requirement for on-site provision for new health facilities is set out in Chapter 13.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HW 2	0	0	0	+	0	0	+	0	+	0	+	++	0	0

J.4.2.1 Policy HW2 seeks to ensure that all new healthcare facilities are well designed and accessible, with a particular focus on ensuring facilities are accessible by public transport. The policy also aims to protect existing health facilities, and details how larger residential developments of ten or more homes should be assessed against the capacity of surrounding facilities and new facilities should *"be located to address accessibility gaps"*. These factors would be expected to help ensure all new residents have good access to healthcare facilities, and as such, a major positive on health would be expected (SA Objective 12).

J.4.2.2 By identifying and addressing accessibility gaps, this policy would also be expected to promote equal access to healthcare and could potentially help to reduce health inequalities; therefore, a minor positive impact on equality would be expected (SA Objective 11).

J.4.2.3 This policy seeks to ensure that all healthcare developments are located in areas with good public transport access for residents, and that where possible, healthcare facilities are co-located alongside other community services to serve nearby residential development. This policy could potentially reduce the need to travel and reduce the volume of visitors arriving at facilities via personal car, with subsequent benefits in terms of reducing local congestion and transport-associated emissions. Therefore, due to the focus on sustainable transport and accessibility, this policy could potentially have a minor positive impact on climate change mitigation, pollution and transport (SA Objectives 4, 7 and 9).

### J.4.3 Policy HW3 - Health Impact Assessment (HIA)

#### Policy HW3 - Health Impact Assessment (HIA)

- 1) Where required in individual Local Planning Authorities’ local development documents, development proposals will be required to demonstrate that they would have an acceptable impact on health and wellbeing through either a Health Impact Assessment (HIA) or Health Impact Assessment Screening Report, as specified in the relevant local development document.
- 2) Where a development has significant negative impacts on health and wellbeing, the Council may require applicants to provide for mitigation of, or compensation for, such impacts in ways to be set out in the individual Local Planning Authorities’ local development documents. Where it is not possible to provide such mitigation or compensation through planning conditions, a planning agreement or planning obligation may be required.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HW 3	0	0	0	+	0	0	+	0	+	0	+	++	0	0

J.4.3.1 This policy ensures that development proposals as specified within each Local Authorities’ local development documents are required to undertake a Health Impact Assessment (HIA). This would help to ensure that opportunities for promoting healthy lifestyles are maximised. This would be likely to result in benefits such as creating engaging public spaces that facilitate social interaction and encourage walking and cycling. This would be expected to have a major positive impact on the health and wellbeing of local residents (SA Objective 12).

J.4.3.2 By requiring some developments to submit an HIA, this policy would help to ensure development proposals do not have direct adverse impacts on: residents’ physical or mental health; social, economic and environmental living conditions; demand for or access to health and social care services; or an individual’s ability to improve their own health and wellbeing. Therefore, this policy would also be likely to have minor positive impact in relation to equality (SA Objective 11).

J.4.3.3 In addition, Policy HW3 could potentially have a minor positive impact on transport and accessibility within the Plan area by promoting walking and cycling over the use of personal vehicles, and as such, encouraging people to engage in higher levels of daily physical

activity (SA Objective 9). This could also result in consequent benefits in terms of reducing the emission of road transport-associated pollutants which can be harmful to health, potentially leading to minor positive impacts regarding climate change mitigation and pollution (SA Objectives 4 and 7).

DRAFT



## J.5 Housing

### J.5.1 Policy HOU1 – Delivering Sustainable Housing Growth

#### Policy HOU1 – Delivering Sustainable Housing Growth

- 1) Sufficient land will be provided to deliver at least 47,837 net new homes over the period 2020 - 2039. The key sources of housing land supply are summarised in Tables 3 and 4 and illustrated in the Housing Spatial Diagram. Housing allocations for each BCA are set out in the relevant tables of Chapter 13.
- 2) The majority of the requirement will be met through sites with existing planning permission and sites allocated for housing by this Plan and other local plan documents. Additional housing supply will also be secured on windfall sites throughout the Black Country urban area and through the update of local Plans covering the Strategic Centres, where appropriate. The estimated net effect of housing renewal up to 2039 will be reviewed annually and taken into account in the calculation of housing land supply.
- 3) The minimum housing target for each Black Country Authority over the period 2020-39 and for each of the Plan phases: 2020-29, 2029-34 and 2034-39 is set out in Table 4.
- 4) The development of sites for housing should demonstrate a comprehensive approach, making best use of available land and infrastructure and not prejudicing neighbouring uses. Incremental development of an allocated site will only be allowed where it would not prejudice the achievement of high-quality design on the allocation as a whole. Master plans and Supplementary Planning Documents will be produced, where appropriate, to provide detailed guidance on the development of strategic allocations.

Table 3 Black Country Housing Land Supply and Indicative Phasing (2020-39)

Source of Supply		Total	2020-2029	2029-2034	2034-2039
<b>CURRENT SUPPLY</b> as of April 2020	Sites Under Construction	<b>5,258</b>	5,258	0	0
	Sites with Planning Permission or Prior Approval <sup>▲</sup>	<b>7,380</b>	7,244	136	0
	Sites with Other Commitment (as set out in 2020 SHLAAs) <sup>⌘</sup>	<b>3,802</b>	2,002	986	814
	Existing Housing Allocations in Strategic Centres <sup>⌘</sup> (not subject to review through the Black Country Plan)	<b>4,973</b>	1,708	1,795	1,470
<b>HOUSING ALLOCATIONS IN BLACK COUNTRY PLAN<sup>5</sup></b>	Occupied Employment Land <sup>◆</sup>	<b>3,091</b>	616	1,228	1,247
	Sites released from the Green Belt	<b>7,720</b>	2,398	3,173	2,149
	Other <sup>⌘</sup>	<b>6,921</b>	4,308	1,487	1,126
	Small sites (<10 homes / 0.25 ha)	<b>7,651</b>	2,661	2,495	2,495

<sup>5</sup> Excluding some sites with planning permission which have been allocated in the BCP to ensure they are not lost to other uses

**Policy HOU1 – Delivering Sustainable Housing Growth**

<b>WINDFALL ALLOWANCES</b>	Wolverhampton City Centre upper floor conversions	<b>812</b>	232	290	290
<b>ADDITIONAL SITE CAPACITY IN STRATEGIC CENTRES</b> (to be allocated in Local Plans)	Wolverhampton City Centre	<b>750</b>	0	250	500
	Walsall Town Centre	<b>0</b>	0	0	0
	Brierley Hill Town Centre	<b>350</b>	0	175	175
	West Bromwich Town Centre	<b>200</b>	0	100	100
<b>TOTAL GROSS HOMES</b>		<b>48,908</b>	26,427	12,115	10,366
<b>TOTAL LOSS HOMES</b>	Dudley Estimated Housing Renewal Demolitions	<b>- 323</b>	- 323	0	0
	Small-scale demolition windfalls	<b>- 748</b>	- 328	- 210	- 210
<b>TOTAL NET HOMES</b>		<b>47,837</b>	<b>25,776</b>	<b>11,905</b>	<b>10,156</b>

▲ discounted by 5%                      ⌘ discounted by 10%                      ◆ discounted by 15%

Table 4 Sources of Housing Land Supply and Phased Housing Targets for each Black Country Authority (2020-39)

Source of Supply (net new homes)		Dudley	Sandwell	Walsall	Wolverhampton
<b>CURRENT SUPPLY</b> as of April 2020	Sites Under Construction	978	624	1,255	2,401
	Sites with Planning Permission or Prior Approval ▲	1,867	2,577	1,105	1,831
	Sites with Other Commitment (as set out in 2020 SHLAAs) ⌘	833 <sup>6</sup>	102	2,691 <sup>7</sup>	176
	Existing Housing Allocations in Strategic Centres ⌘ (not subject to review through the Black Country Plan)	2,506	201	18	2,248
<b>HOUSING ALLOCATIONS IN BLACK COUNTRY PLAN*</b>	Occupied Employment Land ◆	732	1,882	0	477
	Sites released from the Green Belt	1,117	171	5,418 <sup>8</sup>	1,014
	Other ⌘	2,739	2,013	1,402	767
<b>WINDFALL ALLOWANCES</b>	Small sites (<10 homes / 0.25 ha)	2,816	1,728	1,455	1,652
	Wolverhampton City Centre upper floor conversions				812
	Brierley Hill Town Centre	350			

<sup>6</sup> including mixed use allocations which include centre uses and so are not subject to review through the Black Country Plan

<sup>7</sup> including 833 homes on identified sites in Walsall Town Centre

<sup>8</sup> Excludes 1,715 homes which it is estimated will be delivered after 2039



## J.5.2 Policy HOU2 – Housing Density, Type and Accessibility

### Policy HOU2 – Housing Density, Type and Accessibility

- 1) The density and type of new housing provided on any housing site should be informed by:
  - a) The need for a range of types and sizes of accommodation to meet identified sub-regional and local needs;
  - b) The level of accessibility by sustainable transport to residential services, including any improvements to be secured through development, as set out in Table 5;
  - c) The need to achieve high-quality design and minimise amenity impacts, considering the characteristics and mix of uses in the area where the proposal is located.
- 2) Each authority will aim to provide an overall mix of house types over the plan period, tailored to best meet local and sub-regional needs.
- 3) Developments of ten homes or more should provide a range of house types and sizes that will meet the accommodation needs of both existing and future residents, in line with the most recently available information.
- 4) All developments of ten homes or more should achieve the minimum net density set out below, except where this would prejudice historic character and local distinctiveness as defined in Policy ENV5:
  - a. 100 dwellings per hectare where Table 5 accessibility standards for very high-density housing are met and the site is located within a Strategic Centre or Town Centre.
  - b. 45 dwellings per hectare where Table 5 accessibility standards for high density housing are met;
  - c. 40 dwellings per hectare where Table 5 accessibility standards for moderate density housing are met.
- 5) Chapter 13 provides details of the appropriate density and, where appropriate, house type mix, to be sought on each housing allocation site, in accordance with the requirements set out in this Policy. Further details of design requirements for housing developments may be set out in Supplementary Planning Documents.

Table 5 Black Country Housing Accessibility Standards

Density (homes per hectare net)	Very High: 100 + Only appropriate within a Strategic Centre or Town Centre	High: 45 +	Moderate: 40 +
Indicative proportion of flats	100%	>15%	0 – 15%
Indicative amount of housing suited to families	low	medium	high
<b>Accessibility (by either walking or public transport, unless stated)</b>			
Employment - Strategic Centre or other employment area	20 mins	20 mins	30 mins
Health - Primary Care e.g. GP Surgery or Health Centre	10 mins	10 mins	15 mins

Policy HOU2 – Housing Density, Type and Accessibility				
Fresh Food - Centre or food store	N/a	10 mins	15 mins	
Education - Primary School (walking distance only)	N/a	15 mins	10 mins	
Education - Secondary School	N/a	25 mins	20 mins	

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU2	0	0	0	+	0	0	+	0	+	+	+	+	0	0

- J.5.2.1 An appropriate mix of housing is required across the Plan area to help to ensure that the varied needs of current and future residents are met. In particular, this may include an increased number of smaller homes which would be likely to help provide appropriate accommodation for the elderly and first-time buyers entering the market.
- J.5.2.2 Policy HOU2 aims to ensure that residential developments meet the local housing need, supporting the current and future requirements of the population in terms of housing type and size, as well as ensuring new residents have good access to sustainable transport options. The policy sets out criteria for accessibility standards, which would be expected to ensure housing is provided in sustainable locations which results in a reduced need to travel, encourages local shopping and promotes social inclusion in the community. This would be likely to have a minor positive impact on local accessibility, housing provision and equality (SA Objectives 9, 10 and 11).
- J.5.2.3 Due to the requirement to ensure that the density and type of housing development is informed by the level of accessibility via sustainable transport, this policy could potentially help to reduce emission of road transport associated GHGs and air pollutants. Therefore, a minor positive impact would be anticipated on climate change mitigation and pollution (SA Objectives 4 and 7).
- J.5.2.4 By providing a suitable mix of housing types and tenure, this policy would be expected to meet the varying needs of residents, and as such, have a minor positive impact on health and wellbeing (SA Objective 12).

### J.5.3 Policy HOU3 – Delivering Affordable, Wheelchair Accessible and Self Build / Custom Build Housing

#### Policy HOU3 – Delivering Affordable, Wheelchair Accessible and Self Build / Custom Build Housing

##### Affordable Housing

- 1) Developments of ten homes or more should provide a range of tenures that will meet the accommodation needs of both existing and future residents, in line with the most recently available information.
- 2) All developments of ten homes or more should provide a proportion of affordable housing, where this is financially viable. The minimum proportion of affordable housing that should be provided is:
  - a) On all sites in lower value zones and brownfield sites\* in medium value zones: 10% affordable housing;
  - b) On greenfield sites\* in medium value zones: 20% affordable housing;
  - c) On all sites in higher value zones: 30% affordable housing.
- 3) The tenure and type of affordable homes sought will be determined on a site by site basis, based on national planning policy and best available information regarding local housing needs, site surroundings and viability considerations. Detailed guidance may be set out in Supplementary Planning Documents, where appropriate.

##### National Wheelchair Accessibility Standards

- 4) All developments of ten homes or more should provide a proportion of wheelchair accessible housing, where this is financially viable. The minimum proportion that should be provided is:
  - a) On all brownfield sites\* and on greenfield sites\* in lower value zones: 20% of homes to meet the optional Building Regulations Requirement M4(2): Accessible and Adaptable Dwellings<sup>10</sup>;
  - b) On greenfield sites\* in medium or higher value zones: 15% of homes to meet the optional Building Regulations Requirement M4(3): Wheelchair User Dwellings<sup>11</sup> and all remaining homes to meet the optional Building Regulations Requirement M4(2): Accessible and Adaptable Dwellings<sup>12</sup>.
- 5) Other than for reasons of financial viability, these requirements will only be reduced where it can be demonstrated that any of the following apply:
  - a) it is not practically achievable given the physical characteristics of the site, or
  - b) site specific factors mean that step-free access to the dwelling cannot be achieved, or
  - c) the homes are located on the first floor or above of a non-lift serviced multi-storey development.

##### Self-Build and Custom Build Plots

- 6) On developments of 100 homes or more, where there is currently a need for self-build and custom build plots identified in the self-build and custom build register for the local authority where the site is located,

<sup>10</sup> Or any subsequent national equivalent standard

<sup>11</sup> Or any subsequent national equivalent standard

<sup>12</sup> Or any subsequent national equivalent standard

### Policy HOU3 – Delivering Affordable, Wheelchair Accessible and Self Build / Custom Build Housing

at least 5% of plots should be made available for self-build or custom build, or sufficient to match the current number on the register if lower. Any plots that have not been sold after 12 months of appropriate marketing will revert to the developer to build.

#### Financial Viability Assessments

- 7) On sites where applying the affordable housing or wheelchair accessibility requirements can be demonstrated to make the development unviable, the maximum proportion of such housing will be sought that will not undermine the viability of the development, subject to achieving optimum tenure mix and securing other planning obligations necessary for the development to gain planning permission.
- 8) Financial viability assessments conforming to national guidance will be required to be submitted and, where necessary, independently appraised by an appropriate professional appointed by the local planning authority at the cost of the applicant. Flexible arrangements will be sought through planning agreements, wherever possible, to allow for changing market conditions in future years. Any viability assessment should be prepared on the basis that it will be made publicly available other than in exceptional circumstances, and in such circumstances an executive summary will be made publicly available.

*\* or parts of sites*

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU3	0	0	0	0	0	0	0	0	0	+	+	+	0	0

J.5.3.1 Policy HOU3 seeks to ensure an appropriate mix of affordable and accessible homes are delivered across the Plan area, as well as the opportunity for self-build homes. The policy also sets out requirements for developments where the criteria for affordable, accessible and self-build homes on site are not viable.

J.5.3.2 The policy would help to ensure that, throughout the Plan area, the BCP delivers an appropriate mix of affordable housing that meets the varied needs of current and future residents. This policy sets out the requirements for affordable housing for development of ten dwellings or more, to ensure that suitable residential development is provided to meet the social and economic needs of the population.

J.5.3.3 Future residential development needs to consider accessibility requirements for the elderly, as well as families with young children and those with specific needs. Policy HOU3 would

be likely to help ensure residential developments allow for the safe and convenient access for all residents, including older people and wheelchair users.

J.5.3.4 This policy also seeks to meet the needs of those wishing to build their own homes. The policy aims to secure a 5% of major developments of 100 or more units to be available for self-build housing. This would help to ensure that new housing delivered across the Plan area can accommodate the diverse requirements of residents within the Black Country.

J.5.3.5 Overall, Policy HOU3 would be anticipated to result in minor positive impacts in relation to housing, equality and human health (SA Objectives 10, 11 and 12).

#### J.5.4 Policy HOU4 – Accommodation for Gypsies and Travellers and Travelling Showpeople

##### Policy HOU4 – Accommodation for Gypsies and Travellers and Travelling Showpeople

- 1) Phased targets for new gypsy and traveller pitches and travelling show people plots for each Black Country authority are set out in Table 6. These targets are based on needs identified in the Black Country Gypsy and Traveller Accommodation Assessment (GTAA) 2017\*.
- 2) These targets will be met through sites with planning permission, allocated sites and other sites granted planning permission during the Plan period in accordance with the criteria set out below. The Black Country authorities will pursue funding and / or management arrangements for new sites, where necessary.
- 3) To meet gypsy and traveller pitch targets for Walsall, sites WAGT26 and WAGT27 have been removed from the Black Country Green Belt, as listed in Chapter 13. These are two existing sites (WAGT26 being the subject of a personal permission and WAGT27 having a temporary permission which has expired) reserved as permanent pitches for residents who meet the definition of travellers in national guidance.
- 4) Proposals for permanent gypsy and traveller pitches and travelling show people plots will be assessed against the following criteria:
  - a) The site should be suitable as a place to live, particularly regarding health and safety, and the development should be designed to provide adequate levels of privacy and amenity for both occupants and neighbouring uses;
  - b) The site should meet moderate standards of access to residential services as set out in Policy HOU2;
  - c) The site should be located and designed to facilitate integration with neighbouring communities;
  - d) The site should be suitable to allow for the planned number of pitches, an amenity block, a play area, access roads, parking and an area set aside for work purposes where appropriate,



## Policy HOU4 – Accommodation for Gypsies and Travellers and Travelling Showpeople

including, in the case of travelling show people, sufficient level space for outdoor storage and maintenance of equipment;

- e) The site should be served or capable of being served by adequate on-site services for water supply, power, drainage, sewage and waste disposal (storage and collection).
- 5) The location, design and facilities provided on new sites will be determined in consultation with local gypsies and travellers and travelling show people and will also consider / reflect any available national guidance.
- 6) Existing traveller sites will be safeguarded and their redevelopment or use for other purposes will be opposed, unless there is evidence either that a suitable replacement with equivalent capacity has been provided elsewhere or that the existing site is no longer required to meet identified need.

*\* targets in the Publication Plan will be updated in line with the GTAA Update 2021*

Table 5 Black Country Indicative Gypsy, Traveller and Travelling Showpeople Accommodation Targets: 2020-2039<sup>13</sup>

Source: Black Country GTAA 2020

		Dudley		Sandwell		Walsall		Wolverhampton		Black Country
		2016-26	2026-36	2016-26	2026-36	2016-26	2026-36	2016-26	2026-36	2016-36
Gypsy and Traveller Pitches	Target	10	9	8	2	15	9	18	8	79
	Permissions / Allocations	2	0	10	0	23	0	12	0	47
Plots for Travelling show people	Target	6	4	4	2	21	14	0	0	51
	Permissions / Allocations	0	0	0	0	0	0	0	0	0

1	2	3	4	5	6	7	8	9	10	11	12	13	14
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<sup>13</sup> Pitch targets exclude those living in housing and with a psychological aversion to housed accommodation.

Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+	+	+	+/-	+

- J.5.4.1 In accordance with the planning policy for traveller sites<sup>14</sup>, Gypsies and Travellers are defined as *"persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such"*.
- J.5.4.2 Travelling Showpeople are defined as *"Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above"*<sup>15</sup>.
- J.5.4.3 This policy would be expected to meet the identified pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit accommodation needs as set out in the Gypsy and Traveller Accommodation Assessment. Therefore, this policy would be likely to have a minor positive impact on housing (SA Objective 10).
- J.5.4.4 The policy would also be expected to have a minor positive impact on equality, as the provision of Gypsy and Traveller pitches and plots helps to ensure that a diverse range of residents in the Black Country have access to appropriate accommodation to suit their needs (SA Objective 11).
- J.5.4.5 The criteria set out in Policy HOU4 requires all development proposals for Gypsy, Traveller and Travelling Showpeople pitches and plots to have good access in accordance with Policy HOU2, integrate with neighbouring communities, include play areas and access roads, and have adequate access to on site services including water supply, power, drainage, sewage and waste disposal. These requirements would be expected to result in minor positive impacts in regard to transport and accessibility, equality, health and education (SA Objectives 9, 11, 12 and 14).

<sup>14</sup> MHCLG (2015) Planning policy for traveller sites. Available at: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites> [Date Accessed: 19/08/20]

<sup>15</sup> Ibid

- J.5.4.6 An uncertain impact has been identified on the remaining SA Objectives as the extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics. These are assessed in the SA process through the assessment of reasonable alternatives, as documented in this SA report and supporting appendix (Appendix K).
- J.5.4.7 The policy does state that in order to meet the gypsy and traveller accommodation need, some sites have been removed from the Green Belt in Walsall. This could potentially have adverse impact on the surrounding environment, such as landscape, biodiversity and natural resources, as Green Belt sites are likely to be previously undeveloped land.

### J.5.5 Policy HOU5 – Education Facilities

#### Policy HOU5 – Education Facilities

- 1) New nursery, school and further and higher education facilities should be:
  - a) Well-designed and complement and enhance neighbourhood services and amenities;
  - b) Well-served by public transport infrastructure, walking, and cycling facilities, particularly in centres, and located to minimise the number and length of journeys needed in relation to its intended catchment area;
  - c) Wherever possible, located to address accessibility gaps in terms of the standards set out in Policy HOU2, particularly where a significant amount of new housing is proposed.
- 2) New and improved facilities will be secured through a range of funding measures. Where a housing development of ten or more homes would increase the need for education facilities to the extent that new or improved facilities would be required to meet this need, planning obligations or Community Infrastructure Levy will be secured sufficient to meet the need, where this is financially viable. For strategic allocations, the likely requirement for on-site provision of new schools is set out in Chapter 13: Site Allocations. Where land is provided for a new school as part of a housing development, the financial contribution made by that development towards education facilities will be reduced accordingly.
- 3) On sites where the education facility requirement is proven not to be viable, the maximum proportion of funding will be sought that will not undermine the viability of the development, subject to securing other planning obligations necessary for the development to gain planning permission. A financial viability assessment will be required to be submitted, meeting the requirements set out in Policy HOU3.
- 4) New and redeveloped education facilities should include maximum provision for wider community use of sports and other facilities, where appropriate.
- 5) The existing network of education facilities will be protected and enhanced. The physical enhancement and expansion of higher and further educational facilities and related business and

### Policy HOU5 – Education Facilities

research will be supported where it helps to realise the educational training and research potential of the Black Country. Proposals involving the loss of an education facility will be permitted only where adequate alternative provision is available to meet the needs of the community served by the facility.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU5	0	0	0	+	0	0	+	0	+	0	+	+	+	++

- J.5.5.1 Policy HOU5 seeks to support the development or expansion of education facilities secured through a range of funding measures, including s.106 agreements. New facilities would be required to be in accordance with the criteria set out in the policy, such as being situated in areas with good public transport access. The policy also aims to protect and enhance existing facilities. This policy would therefore be expected to have a major positive impact on education (SA Objective 14).
- J.5.5.2 Improved access to education would also be likely to have benefits to the local economy, by ensuring a greater proportion of residents have skills desirable in many employment opportunities. The policy seeks to address accessibility gaps and ensure all residents have good access to educational facilities via public transport. Therefore, this policy would be likely to have a minor positive impact on transport and accessibility, equality and the local economy (SA Objectives 9, 11 and 13).
- J.5.5.3 The policy also states that new education facilities should be “*Well-served by public transport infrastructure, walking, and cycling facilities, particularly in centres, and located to minimise the number and length of journeys needed in relation to its intended catchment area.*” This could potentially result in a minor positive impact on climate change mitigation and pollution, by reducing reliance on travel via car and consequently reducing emission of GHGs and harmful pollutants (SA Objectives 4 and 7).
- J.5.5.4 In addition, this policy seeks to ensure that “*new and redeveloped education facilities should include maximum provision for community use of sports and other facilities*”. This would be expected to have a minor positive impact on the health of local residents (SA Objective 12).

## J.5.6 Policy HOU6 – Houses in Multiple Occupation

### Policy HOU6 – Houses in Multiple Occupation

- 1) Proposals for the creation of Houses in Multiple Occupation, including the conversion of buildings or sub-division of dwellings, will be permitted provided that:
  - a) the development would not result in the loss of family-sized dwellings in areas where there is a proven demand for such accommodation;
  - b) the development is unlikely to be detrimental to the amenities of the occupiers of adjoining or neighbouring properties by way of noise, overlooking, general disturbance, or impact on visual amenity;
  - c) The development would not have a significant adverse impact on the character and appearance of the area, including the historic and natural environment;
  - d) provision for off- and on-street car and cycle parking is sufficient and appropriately incorporated and would not have an adverse impact on the surrounding area by way of increased on-street parking, impaired highway safety or impeding proper access to the area;
  - e) the site is in an area that has good access by walking and public transport to residential services, as set out in Policy HOU2;
  - f) the development meets Nationally Described Space Standards as set out in Policy ENV9 and provides a satisfactory standard of living accommodation, to ensure that the occupiers have adequate floor space and the internal layout is shown to be suitable for the number of units proposed in terms of daylight, outlook and the juxtaposition of living rooms and bedrooms;
  - g) adequate provision is made for the storage and disposal of refuse and recycling; and
  - h) adequate provision of residential amenity is made, including outdoor amenity space for sitting out, play and drying clothes and for external storage space, including cycle storage.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU6	0	0	0	0	0	0	0	0	+	+	+	+	0	0

J.5.6.1 A dwelling is classed as a house in multiple occupation (HMO) if at least three tenants live there and share a toilet, bathroom or kitchen. Policy HOU6 supports the development of HMOs, providing the proposal is in accordance with the criteria set out in the policy. This would be likely to provide a range of housing options to residents of the Black Country, and therefore, would be likely to have a minor positive impact on housing and equality

(SA Objectives 10 and 11). In addition, the policy seeks to ensure the development of any HMOs would not significantly impact cultural heritage, landscape or biodiversity features.

- J.5.6.2 This policy seeks to ensure development proposals are located in an area which has "*good access by walking and public transport to residential services*". This would be expected to have a minor positive impact on transport and accessibility and could potentially encourage outdoor exercise and active travel, with benefits to human health and wellbeing (SA Objectives 9 and 12).

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## J.6 The Black Country Economy

### J.6.1 Policy EMP1 - Providing for Economic Growth and Jobs

#### Policy EMP1 - Providing for Economic Growth and Jobs

- 1) The BCA will seek the delivery of at least 355ha of employment land within the Black Country, in Use Classes E(g)(ii), E(g)(iii), B2, and B8 between 2020 and 2039, to support the growth of the sub-regional economy and increase productivity. Most of this requirement will be met through sites allocated for development in this Plan as set out below:
  - a) Dudley – 22ha
  - b) Sandwell – 29ha
  - c) Walsall – 164ha
  - d) Wolverhampton – 66ha
  - e) Total – 281ha
- 2) Additional employment development of a minimum of 74ha will be brought forward on other sites throughout the Black Country, mainly through the redevelopment, intensification and enhancement of existing employment areas and premises.
- 3) The Plan will deliver a portfolio of sites of various sizes and quality to meet a range of business needs. This land is in addition to sites currently occupied for employment purposes.
- 4) The key clusters of sites are shown on the Employment Key Diagram and individual sites listed in Chapter 13: Sub-Areas and Site Allocations. These sites will be safeguarded for industrial employment uses within Use Classes E(g)(ii), E(g)(iii), B2, and B8.
- 5) Within the existing employment areas subject to Policies EMP2 and EMP3, and, as appropriate, the employment areas subject to Policy EMP4, the BCA will support, with public intervention as necessary, the regeneration and renewal of such areas, including their environmental enhancement and incorporation of sustainable measures and facilities, including circular economy approaches and their infrastructure, as well as their marketing and promotion, to enable the Black Country’s employment areas to be fit-for-purpose in the long term and aid in the economic recovery and rejuvenation of the sub-regional industrial economy.

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
EMP1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-

- J.6.1.1 The BCP allocates 354 ha of employment land for the period between 2020 - 2039 and provides for a further 69ha of development to come forward through the redevelopment of existing employment land and premises. Further land is provided on other sites which have planning permission for employment development. This will therefore accommodate 63% of forecast needs arising within the Black Country. 37% of employment land need arising in the Black Country cannot be met solely within the Black Country.
- J.6.1.2 Minor positive impacts are considered likely as the policy would deliver a significant quantity of employment land, however, would not meet the full identified needs for the Black Country (SA Objective 13).
- J.6.1.3 An uncertain impact has been identified on the remaining SA Objectives as the extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics. These are assessed in the SA process through the assessment of reasonable alternatives, as documented in this SA report.

## J.6.2 Policy EMP2 – Strategic Employment Land

### Policy EMP2 – Strategic Employment Land

- 1) The Strategic Employment Areas are shown on the Policies Map. They are characterised by excellent accessibility, high-quality environments and clusters of high technology growth sector businesses. These areas will be safeguarded for manufacturing and logistics uses within Use Classes E(g)(ii), E(g)(iii), B2 and B8.
- 2) Within Strategic Employment Areas, high-quality development or redevelopment of sites and premises will be required, and planning applications that prejudice or dilute the delivery of appropriate employment activity, or deter investment in such uses, will be refused.
- 3) Strategic Employment Areas will be safeguarded from redevelopment for other non-manufacturing / logistics uses.
- 4) Some ancillary employment-generating non-Class E(g)(ii), E(g)(iii), and Class- B2 and B8 uses, such as childcare facilities and small-scale food and drink outlets, may also be permitted in Strategic Employment Areas, where they can be shown to strongly support, maintain or enhance the business and employment function and attractiveness of the area, and meet sequential and other national or local policy tests (particularly Policies CEN5 and CEN6) relating to appropriate uses as necessary.

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education



EMP2	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-
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- J.6.2.1 Policy EMP2 seeks to allocate Strategic Employment Land within the Black Country. The Strategic Employment Areas correspond to areas of highest market demand and be characterised by “clusters of high technology growth”. This would be likely to have benefits to the local economy, as employment land would be located in desirable areas and would provide technology to enable businesses to thrive.
- J.6.2.2 The policy states that Strategic Employment Areas will be characterised by “excellent accessibility”, which would be expected to ensure residents have good access to employment opportunities and surrounding services via sustainable transport modes. Therefore, a minor positive impact in relation to transport and accessibility would be likely (SA Objective 9).
- J.6.2.3 At present, an uncertain impact has been identified for the remaining SA objectives (SA Objectives 1, 2, 3, 4, 5, 6, 7, 8, 10, 11, 12 and 14).

### J.6.3 Policy EMP3 – Local Employment Areas

#### Policy EMP3 – Local Employment Areas

- 1) Local Employment Areas are shown on the Policies Map. They are characterised by a critical mass of industrial, warehousing and service activity with good access to local markets and employees.
- 2) These areas will provide for the needs of locally-based investment and will be safeguarded for the following uses;
  - a) Industry and warehousing (E(g)(ii), E(g)(iii)), B2 and B8 use
  - b) Motor trade activities, including car showrooms and vehicle repair
  - c) Haulage and transfer depots
  - d) Trade, wholesale retailing and builders’ merchants
  - e) Scrap metal, timber and construction premises and yards
  - f) Waste collection, transfer and recycling uses as set out in Policy W3.
- 3) Not all areas will be suitable for all uses.
- 4) Some ancillary employment-generating non-Class E(g)(ii), E(g)(iii)) and B uses such as childcare facilities and food and drink outlets may also be permitted in Local Employment Areas where they can:
  - a) be shown to strongly support, maintain or enhance the business and employment function of the area; and
  - b) meet sequential and other national or local policy tests (particularly Policies CEN5 and CEN6) relating to appropriate uses, as necessary.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-

J.6.3.1 Policy EMP3 seeks to allocate Local Employment Areas to support the provision of industrial, logistics and commercial activities which would be likely to result in benefits for the local economy and provision of local employment opportunities. This policy would therefore be likely to have a minor positive impact on the economy (SA Objective 13).

J.6.3.2 Policy EMP3 also seeks to safeguard areas for "waste collection, transfer and recycling uses". This policy would therefore be expected to have a minor positive impact on waste, by supporting the efficient disposal of waste (SA Objective 8).

J.6.3.3 An uncertain impact has been identified on the remaining SA Objectives to site specific contextual factors (SA Objectives 1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12 and 14).

#### J.6.4 Policy EMP4 – Other Employment Sites

Policy EMP4 – Other Employment Sites
<p>1) For employment areas that are not designated as either Strategic Employment Areas or Local Employment Areas on the Policies Map, but comprise existing occupied employment land within the BC, development will be supported for:</p> <ul style="list-style-type: none"> <li>a) new industrial employment uses or extensions to existing industrial employment uses, or</li> <li>b) housing or other non-ancillary non-industrial employment uses.</li> </ul> <p>2) Development or uses under 1(b) will only be supported where there is robust evidence to demonstrate to the satisfaction of the relevant authority, that:</p> <ul style="list-style-type: none"> <li>a) The site is no longer required for industrial employment purposes, including the possible relocation of displaced employment uses from other parts of the Black Country;</li> <li>b) The site is no longer viable for such uses;</li> <li>c) There are satisfactory arrangements in place for the relocation of existing occupiers of the employment uses on the site, if suitable sites are available in the local area;</li> <li>d) The site could be brought forward for housing in a comprehensive manner and would not lead to piecemeal development;</li> <li>e) Residential development would not adversely affect the ongoing operation of existing or proposed employment uses on the site or nearby; and</li> </ul>

### Policy EMP4 – Other Employment Sites

The site is suitable for housing or other non-ancillary non-employment uses in accordance with local or national policies relating to these uses.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+	+/-

- J.6.4.1 The policy supports “*new employment uses or extensions to existing employment uses*” which would be likely to increase the provision of employment floorspace across the Black Country. A minor positive impact on employment opportunities and the economy would be expected (SA Objective 13).
- J.6.4.2 This policy would support the redevelopment of some employment sites to housing or other non-employment uses, where the employment site is no longer required for employment purposes. Therefore, this could potentially result in a minor positive impact on local housing provision (SA Objective 10).
- J.6.4.3 At present, the location of these allocations is unknown. It is therefore unknown what impact Policy EMP4 would have on the remaining SA Objectives, and as a result, an uncertain impact has been identified (SA Objectives 1, 2, 3, 4, 5, 6, 7, 8, 9, 11, 12 and 14).

## J.6.5 Policy EMP5 – Improving Access to the Labour Market

### Policy EMP5 – Improving Access to the Labour Market

- 1) Planning applications for new major job-creating development will be required to demonstrate how job opportunities arising from the proposed development will be made available to the residents of the Black Country, particularly those in the most deprived areas of the sub-region and priority groups.
- 2) Planning conditions or obligations will be negotiated with applicants and applied as appropriate to secure initiatives and/or contributions to a range of measures to benefit the local community, including the potential for working with local colleges and universities, to ensure:
  - a) The provision of training opportunities to assist residents in accessing employment opportunities;
  - b) The provision of support to residents in applying for jobs arising from the development;
  - c) Enhancement of the accessibility of the development to residents by a choice means of transport;
  - d) Child-care provision which enables residents to access employment opportunities;
  - e) Measures to assist those with physical or mental health disabilities to access employment opportunities.
- 3) In respect of the planning applications for new employment generating development the Black Country authorities may require applicants to make financial or other contributions, secured through planning obligations or the CIL Charging Schedule.

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP5	0	0	0	0	0	0	0	0	0	0	+	+	+	+

J.6.5.1 Policy EMP5 aims to support proposals for new employment development, so long as the employment opportunities are accessible, in particular for disadvantaged people and residents in the most deprived areas of the Black Country. The development of new employment sites would be expected to have a minor positive impact on the economy (SA Objective 13), whilst ensuring the associated employment opportunities are available for all residents within the Plan area would have a minor positive impact in relation to equality (SA Objective 11).

J.6.5.2 The policy seeks to ensure that provision is made “to assist those with physical or mental health disabilities to access employment opportunities”. The provision of improved

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accessible employment opportunities across the Black Country would be expected to have a minor positive impact on health and wellbeing (SA Objective 12).

- J.6.5.3 Furthermore, this policy would be likely to have benefits to education, by ensuring a diverse range of residents have access to training opportunities to increase their skills and employability. Therefore, a minor positive impact on education would be likely (SA Objective 14).

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## J.7 The Black Country Centres

### J.7.1 Policy CEN1 – The Black Country Centres

#### Policy CEN1 – The Black Country Centres

- 1) The priority for the Black Country’s Centres is to ensure they remain focused on serving the needs of their communities, through performing a well- balanced diversity of commercial, business and service functions. This includes retail provision and an increasing mix of leisure, office, residential and other appropriate, complementary uses that are accessible by a variety of sustainable means of transport. This will enable centres to make a key contribution to regeneration, tackling climate change, fostering healthy communities, and creating pleasant, safe public spaces to increase social interaction and cohesion.
- 2) The Black Country’s defined centres comprise the hierarchy set out in Table 7, which are identified on the Centres Key Diagram (Figure 8). This hierarchy will be supported and protected by ensuring that development in centres is facilitated in a manner that reflects their scale, role, and function, and resisting proposals that would undermine this strategy.
- 3) Proposals for ‘Centre Uses’ (paragraph 8.3b) that are ‘in-centre’ (within the relevant boundaries / Primary Shopping Areas of defined centres) are subject to specific policy requirements, as set out in Table 7 and policies CEN2 - CEN4, as well as relevant policies in Local Development Plans.
- 4) Proposals for ‘Centre Uses’ that are not ‘in-centre’ (are not within the relevant boundaries / Primary Shopping Areas of a defined centre but are in edge-of- centre or out-of-centre locations), must meet the sequential test and other relevant requirements, such as impact tests (as set out in Table 7 and policies CEN5 –CEN6), as well as relevant policies in Local Development Plans.
- 5) Future growth in the Black Country, particularly housing and employment development identified in Policies HOU1 and EMP1 and allocations set out in Chapter 13, should have their service needs met by, and contribute to the regeneration of, the existing network of centres (see paragraph 8.17).
- 6) Where planning permission is granted, or Local Development Plan policies and allocations are made, effective planning conditions and policy wording must be used (see paragraph 8.12)
- 7) A land use approach will be adopted with appropriate degrees of flexibility as necessary to suit local circumstances, to encourage regeneration and to meet the challenges facing centres, particularly as little retail capacity has been identified to support additional floorspace, through supporting:
  - a) diversifying and repurposing of centres enhanced by appropriate complementary uses, particularly residential, education, health and community uses and supporting the evening economy;
  - b) the consolidation and reconfiguration of vacant floorspace into a mix of uses, especially the use of upper floors, and / or extensions to existing floorspace, with any new development being well-integrated with existing provision;
  - c) enhancing the health, accessibility and sustainability of centres, including maximising public realm, open space, provision of suitably- located and accessible pedestrian and cycle networks, and provision of green infrastructure and vehicle charging points.

Table 7: Black Country Hierarchy of Centres

Local Authority		Dudley	Sandwell	Walsall	Wolverhampton	Relevant Centres Policies and Test Thresholds		
Tier	Type					Location		
						In-centre	Edge-of-centre	Out-of-Centre

Policy CEN1 – The Black Country Centres								
One	Strategic Centre	Brierley Hill	West Bromwich	Walsall Town Centre	Wolverhampton City Centre	Policy CEN1  Policy CEN2	Policy CEN1  Policy CEN2  Policy CEN5 (if any unit size <280sqm)  Policy CEN6  Sequential Test  Impact Tests (if total size of proposal >280sqm)	Policy CEN1  Policy CEN5 (if any unit size <280sqm)  Policy CEN6  Sequential Test  Impact Tests (if total size of proposal >280sqm)
Two	Town Centres (including Walsall's District Centres)	Dudley Stourbridge Halesowen	-Blackheath -Cradley Heath -Great Bridge -Oldbury - Wednesbury -Cape Hill -Bearwood	-Bloxwich -Brownhills -Aldridge -Willenhall -Darlaston	-Bilston -Wednesfield	Policy CEN1  Policy CEN3	Policy CEN1  Policy CEN3  Policy CEN5 (if any unit size <280sqm)  Policy CEN6  Sequential Test  Impact Tests (if total size of proposal >280sqm)	
Three	District & Local Centres	-Kingswinford - Lye - Sedgley - Amblecote - Cradley / Windmill Hill - Gornal Wood - Netherton - Pensnett - Quarry Bank - Roseville - Shell Corner - The Stag - Upper Gornal - Wall Heath - Wollaston - Wordsley - Hawne - Oldswinford	-Smethwick High Street - Owen Street, Tipton - Scott Arms - Carter's Green - Quinton - Princes End - Old Hill - Stone Cross - Langley - Hamstead - Rood End - Queens Head Bristnall	- Caldmore - Stafford Street - Pleck - Pelsall - Leamore - Palfrey - High St Walsall Wood - Rushall - Blakenall - Lane Head - Streetly - Queslett - Lazy Hill - New Invention - Bentley - Park Hall	- Stafford Road (Three Tuns) - Cannock Road (Scotlands) - Tettenhall Village - Whitmore Reans / Avion Centre - Broadway - Bushbury Lane - Showell Circus - Wood End - Stubby Lane - Heath Town - Parkfield - Spring Hill - Penn Manor	Policy CEN1  Policy CEN4	Policy CEN1  Policy CEN4  Policy CEN5 (if any unit size <280sqm)  Policy CEN6  Sequential Test  Impact Tests (if total size	

Policy CEN1 – The Black Country Centres							
			- Smethwick High Street (Lower)	- Moxley - Fullbrook - Collingwood Dr, Pheasey - Birchills - Coalpool/Ryecroft - Beechdale - The Butts - Spring Lane, Shelfield - Beacon Road, Pheasey - Brackendale - Woodlands - Shelfield - South Mossley - Dudley Fields - Streets Corner - Buxton Road, Bloxwich - Coppice Farm - Turnberry Road, Bloxwich	- Upper Penn - Penn Fields - Bradmore - Merry Hill - Castlecroft - Finchfield - Tettenhall Wood - Newbridge - Aldersley - Pendeford Park - Fallings Park - Ashmore Park - Compton Village - Warstones Road - Dudley Road (Blakenhall) - Chapel Ash	of proposal >280sqm)	

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN1	+/-	+/-	+/-	+	+/-	+	+/-	+/-	+	+/-	+	+	+	+/-

J.7.1.1 Policy CEN1 aims to ensure centres in the Black Country provide residents with services and facilities that meet the local needs in regard to retail, leisure, commercial, residential, community and civic services. The four strategic centres (Tier One) in the Black Country are Brierley Hill, West Bromwich, Walsall Town Centre and Wolverhampton City Centre. There are 17 town centres (Tier Two): Dudley; Stourbridge; Halesowen; Blackheath; Cradley Heath; Great Bridge; Oldbury; Wednesbury; Cape Hill; Bearwood; Bloxwich; Brownhills; Aldridge; Willenhall; Darlaston; Bilston; and Wednesfield.



- J.7.1.2 The retail hierarchy as set out under this policy would be likely to ensure a range of facilities are provided at these locations which are appropriate to meet the local need. This would be expected to have benefits to the local community, ensuring all residents have access to essential services, and the local economy, through encouraging economic regeneration. Therefore, Policy CEN1 would be likely to have minor positive impacts in relation to equality and the economy (SA Objectives 11 and 13).
- J.7.1.3 The policy seeks to ensure development proposals within centres facilitate *"healthy communities"* and are *"accessible by a variety of sustainable means of transport"*, in particular public transport, walking and cycling. This policy would be likely to encourage residents to live healthy lifestyles by supporting active travel. Residents would also be encouraged to use public transport, which would subsequently reduce the number of cars on the road network, with likely benefits for carbon emissions, congestion and air quality (SA Objectives 4, 9 and 12).
- J.7.1.4 The policy supporting text states that *"bringing vacant floorspace back into use"* will be a supported under this policy. This would be likely to have a minor positive impact in relation to natural resources, by encouraging the efficient use of previously developed land and reducing the quantity of greenfield land that would be lost to development (SA Objective 6).
- J.7.1.5 The type, scale and quantity of development that may be directed to each of the identified centres under this policy is currently not known as this policy sets out the strategic context, priorities and approach to the Black Country's centres. Little future capacity for centre uses have been identified, there is uncertainty about the impact and recovery of centres in the light of the C-19 pandemic and more detailed policies and proposals will come forward in future tier-two plans. This policy, together with more detailed set out in policies CEN2-6, sets out the clear priority and criteria for development to be directed to, and served by, centres. Therefore, the impact development proposals may have on the remaining SA objectives is unknown. At present, uncertain impacts have been identified (SA Objectives 1, 2, 3, 5, 7, 8, 10 and 14).

## J.7.2 Policy CEN2 – Strategic Centres

### Policy CEN2 – Tier 1: Strategic Centres

#### Diversification and Flexibility of Uses

- 1) It is a priority for Strategic Centres to serve the identified BCP housing and employment growth aspirations (Policy CEN1 part 5). The diversification of Strategic Centres to provide a re-purposed well-balanced mix of appropriate uses cited in paragraph 8.3b will be supported, in particular:
  - a) Residential provision will be maximised, to increase and strengthen communities, with indicative housing capacity identified for each strategic centre in Chapter 13 (see paragraph 8.27)

## Policy CEN2 – Tier 1: Strategic Centres

- b) Complementary uses as set out in paragraph 8.3bii, particularly community, health and education uses (see also Policy HOU5 and Policy HW2)

### Centre Uses

- 2) Development should be focussed in strategic centres (in-centre locations being defined in paragraph 8.9), particularly large-scale proposals to serve wider catchment areas, to maximise linked trips, promote the use of sustainable modes of transport and support regeneration.

### Retail

- 3) Existing 'convenience' and 'comparison' retail provision will be protected and appropriate new development in this use supported, to meet both local shopping needs and large-scale provision to serve the wider catchment; focused on re-purposing vacant floorspace (Policy CEN1 point 7 and paragraph 8.15).

### Leisure

- 4) Leisure uses, especially large-scale public and commercial facilities such as cinemas, hotels, and a wide range of high quality family venues and activities, will be supported where they help to diversify strategic centres, encourage linked trips and enhance the evening economy and visitor experience (see paragraph 8.25).

### Office

- 5) Office provision, particularly that of high quality, will be supported, especially as strategic centres are important places of work, with it being a priority to. Identify and maintain a suitable portfolio of sites available to meet future demand (see paragraphs 8.24 and 8.26).
- 6) Proposals in edge-of-centre and / or out-of-centre locations (paragraph 8.9) will have to meet the relevant requirements set out in Policies CEN1 Table 7, CEN5 and CEN6 (paragraph 8.28).

### Sustainability:

- 7) High quality public realm: strategic centres, as a focus for service provision, are highly sustainable locations and it is a priority to ensure high quality public realm is delivered, supported through environmental policies (Policy ENV9)
- 8) Accessibility: strategic centres should be accessible by a variety of means of transport, particularly walking, cycling and public transport. Proposals for commercial and business development that involve more than 500 sq m (gross) of floorspace within the primary shopping areas of the Black Country's strategic centres and well-linked edge-of-centre locations shall evidence the means to which they are compatible with the objectives of achieving sustainable development. This evidence must incorporate the setting out of provisions for the enablement or enhancement of sustainable means of travel and integrated modes of transport to and within individual strategic centres, with a particular focus on the management of demand for car parking and car-borne traffic, including through car parking regimes. Further details are set out in Policy TRAN6, and Local Development Plans.

## Policy CEN2 – Tier 1: Strategic Centres

- 9) In making planning decisions, further guidance (such as frontage policy) is set out in Local Development Plans.

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	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN2	0	0	0	0	0	0	0	0	+	0	+	+	+	+

J.7.2.1 Policy CEN2 aims to support development and diversification within the four Strategic Centres of the Black Country: Brierley Hill; West Bromwich; Walsall Town Centre; and Wolverhampton City Centre. Development proposals which would increase retail provision, jobs and services would be supported under this policy. Policy CEN2 seeks to ensure that development within Strategic Centres include a *"well-balanced mix of uses (e.g. including education)"*. The policy seeks to *"support leisure uses"* including cinemas to particularly contribute to the evening economy.

J.7.2.2 The specifications of Policy CEN2 would be likely to provide improved employment opportunities and retail developments to boost the local economy as well as human health and equality, by helping to ensure all residents have good access to a range of services and facilities, including education, by providing community uses within centres. Overall, this policy would be likely to have minor positive impact in relation to accessibility, equality, health, economy and education (SA Objectives 9, 11, 12, 13 and 14).

### J.7.3 Policy CEN3 – Tier Two Centres

Policy CEN3 –Tier Two Centres
<ol style="list-style-type: none"> <li>1) Proposals for appropriate uses (paragraph 8.3b) will be supported within tier- two centres (in-centre locations being defined in paragraph 8.9), particularly where they contribute to providing a diverse mix of uses, such as retail, office, leisure, residential, community, education and cultural facilities, and where they are of a scale that reflects the size, role and function of those centres and the catchments the centres serve.</li> <li>2) It is a priority for tier-two centres to serve the needs of development identified in the BCP, particularly residential and employment allocations (CEN1 point 5).</li> <li>3) Convenience retail development is encouraged, and proposals to extend or refurbish existing stores where they are well-integrated with the centre will be supported.</li> <li>4) In the assessment and determination of planning proposals, the distinctive offer, unique character, and special roles played by individual centres will be recognised and will be given appropriate weight when decisions are taken on applications that may affect the characteristics of the area.</li> </ol>

### Policy CEN3 –Tier Two Centres

- 5) Proposals in edge-of-centre and/ or out-of-centre locations (paragraph 8.9) must meet the relevant requirements set out in Policies CEN1 Table 7, CEN5 and CEN6 (paragraph 8.35).
- 6) In making planning decisions further guidance (such as frontage policy) is set out in Local Development Plans.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN3	0	0	0	0	0	+	0	0	+	0	+	+	+	0

J.7.3.1 The aim of Policy CEN3 is to help direct appropriate development to the Town Centres as identified under Policy CEN1. The policy seeks to support the development of “retail, office, leisure, residential, community, education and cultural facilities” with the Town Centres. This would be expected to ensure there is adequate supply of employment opportunities within these areas. In addition, this policy would be likely to support a diverse range of services and facilities within town centres, ensuring good accessibility for existing local residents and promoting community cohesion. The policy could potentially direct some residential development to these town centres, further ensuring that new residents would also have good access to services and boosting the local economy. This would be expected to have minor positive impacts in relation to accessibility, housing, equality, health and the economy (SA Objectives 9, 10, 11, 12 and 13).

J.7.3.2 Policy CEN3 also seeks to help reduce the quantity of greenfield land needed for development. Minor positive impacts in relation to natural resources would therefore be expected (SA Objectives 6 and 10).

### J.7.4 Policy CEN4 – Tier Three Centres

#### Policy CEN4 – Tier Three Centres

- 1) Proposals for appropriate uses (paragraph 8.3b) will be supported within tier- three centres (in-centre locations being defined in paragraph 8.9) particularly commercial, business and service uses that meet day-to-day needs and serve local communities within the catchment area of those centres.
- 2) It is a priority for tier three centres to serve the day-to-day shopping and service needs of development identified in the BCP, particularly residential and employment allocations (Policy xx and CEN1 point 5). Convenience retail development is encouraged and proposals to extend or refurbish existing food stores where they are well-integrated with the centre will be supported.

### Policy CEN4 – Tier Three Centres

- 3) Proposals in edge-of-centre (directly adjoining a centre boundary – paragraph 8.9) and / or out-of-centre locations have to meet the relevant requirements as set out in Policies CEN1 Table 7, CEN5 and CEN6 (paragraph 8.35).
- 4) In making planning decisions, further guidance (such as frontage policy) is set out in Local Development Plans.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN4	0	0	0	0	0	0	0	0	+	0	+	0	+	0

J.7.4.1 Policy CEN4 seeks to support development within district or local centres that would serve communities, including food stores and day-to-day services. This could potentially help to encourage social interaction and community cohesion, and help to meet the needs of the community within the local area, reducing the need to travel. This would be likely to have a minor positive impact in relation to local accessibility and equality (SA Objectives 9 and 11).

J.7.4.2 By supporting development within district and local centres and providing job opportunities, this policy would also be likely to have a minor positive impact on the local economy (SA Objective 13).

### J.7.5 Policy CEN5 – Proposals of Small-Scale Local Facilities

#### Policy CEN5 – Provision of Small-Scale Local Facilities

- 1) Proposals subject to planning control for small-scale local facilities (centre uses and complementary uses set out in paragraph 8.3b), in edge or out-of- centre locations (paragraph 8.9) that have a proposed unit floorspace of up to 280sqm (gross) (paragraph 8.48) will only be permitted if all the following requirements are met:
  - a) The proposal does not unduly impact on the health and wellbeing of the community it is intended to serve.
  - b) The proposal is of an appropriate scale and nature to meet the specific day-to-day needs of a population within convenient, safe walking distance for new or improved facilities.
  - c) Local provision could not be better met by investment in a nearby centre (which for centre uses identified in paragraph 8.3b, is the sequential test as set out in national guidance).

### Policy CEN5 – Provision of Small-Scale Local Facilities

- d) Existing facilities that meet day-to-day needs will not be undermined.
- e) Access to the proposal by means other than by car can be demonstrated and will be improved; this will be evidenced by the proposal being within convenient, safe walking distance of the community it will serve.
- 2) Development involving the loss of a local facility, particularly a convenience shop, pharmacy, community facility or post office, will be resisted where this would result in an increase in the number of people living more than a convenient, safe walking distance from alternative provision
- 3) In making planning decisions further guidance is set out in Local Development Plans.
- 4) Where planning permissions are granted, effective planning conditions and / or planning obligations will be required to support the regeneration strategy and minimise impacts (Policy CEN1 point 6 and paragraph 8.12).
- 5) Proposals where total floorspace exceeds 280sqm (gross) will also have to meet the requirements of Policy CEN6 (see paragraphs 8.49 – 8.50).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN5	0	0	0	0	0	0	+	0	+	0	+	+	+	0

J.7.5.1 Policy CEN5 aims to support the development of small-scale centre-uses outside of centres to meet the needs of community, where proposals meet a number of criteria outlined in the policy. These small development proposals would be expected to have benefits to the local economy and the local population by encouraging community cohesion, social inclusion and ensuring residents have good access to essential services in close proximity to their homes. The policy also seeks to retain existing services such as a “convenience shop, pharmacy or post office”. Therefore, a minor positive impact in regard to equality and economy would be expected (SA Objectives 11 and 13).

J.7.5.2 The policy also seeks to ensure proposals are located “within convenient, safe walking distance for new or improved facilities” for residents. The policy would be likely to ensure good access, whilst encouraging active travel and reduce reliance on personal car, with subsequent benefits to local air quality. This would be likely to have a minor positive impact on transport and accessibility and health (SA Objectives 7, 9 and 12).

### J.7.6 Policy CEN6 – Edge-of-Centre and Out-of-Centre Development

#### Policy CEN6 – Edge-of-Centre and Out-of-Centre Development

1) There is a clear presumption in favour of focusing appropriate uses (paragraph 8.3b) in centres.

##### Sequential Test

- 2) All edge-of-centre and out-of-centre proposals (as defined in paragraph 8.9) for centre uses (paragraph 8.3b) should meet the requirements of the sequential test set out in the latest national guidance
- 3) Edge and out-of-centre proposals should be assessed for accessibility by a choice of modes of transport, in particular public transport, walking and cycling, and support both social inclusion and cohesion, and the need to sustain strategic transport links. Edge of centre proposals will need to demonstrate that they will be well-integrated with existing in-centre provision
- 4) When assessing sequentially preferable locations, proposals will need to demonstrate flexibility in their operational requirements, particularly in terms of format and types of goods sold (paragraph 8.11).

##### Impact Tests

- 5) The locally-set floorspace thresholds for edge and out-of-centre retail and leisure proposals to meet the requirements of the Impact Assessment as set out in the latest national guidance is 280sqm (gross) (see Policy CEN1 Table 7). Impact tests should be proportionate to the nature and scale of proposals.
- 6) Proposals should be informed by the latest available robust evidence.
- 7) In making planning decisions, further guidance is set out in Local Development Plans.
- 8) Where planning permissions are granted, effective planning conditions and / or planning obligations will be required to support the regeneration strategy and minimise adverse impacts (Policy CEN1 point 6).
- 9) Proposals that include unit sizes under 280sqm (gross) will also have to meet the requirements of Policy CEN5 (paragraph 8.61).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN6	0	0	0	+	0	0	+	0	+	0	0	+	+	0

J.7.6.1 This policy sets out criteria for the development of edge-of-centre and out-of-centre proposals for centre uses. This could potentially have benefits to the local economy, by encouraging development in centres which are highly sustainable locations. A minor positive impact on the economy would be expected (SA Objective 13).

J.7.6.2 This policy encourages development in centres which are highly sustainable locations. All development proposals under this policy would be required to be assessed for accessibility



via public transport, walking and cycling. This would be expected to ensure all residents and visitors have safe access to these facilities. By supporting access via walking and cycling, this policy could potentially encourage active travel and facilitate healthy lifestyles. If there is adequate access via public transport, there could potentially be a reduction in car use, having benefits to the climate, air pollution and congestion. Therefore, as the policy prioritises development in centres and assuming the assessments outlined in the policy would ensure sustainable access to out-of-centre developments is prioritised, this policy would be likely to have minor positive impacts in relation to climate change, transport and health (SA Objectives 4, 9 and 12).

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## J.8 Transportation and Accessibility

### J.8.1 Policy TRAN1 – Priorities for the Development of the Transport Network

#### Policy TRAN1 – Priorities for the Development of the Transport Network

- 1) Land needed for the implementation of priority transport projects will be safeguarded to allow for their future delivery.
- 2) All new developments must provide adequate access for all modes of travel, including walking, cycling and public transport. Residential development will be expected to meet the accessibility standards set out elsewhere in this Plan
- 3) Key transport corridors will be prioritised through the delivery of infrastructure to support active travel (walking, cycling), public transport improvements, traffic management (including localised junction improvements) and road safety.
- 4) Key transport priorities identified for delivery during the lifetime of the BCP currently include (but are not limited to) the following<sup>21</sup>:
  - a) Motorways:
    - i. M6 Junction 10
    - ii. M5 Improvements (Junctions 1 and 2 and new Smart Motorway Section)
    - iii. M54 - M6 / M6 (Toll) Link Road
  - b) Rail: -
    - i. Wolverhampton - Walsall – Willenhall – Aldridge Rail Link
    - ii. Midlands Rail Hub
    - iii. Wolverhampton – Shrewsbury Line Improvements
  - c) Rapid Transit:
    - i. Wednesbury – Brierly Hill
    - ii. A34 Walsall Road Sprint Corridor
    - iii. Wolverhampton – New Cross Hospital
    - iv. Walsall – Stourbridge corridor tram-train extensions
  - d) Key Road Corridors<sup>16</sup>
    - i. A454 City East Gateway Upgrade
    - ii. A4123 Corridor Upgrade
    - iii. A449 Stafford Road Corridor Upgrade
    - iv. A461 Black Country Corridor
  - e) Interchanges:
    - i. Dudley Town Centre Interchange
    - ii. Dudley Port Integrated Transport Hub
    - iii. Walsall Interchange

<sup>16</sup> Schemes to improve general reliability, public transport, cycling and walking

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN1	0	0	0	+	0	0	+	0	++	0	0	+	0	0

J.8.1.1 Policy TRAN1 outlines the priorities for the Black Country’s transport network during the Plan period, covering a wide range of transport modes including the strategic road network, rail, rapid transit and interchanges. The transport projects identified within this policy would all be expected to contribute towards improving the delivery of sustainable transport options, improving the integration of different modes of transport, reducing issues with congestion and improving traffic flows. Overall, a major positive impact on transport would be expected (SA Objective 9).

J.8.1.2 The policy states that “*all new developments must provide adequate access for all modes of travel, including walking, cycling and public transport*” in accordance with the identified accessibility standards. The promotion of active travel and public transport improvements within key transport corridors would be likely to encourage the uptake of sustainable transport and could potentially help to reduce reliance on travel via car. A modal shift away from personal car use towards public transport and active travel would be expected to result in a reduction in transport-associated emission of GHGs and other air pollutants. Therefore, Policy TRAN1 could potentially result in a minor positive impact on climate change mitigation and pollution (SA Objectives 4 and 7).

J.8.1.3 Furthermore, by encouraging the uptake of active travel and ensuring development is accessible via walking and cycling, Policy TRAN1 could potentially improve the physical and mental wellbeing of residents. Ensuring that road safety and pedestrian access are considered when designing new development would be likely to encourage more people to choose these forms of travel, encouraging physical exercise and social interaction. A minor positive impact on health would be anticipated (SA Objective 12).

## J.8.2 Policy TRAN2 – Safeguarding the Development of the Key Route Network

### Policy TRAN2 – Safeguarding the Development of the Key Route Network

- 1) The four Black Country Highway Authorities will, in conjunction with Transport for West Midlands (TfWM), identify capital improvements and management strategies to ensure the Key Route Network meets its designated function of serving the main strategic demand flows of people and freight across the

metropolitan area, providing connections to the national strategic road network, serving large local flows which use main roads and providing good access for businesses reliant on road based transport .

- 2) Land needed for the implementation of improvements to the KRN will be safeguarded in order to assist in their future delivery.
- 3) Where new development is expected to result in adverse impacts on the KRN, appropriate mitigation measures will need to be identified through transport assessments and provided through planning obligations.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN2	0	0	0	0	0	0	0	0	+	0	0	0	0	0

J.8.2.1 New development within the Black Country as proposed within the BCP would be expected to result in an increased number of vehicles on the local road network, adding more pressure to road infrastructure and travel corridors. An increased volume of traffic on the road can have implications for a variety of issues such as congestion, road safety and air quality as well as resulting in longer journey times. Policy TRAN2 seeks to ensure that the West Midlands Key Route Network (KRN) is effectively managed in order to support the level of growth proposed in the BCP over the Plan period.

J.8.2.2 The policy states that suitable mitigation measures will be identified and put in place, to ensure that any potential adverse impacts on the road network would be avoided. Furthermore, the policy would help to ensure that transport connectivity is improved, through requiring liaison between each authority and Transport for West Midlands. Policy TRAN2 could potentially encourage coordination and streamlining of transport systems including public transport such as rapid transit and bus routes. Overall, a minor positive impact on transport would be anticipated (SA Objective 9).

### J.8.3 Policy TRAN3 – Managing Transport Impacts of New Development

**Policy TRAN3 – Managing Transport Impacts of New Development**

- 1) Planning permission will not be granted for any proposals that are likely to have significant transport implications, unless accompanied by mitigation schemes that demonstrate an acceptable level of accessibility and safety can be achieved using all modes of transport to, from and through the

development. Mitigation schemes must address in particular access by walking, cycling, public transport and car sharing.

2) These proposals should be in accordance with an agreed Transport Assessment, where required, and include the implementation of measures to promote and improve such sustainable transport facilities through agreed Travel Plans and similar measures.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN3	0	0	0	+	0	0	0	0	+	0	0	0	0	0

J.8.3.1 The policy states that “*Planning permission will not be granted for any proposals that are likely to have significant transport implications, unless accompanied by mitigation schemes that demonstrate an acceptable level of accessibility and safety can be achieved using all modes of transport to, from and through the development. Mitigation schemes must address in particular access by walking, cycling, public transport and car sharing.*” Overall, a minor positive impact on transport and climate change would be anticipated through the provisions in Policy TRAN3 (SA Objectives 4 and 9).

#### J.8.4 Policy TRAN4 – The Efficient Movement of Freight

**Policy TRAN4 – The Efficient Movement of Freight**

- 1) The movement of freight by sustainable modes of transport such as rail and waterways will be encouraged. Road-based freight will be encouraged to use the Key Route Network whenever practicable.
- 2) Junction improvements and routeing strategies will be focussed on those parts of the highway network evidenced as being of particular importance for freight access to employment sites and the motorway network.
- 3) Proposals that generate significant freight movements will be directed to sites with satisfactory access to the Key Route Network.
- 4) Existing and disused railway lines<sup>17</sup> will be safeguarded for rail-related uses.
- 5) Sites with existing and potential access to the rail network for freight will be safeguarded for rail-related uses.

<sup>17</sup> As shown on the Transport Key Diagram.

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	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN4	0	0	-	0	0	0	0	0	+	0	0	0	+	0

- J.8.4.1 Policy TRAN4 sets out guidelines for the movement of freight, and the prioritisation of sustainable modes of transport where possible. Road transport is a major source of air pollution and GHG emissions in the UK<sup>19</sup>. Transporting freight via rail and waterways would be expected to result in lower emissions and higher energy efficiency compared to road transport using heavy goods vehicles (HGVs)<sup>20</sup>.
- J.8.4.2 By encouraging the movement of freight via rail and waterways, Policy TRAN4 could potentially help to relieve road congestion issues and result in more sustainable freight transport across the Plan area. Therefore, a minor positive impact on transport would be expected (SA Objective 9).
- J.8.4.3 Furthermore, this policy could potentially result in more cost-effective and efficient movement of freight, which would help to improve economic productivity. As such, this policy could potentially result in a minor positive impact on the economy (SA Objective 13).
- J.8.4.4 The policy states that “existing and disused railway lines will be safeguarded for rail-related uses” and seeks to encourage the use of waterways for freight transport. In the Black Country, canals and disused railway lines often form part of the ecological network in an otherwise heavily urbanised area, for example, the ‘Wyrley and Essington Canal’ Site of Importance for Nature Conservation (SINC), ‘Stourbridge Canal’ Site of Local Importance for Nature Conservation (SLINC) and the ‘Dudley to Priestfield Disused Railway’ SLINC amongst others. The conversion of these routes back into regular use for freight transport could potentially result in a minor negative impact on biodiversity through the increased disturbance of important wildlife corridors (SA Objective 3).

<sup>19</sup> ONS (2019) Road transport and air emissions. Available at: <https://www.ons.gov.uk/economy/environmentalaccounts/articles/roadtransportandairemissions/2019-09-16> [Date Accessed: 15/02/21]

<sup>20</sup> Government Office for Science (2019) Understanding the UK freight transport system. Available at: <https://www.gov.uk/government/publications/future-of-mobility-the-uk-freight-transport-system> [Date Accessed: 15/02/21]

## J.8.5 Policy TRAN5 – Creating Coherent Networks for Cycling and Walking

### Policy TRAN5 – Creating Coherent Networks for Cycling and Walking

- 1) Joint working between the four local authorities will ensure that the Black Country can create and maintain a comprehensive cycle network based on the four local cycle networks, including the use of common cycle infrastructure design standards.
- 2) Creating an environment that encourages sustainable travel requires new developments to link to existing walking and cycling networks. The links should be safe, direct and not impeded by infrastructure provided for other forms of transport.
- 3) Where possible, existing links including the canal network should be enhanced and the networks extended to serve new developments.
- 4) New developments should have good walking and cycling links to public transport nodes and interchanges.
- 5) Cycle parking facilities should be provided at all new developments and should be in convenient locations with good natural surveillance, e.g. near to main front entrances for short stay visitors or under shelter for long stay visitors.
- 6) The number of cycle parking spaces required in new developments and in public realm schemes will be determined by local standards set out in supplementary planning documents.
- 7) The design of cycle infrastructure should be in accordance with the principles and standards contained in the West Midlands Cycle Design Guidance (TfWM 2021).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN5	0	0	0	+	0	0	0	0	++	0	+	+	0	0

J.8.5.1 Policy TRAN5 seeks to ensure that walking and cycling infrastructure networks are developed and maintained across the Black Country to encourage sustainable travel choices.

J.8.5.2 The policy requires the development of cycle and walking links which are “safe, direct and not impeded by infrastructure provided for other forms of transport” and states that “cycle parking facilities should be provided at all new developments and should be in convenient locations with good natural surveillance”. These factors would be likely to encourage more people to consider cycling and walking as alternative forms of travel, reducing reliance on personal car use. Therefore, a major positive impact on transport would be expected (SA Objective 9). This would also be expected to contribute towards a reduction in GHG



emissions, and as such, positive impacts have been identified for climate change mitigation (SA Objectives 4).

J.8.5.3 Furthermore, through facilitating active travel, this policy could potentially encourage outdoor exercise and result in benefits to mental and physical wellbeing. A minor positive impact on health would be likely (SA Objective 12).

J.8.5.4 Policy TRAN5 seeks to ensure that walking and cycling networks are safe, and bicycle storage is in “convenient locations with good natural surveillance”, which could help to reduce crime and the fear of crime. Therefore, this could potentially result in a minor positive impact on equality (SA Objective 11).

### J.8.6 Policy TRAN6 – Influencing the Demand for Travel and Travel Choices

#### Policy TRAN6 – Influencing the Demand for Travel and Travel Choices

- 1) The Black Country Authorities are committed to considering all aspects of traffic management in the centres and wider area in accordance with the Traffic Management Act 2004. The priorities for traffic management in the Black Country are:
  - a) Identifying appropriate strategic and local Park and Ride sites on current public transport routes to ease traffic flows into centres;
  - b) Working together with the rest of the region to manage region-wide traffic flows through the West Midlands Metropolitan Area Urban Traffic Control (UTC) scheme and further joint working;
  - c) Promoting and implementing Smarter Choices measures that will help to reduce the need to travel and facilitate a shift towards using sustainable modes of transport (walking, cycling, public transport, car sharing).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN6	0	0	0	+	0	0	+	0	+	0	0	0	0	0

J.8.6.1 Policy TRAN6 promotes the holistic management of traffic across the Black Country and wider area and seeks to encourage a modal shift towards more sustainable travel options, in accordance with the Traffic Management Act 2004 (TMA). The aim of the TMA is to

*“tackle congestion and disruption on the road network ... [and] places a duty on local authorities to make sure traffic moves freely and quickly”<sup>21</sup>.*

J.8.6.2 Through requiring the BCA to identify “appropriate strategic and local Park and Ride sites” and to work together with neighbouring authorities, this policy would be expected to encourage the development of better-connected public transport systems and deliver more widespread changes to the transport network. The promotion of public transport and development of additional strategic and local sites for delivery would be likely to reduce reliance on personal car use and consequently reduce the emission of GHGs and other air pollutants. Overall, a minor positive impact would be expected in relation to climate change mitigation, pollution and transport (SA Objectives 4, 7 and 9).

### J.8.7 Policy TRAN7 – Parking Management

#### Policy TRAN7 – Parking Management

- 1) The priorities for traffic management in the Black Country include the sustainable delivery and management of parking in centres and beyond, through use of some or all of the following measures as appropriate: -
  - a) The management and control of parking - ensuring that it is not used as a tool for competition between centres;
  - b) The type of parking – ensuring that where appropriate long stay parking is removed near to town centres, to support parking for leisure and retail customers and to encourage commuters to use more sustainable means and reduce peak hour traffic flows;
  - c) Maximum parking standards – ensuring that a consistent approach to maximum parking standards is enforced in new developments as set out in supplementary planning documents;
  - d) The location of parking – by reviewing the location of town centre car parks through the “Network Management Duty Strategy”, to ensure that the flow of traffic around town centres is as efficient as possible.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN7	0	0	0	0	0	0	0	0	+	0	0	0	+	0

<sup>21</sup> Department for Transport (2015) Traffic management Act 2004 overview. Available at: <https://www.gov.uk/government/collections/traffic-management-act-2004-overview> [Date Accessed: 15/02/21]

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J.8.7.1 Policy TRAN7 sets out the approach to parking management in the Black Country, including the type, location and standards for parking in or near to town centres. By regulating the types of parking available in different locations, and ensuring these standards are applied consistently across the Plan area, this policy would be expected to encourage people to choose more sustainable travel modes where possible. The policy also aims to ensure that the efficiency of traffic flows in and around town centres is improved. Overall, a minor positive impact on transport would be anticipated (SA Objective 9).

J.8.7.2 The policy seeks to ensure that the type of parking is appropriate to the location, for example ensuring that “*long stay parking is removed near to town centres, to support parking for leisure and retail customers*”. Furthermore, the policy states that the control of parking should not be used “*as a tool for competition between centres*”. Therefore, this could potentially help to support local shops and businesses and result in a minor positive impact on the economy (SA Objective 13).

### J.8.8 Policy TRAN8 – Planning for Low Emission Vehicles

#### Policy TRAN8 – Planning for Low Emission Vehicles

- 1) Proposals for Low Emission Vehicles will be supported by:
  - a) Ensuring that new developments include adequate provision for charging infrastructure e.g. electric vehicle charging points in car parks, measures to encourage LEV use through Travel plans and other initiatives.
  - b) Where appropriate the four Black Country Authorities will facilitate the introduction of charging points in public locations.
  - c) Working with partners to explore support for alternative low emission vehicle technologies, such as hydrogen fuel cells, across a range of modes; private cars, buses and/or small passenger and fleet vehicles.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN8	0	0	0	+	0	0	+	0	+	0	0	0	0	0

- J.8.8.1 Policy TRAN8 promotes development proposals which would support low emission vehicles (LEV). The term LEV can be used to refer to motorised vehicles which emit lower levels of emissions than traditional petrol- or diesel-powered cars or use low carbon technologies, including pure electric vehicles and plug-in hybrid vehicles<sup>22</sup>.
- J.8.8.2 This policy would help to encourage the use of LEVs within the Black Country, by ensuring the appropriate infrastructure such as electric vehicle charging points are incorporated within new developments and appropriate public locations. The policy also encourages the exploration of alternative low emission vehicle technologies. Overall, this would be expected to result in a minor positive impact on sustainable transport (SA Objective 9). Furthermore, encouraging the use of LEVs could potentially help to reduce the emission of GHGs and other air pollutants, resulting in a minor positive impact on climate change mitigation and pollution (SA Objectives 4 and 7).

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<sup>22</sup> SMMT (2020) Ultra Low Emission Vehicles (ULEVs). Available at: <https://www.smmt.co.uk/industry-topics/technology-innovation/ultra-low-emission-vehicles-ulevs/> [Date Accessed: 15/02/21]

## J.9 Environmental Transformation

### J.9.1 Policy ENV1 – Nature Conservation

#### Policy ENV1 – Nature Conservation

- 1) Development within the Black Country will safeguard nature conservation, inside and outside its boundaries by ensuring that:
  - a. Development will not be permitted where it would, alone or in combination with other plans or projects, have an adverse impact on the integrity of an internationally designated site, including Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites;
  - b. Development is not permitted where it would harm nationally (Sites of Special Scientific Interest and National Nature Reserves) or regionally (Local Nature Reserves and Sites of Importance for Nature Conservation) designated nature conservation sites;
  - c. Locally designated nature conservation sites (Sites of Local Importance for Nature Conservation), important habitats and geological features are protected from development proposals that could negatively impact upon them;
  - d. The movement of wildlife within the Black Country and its adjoining areas, through both linear habitats (e.g. wildlife corridors) and the wider urban matrix (e.g. stepping stone sites) is not impeded by development;
  - e. Species that are legally protected, in decline, are rare within the Black Country or which are covered by national, regional or local Biodiversity Action Plans will not be harmed by development.
- 2) Adequate information must be submitted with planning applications for proposals which may affect any designated site or any important habitat, species or geological feature to ensure that the likely impacts of the proposal can be fully assessed. Where the necessary information is not made available, there will be a presumption against granting permission.
- 3) Where, exceptionally, the strategic benefits of a development clearly outweigh the importance of a local nature conservation site, species, habitat or geological feature, damage must be minimised. Any remaining impacts, including any reduction in area, must be fully mitigated. Compensation will only be accepted in exceptional circumstances. A mitigation strategy must accompany relevant planning applications.
- 4) Over the plan period, the BCA will update evidence on designated nature conservation sites and Local Nature Reserves as necessary in conjunction with the Local Sites Partnership and Natural England and will amend existing designations in accordance with this evidence. Consequently, sites may receive new, or increased, protection over the Plan period.
- 5) All appropriate development should positively contribute to the natural environment of the Black Country by:
  - a. Extending nature conservation sites;
  - b. Improving wildlife movement; and / or

- c. Restoring or creating habitats / geological features that actively contribute to the implementation of Biodiversity Action Plans (BAPs) and / or Geodiversity Action Plans (GAPs) at a national, regional or local level.
- 6) Details of how improvements (which are appropriate to the location and scale) will contribute to the natural environment, and their ongoing management for the benefit of biodiversity and geodiversity, will be expected to accompany planning applications.
- 7) Local authorities will provide additional guidance on this in Local Development Documents and SPDs where relevant .

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV1	0	+	++	+	+	0	+	0	0	0	0	+	0	0

J.9.1.1 Policy ENV1 aims to protect, conserve and enhance biodiversity assets, from internationally designated to locally protected sites. The policy also aims to ensure protected or rare species are not harmed by future development. The policy states that *"development within the Black Country will safeguard nature conservation, inside and outside its boundaries"*. In addition, the policy requires *"adequate information"* to be provided alongside planning applications which have the potential to adversely impact *"any designated site or any important habitat, species or geological feature"*. All future development should also *"positively contribute"* to the local natural environment. Therefore, a major positive impact on biodiversity would be expected (SA Objective 3).

J.9.1.2 Biodiversity assets, such as Local Nature Reserves (LNRs) and Sites of Importance for Nature Conservation (SINCs), are often key features of local landscapes. By protecting and potentially enhancing biodiversity assets, it is likely that some key landscape features would also be protected and potentially enhanced, with benefits to local character and visual amenity. Therefore, this policy would be expected to have a minor positive impact on the local landscape (SA Objective 2).

J.9.1.3 Vegetation provides several ecosystem services to the Plan area, including carbon storage (climate change mitigation), flood risk reduction (climate change adaptation) and filtering air pollutants (pollution). The protection and enhancement of biodiversity features provided by this policy would be likely to help protect and enhance the provision of these essential ecosystem services. This policy could potentially result in minor positive impact on these three SA Objectives (SA Objectives 4, 5 and 7).

J.9.1.4 The protection and enhancement of the natural environment would be likely to result in benefits to the health of local residents. Access to natural and diverse outdoor spaces is known to have benefits for mental wellbeing, whilst also encouraging physical activity and providing opportunities for community cohesion. This would therefore be expected to have a minor positive impact on health and wellbeing (SA Objective 12).

## J.9.2 Policy ENV2 – Development Affecting Special Areas of Conservation

Policy ENV2 – Development Affecting Special Areas of Conservation	
<u>Cannock Chase SAC</u>	
1)	An appropriate assessment will be carried out for any development that leads to a net increase in homes or creates visitor accommodation within 15 km of the boundary of Cannock Chase SAC, as shown on the Policies Maps for Walsall and Wolverhampton.
2)	If the appropriate assessment determines that the development is likely to have an adverse impact upon the integrity of Cannock Chase SAC then the developer will be required to demonstrate that sufficient measures can be provided to either avoid or mitigate the impact.
3)	Acceptable mitigation measures will include proportionate financial contributions towards the current agreed Cannock Chase SAC Partnership Site Access Management and Monitoring Measures (SAMMM).

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV2	0	0	++	+	0	0	+	0	0	0	0	+	+	0

J.9.2.1 Policy ENV2 details the Councils' approach to the protection of SACs, including Cannock Chase SAC, against future development. Any development within 15km of Cannock Chase SAC which would result in a net increase in residential units will be required to undertake an appropriate assessment under this policy. The appropriate assessment will indicate if the development would be likely to result in an adverse impact on the integrity of the SAC, and if so, the developer will be required to ensure sufficient measures are in place to avoid or mitigate the identified impact. The requirements set out in Policy ENV2 would be expected to protect Cannock Chase SAC from inappropriate future development, and therefore, a major positive impact on biodiversity would be expected (SA Objective 3).

J.9.2.2 Future development which could potentially increase nitrous oxide (NO<sub>x</sub>) deposition, and as such impact the integrity of a SAC, would be required to undertake an appropriate



assessment, which may require developers to ensure sufficient measures are in place to avoid or mitigate the impact. This would be likely to benefit the integrity of SACs within and surrounding the Black Country, whilst also having a minor positive impact on pollution by helping to improve local air quality (SA Objective 7). Furthermore, the mitigation of impacts arising from NO<sub>x</sub> deposition within this policy could potentially help to combat the causes of climate change. A minor positive impact would be expected in relation to climate change mitigation (SA Objective 4).

J.9.2.3 Cannock Chase SAC is a popular tourist destination, with activities including mountain biking, camping and 'Go Ape' adventure park. Although the SAC itself is located some 7.5km to the north of the Black Country boundary, protecting the SAC from inappropriate development could potentially have benefits in relation to tourism in the wider area and have a minor positive impact on the local economy (SA Objective 13). The SAC also forms part of the wider green infrastructure network, providing space for outdoor recreation and exercise for the Black Country's residents and visitors. By preserving and enhancing this site, the policy could potentially have a minor positive impact on physical and mental health (SA Objective 12).

### J.9.3 Policy ENV3 – Nature Recovery Network and Biodiversity Net Gain

#### Policy ENV3 – Nature Recovery Network and Biodiversity Net Gain

- 1) All development shall deliver the Local Nature Recovery Network Strategy in line with the following principles:
  - a) Take account of where in the Local Nature Recovery Network the development is located and deliver benefits appropriate to that zone;
  - b) Follow the mitigation hierarchy of avoidance, mitigation and compensation, and provide for the protection, enhancement, restoration and creation of wildlife habitat and green infrastructure;
  - c) Follow the principles of Making Space for Nature and recognise that spaces are needed for nature and that these should be of sufficient size and quality and must be appropriately connected to other areas of green infrastructure, to address the objectives of the Black Country Nature Recovery Network Strategy.
- 2) All development shall deliver a minimum 10% net gain in biodiversity value when measured against baseline site information.
- 3) Losses and gains as a result of proposed development will be calculated using the national Biodiversity Metric.
- 4) Development that is likely to have an impact on biodiversity will be considered in accordance with the mitigation hierarchy set out in the NPPF.
- 5) Biodiversity net gain shall be provided in line with the following principles:
  - a) A preference for on-site habitat provision / enhancement wherever practicable, followed by improvements to sites within the local area, and then other sites elsewhere within the Black Country;
  - b) The maintenance and where possible enhancement of the ability of plants and animals (including pollinating insects) to move, migrate and genetically disperse across the Black Country;
  - c) The provision / enhancement of priority habitats identified at national, regional, or local level, having regard to the scarcity of that habitat within the Black Country;

- 6) Exemptions to the need to provide biodiversity net gain on all development will be as set out in the relevant legislation and national guidance.
- 7) Compensation will only be accepted in exceptional circumstances. Provision of off-site compensation should not replace or adversely impact on existing alternative / valuable habitats in those locations and should be provided prior to development.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV3	0	+	++	+	+	0	+	0	0	0	0	+	0	0

- J.9.3.1 Paragraph 170 of the NPPF states that *"Planning policies and decisions should contribute to and enhance the natural and local environment by ... minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures"*. Mandatory requirements for delivering at least 10% biodiversity net gain, maintained for at least 30 years, is expected to come into force after the Environment Bill receives royal assent.
- J.9.3.2 Policy ENV3 requires all development to deliver a minimum of 10% biodiversity net gain as part of development proposals. This would provide opportunities to enhance the quality and quantity of habitats and improve connectivity for flora and fauna, and as such, improve the biodiversity value of the Plan area. Therefore, this policy would be expected to have a major positive impact on biodiversity (SA Objective 3).
- J.9.3.3 Biodiversity net gain would be expected to contribute towards improved air quality due to the increased uptake of carbon dioxide and filtration of pollutants associated with road transport, which could potentially help to reduce residents' exposure to air pollution. Furthermore, due to this enhanced carbon storage capacity, this policy could potentially help to mitigate anthropogenic climate change. A minor positive impact on the climate change mitigation and pollution objectives would therefore be expected (SA Objectives 4 and 7).
- J.9.3.4 Increased biodiversity and green cover would be expected to help reduce water runoff rates and as such, reduce the risk of both fluvial and pluvial flooding. Improvements to the quality and quantity of the green network would also be likely to enhance natural water storage and flow functions. Connectivity between habitats, including stepping-stone habitats, is particularly important when considering global climatic trends as they provide

opportunities for the movement of species and adaptation to climate change. Overall, a minor positive impact on water and flooding would be expected (SA Objective 5).

J.9.3.5 Enhanced biodiversity and green cover across the Black Country would be likely to have positive impact on residents' wellbeing through providing increased access to a diverse range of natural habitats, which is known to be beneficial for mental and physical health. A minor positive impact on human health and wellbeing would therefore be expected (SA Objective 12).

J.9.3.6 Furthermore, the enhancement of the green network could potentially provide opportunities to safeguard and improve the character and appearance of local landscapes and townscapes and create more pleasant outdoor spaces for both people and wildlife. This would be likely to result in a minor positive impact on the local landscape quality (SA Objective 2).

#### J.9.4 Policy ENV4 – Provision, Retention and Protection of Trees, Woodlands and Hedgerows

##### Policy ENV4 – Provision, Retention and Protection of Trees, Woodlands and Hedgerows

###### Retention and protection of trees and woodland

- 1) Development that would result in the loss of or damage to ancient trees, ancient woodland or veteran trees will not be permitted. Development adjacent to ancient woodland will be required to provide an appropriate landscaping buffer, with a minimum depth of 15m and a preferred depth of 50m.
- 2) Provision should also be made for the protection of individual veteran or ancient trees likely to be impacted by development, by providing a buffer around such trees of a minimum of 15 times the diameter of the tree. The buffer zone should be 5m from the edge of the tree's canopy if that area is larger than 15 times its diameter.
- 3) There will be a presumption against the removal of trees that contribute to public amenity and air quality management unless sound arboricultural reasons support their removal<sup>23</sup>. Where removal is unavoidable, the BCA will expect replacement trees to be provided to compensate for their loss, on a minimum basis of three for one.
- 4) The planting of new, predominantly native trees and woodlands will be sought, in appropriate locations, to increase the extent of tree cover in the Black Country by around 18% over the period to 2039.
- 5) Tree preservation orders will be used to protect individual(s) or groups of trees that are in a safe condition, that contribute to visual amenity and / or the character of an area and that are under threat of damage or removal.

<sup>23</sup> The tree is a clearly identified and immediate threat to human safety; disease is significantly impacting the trees longevity and safety; the tree is causing clearly evidenced structural damage to property where remedial works cannot be undertaken to alleviate the problem; The tree is creating a clearly identified danger or causing significant damage to the adopted highway / footpath network.

## Policy ENV4 – Provision, Retention and Protection of Trees, Woodlands and Hedgerows

### Habitat Creation

- 6) All available data on extant tree cover and associated habitat<sup>24</sup> will be considered when making decisions on the proposed loss of trees and woodland to accommodate infrastructure and other development proposals. In areas where evidence demonstrates that current levels of tree cover are low (in comparison to the rest of the ward), proposals that incorporate additional tree planting will be considered positively, as part of the wider contribution to biodiversity net gain.
- 7) A majority of native tree species able to withstand climate change should be used in landscaping schemes or as replacement planting, to maximise habitats for local wildlife / species and maintain and increase biodiversity. In circumstances where non-native tree species are also considered to be appropriate, a mix of native and non-native species should be provided, to help maintain a healthy and diverse tree population.
- 8) Opportunities for increasing tree provision through habitat creation and the enhancement of ecological networks, including connecting up areas of ancient woodland, will be maximised, in particular by means of the biodiversity net gain and nature recovery network initiatives (see Policy ENV3).

### Trees and development

- 9) An arboricultural survey, carried out by an accredited arboriculturalist, should be undertaken prior to removal of any vegetation or site groundworks and used to inform a proposal's layout at the beginning of the detailed design process.
- 10) Development should be designed around the need to incorporate trees already present on site, using sensitive and well-designed site layouts to maximise their retention.
- 11) Existing mature trees<sup>25</sup>, trees that are ecologically important, ancient / veteran trees, must be retained and integrated into the proposed landscaping scheme, recognising the important contribution of trees to the character and amenity<sup>26</sup> of a development site and to local green infrastructure networks.
- 12) In addition to meeting the requirements for replacement trees on sites and ecological net gain, new tree planting should be included in all new developments and other significant proposals<sup>27</sup>, such as street trees or as part of landscaping schemes. Development proposals should use large-canopied species where possible, which provide a wider range of health, biodiversity and climate change mitigation and adaptation benefits because of their larger surface area and make a positive contribution to increasing overall canopy cover<sup>28</sup>.

<sup>24</sup> E.g. from the local ecological records centre

<sup>25</sup> Health and status as assessed in a report produced by an accredited arboriculturalist

<sup>26</sup> National planning guidance identifies trees worthy of retention on amenity grounds (through use of a TPO) as those that are visible in part or whole from a public place and / or those with individual, collective and wider impact (in terms of size, form, future potential, rarity, cultural / historic value, landscape contribution and / or contribution to a conservation area). Other factors such as value for nature conservation and climate change may also be considered.

<sup>27</sup> E.g. new infrastructure, non-residential development, town centre regeneration and other similar schemes

<sup>28</sup> The area of ground covered by trees when seen from above.

## Policy ENV4 – Provision, Retention and Protection of Trees, Woodlands and Hedgerows

- 13) New developments should make a minimum contribution of 20% canopy cover and a recommended contribution of 30% canopy cover across the development site<sup>29</sup>.
- 14) New houses and other buildings must be carefully designed and located to prevent an incompatible degree of shade<sup>30</sup> being cast by both existing and new trees that might result in future pressure for them to be removed.
- 15) The positioning of trees in relation to streets and buildings should not worsen air quality for people using and living in them. Care should be taken to position trees and / or design streets and buildings in a way that allows for street-level ventilation to occur, to avoid trapping pollution between ground level and tree canopies (see also Policy CC4 – Air Quality).
- 16) Where planning permission has been granted that involves the removal of trees, agreed replacement trees of a suitable species must be provided onsite. Where sufficient and suitable onsite replacements cannot be provided, off-site planting or woodland enhancement, including support for natural regeneration, in the near vicinity of the removed tree(s) must be provided, in line with the mitigation hierarchy set out in Policy ENV3. Appropriate planning conditions will be used to secure timely and adequate alternative provision and ongoing maintenance.
- 17) Replacement trees located off-site should not be planted where they would impact on areas designated as ecologically important, unless this has been specifically agreed with the relevant authority and its ecological officers / advisers.
- 18) Trees proposed for removal during development should be replaced at a ratio of at least three for one. The species, size and number of replacement trees will be commensurate with the size, stature, rarity or public amenity of the tree(s) to be removed. Where trees to be replaced form a group of amenity value (rather than individual specimens), replacement must also be in the form of a group of trees of appropriate species and quality and must be in a position that will mitigate the loss of the visual amenity associated with the original group<sup>31</sup>.
- 19) Trees on development sites must be physically protected during development. Care must be taken to ensure that site engineering / infrastructure works, the storage of plant and machinery, excavations and new foundations do not adversely impact their continued retention, in line with current arboricultural and Building Regulation requirements.
- 20) New trees on development sites should be planted in accordance with arboricultural best practice, including the use of suitably sized planting pits, supporting stakes and appropriate protective fencing during the construction phase.
- 21) Appropriate conditions will be included in planning permissions to ensure that new trees that fail on development sites are replaced within a specified period by trees of a suitable size, species and quality.
- 22) Where proposed development will impact on the protection, safety and / or retention of a number of trees, or on the character and appearance of trees of importance to the environment and landscape, the

<sup>29</sup> Emergency Tree Plan for the UK [The Woodland Trust 2020](#)

<sup>30</sup> This will be in the context of the requirements outlined in policies elsewhere in this plan on the role of trees in mitigating climate change and providing appropriate levels of shade and cooling.

<sup>31</sup> That is, as close as possible to the site of the removed trees.

## Policy ENV4 – Provision, Retention and Protection of Trees, Woodlands and Hedgerows

use of an arboricultural clerk of works will be required, to be made subject to a condition on the relevant planning permission.

- 23) A presumption should be applied that replacement trees are UK and Ireland sourced and grown, to help limit the spread of tree pests and diseases, while supporting Black Country nurseries.

### Hedgerows

- 24) There will be a presumption against the wholesale removal of hedgerows for development purposes, especially where ecological surveys have identified them to be species-rich and where they exist on previously undeveloped land.

- 25) Hedgerow retention will be of particular importance where hedgerows form part of an established ecological network enabling the passage of flora and fauna into and out of rural, suburban and urban areas. Site layouts and landscape proposals should incorporate them as features of interest; if removal is required to accommodate a high-quality site layout, replacement hedgerow planting will be required.

- 26) Protection of hedgerows before and during development will be required. This will include: the provision of landscape buffers where appropriate; protective fencing; and careful management of plant and materials on site to avoid damage to the hedgerow(s) and its root system.

- 27) New hedgerows will be sought as part of landscaping schemes. Ways to incorporate the planting of new hedgerow, even short lengths, should be incorporated.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV4	+	+	+	+	+	+	+	0	0	0	0	+	0	0

- J.9.4.1 Policy ENV4 aims to create, retain and protect trees, woodlands and hedgerows, including ancient trees, ancient woodlands and veteran trees across the Plan area. Where the loss of a tree is unavoidable, this policy requires the planting of three appropriate native trees in replacement of every tree lost. This policy requires an arboricultural survey to be carried out prior to removal of any vegetation or site groundworks. Ecological surveys will also be required to identify the ecological importance of hedgerows. This would be expected to help prevent the inappropriate loss of vegetation. The policy also states that Tree Preservation Orders (TPOs) will be used to protect individual or groups of trees that contribute to the character of the local area. Policy ENV4 also encourages habitat creation and biodiversity net gain. Trees, woodlands and hedgerows support a vast array of

important flora and fauna and can serve as useful connecting habitats to facilitate the movement of species. Therefore, this policy would be expected to result in a minor positive impact on biodiversity (SA Objective 3).

J.9.4.2 The retention and enhancement of trees and woodland supported under this policy would be likely to boost the natural carbon sink and air filtration ecosystem services provided by trees and vegetation. This could also potentially help to reduce residents' exposure to air pollution, for example through the filtration or buffering of emissions associated with road transport. Furthermore, due to the enhanced carbon storage capacity tree planting would provide, this policy could potentially help to mitigate anthropogenic climate change. A minor positive impact on the climate change mitigation and pollution objectives would therefore be expected (SA Objectives 4 and 7). = This could also help to improve the respiratory health of residents and provide opportunities for integrating green spaces amongst development for recreation. Access to a diverse range of natural habitats is also expected to benefit mental wellbeing. Therefore, a minor positive impact would also be expected in terms of human health (SA Objective 12).

J.9.4.3 Trees serve an important role in protecting soil from erosion as a result of rainfall and surface water runoff, due to the stabilisation provided by roots and interception of rainfall by foliage. Through conserving and enhancing tree coverage across the Plan area, this policy would therefore be likely to help preserve soils and have a minor positive impact on natural resources (SA Objective 6). By reducing water runoff rates this would also be expected to enhance natural water storage and help to reduce the risk of fluvial and pluvial flooding. A minor positive impact would be expected in terms of reducing flood risk (SA Objective 5).

J.9.4.4 Furthermore, trees, woodlands and hedgerows can be a useful tool to help integrate new development into the existing landscape character, for example, in terms of protecting or enhancing views, or providing visual interest. Additionally, the protection of ancient and veteran trees, hedgerow and woodland would be expected to help protect and enhance historic character. Therefore, this policy could potentially result in minor positive impact to cultural heritage and the local landscape (SA Objectives 1 and 2).

J.9.4.5 It is recommended that this policy is expanded to ensure tree planting considers the species of tree, as well as their location within the development following a site-specific ecological survey.

## J.9.5 Policy ENV5 – Historic Character and Local Distinctiveness of the Black Country

### Policy ENV5 – Historic Character and Local Distinctiveness of the Black Country

- 1) All development proposals within the Black Country should sustain and enhance the locally distinctive character and distinctiveness of the area in which they are to be sited, whether formally recognised as a

## Policy ENV5 – Historic Character and Local Distinctiveness of the Black Country

designated heritage asset or as a non-designated heritage asset. They should respect and respond to its positive attributes in order to help maintain The Black Country's cultural identity and strong sense of place.

- 2) Development proposals will be required to preserve and enhance local character and those aspects of the historic environment - together with their settings - which are recognised as being of special historic, archaeological, architectural, landscape or townscape quality.
- 3) Physical assets, whether man-made or natural which contribute positively to the local character and distinctiveness of the Black Country's landscape and townscape, should be retained and, wherever possible, enhanced and their settings respected.
- 4) The specific pattern of settlements (urban grain), local vernacular and other precedents that contribute to local character and distinctiveness should be used to inform the form, scale, appearance, details and materials of new development.
- 5) New development in the Black Country should be designed to make a positive contribution to local character and distinctiveness and demonstrate the steps that have been taken to achieve locally responsive design. Proposals should therefore demonstrate that:
  - a) all aspects of the historic character and distinctiveness of the locality, including any contribution made by their setting, and where applicable, views into, from, or within them, have been fully assessed and used to inform proposals; and
  - b) they have been prepared with full reference to the Black Country Historic Landscape Characterisation Study (BCHLCS) (October 2019), the Historic Environment Record (HER), and to other relevant Historic Landscape Characterisation documents, Supplementary Planning Documents (SPD's) and national and local design guides where applicable.
- 6) All proposals should aim to sustain and reinforce special character and conserve the historic aspects of locally distinctive areas of the Black Country, for example:
  - a) The network of now coalesced but nevertheless distinct small industrial settlements of the former South Staffordshire Coalfield, such as Darlaston & Netherton;
  - b) The civic, religious and commercial cores of the principal settlements of medieval origin such as Wolverhampton, Dudley, Wednesbury & Walsall;
  - c) Surviving pre-industrial settlement centres of medieval origin such as Halesowen, Tettenhall, Aldridge, Oldbury and Kingswinford;
  - d) Rural landscapes and settlements including villages/hamlets of medieval origin, relic medieval and post-medieval landscape features (hedgerows, holloways, banks, ditches, field systems, ridge and furrow), post-medieval farmsteads and associated outbuildings, medieval and early post-medieval industry (mills etc) and medieval and post-medieval woodland. The undeveloped nature of these areas means there is also the potential for evidence of much earlier activity that has largely been lost in the urban areas.
  - e) Areas of Victorian and Edwardian higher density development which survive with a high degree of integrity including terraced housing and its associated amenities;
  - f) Areas of extensive lower density suburban development of the mid-20th century including public housing and private developments of semi-detached and detached housing;



## Policy ENV5 – Historic Character and Local Distinctiveness of the Black Country

- g) Public open spaces, including Victorian and Edwardian municipal parks, often created from earlier large rural estates or upon and retaining elements of relict industrial landscape features;
  - h) The canal network and its associated infrastructure, surviving canal-side pre-1939 buildings and structures together with archaeological evidence of the development of canal-side industries and former canal routes (see Policy ENV7);
  - i) Buildings, structures and archaeological remains of the traditional manufacturing and extractive industries of the Black Country including glass making, metal trades (such as lock making), manufacture of leather goods, brick making, coal mining and limestone quarrying;
  - j) Geosites of geological, historic, cultural, and archaeological significance within the UNESCO Black Country Geopark (see Policy ENV6);
  - k) The Beacons and other largely undeveloped high prominences lying along the Sedgley to Northfield Ridge (including Sedgley Beacon and Wrens Nest), Castle Hill and the Rowley Hills (Turners Hill), and the Queslett to Shire Oak Ridge (including Barr Beacon) and views to and from these locations.
- 7) In addition to designated heritage assets<sup>32</sup>, attention should be paid to the following non-designated heritage assets<sup>33</sup> including the Historic Environment Area Designations (HEADS) described and mapped in the Black Country Historic Landscape Characterisation Study (BCHLCS, 2019 – see evidence section for link):
- a) Areas of High Historic Townscape Value (AHHTV) that exhibit a concentration of built heritage assets and other historic features that, in combination, make a particularly positive contribution to local character and distinctiveness;
  - b) Areas of High Historic Landscape Value (AHHLV) that demonstrate concentrations of important wider landscape elements of the historic environment such as areas of open space, woodland, watercourses, hedgerows and archaeological features, that contribute to local character and distinctiveness;
  - c) Designed Landscapes of High Historic Value (DLHHV) that make an important contribution to local historic character but do not meet the criteria for inclusion on the national Register for Parks and Gardens;
  - d) Archaeology Priority Areas (APA) that have a high potential for the survival of archaeological remains of regional or national importance that have not been considered for designation as scheduled monuments, or where there is insufficient data available about the state of preservation of any remains to justify a designation;
  - e) Locally Listed buildings/structures and archaeological sites;
  - f) Non-designated heritage assets of archaeological interest;

<sup>32</sup> NPPF 2019 Annex 2 Designated heritage asset: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

<sup>33</sup> NPPF 2019 Annex 2 Heritage asset: A building monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

## Policy ENV5 – Historic Character and Local Distinctiveness of the Black Country

- g) Any other buildings, monuments, sites, places, areas of landscapes identified as having a degree of significance<sup>34</sup>.
- 8) Development proposals that would potentially have an impact on the significance of any of the above distinctive elements, including any contribution made by their setting, should be supported by evidence that the historic character and distinctiveness of the locality has been fully assessed and used to inform proposals. Clear and convincing justification should be provided, either in Design and Access Statements, Statements of Heritage Significance, or other appropriate report.
- 9) In some instances, local planning authorities will require developers to provide detailed Heritage Statements and/or Archaeological Desk-based Assessments to support their proposals.
- 10) For sites with archaeological potential, local authorities may also require developers to undertake Field Evaluation to support proposals.

<sup>34</sup> NPPF Annex 2 Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV5	++	+	+	0	0	0	0	0	0	0	+	0	+	0

- J.9.5.1 This policy would be expected to help ensure that heritage assets are conserved in a manner appropriate to their significance, in line with national policy, and that the setting and special character of heritage assets are not adversely impacted by development. Where development proposals could potentially affect the significance of an asset, this policy requires an accompanying statement to be produced, in order to ensure that impact can be adequately assessed. The policy seeks to enrich the historic environment, stating that development proposals should enhance local distinctiveness, retain and enhance built assets and their settings, historic townscape value and archaeological potential. Overall, this policy would be expected have a major positive impact on cultural heritage (SA Objective 1).
- J.9.5.2 As the policy states that "*local character and distinctiveness should be used to inform the form, scale, appearance, details and materials of new development*", this would be expected to benefit the character, appearance and distinctiveness of local landscapes and townscapes. This policy seeks to protect and enhance urban landscape features and encourage the appropriate re-use of historic buildings, and therefore, have a minor positive impact on the local landscape (SA Objective 2).
- J.9.5.3 Furthermore, the policy seeks to ensure that development proposals "*help maintain the Black Country's cultural identity and strong sense of place*" and have regard to locally distinctive features including public open spaces and local landmarks. This could potentially benefit the local community by encouraging a sense of belonging and promoting social inclusion, and therefore, a minor positive impact on equality would be expected (SA Objective 11). Furthermore, the conservation and enhancement of heritage assets and historic townscapes can have benefits to the economy including through encouraging tourism and attracting investment<sup>35</sup>. The policy could potentially result in a minor positive impact on the economy (SA Objective 13).

<sup>35</sup> Historic England (2020) Heritage and the Economy 2020. Available at: <https://historicengland.org.uk/research/heritage-counts/heritage-and-economy/> [Date Accessed: 17/02/21]

J.9.5.4 Policy ENV5 seeks to protect “*landscape elements of the historic environment such as areas of open space, woodland, watercourses [and] hedgerows*” and states that development should conserve and enhance “*Geosites of geological, historic, cultural, and archaeological significance within the UNESCO Black Country Geopark*”; therefore, a minor positive impact on biodiversity and geodiversity could be expected (SA Objective 3).

### J.9.6 Policy ENV6 – Geodiversity and the Black Country UNESCO Global Geopark

Policy ENV6 – Geodiversity and the Black Country UNESCO Global Geopark	
1)	Development proposals should: <ul style="list-style-type: none"> <li>a) wherever possible, make a positive contribution to the protection and enhancement of geodiversity, particularly within the boundaries of the Black Country UNESCO Global Geopark and in relation to the geosites identified within it;</li> <li>b) be resisted where they have significant adverse impact on the Geopark geosites or other sites with existing or proposed European or national designations in accordance with Government guidance;</li> <li>c) give locally significant geological sites a level of protection commensurate with their importance.</li> <li>d) take into account, and avoid any disruption to, the importance of the inter-connectivity of greenspace and public access between geosites within the boundary of the Black Country UNESCO Global Geopark.</li> </ul>
2)	In their local plans, the BCA should: <ul style="list-style-type: none"> <li>a) establish clear goals for the management of identified sites (both individually and as part of a network) to promote public access, appreciation and the interpretation of geodiversity;</li> <li>b) ensure geological sites of international, national or regional importance are clearly identified.</li> </ul>

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV6	+	+	+	0	0	0	0	0	0	0	0	0	+	+

J.9.6.1 Policy ENV6 would be expected to help protect and enhance geodiversity sites across the Black Country. Of particular importance is the Black Country UNESCO Global Geopark. Development proposals which could potentially result in an adverse impact on geodiversity sites of international or national importance will be resisted. This policy would be likely to have a minor positive impact on local geodiversity (SA Objective 3). Sites of geological importance are often strongly linked to the surrounding local landscape and historic features, including the industrial heritage within the Black Country. By protecting the local

geodiversity, this policy would also be expected to have a minor positive impact on cultural heritage and the local landscape (SA Objectives 1 and 2).

J.9.6.2 The protection and enhancement of geologically important sites including the UNESCO Global Geopark would be likely to have benefits to tourism in the area, and therefore, have a minor positive impact on the local economy (SA Objective 13). Furthermore, sustainable tourism, outdoor learning and education are major themes of the Geopark<sup>36</sup>. Policy ENV6 states that the BCA should “*establish clear goals for the management of identified sites ... to promote public access, appreciation and the interpretation of geodiversity*” which could potentially have a minor positive impact on education (SA Objective 14).

### J.9.7 Policy ENV7 - Canals

#### Policy ENV7 - Canals

- 1) The Black Country canal network comprises the canals and their surrounding landscape corridors, designated and undesignated historic assets, character, settings, views and interrelationships. The canal network provides a focus for future development through its ability to deliver a high-quality environment and enhanced accessibility for pedestrians, cyclists and other non-car-based modes of transport.
- 2) All development proposals likely to affect the canal network must:
  - a) safeguard the continued operation of a navigable and functional waterway;
  - b) ensure that any proposals for reinstatement or reuse would not adversely impact on locations of significant environmental value where canals are not currently navigable;
  - c) protect and enhance its special historic, architectural, archaeological and cultural significance, including potential to record, preserve and restore such features;
  - d) protect and enhance its nature conservation value including habitat creation and restoration along the waterway and its surrounding environs;
  - e) protect and enhance its visual amenity, key views and its setting;
  - f) protect and enhance water quality in the canal.
  - g) reinstate and/or upgrade towpaths and link them into high quality wider pedestrian and cycle networks, particularly where they can provide links to transport hubs, centres and opportunities for employment.
- 3) Where opportunities exist, all development proposals within the canal network must:
  - a) enhance and promote its role in providing opportunities for leisure, recreation and tourism activities;
  - b) enhance and promote opportunities for off road walking, cycling and boating access, including for small scale commercial freight activities;
  - c) Preserve and enhance the historical, geological and ecological value of the canal network and its associated infrastructure.
  - d) Positively relate to the opportunity presented by the waterway by promoting high quality design, including providing active frontages onto the canal and by improving the public realm;

<sup>36</sup> Black Country Geopark (2021) Black Country Geopark – Education, Events & Sustainable Tourism. Available at: <https://blackcountrygeopark.dudley.gov.uk/education/> [Date Accessed: 16/02/21]

## Policy ENV7 - Canals

- e) Sensitively integrate with the canal and any associated canal-side features and where the opportunities to do so arise incorporate canal features into the development
- 4) Such development proposals must be fully supported by evidence that the above factors have been fully considered and properly incorporated into their design and layout.
- 5) Where proposed development overlays part of the extensive network of disused canal features, the potential to record, preserve and restore such features must be fully explored. Development on sites that include sections of disused canals should protect the line of the canal through the detailed layout of the proposal. Development will not be permitted which would sever the route of a disused canal or prevent the restoration of a canal link where there is a realistic possibility of restoration, wholly or in part.

### Residential Canal Moorings

- 6) For residential moorings planning consent will only be granted proposals which include the provision of:
  - a) The necessary boating facilities (a minimum requirement of electrical power, a water supply and sanitary disposal);
  - b) dedicated car parking provided within 500m of the moorings and suitable vehicular access, including access by emergency vehicles and suitable access for use by people with disabilities;
  - c) appropriate access to cycling and walking routes;
  - d) an adequate level of amenity for boaters, not unduly impacted upon by reason of noise, fumes or other nearby polluting activities.
- 7) In determining a planning application for residential moorings, account will be taken of the effect that such moorings and their associated activities may have on the amenities or activities of nearby residential or other uses

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV7	+	+	+	0	0	0	+	0	+	+	0	+	+	0

J.9.7.1 Policy ENV7 aims to protect and enhance the Black Country’s canal network. The policy requires all development proposals to *"safeguard the continued operation of a navigable and functional waterway"*. The policy also requires development proposals to seek to reinstate and/or upgrade towpaths and link them into high-quality, wider pedestrian and cycle networks. This would be expected to ensure the canal network remains functional across the Plan area, with minor positive impacts in regard to transport and accessibility (SA Objective 9). Furthermore, enhancing the canal towpath network for use by

pedestrians and cyclists could potentially encourage outdoor exercise and active travel, resulting in a minor positive impact on physical and mental health (SA Objective 12).

J.9.7.2 Policy ENV7 requires development proposals to protect and enhance the canals "*special historic, architectural, archaeological and cultural significance*", "*nature conservation value including habitat creation and restoration*", "*visual amenity, key views and its setting*" and "*water quality*". These requirements would be likely to result in minor positive impacts in relation to cultural heritage, landscape, biodiversity and pollution (SA Objectives 1, 2, 3 and 7).

J.9.7.3 The policy states that where the opportunity exists, future development should aim to improve leisure, recreation and tourism activities. This would be likely to have a minor positive impact on the local economy (SA Objective 13).

J.9.7.4 This policy would support the development of residential moorings within the Black Country. This policy could potentially have benefits by providing increased provision of accommodation. Therefore, this policy would have a minor positive impact on the overall accommodation provision (SA Objective 10).

## J.9.8 Policy ENV8 – Open Space, Sport and Recreation

### Policy ENV8 – Open Space, Sport and Recreation

- 1) All development proposals should recognise the values and functions of open space as set out in Government Policy and Guidance and also the following functions of open space that are of particular importance in the Black Country:
  - a) Improving the image and environmental quality of the Black Country;
  - b) Defining and enhancing local distinctiveness;
  - c) Preserving and enhancing industrial, geological, archaeological and architectural heritage, including canals;
  - d) Enhancing visual amenity;
  - e) Providing buffer zones between incompatible uses;
  - f) Mitigating the effects of climate change, through reducing potential urban heat island effects and providing opportunities for additional landscaping and tree planting;
  - g) Preserving and enhancing diversity in the natural and built environment and preventing the fragmentation of habitat networks;
  - h) Strengthening (through extension, increased access and enhanced value) and providing components of a high quality, multifunctional green space and greenway network;
  - i) Providing outdoor sport and physical activity facilities, including footpath and cycle networks and areas for informal recreation and children's play;
  - j) providing opportunities for people to grow their own food on allotments and encouraging urban horticulture;
  - k) Enhancing people's mental and physical health and well-being.

## Policy ENV8 – Open Space, Sport and Recreation

- 2) Development that would reduce the overall value of the open space, sport and recreation network in the Black Country will be resisted. Development that would increase the overall value of the open space, sport and recreation network will be supported, especially in areas of proven deficiency against adopted quantity, quality and accessibility standards.
- 3) Each Local Authority will set out, in their Local Plans and on Policies Maps, proposals for specific open space, sport and recreation facilities and planning requirements for open space, sport and recreation, in order to:
  - a) Move towards the most up-to-date local open space, sport and recreation standards for each Local Authority, in terms of quantity, quality and access. In order to balance achievement of these standards, in some cases a loss in quantity of open space or facilities may be acceptable if compensatory gains in quality and / or accessibility of other open spaces / facilities can be secured that would be of a greater value in the local area;
  - b) Address the priorities set out in the Birmingham and Black Country Nature Recovery Network Strategy;
  - c) Make more efficient use of urban land by:
    - i. creating more multifunctional open spaces;
    - ii. protecting the existing greenway network for recreation and biodiversity and taking opportunities to strengthen and expand the network;
    - iii. significantly expanding community use of open space, sport, play and recreation facilities provided at places of education (see Policy HOU5);
    - iv. providing opportunities to increase accessible public open space, sport and recreation use of the Green Belt;
    - v. making creative use of land exchanges and disposing of surplus assets to generate resources for investment;
    - vi. increasing access to open space, sport and recreation facilities for all, including people with disabilities and other target groups with limited access at present; and
    - vii. where there is a cross-boundary impact, identifying the most appropriate location to maximise community access and use of new facilities.
- 4) The existing network of built sports facilities will be protected and enhanced. Proposals involving the loss of a built sports facility will be permitted only where adequate alternative provision is available to meet the needs of the community served by the facility.
- 5) New built sports facilities should be:
  - a) Well designed, including through the provision of high quality landscaping and public realm enhancements, and well related to neighbourhood services and amenities;
  - b) Well linked to public transport infrastructure and footpath and cycleway networks, and directed to a Centre appropriate in role and scale to the proposed development and its intended catchment area. Proposals located outside Centres must be justified in terms of relevant national policy.
- 6) Where a housing development would increase the need for built sports facilities to the extent that significant new or improved facilities would be required to meet this need, proportionate planning obligations or Community Infrastructure Levy will be secured to help address this need, where this is financially viable and appropriate, long term management arrangements can be secured and funded.



## Policy ENV8 – Open Space, Sport and Recreation

- 7) Where land is provided for a new built sports facility as part of a housing development the financial contribution made by that development towards built sports facilities will be reduced accordingly.

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Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV8	+	+	+	+	+	0	+	0	+	0	+	++	0	0

J.9.8.1 Policy ENV8 seeks to ensure that open space, sport and recreation facilities throughout the Plan area will be protected, managed and enhanced, in order to provide safe and accessible community facilities for existing and future residents. Open space has multiple benefits within an area. This includes physical and mental health benefits associated with residents’ access to a diverse range of natural habitats, alongside the facilitation of outdoor recreation.

J.9.8.2 Access to sports, recreation and leisure facilities is essential for residents to be able to pursue healthy and active lifestyles. This policy would be expected to support the development of new sports, recreation and leisure facilities within the Plan area. This could potentially help to meet the identified need for additional leisure centres in some areas of the Black Country. This policy would be expected to improve current facilities, contribute to the development of new facilities and ensure residents have good access to outdoor space. Therefore, this policy would be expected to have a major positive impact on the health and wellbeing of residents (SA Objective 12). This policy also encourages the development of footpath and cycle networks, with benefits to local accessibility (SA Objective 9).

J.9.8.3 Furthermore, through “*increasing access to open space, sport and recreation facilities for all, including people with disabilities and other target groups with limited access at present*” this policy would be expected to help fill gaps in accessibility for vulnerable or disadvantaged groups, providing more equitable access to these important facilities. Therefore, a minor positive impact on equality would be expected (SA Objective 11).

J.9.8.4 Open space is beneficial to the local biodiversity network by providing an increased number of natural habitats and the opportunity to create green links within urban areas. This could also benefit the local landscape by creating attractive open spaces within the area. This policy aims to improve visual amenity and contribute towards the preservation and enhancement of archaeological heritage and diversity in the natural and built environment. As a result, it would be expected that Policy ENV8 would have a minor positive impact on local cultural heritage, landscape and biodiversity (SA Objectives 1, 2 and 3).

J.9.8.5 Potential new or enhanced open spaces, and associated green infrastructure, would be expected to contribute towards improved air quality due to the increased uptake of carbon dioxide. Due to this enhanced carbon storage capacity, this policy could potentially contribute towards the mitigation anthropogenic climate change. Green infrastructure could also potentially provide natural filtration to reduce residents' exposure to air pollution, for example from emissions associated with road transport. Furthermore, this policy encourages active travel, which would be expected to reduce the reliance on personal car use. A minor positive impact on the climate change and pollution would therefore be expected (SA Objectives 4 and 7). Enhanced open space and green infrastructure could also potentially help to reduce water runoff rates, and as such, have a minor positive impact by reducing the risk of flooding (SA Objective 5).

## J.9.9 Policy ENV9 – Design Quality

### Policy ENV9 – Design Quality

- 1) Development proposals must demonstrate that the following aspects have been addressed, through design and access statements that reflect their Black Country context:
  - a) Implementation of the principles of the National Design Guide<sup>37</sup> to ensure the provision of a high-quality network of streets, buildings and spaces;
  - b) Implementation of the principles of "Manual for Streets<sup>38</sup>" to ensure urban streets and spaces are designed to provide a high-quality public realm and an attractive, safe and permeable movement network;
  - c) Use of the Building for a Healthy Life<sup>39</sup> criteria (or subsequent iterations) for new housing developments, to demonstrate a commitment to achieve the highest possible design standards, good place-making and sustainable development, given local circumstances;
  - d) Consideration of crime prevention measures and Secured by Design principles, in addition to the requirements of Part Q of the Building Regulations or any successor legislation.
  - e) Accordance with the agent of change<sup>40</sup> principle in relation to existing uses adjacent to proposed development sites, as the Black Country has a strong tradition of providing live music and entertainment and this aspect of its character and economy should be protected.
2. Development will be designed to the highest possible standards, creating a strong sense of place. Development proposals must address as appropriate:
  - a) the townscapes of the Black Country;

<sup>37</sup> <https://www.gov.uk/government/publications/national-design-guide>

<sup>38</sup> To be supplemented by Manual for Streets 2 in 2022 - <https://www.ciht.org.uk/knowledge-resource-centre/resources/revising-manual-for-streets/>

<sup>39</sup> <https://www.udg.org.uk/publications/othermanuals/building-healthy-life>

<sup>40</sup> Paragraph 182 of the NPPF (July 2019) states that both planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (e.g. places of worship, pubs, music venues and sports clubs). Unreasonable restrictions should not be placed on existing businesses because of development permitted after they were established.

## Policy ENV9 – Design Quality

- b) the need to maintain strategic gaps and views;
  - c) the built and natural settings of development and the treatment of 'gateways';
  - d) the Black Country's industrial architecture and links with the wider rural hinterland;
  - e) the need to ensure development has no harmful impacts on key environmental assets (see Policies ENV1 and ENV3).
3. New residential development (including conversions from non-residential properties) and houses in multiple occupation will be required to meet water efficiency standards<sup>41</sup> of 110 litres per person per day, as set out in Part G2 of current Building Regulations 2010 or any successor legislation.
4. All new residential development (including the conversion of buildings) and the creation of houses in multiple occupation will be required to meet the Nationally Described Space Standards (NDSS)<sup>42</sup>, except where it can be clearly evidenced that the implementation of the NDSS would cause harm to the significance of a heritage asset. The space standards will apply to all tenures.
5. Major development proposals should contribute to the greening of the Black Country by:
- a) including urban greening as a fundamental element of site and building design;
  - b) incorporating measures such as high-quality landscaping (including trees), other soft landscaping and planting, green roofs, green walls and sustainable drainage and conserving existing green spaces and natural resources;
  - c) optimising the use of multi-functional green infrastructure (including water features, green roofs and planting) for urban cooling, local flood risk management and to provide access to outdoor space and shading.
6. Development should reflect National Design Guide principle H1 in delivering functional, healthy and sustainable homes and buildings, particularly in relation to creating healthy, comfortable and safe internal and external environments.
7. Development must not cause a detrimental impact on the living environment for occupiers of existing residential properties or unacceptable living conditions for future occupiers of new residential properties, in terms of:
- a) Privacy and overlooking
  - b) Access to sunlight and daylight;
  - c) Artificial lighting;
  - d) Vibration;
  - e) Dust and fumes;
  - f) Smell;
  - g) Noise;
  - h) Crime and safety;
  - i) Wind, where the proposals involve new development of more than eight storeys.

<sup>41</sup> <https://www.gov.uk/government/publications/sanitation-hot-water-safety-and-water-efficiency-approved-document-gov>

<sup>42</sup> <https://www.gov.uk/guidance/housing-optional-technical-standards#internal-space-standards>

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Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV9	+	+	+	+	+	+	+	0	+	0	+	+	0	0

J.9.9.1 Effective design codes can help to ensure new developments are integrated effectively into the local landscape, reinforcing local distinctiveness and conserving cultural and heritage assets. Good design can enhance the quality of life for residents, strengthen the sense of place, improve the attractiveness of a location and create safer places to live and work.

J.9.9.2 The National Design Guide<sup>43</sup> sets out the characteristics of well-designed places and aims to demonstrate good design. The Manual for Streets<sup>44</sup> guidance sets out how to effectively design, construct, adopt and maintain new and existing residential streets. Building for Life 12<sup>45</sup> is a government endorsed design quality indicator for well-designed developments. This policy also refers to the Building Regulations<sup>46</sup>, which contains general guidance on the performance of building work expected, and practical solutions on how to achieve compliance. These guides should be used by local authorities to help guide design codes within the Plan area.

J.9.9.3 The Nationally Described Space Standards<sup>47</sup> help to ensure that all development satisfies the requirement for internal space, in particular, ensuring more affordable homes still

<sup>43</sup> Ministry of Housing, Communities and Local Government (2019) National Design Guide: Planning practice guidance for beautiful, enduring and successful places. Available at: <https://www.gov.uk/government/publications/national-design-guide> [Date Accessed: 21/05/20]

<sup>44</sup> Department for Transport (2007) Manual for Streets. Available at: <https://www.gov.uk/government/publications/manual-for-streets> [Date Accessed: 21/05/20]

<sup>45</sup> D. Birkbeck and S. Kruczkowski (2015) Building for Life 12. Available at: <https://www.designcouncil.org.uk/resources/guide/building-life-12-third-edition> [Date Accessed: 21/05/20]

<sup>46</sup> Ministry of Housing, Communities and Local Government (2016) Building Regulations: Approved Documents. Available at: <https://www.gov.uk/government/collections/approved-documents> [Date Accessed: 21/05/20]

<sup>47</sup> Ministry of Housing, Communities and Local Government (2015) Technical housing standards – nationally described space standards. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/524531/160519\\_Nationally\\_Described\\_Space\\_Standard\\_Final\\_Web\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf) [Date Accessed: 21/05/20]

- provide residents with enough internal space. It is thought that the greater the internal space within a property, the better the standard of living for residents.
- J.9.9.4 High-quality design would help to ensure that new development does not have an adverse impact on any surrounding heritage assets. This policy sets out criteria to help ensure future development proposals do not result in *"harm to the significance of a heritage asset"* and that the townscapes of the Black Country are protected. Therefore, a minor positive impact on the historic environment would be expected (SA Objective 1).
- J.9.9.5 The policy requires development proposals to create a *"strong sense of place"*, *"maintain strategic gaps and views"* and include high-quality landscaping. This would be likely to result in a minor positive impact on the local landscape, by helping to ensure that future development does not adversely affect the existing landscape character and where appropriate, enhances visual amenity and sense of place in the area (SA Objective 2).
- J.9.9.6 This policy states that *"major development proposals should contribute to the greening of the Black Country"*. This provision of green infrastructure would be likely to deliver additional habitats for wildlife and present opportunities to better connect biodiversity features. This policy would therefore be likely to have a minor positive impact on biodiversity (SA Objective 3).
- J.9.9.7 This policy would be likely to encourage climate change resilience and help reduce carbon emissions associated with development, due to the promotion of energy efficient design. Therefore, a minor positive impact on climate change mitigation would be expected (SA Objective 4).
- J.9.9.8 Policy ENV9 aims for development proposals to optimise green infrastructure and local flood risk management where appropriate. Green infrastructure can have benefits such as enhancing natural water storage and flow functions. In addition, this policy promotes the use of flood management, including SuDS, which would be expected to have a beneficial impact on local surface water flooding issues. This would be likely to have a minor positive impact on climate change adaptation (SA Objective 5).
- J.9.9.9 Future development must meet the water efficiency requirements as stated in the Building Regulations. The efficient use of water and energy would be expected to have a minor positive impact on natural resources (SA Objective 6).
- J.9.9.10 The policy states that future development must not result in detrimental impact on the living environment in regard to artificial lighting, vibrations, dust, fumes, smell and noise. Urban greening encouraged within this policy would also be expected to help to buffer developments against these pollutants. This would be likely to have a minor positive impact in relation to pollution (SA Objective 7).

- J.9.9.11 Policy ENV9 seeks to ensure that development proposals follow the 'Manual for Streets' to provide an attractive, safe and permeable movement network. This would be likely to have benefits for local accessibility and have a minor positive impact in relation to transport (SA Objective 9).
- J.9.9.12 This policy would be likely to make a positive contribution to reducing crime and fear of crime in the local area. This would be expected to create safe and cohesive communities and help to improve quality of life for residents. As such, this policy would be likely to have a minor positive impact on equality (SA Objective 11).
- J.9.9.13 An increased amount of residential space facilitates an improved standard of living, leading to a more comfortable and higher quality life. Residents with more space, and therefore better qualities of life, are likely to be part of a more vibrant and interactive community, and as such, a minor positive impact on the wellbeing of residents would be expected (SA Objective 12).

## J.10 Climate Change

### J.10.1 Policy CC1 - Increasing Efficiency and Resilience

#### Policy CC1 - Increasing Efficiency and Resilience

- 1) Development should be designed to mitigate climate change impacts and provide adaptations that will help communities and individuals to continue to avoid or mitigate adverse effects on human health. Proposals for development will need to demonstrate how they have been designed to maximise resistance and resilience to climate change through addressing the following requirements: -
  - a) Wherever feasible, new buildings will be orientated to maximise opportunities for both natural heating and ventilation and to reduce exposure to wind and other elements.
  - b) Development proposals that include and / or impact on transport infrastructure and / or which generate a significant number of person trips will need to meet the needs of all sections of the community by including a range of sustainable and low carbon transport modes as alternatives to private car use (see also Policy TRAN6).
  - c) Use of trees and other planting in landscaping schemes will be required throughout the Black Country, to provide for the shading of amenity areas, buildings and streets, mitigate against poor air quality and help connect fragmented habitats and protect and support biodiversity networks.
  - d) Landscaping schemes should be designed using a mix of native tree species and plants where appropriate and should also use species that are able to adapt to changing climate conditions (see also Policy ENV4 Trees, Woodland and Hedgerows).
  - e) All development will need to minimise the impact of surface water runoff through the design of proposed drainage systems, including where possible grey water recycling and rainwater collection, and the use of permeable surfaces. Schemes should also make provision for sustainable drainage infrastructure, which should be built into landscaping schemes/ open space provision as appropriate (see Policies CC5 and CC6).
  - f) Development will be required to incorporate mitigation and resilience measures designed to reduce the risk of river and surface water flooding (see Policies CC5 and CC6).
  - g) The conversion of non-domestic buildings to residential use will be expected to employ high environmental standards, incorporating improved thermal insulation, appropriate levels of natural ventilation and measures to improve water efficiency.
  - h) Proposals for increasing the energy efficiency and resilience to climate change of designated heritage assets will be supported only where this will not cause demonstrable harm to the historic fabric, character, setting or appearance of the asset.



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Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC1	+	+	+	++	+	+	+	0	+	0	0	+	0	0

- J.10.1.1 Policy CC1 aims to ensure that development proposals seek opportunities for adaptation to, and mitigation of, climate change. This would help to promote sustainable development throughout the Plan area and help to protect the environment.
- J.10.1.2 This policy supports the development of energy efficient technologies associated with historic assets as long as the development *"will not cause demonstrable harm to the historic fabric, character, setting or appearance of the asset"*. Therefore, a minor positive impact on cultural heritage would be anticipated (SA Objective 1).
- J.10.1.3 The policy requires development proposals to *"protect and support biodiversity networks"*, to incorporate *"landscaping schemes"* and to be designed *"using a mix of native tree species and plants where appropriate"*. This policy could potentially help to protect and enhance, and therefore have a minor positive impact in relation to, biodiversity and landscape character (SA Objectives 2 and 3).
- J.10.1.4 In addition to increased green cover, the policy states that *"all development will need to minimise the impact of surface water runoff through the design of proposed drainage systems, including where possible grey water recycling and rainwater collection, and the use of permeable surfaces"*. These requirements will provide mitigation for potential fluvial or pluvial flood events. Therefore, a minor positive impact on climate change adaptation would be expected (SA Objective 5). In addition, these requirements will benefit water efficiency, and have a minor positive impact on natural resources (SA Objective 6).
- J.10.1.5 Enhanced green cover alongside amenity areas, buildings and streets could potentially help to promote natural air filtration, and as such, reduce residents' exposure to transport-associated air pollution. Furthermore, providing a more attractive local area could potentially encourage walkable neighbourhoods and facilitate outdoor exercise. Policy CC1 also requires development proposals to consider accessibility via *"a range of sustainable and low carbon transport modes as alternatives to private car use"*. This would be likely to reduce reliance on personal car use, reducing local GHG emissions, as well as improving access via walking and cycling to encourage the uptake of active travel. This policy states that new development should incorporate natural heating and ventilation, wherever possible. This would be expected to ensure that living conditions are of a high quality.

Overall, a minor positive impact on local air quality, accessibility and human health would be expected (SA Objectives 7, 9 and 12).

J.10.1.6 The incorporation of green cover, minimisation of flood risk, use of greywater recycling and promotion of natural heating systems would be expected to help reduce the Plan area's contributions to the causes of climate change. By requiring adaptation and mitigation measures to ensure that development proposals are resilient in the face of climate change, this policy would be expected to have a major positive impact on climate change mitigation (SA Objective 4).

J.10.1.7 Whilst more applicable to project level Environmental Impact Assessment (EIA), it is noted that the changes to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 introduce wider scope for the inclusion of topics such as climate change mitigation and adaptation to be assessed and reported on in the Environmental Statement, where a project is subject to EIA and has the potential to give rise to significant effects in terms of climate change. This process is subject to separate regulatory mechanisms that would be determined in respect to individual planning applications and (where relevant) the scoping stage for EIA developments.

## J.10.2 Policy CC2 – Energy Infrastructure

### Policy CC2 – Energy Infrastructure

#### Decentralised energy and communal heating provision

- 1) Any development including ten homes or more, or non-residential floorspace of 1,000 sq m or more must include opportunities for decentralised energy provision within the site, unless it can be demonstrated that the development is not suitable, feasible or viable for decentralised heat or power networks.
- 2) Where there is existing decentralised energy provision available close to the site, the development will be expected to link into it or should be designed to accommodate a subsequent connection if a source has not yet become operational. Information on this linkage should be included in a design and access or planning statement, which should also explain how access to a decentralised network can be achieved in the future if it is not currently operational or available.
- 3) Where developers can demonstrate to the satisfaction of the relevant BCA that a link to a decentralised energy source is not viable, the local authority will support the provision of alternative carbon reduction measures that can be incorporated into the scheme (see Policy CC7).

#### Onsite energy provision

- 4) Developers should engage with relevant energy companies and bodies at an early stage in the development process to establish the likely future energy and infrastructure requirements arising from large-scale development proposals including 100 homes or more, or non-residential floorspace of 10,000 sq m or more. Proposals for addressing energy provision on such sites, should be developed and agreed between the local planning authority and developer(s) to establish the most

## Policy CC2 – Energy Infrastructure

sustainable and effective energy supply provision. Information to support the preferred solution(s) should identify and address:

- a) Current and future major sources of demand for heat (e.g. sites such as universities, large-scale sporting or leisure development, hospitals and social housing);
  - b) demands for heat from existing buildings that can be connected to future phases of a heat network;
  - c) major heat supply plant;
  - d) possible opportunities to utilise energy from waste;
  - e) opportunities for heat networks;
  - f) opportunities for private wire electricity supply;
  - g) possible land for energy centres and / or energy storage;
  - h) possible heating and cooling network routes;
  - i) infrastructure and land requirements for electricity and gas supplies;
  - j) implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector.
- 5) The BCAs' local plans will, where applicable:
- a) identify any necessary energy infrastructure requirements, including upgrades to existing infrastructure;
  - b) identify existing heating and cooling networks and opportunities for expanding existing networks and establishing new ones.

### Heating / hot water systems

- 6) Heat sources for a communal heating system should be chosen to minimise likely emissions and to make best use of any local decentralised networks, in preference to other solutions.
- 7) Where a communal heating system is provided, development proposals must provide evidence to show that any emissions related to energy generation will be equivalent to or lower than those of an ultra-low NO<sub>x</sub><sup>48</sup> gas boiler.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC2	0	0	0	+	+	0	+	0	0	0	0	+	0	0

<sup>48</sup> Ultra-low NO<sub>x</sub> boiler Standard specified in the Black Country Air Quality Supplementary Planning Document.

J.10.2.1 Policy CC2 aims to encourage the use of decentralised energy sources within development proposals and, where appropriate, the use of communal heating systems to reduce GHG emissions. More efficient energy infrastructure will lead to a decrease in the amount of energy needed, and consequently, a decrease in GHG emissions released through the generation of energy. Policy CC2 would therefore have a minor positive impact in relation to climate change mitigation (SA Objective 4). By identifying and improving heating and cooling networks and considering future requirements, this policy could also potentially result in a minor positive impact on climate change adaptation (SA Objective 5).

J.10.2.2 In addition, through improved energy efficiency, this policy would be likely to result in health benefits. This is due to a reduction in GHG emissions, which can cause poor air quality and impact human health, primarily due to particulate matter pollution. Therefore, this policy would have a minor positive impact in regard to pollution and human health (SA Objectives 7 and 12).

### J.10.3 Policy CC3 – Managing Heat Risk

#### Policy CC3 – Managing Heat Risk

- 1) Development proposals<sup>49</sup> should minimise both internal heat gain and the impacts of urban heat islands<sup>50</sup> by using appropriate design, layout, orientation and materials.
- 2) Development proposals will be expected to demonstrate how their potential for overheating and reliance on artificial cooling systems will be reduced, in accordance with the following cooling hierarchy:
  - a) minimise internal heat generation through energy-efficient design;
  - b) reduce the amount of heat entering a building through orientation, shading, albedo<sup>51</sup>, fenestration, insulation and the provision of green roofs and walls (see also Policy ENV10 - Design);
  - c) manage heat within a building through exposed internal thermal mass<sup>52</sup> and high ceilings;
  - d) provide passive ventilation;
  - e) provide mechanical ventilation;
  - f) provide active cooling systems<sup>53</sup>.

<sup>49</sup> Excluding domestic extensions.

<sup>50</sup> Caused by extensive built-up areas absorbing and retaining heat.

<sup>51</sup> The reflectivity of a surface. A high albedo surface reflects the sun's heat back into the atmosphere; Low albedo surfaces absorb it. Pale coloured surfaces have a high albedo and can help to minimise heat gain.

<sup>52</sup> 'Thermal mass' is a material's capacity to absorb, store and release heat.

<sup>53</sup> Systems using energy to provide cooling. They circulate a coolant (gas, fluid) to transfer heat from one place to another.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC3	0	0	+	+	+	0	+	0	0	0	0	0	0	0

J.10.3.1 Efficient design and building of development proposals can help to reduce the risk of heat gain and the urban heat island effect (UHI). UHI refers to an urban area which is significantly warmer than the surrounding rural areas, caused primarily by human activity. This could potentially be an issue within the Black Country due to the predominantly urban area, tall buildings and large population. The policy states that "*energy-efficient design*", "*passive ventilation*" and "*active cooling systems*" will be required within developments. This would be expected to help reduce heat gain and the UHI effect, reduce the amount of energy needed to cool environments and reduce heat lost to the environment. This policy would therefore be likely to have minor positive impacts in relation to climate change mitigation, climate change adaptation and pollution (SA Objectives 4, 5 and 7).

J.10.3.2 Furthermore, Policy CC3 encourages "*provision of green roofs and walls*" which could potentially help to support wildlife networks and opportunities for habitat creation amongst the urban areas. Therefore, this policy could result in a minor positive impact on biodiversity and climate change adaptation (SA Objectives 3 and 5).

#### J.10.4 Policy CC4 – Air Quality

Policy CC4 – Air Quality
<p>Strategic Approach</p> <p>1) The BCP will promote a diverse approach to addressing the issue of poor air quality across the Black Country, including:</p> <ul style="list-style-type: none"> <li>a) requiring development and other land use proposals to promote the integration of cycling, walking, and electric charging points as part of their transport provision;</li> <li>b) promoting and supporting (including through continued joint working with authorities outside the Black Country) a modal shift from private vehicles to clean, fast and accessible public transport alternatives such as rail, the Metro and bus transport networks;</li> <li>c) requiring the provision and protection of green open spaces and significant additional tree cover;</li> <li>d) ensuring the sustainable location of new residential and employment development to minimise commute times; and</li> <li>e) as part of an integrated low emission public transport system, promoting and requiring the use of sustainable technologies, greener fleet vehicles, design and materials and providing new or</li> </ul>

### Policy CC4 – Air Quality

extended bus services to meet demand when development of a strategic nature is planned and constructed.

- 2) New development must be at least air quality neutral. Planning permission for new development or changes of use will be refused where data assessment indicates that development will:
  - a) lead to deterioration of existing poor air quality,
  - b) create any new areas that exceed air quality objectives, or
  - c) delay compliance being achieved in areas that are currently in exceedance of legal limits, unless sufficient mitigation can be achieved.

#### Improving air quality

- 3) Residential or other sensitive development such as schools, hospitals and care facilities should be sited in areas where air quality already meets national objectives, or where compliance with those objectives can be achieved with suitable mitigation proposed as part of the development proposal and verified as being achieved before occupation of the development.
- 4) Developments that will have a moderate air quality impact, and which can be dealt with through standard mitigation measures, will not require an air quality assessment.
- 5) Whenever development is proposed in locations where air quality does not / will not meet national objectives, or where significant air quality impacts are likely to be generated onsite or elsewhere by the development itself or its subsequent use / activities, an appropriate Air Quality Assessment (AQA) will be required to demonstrate that the proposed development will improve air quality in order that it will meet air quality objectives once the development is completed and occupied / operational:
  - a) The assessment must take into consideration the potential cumulative impact on air quality of all extant planning permissions in the locality, for both large / strategic and small schemes;
  - b) the impact of point source emissions of pollutants to air on the scheme (pollution that originates from one place) must also be considered;
  - c) The assessment must take into consideration the types of pollutant emissions likely to be generated by the development and its future use / associated activities that will have an impact on human health;
  - d) Where assessments show that a development is likely to result in exposure to pollutant concentrations that exceed national objectives, a mitigation plan will be required to determine that the development will improve air quality, in order that it will meet air quality objectives once it is complete and occupied / operational.
  - e) Adequate and satisfactory mitigation measures that are capable of implementation, including the planting of additional and replacement trees in appropriate locations, must be identified, submitted as part of an application and made subject to appropriate conditions before planning permission is granted.
- 6) Developments should not include materials or be positioned or ventilated in a way that would result in poor indoor air quality. Guidance will be provided to detail how such issues should be addressed.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC4	0	0	+	+	0	0	++	0	+	0	0	+	+	0

- J.10.4.1 Air pollution is a significant concern internationally and locally. The four authorities within the Black Country: Dudley; Sandwell; Walsall; and Wolverhampton, are designated as Air Quality Management Areas (AQMAs). Development within an AQMA would make it more difficult to meet national air quality objectives within the AQMA, whilst also exposing new residents to existing poor air quality.
- J.10.4.2 Policy CC4 requires development proposals to promote the use of pedestrian and cycle routes, access to rail, the Metro and bus transport networks, plus provide electric car charging points. These measures would be expected to support a modal shift to the use of public transport and more sustainable travel options. In terms of air quality, electric vehicles are an effective alternative to petrol or diesel-powered vehicles as they emit fewer, or zero, air pollutants. By discouraging the use of the private car, this policy would be expected to help reduce transport-associated emissions and have a positive impact on local air quality.
- J.10.4.3 Where a development proposal is situated in a location that does not currently meet national objectives, the policy requires an appropriate Air Quality Assessment (AQA) to be carried out to demonstrate that the proposed development will meet air quality objectives once the development is completed. Overall, Policy CC4 would be expected to have a major positive impact on air pollution (SA Objective 7).
- J.10.4.4 The requirements set out in Policy CC4 could potentially help to minimise the Plan area's contributions to climate change by offering alternative, lower emission and more sustainable means of transport. A minor positive impact would therefore also be expected for climate change mitigation (SA Objective 4).
- J.10.4.5 As well as contributing towards the improvement of local air quality, encouraging the provision of sustainable transport methods and electric car charging points would be expected to have a minor positive impact on transport and accessibility (SA Objective 9).
- J.10.4.6 Policy CC4 aims to encourage active travel by integrating pedestrian and cycle routes into development proposals. In addition, the policy aims to increase the provision of green and open spaces across the Black Country. This would be likely to facilitate healthy lifestyles, through promoting outdoor exercise and benefiting mental wellbeing of residents. Overall, this policy would be likely to have a minor positive impact in regard to human health (SA Objective 12).
- J.10.4.7 Some habitats are sensitive to air pollution in the form of atmospheric nitrogen deposition. This policy would help to prevent deterioration of air quality and thereby help to protect sensitive habitats from elevated rates of atmospheric nitrogen deposition. Therefore, this policy could potentially have a minor positive impact on biodiversity (SA Objective 3).
- J.10.4.8 In addition, this policy requires development proposals to be situated in a sustainable location to minimise commuter distance and time. This would be likely to situate residents

in close proximity to a range of job opportunities, and therefore, have a minor positive impact on the local economy (SA Objective 13).

### J.10.5 Policy CC5 – Flood Risk

#### Policy CC5 – Flood Risk

- 1) The Black Country Authorities will seek to minimise the probability and consequences of flooding by adopting a strong risk-based approach to site allocations and the granting of planning permission, in line with the National Planning Policy Framework.
- 2) The Sequential Test<sup>54</sup> will:
  - a) be applied to all developments to ensure that development takes place in areas with the lowest flood risk.
  - b) take account of the most up to date, available information on river (fluvial) flooding and all other sources of flooding, making use of the information provided in the 2020 Strategic Flood Risk Assessment SFRA).
  - c) consider the impact of climate change over the lifetime of that development.
- 3) Developers should apply the Sequential Test to all development sites, unless the site is:
  - a) A strategic allocation and the test has already been carried out by the LPA, or
  - b) A change of use (except to a more vulnerable use), or
  - c) A minor development (householder development, small non-residential extensions with a footprint of less than 250m<sup>2</sup>), or
  - d) A development in flood zone 1 unless there are other flooding issues in the area of the development (i.e. surface water, ground water, sewer flooding). The SFRA can be used to identify where there are flooding issues from sources others than rivers.
- 4) Developers should provide evidence to the LPA that they have considered all reasonably available alternative sites that are at a lower risk of flooding prior to determining the suitability of the chosen site for the proposed development type, in relation to all sources of flood risk on it.
- 5) For all developments the vulnerability of the development type to flooding should be considered with regard to the most up to date Flood Zone information in accordance with the NPPF, as set out below
- 6) Flood Zone 3
  - a) Where the site is in Flood Zone 3b (Functional Floodplain), all development other than essential infrastructure (subject to the Exception Test) will be refused (including extensions and intensification of use and changes of use) and opportunities to relocate development out of the floodplain should be sought.
  - b) Where the site is in Flood Zone 3a (High Probability), new homes can only be permitted subject to the Exception Test.
- 7) Flood Zone 2
  - a) Where the site is in Flood Zone 2 (Medium Probability), most development can be permitted, subject to a site-specific Flood Risk Assessment.

<sup>54</sup> NPPF (2019), paragraph 158



## Policy CC5 – Flood Risk

- b) Highly vulnerable developments, such as caravans, mobile homes and park homes with permanent residential use can be permitted, subject to the Exception Test.
  - c) Where the site is Low Probability (Flood Zone 1), the information in the 2019 SFRA should be used to assess if a development is at risk from other sources of flooding and/ or if there is an increased risk of flooding in the future due to climate change. If this site is shown to be at risk, a site-specific Flood Risk Assessment should accompany a planning application.
- 8) To pass the Exception Test, developments will need to:
- a) Provide a demonstrable benefit to the wider sustainability of the area. Matters such as biodiversity, green infrastructure, historic environment, climate change adaptation, flood risk, green energy, pollution, health, transport should be considered.
  - b) Applicants should detail the sustainability issues the development will address and how doing so will outweigh the flood risk concerns for the site<sup>55</sup>
  - c) Prove that the development will be safe from flooding for its lifetime, taking account of the vulnerability of its users,
  - d) Prove that the development can be achieved without increasing flood risk elsewhere, and, where possible, will result in a reduced flood risk overall.
- 9) All new developments in the following locations should be accompanied by a Flood Risk Assessment and Surface Water Drainage Strategy that sets out how the development will provide a betterment in flood risk terms i.e. help to reduce flood risk both on and off site:
- a) Where any part of the site is within Flood Zone 2 or Flood Zone 3
  - b) Where the site is greater than 1 hectare and is within Flood Zone 1
  - c) Where the site is a minerals or waste development
  - d) Where the site is within 5m of an Ordinary Watercourse
  - e) Where the site is within 20m of a known flooding hotspot
  - f) Where the site is within the 1 in 100-year flood extent based on the Risk of Flooding from Surface Water Map
- 10) Surface Water Drainage Strategies are also required for all major developments. These should take into account all sources of flooding to ensure that future development is resilient to flood risk and does not increase flood risk elsewhere.

### Groundwater Source Protection Zones

- 11) No development will be permitted within a groundwater Source Protection Zone 1 which would physically disturb an aquifer, and no permission will be granted without a risk assessment demonstrating there would be no adverse effect on water resources.

### Watercourses and flood mitigation

- 12) Developments should, where possible naturalise urban watercourses (by reinstating a natural, sinuous river channel and restoring the functional floodplain) and open up underground culverts, to provide biodiversity net gain as well as amenity improvements.

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<sup>55</sup> e.g. by facilitating wider regeneration of an area, providing community facilities, infrastructure that benefits the wider area etc.

### Policy CC5 – Flood Risk

- 13) Developers should set out how their mitigation designs will ensure that there is no net increase to fluvial flood risk downstream and where practicable how the development could help mitigate against downstream fluvial flood risk.
- 14) Development should not take place over culverted watercourses.
- 15) There should be no built development within 5m of an Ordinary Watercourse and within 8m of the top of the bank of a main river<sup>56</sup>. This is for the preservation of the watercourse corridor, wildlife habitat, flood flow conveyance and future watercourse maintenance or improvement.
- 16) Where there is a known or suspected culverted watercourse either on or immediately downstream of a site, where the SFRA highlights there may be a risk of flooding, developers should:
  - a) Confirm the location and presence of a watercourse (or otherwise) through ground truthing strategic datasets and undertaking an assessment of the culvert extent and condition;
  - b) Confirm by survey, modelling and mapping, the flood extents of the watercourse(s), as many of the flood outlines associated with such watercourses have been carried out at a broad scale level and may not take into specific local features, such as culverts, bridges and detailed topographical survey;
  - c) Design the development to accommodate the floodplain of the watercourse and mitigate against flooding to properties on site. This should include a consideration of residual flood risk e.g. if a culvert were to block downstream.
- 17) All developments should seek to provide wider betterment by demonstrating in site-specific Flood Risk Assessments and Surface Water Drainage Strategies (where required) what measures can be put in place to contribute to a reduction in overall flood risk downstream. This may be by provision of additional storage on site e.g. through oversized SuDS, natural flood management techniques, green infrastructure and green-blue corridors and/or by providing a Partnership Funding contribution towards wider community schemes (both within the Black Country and in shared catchments with Southern Staffordshire and Birmingham). Consultation on the site-specific requirements should be undertaken with the Councils, the Environment Agency and Severn Trent Water (where this is a sewer flooding issue) at the earliest opportunity.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC5	0	0	+	0	++	0	+	0	0	0	0	+	0	0

<sup>56</sup> Top of bank should be defined by a site-specific survey

- J.10.5.1 Policy CC5 seeks to manage the risk of flooding throughout the Plan area and ensure that measures are in place within new developments to promote resilience to flooding.
- J.10.5.2 The policy sets out criteria requiring development proposals to carry out a Flood Risk Assessment and Surface Water Drainage Strategy. The Sequential Test will be applied to all development proposals to ensure that development takes place in areas with the lowest flood risk. This, and other requirements as set out in the policy, would be expected to ensure that all future development proposals would not place new residents at risk of flooding or exacerbate flood risk in areas surrounding the development. The policy states that all development proposals should incorporate SuDS to help reduce the risk of surface water flooding and seek to provide wider flood risk betterment. Overall, a major positive impact on climate change adaption would be anticipated (SA Objective 5).
- J.10.5.3 Flooding can pose a number of risks to human health and wellbeing, including physical and mental trauma, disease and disruption to power and water supplies<sup>57</sup>. Providing new development which is flood resilient and results in flood risk betterment in surrounding areas would therefore be expected to have benefits to human health (SA Objective 12).
- J.10.5.4 Surface water run-off can lead to flooding and a decrease in water quality. The incorporation of SuDS into developments would be expected to benefit water quality, biodiversity and amenity interest through the integration into the wider green and blue infrastructure networks and promoting natural management of flood water. Developments should, where possible, naturalise urban watercourses and open up underground culverts *"to provide biodiversity net gain as well as amenity improvements"*. This would be likely to benefit biodiversity and provide opportunities for habitat connectivity and the filtration of pollutants. Therefore, Policy CC5 would be likely to have a minor positive impact on biodiversity and pollution (SA Objectives 3 and 7).

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<sup>57</sup> Public Health England (2014) Flooding and the public's health: looking beyond the short-term. Available at: <https://publichealthmatters.blog.gov.uk/2014/01/06/flooding-and-the-publics-health-looking-beyond-the-short-term/>  
[Date Accessed: 17/02/21]

## J.10.6 Policy CC6 – Sustainable Drainage and Surface Water Management (SuDS)

### Policy CC6 – Sustainable Drainage and Surface Water Management (SuDS)

- 1) All new developments should incorporate SuDS and all development proposals should provide details of adoption, ongoing maintenance, and management of SuDS.
- 2) SuDS shall be designed in line with the Black Country Local Standards for SUDS. Preference will be given to systems that contribute to the conservation and enhancement of biodiversity and green infrastructure in the wider area.
- 3) For all major developments, surface water flows must be reduced back to equivalent greenfield rates. If greenfield runoff rates are not considered to be feasible for viability reasons, then the developer must submit evidence demonstrating what the constraints to achieving this are and how their development will accommodate runoff rates that are as close as reasonably possible to greenfield rates.
- 4) Under no circumstances will post-development runoff rates that are greater than pre-development runoff rates be permitted.
- 5) Surface water drainage strategies are required for all major developments, regardless of their size and the flood zone and catchment they are in to meet the requirements of the Lead Local Flood Authority(s). These should take into account all sources of flooding to ensure that future development is resilient to flood risk and does not increase flood risk elsewhere.
- 6) A hydrogeological risk assessment is required where infiltration SuDS is proposed for anything other than clean roof drainage in a SPZ1.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC6	0	0	0	0	+	0	0	0	0	0	0	0	0	0

J.10.6.1 Policy CC6 sets out guidelines for future development with respect to Sustainable Drainage and Surface Water Management. The policy requires developments to incorporate SuDS designed in line with the Black Country Local Standards for SUDS which would be anticipated to help reduce the risk of surface water flooding. The policy further states that “Surface water drainage strategies are required for all major developments, regardless of their size and the flood zone and catchment they are in to meet the requirements of the Lead Local Flood Authority(s). These should take into account all sources of flooding to ensure that future development is resilient to flood risk and does not increase flood risk elsewhere.” This policy would be expected to have a minor positive impact on Climate Change Adaptation (SA Objective 5).

## J.10.7 Policy CC7 – Renewable and Low Carbon Energy and BREEAM Standards

### Policy CC7 – Renewable and Low Carbon Energy and BREEAM Standards

#### Renewable and Low Carbon Energy

- 1) Proposals involving the development of renewable or low carbon energy sources will be permitted where the proposal accords with local and national guidance and would not significantly harm the natural, historic or built environment or have a significant adverse effect on the amenity of those living or working nearby, in terms of visual, noise, odour, air pollution or other effects. The potential for inland waterways to promote low carbon technologies is recognised and supported.
- 2) Small developments creating between one and nine homes or non-residential floorspace of less than 1,000 sqm gross (whether new build or conversion) must incorporate generation of energy from renewable or low carbon sources sufficient to off-set at least 10% of the estimated residual energy demand<sup>58</sup> of the development on completion.
- 3) Major developments creating 10 or more homes or non-residential floorspace of 1,000 sqm gross or more (whether new build or conversion) must:
  - a) Achieve a 19% carbon reduction improvement upon the requirements within Building Regulations Approved Document, Part L 2013, or achieve any higher standard than this that is required under new national planning policy or Building Regulations;  
and, in addition
  - b) Incorporate generation of energy from renewable or low carbon sources sufficient to off-set at least 20% of the estimated residual energy demand of the development on completion.
- 4) A variety of renewable and low carbon energy sources and generation methods should be assessed and costed, including on-site and off-site sources where appropriate, and the use of combined heat and power facilities should be explored for major developments. An energy assessment must be submitted with the planning application to demonstrate that these requirements have been met.
- 5) The renewable energy target may be reduced only if it can be demonstrated that achievement of the target would:
  - a) make the proposal unviable through submission of an independently assessed financial viability appraisal; or
  - b) would not be feasible due to practical constraints.

#### BREEAM Standards

- 6) All new build non-residential developments, student housing and care homes of 1,000 sqm gross or more should achieve the following standards of BREEAM New Construction certification, including full credits for category Wat 01 (water efficiency) in line with Policy ENV9:

<sup>58</sup> Residual energy demand means that the estimated energy demand for the operational development after allowance has been made for the full range of energy efficiency measures required under Building Regulations (at the time of construction) and the 19% carbon reduction improvement required for major developments under policy CC7.

### Policy CC7 – Renewable and Low Carbon Energy and BREEAM Standards

Size	Standard	Year
1,000-5,000 sqm gross:	BREEAM Very Good	up to 2029*
	BREEAM Excellent	2029-2039*
>5,000 sqm gross:	BREEAM Excellent	

\* Year refers to date planning permission is granted

- 7) BREEAM requirements may be varied if it can be demonstrated that achievement of the standard would make the proposal unviable, through submission of an independently assessed financial viability appraisal.

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC 7	0	0	0	+	0	0	+	0	0	0	0	0	0	0

J.10.7.1 The promotion of on-site renewable or low carbon technologies incorporated within new development in the Black Country would help to decrease reliance on energy that is generated from unsustainable sources, such as fossil fuels. A reduction in the use of fossil fuels would help to reduce the volume of GHGs that are emitted into the atmosphere. This in turn would reduce the Plan area’s contribution towards the causes of climate change. Policy CC7 requires all non-residential development of 1,000 sqm gross or more to be in accordance with the BREEAM New Construction Technical Standards<sup>59</sup>. The policy states that development proposals should in particular achieve full credits for category Wat 01 (water efficiency).

J.10.7.2 This policy would be likely to have a minor positive impact on climate change mitigation by helping to ensure development proposals are more energy efficient and seek opportunities to utilise renewable and low carbon energy sources (SA Objective 4).

<sup>59</sup> BREEAM (2018) New Construction Technical Standards. Available at: <https://www.breeam.com/discover/technical-standards/newconstruction/> [Date Accessed; 26/05/20]

- J.10.7.3 Although this policy would help to ensure that major development within the Plan area meets the 19% carbon reduction target and that 20% of energy used is from renewable sources, only a 10% renewable energy target is set for development between one and nine dwellings. This policy could potentially be further expanded to help to ensure future development within the Black Country aims to reach higher energy efficient targets from renewable and low carbon technologies.
- J.10.7.4 The promotion of alternative renewable and low carbon technologies would be likely to result in reduced emission of pollutants. This would be expected to have a minor positive impact on pollution in the Plan area (SA Objective 7).
- J.10.7.5 Furthermore, by ensuring that development proposals "*would not significantly harm the natural, historic or built environment or have a significant adverse effect on the amenity of those living or working nearby*" the policy would be expected to reduce the potential for adverse impacts on cultural heritage, landscape, biodiversity and human health. Therefore, negligible impacts would be likely against these objectives (SA Objectives 1, 2, 3 and 12).

## J.11 Waste and Minerals

### J.11.1 Policy W1 – Waste Infrastructure: Future Requirements

#### Policy W1 – Waste Infrastructure: Future Requirements

- 1) Proposals for relevant, major development shall evidence how its operation will minimise waste production, as well as facilitating the re-use and recovery of waste materials including, for example, through recycling, composting and energy from waste.
- 2) Proposals for waste management facilities to deal with waste arisings will be encouraged based upon the following principles;
  - a) Managing waste through the waste hierarchy in sequential order. Sites for the disposal of waste will only be permitted where it meets a need which cannot be met by treatment higher in the waste hierarchy.
  - b) Promoting the opportunities for on-site management of waste where it arises and encouraging co-location of waste developments that can use each other’s waste materials.
  - c) Ensuring that sufficient capacity is located within the Black Country to accommodate forecast waste arisings of all types during the Plan period and reducing the reliance on other authority areas.
  - d) Facilitating the development of recycling facilities across the Black Country including civic amenity sites and ensure that there is enough capacity and access for the deposit of municipal waste for re-use, recycling and disposal.
  - e) Waste must be disposed of or be recovered in one of the nearest appropriate facilities, by means of the most appropriate methods and technologies, to ensure a high level of protection for the environment and public health.
  - f) Ensuring new waste management facilities are located and designed to avoid unacceptable adverse impacts on the environment, human health and well-being, wildlife, heritage assets and amenity.
  - g) Working collaboratively with neighbouring authorities with responsibilities for waste and other local authorities with responsibilities where waste import and export exist. This will ensure a co-operative cross boundary approach to waste management is maintained.

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W1	0	0	0	0	0	0	0	++	0	0	0	0	0	0



- J.11.1.1 Policy W1 sets out the strategy for waste management within the Black Country. The policy also sets out the levels of new waste management capacity likely to be needed to support the proposed growth across the Plan period.
- J.11.1.2 Policy W1 supports the "*minimisation of waste production and the re-use and recovery of waste materials*" and aims to encourage development proposals "*managing waste through the waste hierarchy*" and "*ensuring that sufficient capacity is located within the Black Country to accommodate forecast waste arisings of all types during the Plan period and reducing the reliance on other authority areas*". The policy seeks to promote the re-use and recycling of materials. Overall, the policy would be expected to help reduce the volume of waste generated in the Black Country and improve the management and disposal of waste. Therefore, a major positive impact would be expected (SA Objective 8).
- J.11.1.3 The policy also seeks to ensure "*new waste management facilities are located and designed to avoid unacceptable adverse impacts on the environment, human health and well-being, wildlife, heritage assets and amenity*". These criteria would be likely to help avoid adverse impacts but does not set out details on how development proposals would result in positive impacts in relation to human health, biodiversity and cultural heritage. Therefore, negligible impacts would be likely against these objectives (SA Objectives 1, 3 and 12).

## J.11.2 Policy W2 –Waste Sites

### Policy W2 –Waste Sites

#### Protecting Waste Sites

- 1) The BCA will safeguard all existing strategic and other waste management facilities from inappropriate development, in order to maintain existing levels of waste management capacity and meet Strategic Objective 13, unless it can be demonstrated that:
  - a) there is no longer a need for the facility; and
  - b) capacity can be met elsewhere; or
  - c) appropriate compensatory provision is made in appropriate locations elsewhere in the Black Country; or
  - d) the site is required to facilitate the strategic objectives of the Black Country.
- 2) This policy will also apply to all new waste management sites which are implemented within the lifetime of the plan.

#### New development near existing waste facilities

- 3) Proposals for housing and other potentially sensitive uses will not be permitted near to or adjacent to an existing waste management site where there is potential for conflict between the uses,
  - a) unless a temporary permission for a waste use has expired, or the waste management use has otherwise ceased, and the site or infrastructure is considered unsuitable for a subsequent waste use;

### Policy W2 –Waste Sites

- b) or redevelopment of the waste site or loss of waste infrastructure would form part of a strategy or scheme that has wider environmental, social and/or economic benefits which outweigh the retention of the site or infrastructure for the waste use and alternative provision is made for the displaced waste use;
  - c) or a suitable replacement site or infrastructure has otherwise been identified and permitted.
- 4) Waste site impact assessments will be expected to demonstrate that at least one of the above criteria applies. Applications should also identify any 'legacy' issues arising from existing or former waste uses, and how these will be addressed through the design of the development and the construction process

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W2	0	0	0	0	0	0	0	+	0	0	0	0	0	0

J.11.2.1 The aim of Policy W2 is to safeguard and retain capacity of the existing waste facilities in the Black Country. The policy also states that “*proposals for housing and other potentially sensitive uses will not be permitted near to or adjacent to an existing waste management site where there is potential for conflict between the uses*”. The policy would be likely to help ensure appropriate waste management continues in the Black Country and that capacity at these facilities does not decrease. Overall, a minor positive impact on waste would be expected (SA Objective 8).

### J.11.3 Policy W3 – Preferred Areas for New Waste Facilities

#### Policy W3 – Preferred Areas for New Waste Facilities

- 1) The preferred locations for enclosed waste management facilities are the employment areas shown on the Waste Key Diagram and Local Authority Plan Maps.
- 2) All proposals for new waste management facilities should demonstrate how they will contribute to Spatial Objective 13 and the strategic objectives of Policy W1, such as the contribution they will make to landfill diversion, delivery of new waste management capacity and diversification of the range of facilities currently available.
- 3) All applications for waste development will be expected to comply with the requirements in Policy W4.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0

J.11.3.1 Policy W3 identifies allocations for new waste management infrastructure in the Black Country. The provision of waste management facilities would be likely to have a major positive impact on waste, by ensuring there are adequate facilities and capacity within the Black Country to effectively manage waste production (SA Objective 8).

J.11.3.2 At present, the scale and location of the proposed waste management facilities is unknown. Seeking to manage the Black Country’s waste rather than exporting to surrounding areas could potentially result in some benefits, although these benefits are unknown at present. Overall, the likely impact in relation to environmental objectives is uncertain (SA Objectives 1, 2, 3, 4, 5, 6, 7 and 9).

J.11.3.3 The provision of waste management facilities would not be expected to impact housing, equality, health, economy or education (SA Objectives 10, 11, 12, 13 and 14).

#### J.11.4 Policy W4 – Locational Considerations for New Waste Facilities

##### Policy W4 – Locational Considerations for New Waste Facilities

###### Key Locational Considerations for All Waste Management Proposals

- 1) Proposals should demonstrate how they will contribute to Spatial Objective 13 and the strategic objectives of Policy W1, such as the contribution they will make towards landfill diversion, delivery of new waste management capacity and diversification of the range of facilities currently available.
- 2) Development for new build waste management facilities should be focused in local employment areas and will be required to meet the following criteria:
  - a) Evidence the need for the facility;
  - b) All waste processes and operations must be contained, processed and managed within buildings unless there are acceptable operational reasons why these processes cannot be contained in buildings;
  - c) Proposals must accord with all other policies in relation to the protection of the environment and public amenity, or demonstrate that other material considerations outweigh any policy conflicts;
  - d) Consideration will be given to the potential impacts of waste management proposals on;
    - i) Minimising adverse visual impacts;
    - ii) Potential detrimental effects on the environment and public health;

## Policy W4 – Locational Considerations for New Waste Facilities

- iii) Generation of odours, litter, light, dusts, flies, rodents, birds and other infestation;
- iv) Noise, excessive traffic and vibration;
- v) Risk of serious fires through combustion of accumulated wastes;
- vi) Harm to water quality and resources and flood risk management;
- vii) Land instability;
- viii) Land use conflict; proposals should demonstrate compatibility with the uses already present within/adjacent to the area;
- ix) Where necessary mitigation measures should be identified to reduce any adverse effects to an acceptable level.
- x) Whether the proposal would provide opportunities for co-location of related uses and/or generate other benefits (for example; produce a range of waste types or streams, produce high quality aggregates or other useful raw materials, or supply heat and power or other forms of energy to adjacent uses).

### Waste Applications – Supporting Information

- 3) Planning applications for waste development (Note 1) should include a supporting statement which clearly describes the key characteristics of the development. It should also explain how the development aligns with Spatial Objective X and the General Principles and Preferred Methods of managing waste in Policy W1. In particular, they should explain the contribution the development would make towards driving waste up the waste hierarchy, supporting the development of a more circular economy, meeting the Black Country's additional waste capacity requirements, and broadening the range of waste facilities currently available in the plan area.
- 4) The following information should also be included in the supporting statement and/ or on the planning application form:
  - a) The type of waste facility or facilities proposed;
  - b) The waste streams and types of waste to be managed;
  - c) The types of operation to be carried out on the site;
  - d) Whether waste would be sourced locally, regionally or nationally;
  - e) The maximum operational throughput in tonnes per annum;
  - f) For waste disposal, the total void space to be infilled in cubic metres;
  - g) The outputs from the operations, including waste residues;
  - h) The expected fate and destination of the outputs;
  - i) The number of associated vehicular movements;
  - j) The number of jobs created.

### Notes:

- (1) This includes applications for new build waste developments, changes of use to waste developments, applications for new operational development and other material changes to existing waste sites, and 's73' applications to vary a condition attached to an existing waste permission. For definitions of 'waste development' and 'waste' see provided in the Policy Justification.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W4	0	0	0	0	0	0	0	+	0	0	0	0	0	0

J.11.4.1 Policy W4 sets out criteria to which new waste management facilities should be in accordance with. Waste management facilities will only be supported where there is an identified need for the facility. This would be likely to help fill any gaps in the Black Country and meet the locally identified waste management needs. A minor positive impact on waste would therefore be expected (SA Objective 8).

J.11.4.2 The policy states that consideration will be given to *"visual impacts"*, *"detrimental effects on the environment and public health"*, *"noise, excessive traffic and vibration"* and *"water quality and resources and flood risk management"* when allocating waste management facilities. These criteria would be expected to help prevent adverse impacts, and therefore, negligible impacts have been identified in relation to landscape, biodiversity, human health, transport, flood risk and pollution (SA Objectives 2, 3, 5, 7, 9 and 12).

J.11.4.3 Policy W4 states *"proposals must accord with all other policies in relation to the protection of the environment and public amenity"*. However, it is uncertain what policies this is referring to. It is recommended that this statement is expanded, and further detail provided.

### J.11.5 Policy W5 – Resource Management and New Development

#### Policy W5 – Resource Management and New Development

##### Waste Management in new developments

- 1) All new developments should;
  - a) Address waste as a resource;
  - b) Minimise waste as far as possible;
  - c) Design sites with resource and waste management in mind;
  - d) Manage unavoidable waste in a sustainable and responsible manner; and
  - e) Maximise use of materials with low environmental impacts.
- 2) Where a proposal includes uses likely to generate significant amounts of waste, these should be managed either on-site or in as close a proximity, as possible to the source of the waste.
- 3) Resource and waste management requirements should be reflected in the design and layout of new development schemes. Wherever possible building, engineering and landscaping projects should use

### Policy W5 – Resource Management and New Development

alternatives to primary aggregates such as secondary and recycled materials, renewable and locally sourced products and materials with low environmental impacts. Consideration should also be given to how waste will be managed within the development once it is in use.

- 4) Where redevelopment of existing buildings or structures and/or remediation of derelict land is proposed, construction, demolition and excavation wastes (CD&EW) should be managed on-site where feasible and as much material as possible should be recovered and re-used for engineering or building either on-site or elsewhere.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W5	0	0	0	0	0	+	0	++	0	0	0	0	0	0

- J.11.5.1 Policy W5 sets out criteria for the sustainable management of waste and resources associated with new developments, during both construction and occupation.
- J.11.5.2 The policy requires all new developments to “*minimise waste as far as possible*” and seeks to maximise the use of “*secondary and recycled materials, renewable and locally sourced products and materials with low environmental impacts*” wherever possible. This policy would be expected to promote sustainable and efficient waste management and use of materials across all new development in the Black Country and limit the generation of waste as much as is feasible. Furthermore, Policy W5 seeks to ensure that development design takes into account the need for waste management, when occupied. Overall, a major positive impact on waste would be expected (SA Objective 8).
- J.11.5.3 Additionally, through encouraging the efficient use of resources and reducing the need for extraction of primary aggregates, Policy W5 would be expected to result in a minor positive impact on natural resources (SA Objective 6).
- J.11.5.4 Policy W5 also seeks to ensure that environmental impacts as a result of resource management and new development are minimised. The policy encourages the use of materials with low environmental impacts and the management of waste either on-site or as close as possible to the source. These factors would be expected to minimise the potential for, and scale of, adverse impacts on the environment by reducing the distances travelled by waste management vehicles such as HGVs. Therefore, negligible impacts

have been identified for landscape, biodiversity, pollution and transport (SA Objectives 2, 3, 7 and 9).

### J.11.6 Policy MIN1 – Minerals Production: Requirements

#### Policy MIN1 – Minerals Production: Requirements

- 1) To enable the Black Country to make an appropriate contribution towards identified local and regional requirements, the following production targets are identified for minerals over the plan period.

##### Construction Aggregates

###### Primary Land Won Sand and Gravel

- 2) Sufficient provision has been identified in this plan to enable the Black Country to supply at least 25% of the 7-year sand and gravel landbank for the West Midlands Metropolitan Area (WMMA)<sup>60</sup> over the plan period (see Policy MIN3). This equated to 6.2 million tonnes in total at the end of 2017, sufficient to provide for an average annual production rate of 120,000 tonnes per annum. The other resources in the Minerals Safeguarding Areas (MSAs) also have the potential to contribute towards future sand and gravel production.

###### Secondary and Recycled Aggregates

- 3) At the end of 2017, the Black Country was estimated to be producing around 720,800 tonnes of secondary and recycled aggregates per annum at permitted production sites<sup>85</sup>. As a minimum, the Black Country will aim to maintain this level of production throughout the plan period. In support of this, permitted secondary and recycled aggregate sites expected to continue in production up to 2039 will be safeguarded (see Policy MIN2).

###### Efficient Use of Mineral Resources

- 4) All new developments will be encouraged to be resource-efficient, by making the maximum possible use of recycled mineral products in construction, to reduce reliance on quarried products and help maintain existing supplies for longer.

##### Industrial Minerals

###### Brick Clay (Etruria Marl)

- 5) Sufficient brick clay provision has been identified in this plan to meet the supply requirements of the operational brick manufacturing plants in the Black Country over the plan period, allowing for permitted imports from other areas. At the end of 2017 there were around 10 million tonnes of permitted reserves of Etruria Marl in Walsall. Subject to availability this would be sufficient to provide a 25-year supply to Aldridge, Atlas and Sandown brickworks in Walsall, based on the expected future annual consumption rates of these factories. This brick clay resource should therefore be safeguarded from inappropriate development (see also Policy MIN2).

###### Fireclay

<sup>60</sup> The West Midlands Metropolitan Area (WMMA) comprises the seven unitary authorities of Birmingham, Coventry, Dudley, Sandwell, Solihull, Walsall and Wolverhampton.

### Policy MIN1 – Minerals Production: Requirements

6) Sufficient fireclay provision has been identified in this plan to meet the supply requirements of Swan Works in Walsall over the plan period. The existing stockpile and permitted reserves identified in Policy MIN3 and the other potential resources within the MSA have the capability to provide a 25- year supply of fireclay to this factory. They could also provide a long-term supply to brick manufacturing plants in Walsall, assuming that the fireclay present meets the requirements of the operators. This Fireclay resource should therefore be safeguarded (see also Policy MIN2).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
MIN1	0	0	0	0	0	+	0	0	0	0	0	0	+	0

J.11.6.1 Policy MIN1 sets out requirements for the production of construction aggregate and industrial minerals in the Black Country. The policy would be expected to help the Black Country "make an appropriate contribution towards identified local and regional requirements". This policy would be expected to have a minor positive impact on natural resources within the Black Country (SA Objective 6).

J.11.6.2 This policy would also be expected to have a minor positive impact on the local economy, by supporting local construction and industrial businesses (SA Objective 13). Aggregate production can also have a role to play in the provision of materials for inland fluvial and coastal defence infrastructure, however, this policy is not considered to result in direct impacts on any other SA Objective.

### J.11.7 Policy MIN2 – Minerals Safeguarding

#### Policy MIN2 – Minerals Safeguarding

##### Minerals Safeguarding Areas (MSAs)

- 1) Minerals safeguarding areas (MSAs) have been defined around the following mineral resources in Walsall Borough:
  - a) Sand and Gravel – Bedrock (Triassic, Sherwood Sandstone)
  - b) Brick Clay – Etruria Formation (principal brick clay resource within Carboniferous Upper Coal Measures)
  - c) Fireclay (potentially winnable resources underlying the principal coal seams within the Carboniferous – Upper Coal Measures)



## Policy MIN2 – Minerals Safeguarding

- 2) The MSAs are identified on the Minerals Key Diagram and on the Policies Map for Walsall.
- 3) Planning applications for non-mineral development will only be supported in a MSA where the development will not compromise existing or future mineral working within the MSA and the following conditions are met:
  - a) The development will involve the extraction of some or all of the mineral resource prior to development, where is practicable to do so; or
  - b) It can be demonstrated that the site does not contain any mineral resources of economic value; or
  - c) It can be demonstrated that the 'prior extraction' of minerals is not feasible.
- 4) Applications for non-mineral development in a MSA should include supporting evidence demonstrating that one of the above criteria applies. Exceptions to this policy will apply to householder developments, conversions and changes of use of existing buildings, and other forms of development that do not involve any new building or excavation works likely to sterilise mineral resources.

### Non-minerals developments outside the MSAs

- 5) Outside MSAs, mineral deposits that are identified as being, or may become of, economic importance will be safeguarded from unnecessary sterilisation.
- 6) Where development is proposed, encouragement will be given to the extraction of the mineral resource prior to or in conjunction with, development, where this would not have unacceptable impacts on neighbouring uses. Developments over five hectares should be accompanied by supporting information (as set out in the Justification) demonstrating that mineral resources will not be needlessly sterilised.

### Existing Minerals Sites

- 7) The location of all permitted mineral extraction and mineral infrastructure sites are identified on the Minerals Key Diagram, and these sites are also listed in each of the BCA sections in Chapter 13. Applications for development within a 150m buffer zone of these sites will need to demonstrate they will not have any unacceptable impacts on these sites that would prevent them from continuing to operate.

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
MIN2	0	0	0	0	0	+	0	0	0	0	0	0	0	0

J.11.7.1 Policy MIN2 seeks to safeguard land as Mineral Safeguarding Areas (MSAs) containing potential mineral resource from other types of development that could compromise the availability of resources. Other development uses within MSAs will only be supported if the identified mineral resources are extracted prior to development or it is not feasible to extract the resource. This policy would be expected to protect mineral resources in the

Black Country and therefore have a minor positive impact on natural resources (SA Objective 6).

### J.11.8 Policy MIN3 – Preferred Areas for New Minerals Development

#### Policy MIN3 – Preferred Areas for New Mineral Development

- 1) The preferred areas for new mineral development over the plan period are identified below and are shown on the Minerals Key Diagram and the Policies Map for Walsall. New mineral extraction proposals will be supported in these locations, provided that the development would comply with Policy MIN4, and would not conflict with other policy requirements or site allocations in this plan or in any other adopted development plan.

#### Aggregate Minerals

##### Sand and Gravel

- 2) Sand and gravel production is currently only permitted at the Branton Hill Quarry Extension site in Walsall (MX1). Further sand and gravel extraction will be supported in principle in the following Preferred Area:
  - a) MP1: Birch Lane, Aldridge, Walsall
- 3) Sand and gravel extraction will also be acceptable elsewhere within the MSA for sand and gravel (see Policy MIN2). When considering new sand and gravel extraction proposals, significant weight will be given to the contribution this would make towards the sand and gravel supply requirements identified in Policy MIN1

##### Borrow Pits

- 4) Short-term, time-limited excavation of fill material for specific engineering projects ('borrow pits') will be supported in principle. Such proposals should be supported by evidence that they are as near as possible to the project they will be supplying, and that secondary or recycled materials are either not available or are insufficient to meet the identified need for fill.

#### Industrial Minerals

##### Brick Clay

- 5) The extraction of brick clay (Etruria Marl) is currently permitted at the following sites in Walsall:
  - a) MX2: Atlas Quarry
  - b) MX3: Sandown Quarry
  - c) MX4: Highfields North
- 6) Atlas and Sandown Quarries are active clay pits which are supplying the adjacent brickworks, whereas Highfields North is a 'dormant' site.
- 7) Due to the limitations of the Etruria Formation resource areas in the Black Country, there is unlikely to be scope for further clay extraction outside of the permitted sites. However, if such proposals should come forward within the brick clay MSA during the plan period, significant weight will be given to the contribution that they would make towards providing or maintaining a 25-year supply of clay to a brick manufacturing plant.

##### Fireclay

### Policy MIN3 – Preferred Areas for New Mineral Development

- 8) There is a stockpile of fireclay remaining from the former Birch Coppice site in Walsall (MS1). This is the main source of supply to the adjacent Swan Works, which manufactures pot clay blends. The same mineral permission for clay and coal working also applies to another site nearby, Land at Brownhills Common (MX5). Due to the constraints of the Brownhills Common site, mineral working is not expected to take place during the plan period.
- 9) Proposals for clay and coal extraction elsewhere within the fireclay MSA identified on the Key Diagram, and for the stocking of fireclay following extraction, will be supported in principle where it can be demonstrated that this is essential to maintain supplies of fireclay to brickworks over the long-term, and that there are no alternative sources of supply available. Significant weight will also be given to proposals that would allow for the revocation of the existing 'dormant' permission at Brownhills Common.
- 10) Proposals for clay and coal working in the vicinity of the Cannock Extension Canal must be accompanied by a Habitats Regulations Assessment (HRA) demonstrating that they would not harm the integrity of the SAC.

#### Building Stone

- 11) Building stone has not been worked in the Black Country for many years and is unlikely to be worked again during the plan period. However, short-term, time-limited extraction of Dudley (Wenlock) Limestone, Barr Limestone, Gornal Stone, Halesowen Sandstone and Sherwood Sandstone for the repair and conservation of heritage assets constructed of these materials will be supported in principle.

#### Energy Minerals

##### Coal

- 12) There is a general presumption against deep mining of coal, surface coal working (except where this is in relation to the working of fireclay) and colliery spoil disposal in the Black Country, unless the proposal would meet the tests of environmental acceptability set out in national policy guidance. Any such proposals will be expected to be fully justified in terms of the economic and energy benefits they will generate. Proposals for the working of coal will also be expected to extract maximum value from other mineral resources associated with coal deposits.

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
MIN3	0	+/-	+/-	0	0	+	+/-	0	0	0	0	0	+	0

J.11.8.1 Policy MIN3 identifies areas for mineral extraction in the Black Country. Identified sites include: sand and gravel extraction at Branton Hill Quarry and Birch Lane, Aldridge; brick clay extraction at Atlas Quarry, Sandown Quarry and Highfields North; and fireclay extraction at Brownhills Common. The extraction of mineral resources at these sites would

be likely to have a minor positive impact to the provision of natural resources within the Black Country (SA Objective 6).

J.11.8.2 The extraction of minerals within the Black Country would also be expected to support local construction and industrial businesses, and therefore, have a minor positive impact on the local economy (SA Objective 13).

J.11.8.3 The policy also states that *"proposals for clay and coal working in the vicinity of the Cannock Extension Canal must be accompanied by a Habitats Regulations Assessment (HRA) demonstrating that they would not harm the integrity of the SAC"*. It is recommended that this policy text is expanded to provide further detail, in particular to provide specifics for proposals *"in the vicinity"* of the SAC. Policy MIN3 could therefore potentially help to prevent adverse impacts occurring at Cannock Extension Canal SAC.

J.11.8.4 Nevertheless, the continual extraction of minerals or further extraction at the sites listed under Policy MIN3 would be expected to result in adverse impacts in relation to noise and air pollution, loss of biodiversity and geodiversity features, and potentially the local landscape. As the scale of the mineral extraction within the Preferred Areas are currently unknown, uncertain impacts would be likely in relation to landscape, biodiversity and pollution (SA Objectives 2, 3 and 7). Policy MIN4 'Managing the effects of Mineral Development' seeks to manage and minimise potential impacts for existing and new sites.

### J.11.9 Policy MIN4 – Managing the Effects of Mineral Development

#### Policy MIN4 – Managing the Effects of Mineral Development

##### General Requirements for Minerals Developments

- 1) All mineral proposals at both new and existing sites should demonstrate how they will contribute towards Strategic Objective 'Meeting our resources and infrastructure needs', Strategic Priority 14 and the strategic objectives of Policy MIN1.
- 2) Proposals should minimise waste and provision should be made for the extraction, re-use or recycling of any other potentially useable materials.
- 3) Working plans and restoration proposals should include measures to maintain the stability of the working face, site and surrounding area.
- 4) When working ceases, all plant and equipment should be removed, and sites should be restored, as soon as possible.
- 5) The working, processing or recycling of minerals or extraction of coal bed methane must accord with all other policies in relation to the protection of the environment, public amenity and health, and surrounding land uses – or otherwise demonstrate that other material considerations outweigh any policy conflict;
- 6) Restoration programmes and after-uses for former mineral workings should reflect local character, include provision for after care, and where appropriate contribute towards environmental quality and infrastructure.

### Policy MIN4 – Managing the Effects of Mineral Development

- 7) Long-distance transport or haulage of material should be avoided wherever possible, and the potential for transporting material by rail or inland waterways should be explored where feasible.
- 8) Proposals should address the impact of transporting minerals and mineral products on the highway network and should be accompanied by a Transport Assessment if generating a significant number of vehicle movements.

#### Additional Assessment Criteria for Minerals Developments

- 9) In addition to the general requirements set out above, proposals for mineral working or mineral-related infrastructure at both new and existing sites will be further assessed in terms of:
  - a) Minimising any adverse visual impacts;
  - b) Effects on natural, built and historic (including archaeological) environments and on public health;
  - c) Generation of noise, dust, vibration, infestation, lighting and excessive vehicle movements;
  - d) Compatibility with neighbouring uses – taking into account the nature of the operations, hours of working, the timing and duration of operations and any cumulative effects;
  - e) Harm to water quality and resources and flood risk management;
  - f) Ground conditions and land stability;
  - g) Land use conflict – proposals should demonstrate compatibility with the uses already present within the surrounding area;
  - h) Impacts on the highway, transport and drainage network;
  - i) Where necessary, mitigation measures should be identified to reduce any adverse effects to an acceptable level.
- 10) The above criteria will be used to identify and select sites for inclusion in other development plan documents (where appropriate) as well as for assessing planning applications.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
MIN4	0	0	0	0	0	+	0	+	0	0	0	0	0	0

J.11.9.1 Policy MIN4 sets out criteria by which development proposals for minerals working and infrastructure would be expected to comply. All development proposals will need to contribute to the extraction of minerals as set out in Policy MIN1. A minor positive impact on natural resources would therefore be expected (SA Objective 6).

- J.11.9.2 The policy seeks to "*minimise waste*", and where possible, re-use materials. This would be likely to help reduce the volume of waste generated within the Black Country and as a result, a minor positive impact would be expected (SA Objective 8).
- J.11.9.3 Under this policy, mineral extraction sites would be required to be restored as soon as possible once work ceases. As part of restoration, consideration should be made to ensure restoration programmes "*reflect local character*" and "*contribute towards environmental quality and infrastructure*". These factors would be likely to help prevent adverse impacts on landscape and biodiversity, and therefore, negligible impacts have been identified (SA Objectives 2 and 3).
- J.11.9.4 Policy MIN4 seeks to ensure "*long-distance transport or haulage of material should be avoided wherever possible*" and proposals should be accompanied by a Transport Assessment. This would be expected to have benefits to transport and local congestion, as well as reducing transport-related air pollution and carbon emissions. Nevertheless, the transportation of minerals would be expected to lead to a high number of HGVs on nearby roads. Overall, a negligible impact on climate change mitigation, pollution and transport would be likely (SA Objectives 4, 7 and 9).
- J.11.9.5 Development proposals for minerals extraction will be assessed for their effect on public health under this policy. This would be expected to help prevent development resulting in adverse impacts on human health, including inappropriate noise pollution and vibrations. Overall, a negligible impact on health would be likely (SA Objective 12).
- J.11.9.6 The policy also seeks to assess development proposals for their effects on "*historic (including archaeological) environments*" and would be likely to prevent adverse impacts on the historic environment. Therefore, a negligible impact on cultural heritage would be expected (SA Objective 1).
- J.11.9.7 Policy MIN4 will assess development proposals in terms of "*harm to water quality and resources and flood risk management*". This would be likely to help ensure proposals under this policy do not exacerbate local flood risk, and therefore, a negligible impact would be expected (SA Objective 5).
- J.11.9.8 The policy states that "*the working, processing or recycling of minerals or extraction of coal bed methane must accord with all other policies in relation to the protection of the environment, public amenity and health, and surrounding land uses*". However, it is uncertain which policies are being referred to here. It is recommended that further detail is included to provide clarity.

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## J.12 Recommendations

- J.12.1.1 Lepus has prepared a list of recommendations for the plan-makers to help shape the BCP policies (see Table J.14.1). These recommendations are not exhaustive. Further recommendations will be provided where appropriate throughout the plan making process.

DRAFT

Table J.12.1: SA Recommendations for the Black Country Plan policies

SA Objective	SA sub-category	SA Recommendations	BCA Response
1: Cultural Heritage	Heritage assets	a. Where a development proposal could potentially result in substantial harm to the significance of a historic asset, clear justification should be provided, for example public benefits outweighing the harm to the asset.	
2: Landscape	Locally designated landscapes	a. Ensure development proposals aim to protect and enhance the special qualities of locally designated landscapes including the surrounding Country Parks.	
	Landscape character	a. Ensure development proposals are in-keeping with the local landscape character and the findings of the most recent Landscape Sensitivity Assessment <sup>61</sup> . b. Ensure development proposals are constructed in accordance with appropriate design guides and codes, including the 'Design: process and tools' <sup>62</sup> government guidance.	
	PRoW network and local properties	a. Development proposals which have the potential to significantly adversely affect views experienced by users of the PRoW network or local residents should incorporate appropriate mitigation.	
	Urbanisation and coalescence	a. Support development proposals which are in accordance with the findings of the Green Belt Study <sup>63</sup> .	
3: Biodiversity, flora, fauna	International/ European	a. Policy ENV2 should take into account the findings of the Habitats Regulations Assessment when available. b. Where development proposals have the potential to adversely impact international or European designated sites, reference should be made to the 'Guidance to mitigate the impact of new residential development' <sup>64</sup> and other relevant documents within the Evidence Base.	

<sup>61</sup> Land Use Consultants (2019) Black Country Landscape Sensitivity Assessment. Available at: <https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-redacted.pdf> [Date Accessed: 15/09/20]

<sup>62</sup> MHCLG (2019) Guidance. Design: process and tools. Available at: <https://www.gov.uk/guidance/design> [Date Accessed: 14/09/20]

<sup>63</sup> Land Use Consultants (2019) Black Country Green Belt Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced_redacted.pdf) [Date Accessed: 15/09/20]

<sup>64</sup> Missing ref?



SA Objective	SA sub-category	SA Recommendations	BCA Response
and geodiversity	designated sites	c. Policies should support development which aims to protect, and where possible provide, supporting habitat to nearby Natura 2000 sites.	
	Green network	a. An 'Environmental Net Gain' policy would be more appropriate than a 'Biodiversity Net Gain' policy and would better reflect the 25-year Environment Plan <sup>65</sup> . b. Protect and enhance the local green and blue infrastructure networks through a specific GI policy. It is recommended that a Green Infrastructure Plan or Strategy is prepared. c. Improve resilience and connectivity of biodiversity sites through landscape scale management. d. Provide reference to each authorities' Tree and Woodland Strategy or prepare one where a strategy is not yet in place. e. Ensure development proposals consider the potential to deliver wider benefits to natural capital and ecosystem services. f. Ensure development proposals set out ways to maintain and enhance links to the surrounding green network. g. It is recommended that Evidence Base documents in relation to biodiversity (including the 2010 Birmingham and the Black Country Biodiversity Action Plan) are updated in accordance with the latest guidance.	
4: Climate change mitigation	Sustainable transport	a. Provide necessary infrastructure to encourage low carbon options. b. Aim to protect and enhance public space to encourage safe walking and cycling opportunities. c. Where appropriate, site-specific Transport Plans should be prepared.	
	Energy efficiency	a. Development proposals should aim to be carbon neutral. b. All development proposals should aim to exceed the standards set out in the Building Regulations <sup>66</sup> . c. Seek to achieve no biodegradable waste to landfill to reduce emissions, in line with 'Net Zero the UK's contribution to stopping global warming' <sup>67</sup> . d. Consider retrofitting buildings to make them more energy efficient. e. It is recommended that a Climate Change Strategy is prepared. This could also help to identify the carbon capture and storage potential of the Plan area. f. Consider local partnerships to establish locally appropriate solutions to the climate crisis.	

<sup>65</sup> HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) [Date Accessed: 15/09/20]

<sup>66</sup> MHCLG (2016) Building Regulations: Approved Document. Available at: <https://www.gov.uk/government/collections/approved-documents> [Date Accessed: 14/09/20]

<sup>67</sup> Committee on Climate Change (2019) Net Zero The UK's contribution to stopping global warming. Available at: <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/> [Date Accessed: 14/09/20]

SA Objective	SA sub-category	SA Recommendations	BCA Response
	Natural environment	a. Protect and enhance the local green and blue infrastructure networks through a specific GI policy. It is recommended that a Green Infrastructure Plan or Strategy is prepared.	
5: Climate change adaptation	Fluvial flood zones	a. Using relevant data sources, ensure development proposals incorporate green infrastructure where appropriate.	
	Surface water flood zones	a. Ensure development proposals do not result in the exacerbation of surface water flood risk in surrounding areas. b. Development proposals should be built in accordance with the relevant Surface Water Management Plan <sup>68</sup> . It is recommended that the Black County Surface Water Management Plan is updated.	
	Water quantity and quality	c. Ensure capacity of water treatment works d. Promote water efficiency in new developments	
6: Natural resources	Previously undeveloped land	a. The retention of trees and other vegetation should be encouraged to help retain the stability of the soil and prevent erosion. b. Effective management should be in place to help prevent pollution and unnecessary compaction of soils during construction. Consider the requirement for Construction Environmental Management Plans in Planning Conditions. c. Where sites contain bare soil following construction of development, it is recommended that vegetation, in particular native plant species, be used to cover the ground.	
	ALC Grade	a. Where appropriate, site-specific ALC studies should be carried out. b. Where possible, provide green infrastructure or open space to protect areas of BMV soil within a site boundary.	
	Contaminated land	a. Ensure development proposals on contaminated land are only permitted where it can be demonstrated that the contamination can be effectively managed or remediated so that it is appropriate for the proposed use.	
7: Pollution	Air pollution	a. Where appropriate, planning obligations should be used to secure contributions to tackle poor air quality or for air quality monitoring. b. Development should take into consideration recommendations within the relevant Air Quality Action Plan and the outputs of the Annual Status Reports.	
	Noise pollution	a. Ensure visual and auditory buffers are incorporated at the edge of development proposals located in close proximity to railway lines to help mitigate noise pollution.	

<sup>68</sup> Scott Wilson (2009) Black Country Water Cycle Study and Scoping Surface Water Management Plan. Available at: [https://blackcountryplan.dudley.gov.uk/media/11668/water\\_cycle\\_study\\_scoping\\_surface\\_water\\_mgmt\\_plan.pdf](https://blackcountryplan.dudley.gov.uk/media/11668/water_cycle_study_scoping_surface_water_mgmt_plan.pdf) [Date Accessed: 15/09/20]

SA Objective	SA sub-category	SA Recommendations	BCA Response
		<ul style="list-style-type: none"> <li>b. Ensure development proposals which could potentially result in an increase in noise disturbance are adequately mitigated, for example, through efficient layout of development, restrict activities at certain times or the use of noise insulation.</li> <li>c. Development proposals should aim to protect areas identified as tranquil. An example method for identifying tranquillity include 'Mapping Tranquillity'<sup>69</sup>.</li> </ul>	
	Water pollution	<ul style="list-style-type: none"> <li>a. Development proposals should be built in accordance with recommendations within the Water Cycle Study<sup>70</sup> and other relevant documents within the Evidence Base, including Water Resource Management Plans, Catchment Flood Management Plan and Basin Management Plans. It is recommended that the Water Cycle Study is updated.</li> </ul>	
8: Waste	Waste generation	<ul style="list-style-type: none"> <li>a. Development proposals should demonstrate measures to minimise waste generation during construction.</li> <li>b. Development proposals should integrate well-designated waste storage space to facilitate effective waste storage, recycling and composting.</li> </ul>	
9: Transport and accessibility	TBC	<ul style="list-style-type: none"> <li>a. TBC</li> </ul>	
	Accessibility	<ul style="list-style-type: none"> <li>a. Ensure all development proposals and Travel Plans (where applicable) aim to reduce the reliance on the private car where-ever possible and aim to promote access to local facilities and services in a manner which minimises climate change emissions and promotes active travel.</li> </ul>	
10: Housing	Provision of housing	<ul style="list-style-type: none"> <li>a. Ensure all development proposals are built to a high-quality design in line with the 'Design: process and tools'<sup>71</sup> government guidance.</li> </ul>	
11: Equality	Community cohesion	<ul style="list-style-type: none"> <li>a. Ensure residential development proposals incorporate functional private or communal open space, including green space.</li> <li>b. Ensure development proposals provide adequate indoor space in line with, or beyond, the requirements set out in the technical housing standards<sup>72</sup>.</li> </ul>	

<sup>69</sup> CPRE (2005) Mapping Tranquillity. Available at: <https://www.cpre.org.uk/resources/mapping-tranquillity/> [Date Accessed: 14/09/20]

<sup>70</sup> Scott Wilson (2009) Black Country Water Cycle Study and Scoping Surface Water Management Plan. Available at: [https://blackcountryplan.dudley.gov.uk/media/11668/water\\_cycle\\_study\\_scoping\\_surface\\_water\\_mgmt\\_plan.pdf](https://blackcountryplan.dudley.gov.uk/media/11668/water_cycle_study_scoping_surface_water_mgmt_plan.pdf) [Date Accessed: 15/09/20]

<sup>71</sup> MHCLG (2019) Guidance. Design: process and tools. Available at: <https://www.gov.uk/guidance/design> [Date Accessed: 14/09/20]

<sup>72</sup> MHCLG (2015) Technical housing standards – nationally described space standards. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/524531/160519\\_Nationally\\_Described\\_Space\\_Standard\\_Final\\_Web\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf) [Date Accessed: 14/09/20]

SA Objective	SA sub-category	SA Recommendations	BCA Response
		<ul style="list-style-type: none"> <li>c. Where appropriate, consider the option for community ownership of some facilities and services.</li> <li>d. Ensure development proposals promote social interaction, including the establishment of strong neighbourhood centres.</li> <li>e. It is recommended that an Equality Impact Assessment of the BCP is prepared.</li> </ul>	
	Crime	<ul style="list-style-type: none"> <li>a. Ensure development proposals take into account privacy, access to sunlight, noise and disturbance, vibration, artificial lighting, odor, crime and safety.</li> <li>b. Ensure development proposals promote a safe and accessible neighbourhoods, helping to reduce crime and the fear of crime.</li> <li>c. Consider supporting the use of the 'Secured by Design'<sup>73</sup> scheme in relation to crime prevention.</li> </ul>	
12: Health	Access to health-related facilities	<ul style="list-style-type: none"> <li>a. Development proposals should take into consideration the findings of the relevant Playing Pitch or Sports Strategies, along with other relevant documents within the Evidence Base.</li> <li>b. It is recommended that a Health Impact Assessment of the BCP is prepared.</li> </ul>	
	Air pollution	<ul style="list-style-type: none"> <li>a. Where appropriate, planning obligations should be used to secure contributions to tackle poor air quality and for air quality monitoring.</li> <li>b. Development should take into consideration recommendations within the relevant Air Quality Action Plan and the outputs of the Annual Status Reports.</li> </ul>	
	Access to natural and outdoor spaces	<ul style="list-style-type: none"> <li>a. Improve or enhance the PRoW and cycle network across the Plan area. It is recommended that the Rights of Way Improvement Plans for the four authorities are updated.</li> <li>b. Provide or improve safe pedestrian and cycle access to public greenspaces and open spaces.</li> <li>c. Development proposals should be in accordance with the relevant Open or Green Space Strategy.</li> <li>d. Ensure development proposals do not result in detrimental impacts to the safety of pedestrians and cyclists.</li> </ul>	
13: Economy	Access to employment opportunities	<ul style="list-style-type: none"> <li>a. Ensure residential-led proposals are located in close proximity to bus stops or other sustainable transport options to reach employment opportunities.</li> <li>b. Improve access to employment opportunities, through provision of bus stops and bus services, and/ or improvements to the local pedestrian and cycle networks.</li> </ul>	
14: Education	Access to primary and secondary education	<ul style="list-style-type: none"> <li>a. Increase the provision and capacity of primary and secondary schools across the Plan area in line with the identified need.</li> </ul>	

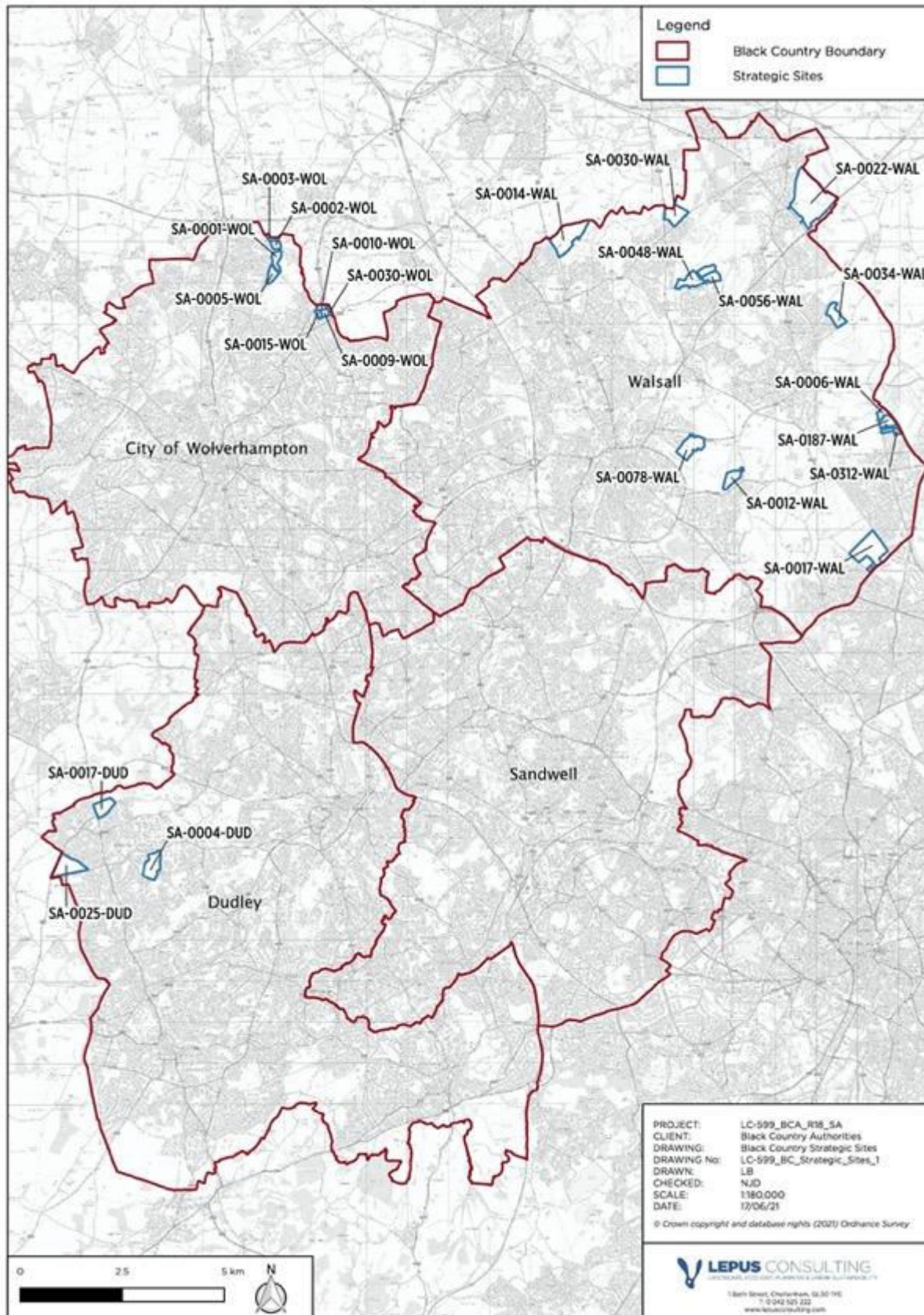
<sup>73</sup> Secured by Design. Available at: <https://www.securedbydesign.com/> [Date Accessed: 14/09/20]

## J.13 Strategic Site Allocations

### J.13.1 Introduction

- J.13.1.1 Part of the Black Country's spatial development strategy for the distribution of growth within is to focus strategic housing growth at a number of extensions to Neighbourhood Growth Areas.
- J.13.1.2 By focusing strategic growth within the Black Country towards strategic locations, the BCAs aim to ensure that future development is located within proximity to a range of services, facilities and employment opportunities.
- J.13.1.3 15 potential strategic locations for housing have been identified by the Draft BCP. Policies for these proposed strategic housing sites are provided within Draft BCP in Chapter 13 (Policy references WSA1-WSA9, DSA1-3, CSA1-2).
- J.13.1.4 The location of these 15 proposed strategic housing sites are presented in **Figure 13.1**.
- J.13.1.5 Tables 5.1-5.4 of the Main SA Report summarises the pre-mitigation scores (i.e. existing baseline constraints) for each of these strategic sites. Each of these strategic sites are assessed in detail in Appendices F to I and summarised / compared to all identified to reasonable site alternatives in Section 5 of the main SA report. The full supporting narrative in the appendices and methodology provided in Section 5 of the main SA report should be read in conjunction with this assessment..
- J.13.1.6 The BCA in selecting reasonable alternatives have considered the potential for mitigation in the site selection process and in the reasons for selecting and rejecting reasonable alternatives (see Section 5) of SA Main Report. The approach to 'post-mitigation scores' in the SA process set out below has only been applied to strategic housing sites accompanied by draft BCP policies. This is to ensure a consistent and transparent approach to the SA process in relation to information provided in the public domain in the form of BCP policies.
- J.13.1.7 'Post mitigation' scores will also be considered at the Regulation 19 stage of the SA process, taking into account the policies as specified in the pre submission version of the BCP.
- J.13.1.8 General Notes:
- J.13.1.9 The full implications of development proposed within the BCP on European sites are considered in greater detail in the accompanying Habitats Regulations Assessment (HRA). This includes consideration of hydrological considerations (water quantity and quality and hydrological linkages), air quality impacts, recreational pressures and functionally linked land.

- J.13.1.10 A number of candidate SINCs and SLINCs have been identified by the Local Sites Partnership within the BCA. It is understood that these will be subject to cabinet review prior to the Regulation 19 stage of the BCP. Once approved, candidate SLINCs will be incorporated into the SA assessment at that time. Where candidate SLINCs have been identified in relevant policies these have been referred to appropriately in the policy text by the BCA.
- J.13.1.11 The SA is mindful of the Government's intention to make biodiversity net gain a mandatory requirement for new development, once the Environment Bill receives Royal Assent and following publication of national guidance. Where possible, developers should be encouraged to carry out a biodiversity metric calculation early in the master planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements.



J.13.2 Policy DSA1 (Dudley Strategic Allocation) - Holbeache Lane /Wolverhampton Road, Kingswinford

Policy DSA1 (Dudley Strategic Allocation) - Holbeache Lane /Wolverhampton Road, Kingswinford





## Policy DSA1 (Dudley Strategic Allocation) - Holbeache Lane /Wolverhampton Road, Kingswinford

- A52 The land south of Holbeache Lane / Wolverhampton Road Strategic Allocation falls within the Kingswinford Neighbourhood Growth Area and covers BCP Allocation DUH208. It is proposed that the site be removed from the Green Belt and be allocated to deliver approximately 330 homes at an average net density of 40 dph.
- A53 The estimated phasing of delivery is:
- 2030 - 2035 155 homes
  - 2035 – 2039 175 homes
- A54 There will be a requirement for the development of the site to be of the highest quality and to accommodate the correct infrastructure provision in the right places. The key planning requirements for the Holbeache Lane /Wolverhampton Road Strategic Allocation are set out below. Other standard policy requirements, as set out in the BCP and Dudley Local Plan documents and SPDs, will also apply. A Master Plan will be prepared to guide the development of the Strategic Allocation. This will provide further detail on the requirements set out in this policy and will provide a spatial framework for development.
- A55 The site is in one ownership and is situated in close proximity to strategic sites: Policy xx Ketley Quarry, Former Lower Gornal Sewage Works and Land at Swindon Road. The cumulative impact of the sites (and other housing / employment allocations) on local infrastructure provision will need to be considered, in terms of:
- school place impacts;
  - highways impacts;
  - delivery of green belt loss mitigation;
  - delivery of biodiversity net gain;
  - delivery of recreational open space improvement.
- A56 Once the BCP has been adopted, allocations should be developed in accordance with the criteria identified in respect of each site and all general policy requirements, including any necessary developer contributions.

### School Place Requirements

- A57 A59 It is currently anticipated that both primary and secondary school place requirements arising from housing developments in the northwest of Dudley over the Plan period will be capable of being met through extensions to existing primary and secondary schools. Pedestrian and public transport improvements to increase accessibility to local primary and secondary schools may be required in accordance with Policy HOU2.

### Highways Requirements

- A58 A60 It is essential that good pedestrian and cycle connections are made available to all nearby local amenities, including the local primary school and local centres. These connections should include pedestrian crossing improvements at the A449 to enable safe crossing of the highway.

## Policy DSA1 (Dudley Strategic Allocation) - Holbeache Lane /Wolverhampton Road, Kingswinford

A59 It is considered that a vehicular access point could be gained from the existing roundabout (A449 / A491) to the west of the site, subject to junction capacity analysis and wider transport modelling. A potential second access to Oak Lane via an improved Ham Lane could be provided. Highway and junction improvements would be required to Wall Heath and Kingswinford centres, as well as Stalling Lane and A449 / Himley Road. Details will be set out in the masterplan.

### Green Belt Loss Mitigation Requirements

- A60 Measures to provide sufficient mitigation for the loss of green belt cannot be confirmed yet; rather this will be set out in the pre-submission document.
- A61 There will be a requirement for all green belt loss mitigation works and any necessary transfer of land ownership to be completed before the substantial completion of development.
- A62 The Green Belt boundary has been redrawn around the development site. In most cases there is an existing landscaped buffer or road that provides a defensible new green belt boundary. It is recommended that a buffer of landscaped open space is provided along the northern portion of the site, in order to ensure development is appropriately screened from the historically sensitive Holbeache Lane and Holbeache House. Developments should be designed to minimise potential harm to the integrity of remaining green belt areas and to landscape character, as identified in the Black Country Green Belt Study and Black Country Landscape Sensitivity Assessment.

### Nature Conservation and Net Biodiversity Gain Requirements

- A63 All existing SINCs, SLINCs, tree preservation orders, hedgerows, woodland and significant trees both within and adjoining the development sites should be retained, protected and incorporated sympathetically into the design of development. Sufficient buffer areas should be provided at the edge of these habitat areas, particularly mature trees and hedgerows, to allow them to thrive following development (see ENV4).
- A64 It is anticipated that net biodiversity gain requirements for the developments will be met through delivery of the green belt loss mitigation requirements set out above, subject to the minimum 10% requirement identified in the Environment Bill / Act and the requirements of Policy ENV3.

### Historic Environment Requirements

- A65 Located adjacent to this allocation, on its northern boundary, is the Grade II\* listed Holbeache House and its curtilage (List Entry Number 1228293). The impact of any proposals on the setting and significance of this designated heritage asset will be a material planning consideration for development. Also in close proximity to this allocation, on its northern and north-eastern boundary, is the Oak Farm Wedge Area of High Historic Landscape Value (AHHLV 38), a non- designated heritage asset.
- A66 Applicants will therefore be required to support their proposals with a Statement of Heritage Significance (prepared in accordance with Historic England's latest guidance) illustrating that proposals have been formulated with a full appreciation of the requirements of Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and with the policies relating to designated and non-designated heritage assets laid out in the NPPF and local plan.
- A67 The design of the development should not impact on the existing character and appearance of Holbeache Lane, which provides a significant contribution to the setting and significance of

## Policy DSA1 (Dudley Strategic Allocation) - Holbeache Lane /Wolverhampton Road, Kingswinford

Holbeache House and is also one of the positive features that contributes to the Oak Farm Wedge AHHLV.

### Recreational Open Space Requirements

- A68 The incorporation of high-quality landscaping across the development should be a significant forethought of the design process. A well landscaped green buffer is required to the north of the site, which should also provide a neighbourhood area for play. In effect this should well separate development completely from the historically sensitive elements to the north.
- A69 Further to this, there should be some offsetting of development to the south of the site where existing dwelling houses are located, and well-used informal pedestrian routes exist. It is understood that a high-pressure gas pipeline runs across the middle of the site, which may require some offsetting of development if it were to be retained.

### Sustainable Drainage Requirements

- A70 Naturalised sustainable drainage systems that are sufficient to retain greenfield runoff rates should be provided for the site, in accordance with Policy CC5. An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the master plan is prepared.

### Local Wastewater Treatment Capacity

- A71 This site is served by Roundhill Wastewater Treatment Works and it is not anticipated that there are any issues with the site handling additional flow during the Plan period.

### Design principles

- A72 The development of the site will form a new community and neighbourhood on Green Belt land; all proposals must have distinguishable merit in their design and form. Only high-quality design that is bespoke, unique and specific to the site will be acceptable, in line with the requirements of Policies CSP4 and ENV9 among others. The incorporation of high-quality landscaping across the development should be a significant part of the initial design process. A well-landscaped green buffer is required to the north of the site, which should also provide a neighbourhood area for play. In effect this should separate development completely from the historically sensitive elements to the north. All mature trees and hedgerows should be maintained as this will be vital to mitigate some of the visual impact of developing this Green Belt site.
- A73 Development should sit behind the existing tree-lined boundary along the A449 and should be outward looking making use of continuous perimeter roads to aid connectivity and permeability. The site as a whole should be highly permeable, avoiding the use of private drives and cul-de-sacs that limit on-foot and cycle connectivity. The layout of development should consider as a priority the amenity of existing residents to the south of the site, specifically those with dwellings that back onto it. Where possible the site layout should also seek to maintain and maximise key views across the development (predominantly south-east to north-west). Although there are no key commutable desire lines across the site, at current it is well-used for leisure by residents. This reinforces the need for a well-connected and permeable site layout as well as for an enhanced element of open space to make up for the loss of the site as whole.

**Policy DSA1 (Dudley Strategic Allocation) - Holbeache Lane /Wolverhampton Road, Kingswinford**

A74 Due to the sensitive historic location of the site and existing green belt setting, it is considered that apartments would not be acceptable here.

**Nature Conservation and Net Biodiversity Gain Requirements**

A75 The site is currently a large arable field surrounded by species-rich hedgerows – designated as SLINC, with rich ground flora. The site is adjacent to a woodland SLINC and has connectivity to the wider open countryside to the north of the site via arable fields and hedgerows. Mature hedgerows form the boundary of the arable area and the grassland areas of the site. These will need to be retained as part of the development as they support a wide variety of flora, support breeding birds and create a nesting and foraging habitat for many species. They include large stretches of intact, stock-proof hedge, and stretches of defunct, non-stock proof, hedge with gaps. The hedgerow adjacent to the Wolverhampton Road (A491) has several large, mature trees within it, including Norway maple and aspen. These will need to be retained as part of the development.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DSA1	0	-	+/-	+	0	-	-	-	+	++	0	+	+	+

J.13.2.1 The land south of Holbeache Lane / Wolverhampton Road Strategic Allocation falls within the Kingswinford Neighbourhood Growth Area and is proposed to be released from the Green Belt. Approximately 330 homes are proposed at an average net density of 40 dph. Overall, a major positive impact on Housing (SA Objective 10) and minor positive effect on the Economy (SA Objective 13) would be expected as a result of the proposed development at this strategic location.

J.13.2.2 One Grade II\* Listed Building, Holbeache House and its curtilage, is situated near to the strategic location to the north. Also in close proximity to this allocation, on its northern and north-eastern boundary, is the Oak Farm Wedge Area of High Historic Landscape Value, a non- designated heritage asset. The measures outlined in this policy include a buffer of landscaped open space to the north of the proposed development and it is also noted that “*The design of the development should not impact on the existing character and appearance of Holbeache Lane, which provides a significant contribution to the setting and significance of Holbeache House and is also one of the positive features that contributes to the Oak Farm Wedge AHHLV.*” Assuming measures such as this are taken

into account, it is considered that there is potential to avoid significant adverse impacts on the historic environment, including the setting of heritage assets. Overall, the proposed development at this strategic location would be anticipated to have a negligible impact on heritage assets. Further reference could be made to a requirement to produce a Statement of Heritage Significance in accordance with other site allocation policies.

J.13.2.3 The site is located in an area of low landscape sensitivity based on the Landscape Sensitivity Assessment and an area of moderate sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents and users of PRow. It is envisaged that a masterplan will be prepared to guide the development of the Strategic Location. Policy DSA 1 states that *"Measures to provide sufficient mitigation for the loss of green belt cannot be confirmed yet; rather this will be set out in the pre-submission document...In most cases there is an existing landscaped buffer or road that provides a defensible new green belt boundary. It is recommended that a buffer of landscaped open space is provided along the northern portion of the site, in order to ensure development is appropriately screened from the historically sensitive Holbeache Lane and Holbeache House. Developments should be designed to minimise potential harm to the integrity of remaining green belt areas and to landscape character, as identified in the Black Country Green Belt Study and Black Country Landscape Sensitivity Assessment."* In addition *"All mature trees and hedgerows should be maintained as this will be vital to mitigate some of the visual impact of developing this Green Belt site."* This policy therefore sets out envisaged measures to minimise harm to the statutory purposes of the Greenbelt, with a minor adverse impact identified in respect to Landscape (SA Objective 2) taking these measures into account. The policy includes provisions such as *"the incorporation of high-quality landscaping"*, retention of existing features, and landscaped buffer areas. This will include *"some offsetting of development to the south of the site where existing dwelling houses are located, and well-used informal pedestrian routes exist"*. The policy text recommends that layout of development should consider as a priority *"the amenity of existing residents to the south of the site, specifically those with dwellings that back onto it. Where possible the site layout should also seek to maintain and maximise key views across the development (predominantly south-east to north-west)"* and provide for *"a well-connected and permeable site layout as well as for an enhanced element of open space."* Overall, these measures are envisaged to help integrate the development into the existing local landscape context and help to minimise impacts on visual amenity.

J.13.2.4 Minor adverse effect in relation to biodiversity were identified in the pre-mitigation SA assessment due to potential development-related threats and pressures on the adjacent SLINC. The strategic location also contains various undesignated assets on-site which provide essential habitats for many species, including hedgerows, trees, and arable field boundaries. The policy identifies that *"The site is currently a large arable field surrounded by species-rich hedgerows – designated as SLINC, with rich ground flora. The site is adjacent to a woodland SLINC and has connectivity to the wider open countryside to the*

north of the site via arable fields and hedgerows. Mature hedgerows form the boundary of the arable area and the grassland areas of the site. These will need to be retained as part of the development as they support a wide variety of flora, support breeding birds and create a nesting and foraging habitat for many species. They include large stretches of intact, stock-proof hedge, and stretches of defunct, non-stock proof, hedge with gaps. The hedgerow adjacent to the Wolverhampton Road (A491) has several large, mature trees within it, including Norway maple and Aspen. These will need to be retained as part of the development." Further provisions within the policy text state that "All existing SINCs, SLINCs, tree preservation orders, hedgerows, woodland and significant trees both within and adjoining the development sites should be retained, protected and incorporated sympathetically into the design of development. Sufficient buffer areas should be provided at the edge of these habitat areas, particularly mature trees and hedgerows, to allow them to thrive following development (see ENV4). It is anticipated that net biodiversity gain requirements for the developments will be met through delivery of the green belt loss mitigation requirements set out above, subject to the minimum 10% requirement identified in the Environment Bill / Act and the requirements of Policy ENV3." The proposed development of approximately 330 dwellings at Holbeache Lane / Wolverhampton Road would be likely to result in a loss of biodiversity features, to some extent. It is also anticipated that the measures set out at the strategic location would potentially help to contribute towards maintaining habitat connectivity and enhancement. Where possible, it is recommended that all developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. Both potential positive and negative / uncertain effects are therefore identified in respect to biodiversity (SA Objective 3).

- J.13.2.5 The site is located within Flood Zone 1. A small part of the site coincides with areas of low and/or medium surface water flood risk. It is anticipated that Sustainable Drainage Systems (SuDS) "sufficient to retain greenfield runoff rates will be provided for the site, in accordance with Policy CC5". The policy text notes that "An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the master plan is prepared." Integration with Sustainable Drainage Systems (SuDS) would be expected to minimise the extent of surface water flooding. Assuming that these measures are put in place this would lead to an overall negligible impact on Climate Change Adaptation (SA Objective 5). Options to minimise surface water flood risk and other sources of flooding should be assessed as part of the Flood Risk Assessment (FRA) that will be prepared for the site, including access options and potential allowances for climate change.

- J.13.2.6 The site is located within an AQMA, within 200m of a Main Road and within a Groundwater Source Protection Zone. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site-specific assessments. A minor adverse impact in respect to Pollution (SA Objective 7) is identified at this stage of the assessment.
- J.13.2.7 The site is identified as being located within predominantly Grade 2 land with a smaller component of urban land based on regional ALC Natural England mapping. The site is also located within an MSA. The site would lead to the loss of less than 20ha of undeveloped land and therefore a minor residual adverse impact is identified in relation to Natural Resources (SA Objective 6). Further mitigation may be required in regards to prior extraction of mineral resources owing to the site lying within a Mineral Safeguarding Area (Sand & Gravel and Wood).
- J.13.2.8 Minor positive impacts were identified in the SA assessment at the pre mitigation stage (See Appendix F) in relation to proximity to bus stops, pedestrian access, road access, pedestrian access to local services and public transport access to local services, with minor adverse impacts identified in relation to access to a railway station (>2km). A number of highways considerations are set out in this policy including seeking to ensure *“that good pedestrian and cycle connections are made available to all nearby local amenities, including the local primary school and local centres. These connections should include pedestrian crossing improvements at the A449 to enable safe crossing of the highway.”* The policy also reinforces the need for a well-connected and permeable site layout including *“making use of continuous perimeter roads to aid connectivity and permeability. The site as a whole should be highly permeable, avoiding the use of private drives and cul-de-sacs that limit on-foot and cycle connectivity.”* Opportunities to provide linkages to local railway stations could be explored where feasible. On balance, a minor positive impact is identified in relation to Transport and Accessibility (SA Objective 9) and climate change mitigation (SA objective 4).
- J.13.2.9 Recreational Open Space requirements are set out in the policy text in qualitative terms including a neighbourhood area for play and the envisaged transport measures are considered to facilitate active lifestyles via walking and cycling which would have a minor positive impact in terms of health objectives (SA objective 12).
- J.13.2.10 As noted in the policy text cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area including consideration of highways impacts; delivery of green belt loss mitigation; delivery of biodiversity net gain; delivery of recreational open space improvement. Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

J.13.3 Policy DSA 2 – Land at Swindon Road, Wall Heath, Kingswinford (The Triangle site)





### **Policy DSA 2 – Land at Swindon Road, Wall Heath, Kingswinford (The Triangle site)**

A76 Land at Swindon Road, Wall Heath, Kingswinford will be allocated for new residential growth and will form part of the Kingswinford Neighbourhood Growth Area; it includes BCP Allocation DUH211. It is proposed that the site be removed from the Green Belt and be allocated to deliver approximately 530 homes at an average net density of 40 dph.

A77 The estimated phasing of delivery is:

- 2030 - 2035 280 homes
- 2035- 2039 250 homes

A78 There will be a requirement for the development of the site to be of the highest quality and accommodate the correct infrastructure provision in the right places. The key planning requirements for the Swindon Road, Wall Heath Strategic Allocation are set out below. Other standard policy requirements, as set out in the BCP and Dudley Local Plan documents and SPDs, will also apply. A master plan will be prepared to guide the development of the strategic allocation. This will provide further detail on the requirements set out in this Policy and will provide a spatial framework for development.

A79 The site is in one ownership and is situated in close proximity to strategic sites: Policy xx Ketley Quarry, Former Lower Gornal Sewage Works and Holbeache Lane / Wolverhampton Road. The cumulative impact of these sites (and other housing /employment allocations) on local infrastructure provision will need to be considered, in terms of:

- school place impacts;
- highways impacts;
- delivery of green belt loss mitigation;
- delivery of biodiversity net gain;
- delivery of recreational open space improvement.

A80 Once the BCP has been adopted, allocations should be developed in accordance with the criteria identified in respect of each site and all general policy requirements, including any necessary developer contributions.

#### **School Place Requirements**

A81 It is currently anticipated that both primary and secondary school place requirements arising from housing developments in the north west of Dudley over the Plan period will be capable of being met through extensions to existing primary and secondary schools. Pedestrian and public transport improvements to increase accessibility to local primary and secondary schools may be required in accordance with Policy HOU2.

A82 Should it be determined that some form of primary school provision is required as the BCP progresses towards adoption, this may need to be accommodated on the site and land will need to be allocated to accommodate a two-form entry primary school (appro 2.4ha).

#### **Highways Requirements**

A83 Highway infrastructure is necessary in order for any development to function effectively and to minimise impacts on surrounding road junctions. It is considered that there should be three points of vehicular access, including from Swindon road to the north and Lodge Lane to the south. The number of access points required and their precise location should be subject to further detailed

## **Policy DSA 2 – Land at Swindon Road, Wall Heath, Kingswinford (The Triangle site)**

transport assessment. Connections should be made through the site, so that pedestrians and vehicles can travel from Swindon Road, through to the A449 or Lodge Lane as they choose. Cycle infrastructure should form a key part of the site layout. Details will be set out in the master plan.

### **Green Belt Loss Mitigation Requirements**

- A84 Measures to provide sufficient mitigation for the loss of green belt cannot be confirmed yet; rather this will be set out in the pre-submission document.
- A85 There will be a requirement for all Green Belt loss mitigation works and any necessary transfer of land ownership to be completed before substantial completion of development. Being a green belt site, the retention and provision of high quality landscaping should be a significant first stage in the design process. Aside from the aforementioned considerations regarding open space, mature trees along the periphery and within the site should be retained, as well as hedgerows within the site where possible.
- A86 The green belt boundary has been redrawn around the development site. In most cases there is an existing landscaped buffer or road that provides a defensible new green belt boundary. A significant level of well-landscaped open space should be retained, providing a landscaped open space buffer along the western side of the site where the impact on views is highest and there are clear constraints to development (notably the north-westernmost and south-westernmost fields, due to their topography and the potential impact of development on visual amenity in this location). Development will be concentrated in the easternmost portion of the site, where impacts on views and the surrounding area would be lowest. It is likely that higher densities could be accommodated here than in locations to the west. Developments should be designed to minimise potential harm to the integrity of remaining green belt areas and landscape character, as identified in the Black Country Green Belt Study and Black Country Landscape Sensitivity Assessment.

### **Nature Conservation and Net Biodiversity Gain Requirements**

- A87 The site sits on the fringe of the urban area, with links to wider greenspace and open countryside. The site is surrounded by hedgerows that are of high ecological value due to the species that they support. Both the internal and boundary hedgerows contain mature trees, which should be retained as part of the site's features. These current hedgerow lines are growing along pre-existing / old boundaries. The site as a whole assists in the movement and migration of species as well as providing important feeding areas for local and migratory wildlife populations. There is potential for bat roosting sites in the mature hedgerow trees. Bat and bird boxes could be installed on some of the mature trees to provide nesting and roosting opportunities. A mixed semi-natural woodland occurs in the form of a small wooded copse, situated in the west of the site. Opportunities for enhancement and planting around this part of the site should be explored in line with Policy ENV4 - Trees, Woodland and Hedgerows. A management plan for the long-term maintenance of the woodland would also be required.
- A88 It is anticipated that net biodiversity gain requirements for the developments will be met through delivery of the green belt loss mitigation requirements set out above.
- A89 Policy ENV3 will apply to this site.

### **Historic Environment Requirements**

## **Policy DSA 2 – Land at Swindon Road, Wall Heath, Kingswinford (The Triangle site)**

- A90 Located adjacent to this strategic allocation, on its south-eastern edge is the Grade II listed Summerhill Hotel (List Entry Number 1228678). The impact of any development proposals on the setting and significance of this designated heritage asset will be a material planning consideration. Applicants will therefore be required to support their proposals with a Statement of Heritage Significance (prepared in accordance with Historic England’s latest guidance) illustrating that proposals have been formulated with a full appreciation of the requirements of Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and with the policies relating to designated heritage assets laid out in the NPPF and local plan.
- A91 Within this allocation there is one site recorded on the Council’s Historic Environment Record (HER), HER record 12113, which relates to a medieval book fitting. In view of this and in view of the fact that the allocation still retains the majority of its original field boundaries (as marked on the first edition OS) applicants will be required to support their proposals with a historic environment desk-based assessment, undertaken in accordance with guidance provided by the Chartered Institute for Archaeologists (CIfA).

### **Recreational Open Space Requirements**

- A92 Subject to satisfactory delivery of mitigation for the loss of green belt, it is considered that the local area will have good access to existing recreational open space, allotment, play and sports facilities that have the capacity to meet the varied needs of new residents, in line with adopted open space standards. Therefore, no new on-site open space will be required, beyond that necessary to protect existing nature conservation value and provide sufficient natural, sustainable drainage systems. However, it will be necessary to provide quality walking and cycle routes within the developments that provide easy, quick and safe access to nearby open spaces and the countryside.

### **Sustainable Drainage Requirements**

- A93 Naturalised sustainable drainage systems that are sufficient to retain greenfield runoff rates should be provided for the site, in accordance with Policy CC5. An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the master plan is prepared.

### **Local Wastewater Treatment Capacity**

- A94 This site is served by Roundhill Wastewater Treatment Works and it is not anticipated that there are any issues with the site handling additional flow during the Plan period.

### **Design principles**

- A95 Due to the tree-lined periphery of the site and its topography, it is considered that development would be best located at the edge of the site, fronting directly onto Swindon Road and Lodge Lane. The chosen layout must be highly permeable and well connected, prioritising pedestrian and cycle users, maximising the feeling of enclosure and responding to human scales. Proposals should avoid the use of private drives and cul-de-sacs, as these will hinder good on-foot / cycle connectivity. As such it is likely that proposals brought forward will differ to much of the existing morphology (cul-de-sac) in the surrounding area. As the site will create a new community / neighbourhood on green belt land, proposals must have distinguishable merit in their design and form. Only high-quality design that is bespoke, unique and specific to the site will be acceptable.

**Policy DSA 2 – Land at Swindon Road, Wall Heath, Kingswinford (The Triangle site)**

A96 Existing desire lines are well-used by local residents for leisure and walking to / from Summerhill School in the south. These should be retained and routes for school commuters diverted as little as possible.

DRAFT

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DSA 2	-	-	0	+	0	--	-	-	+	++	0	+	+	+

J.13.3.1 Land at Swindon Road, Wall Heath, Kingswinford (The Triangle site) will be allocated for new residential growth and will form part of the Kingswinford Neighbourhood Growth Area and is proposed to be released from the Green Belt. Approximately 530 homes are proposed at an average net density of 40 dph. Overall, a major positive impact on Housing and minor positive effect on the Economy would be expected as a result of the proposed development at this strategic location.

J.13.3.2 The site is located approximately 50m from the Grade II listed Summerhill Hotel, located to the southeast of the site. In addition, the policy notes that “*Applicants will be required to support their proposals with a Statement of Heritage Significance (prepared in accordance with Historic England’s latest guidance) illustrating that proposals have been formulated with a full appreciation of the requirements of Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and with the policies relating to designated heritage assets laid out in the NPPF and local plan. Within this allocation there is one site recorded on the Council’s Historic Environment Record (HER), HER record 12113, which relates to a medieval book fitting. In view of this and in view of the fact that the allocation still retains the majority of its original field boundaries (as marked on the first edition OS) applicants will be required to support their proposals with a historic environment desk-based assessment, undertaken in accordance with guidance provided by the Chartered Institute for Archaeologist (CIfA).*” Policy DSA 2 would be expected to ensure that heritage assets within Dudley are conserved in a manner appropriate to their significance, in line with national policy, and that the setting of historic assets are conserved. Where development proposals may present risks to the significance of an asset, Policy DSA 2 would require an accompanying statement to be prepared to describe the how the assessment has considered impacts on the significance of the asset and any mitigating actions that are proposed. With considerate planning, it is likely that there would be sufficient scope within this strategic location to direct development towards locations that would minimise effects on heritage resources. This policy would be expected to ensure that cultural heritage resources across the black country are suitably protected, however minor adverse impacts cannot be ruled out at this stage of the assessment process.

- J.13.3.3 The site is located in an area of moderate landscape sensitivity based on the Landscape Sensitivity Assessment and an area of moderate-high sensitivity in relation to greenbelt harm. No PRoW cross the site. A number of trees subject to Tree Preservation Orders (TPOs) lie at the boundaries of the site. Views towards the site from adjacent residential areas form an important consideration. Policy DSA 2 states that *"Measures to provide sufficient mitigation for the loss of green belt cannot be confirmed yet; rather this will be set out in the pre-submission document... A significant level of well-landscaped open space should be retained, providing a landscaped open space buffer along the western side of the site where the impact on views is highest and there are clear constraints to development (notably the north-westernmost and south-westernmost fields, due to their topography and the potential impact of development on visual amenity in this location). Development will be concentrated in the easternmost portion of the site, where impacts on views and the surrounding area would be lowest. It is likely that higher densities could be accommodated here than in locations to the west. Developments should be designed to minimise potential harm to the integrity of remaining green belt areas and landscape character, as identified in the Black Country Green Belt Study and Black Country Landscape Sensitivity Assessment."* The policy text further recommends that *"Being a green belt site, the retention and provision of high quality landscaping should be a significant first stage in the design process. Aside from the aforementioned considerations regarding open space, mature trees along the periphery and within the site should be retained, as well as hedgerows within the site where possible."* On balance, and assuming these recommendations are taken into account, a residual minor adverse impact is identified in respect to Landscape (SA Objective 2).
- J.13.3.4 There are no designated ecological or geological sites located on, or immediately adjacent to, the site. However, the policy notes that *"The site is surrounded by hedgerows that are of high ecological value due to the species that they support. Both the internal and boundary hedgerows contain mature trees, which should be retained as part of the site's features. These current hedgerow lines are growing along pre-existing / old boundaries. The site as a whole assists in the movement and migration of species as well as providing important feeding areas for local and migratory wildlife populations. There is potential for bat roosting sites in the mature hedgerow trees. Bat and bird boxes could be installed on some of the mature trees to provide nesting and roosting opportunities. A mixed semi-natural woodland occurs in the form of a small wooded copse, situated in the west of the site. Opportunities for enhancement and planting around this part of the site should be explored in line with Policy ENV4 - Trees, Woodland and Hedgerows. A management plan for the long-term maintenance of the woodland would also be required."* Opportunities for delivering net gains in biodiversity should be sought in line with comments provided above in relation to Policy DSA1. The proposal is not anticipated to have an impact on statutory or non-statutory designated sites. Assuming an appropriate layout, GI and biodiversity mitigation and enhancement measures are put in place, it is likely that there

would be both positive and negative impacts with regard to on-site biodiversity. Taking each of these considerations into account, an overall negligible impact would be anticipated in respect biodiversity overall at this strategic location.

- J.13.3.5 The site is identified as being located within predominantly Grade 3 land and part Grade 2 based on regional ALC Natural England mapping. The site is not located within an MSA. The site would lead to the loss of more than 20 ha of undeveloped land which would lead to permanent impacts on the loss of natural resources associated with the change in use and therefore residual major adverse impacts are identified in relation to SA Objective 6.
- J.13.3.6 The site is located predominantly within Flood Zone 1, with a very small proportion located within Flood Zone 2. A small part of the site coincides with areas of low and/or medium surface water flood risk. Mitigation measures should be informed by the site-specific Flood Risk Assessments which is a standard requirement under the NPPF for any development located in Flood Zone 2, or for sites greater than 1 ha in Flood Zone 1. This should include consideration of site accesses and appropriate climate change allowances. It is anticipated that Sustainable Drainage Systems (SuDS) *“sufficient to retain greenfield runoff rates will be provided for the site, in accordance with Policy CC5”*. The policy text notes that *“An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the master plan is prepared.”* Integration with Sustainable Drainage Systems (SuDS) would be expected to minimise the extent of surface water flooding. Assuming that these measures are put in place, this would lead to an overall negligible impact on climate change adaptation (SA Objective 5).
- J.13.3.7 The site is located within an AQMA, within 200m of a Main Road and within a Groundwater Source Protection Zone. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site assessments. A minor adverse impact in respect to Pollution (SA Objective 7) is identified at this stage of the assessment.
- J.13.3.8 Minor positive impacts were identified in the SA assessment in relation to proximity to bus stops, pedestrian access, road access, pedestrian access to local services and public transport access to local services, with minor adverse impacts identified in relation to access to a railway station (>2km). This policy notes that *“Highway infrastructure is necessary in order for any development to function effectively and to minimise impacts on surrounding road junctions. It is considered that there should be three points of vehicular access, including from Swindon road to the north and Lodge Lane to the south. The number of access points required and their precise location should be subject to further detailed transport assessment. Connections should be made through the site, so that pedestrians and vehicles can travel from Swindon Road, through to the A449 or Lodge Lane as they choose. Cycle infrastructure should form a key part of the site layout.”* Details will be set out in the master plan. Assuming that these measures are implemented, a

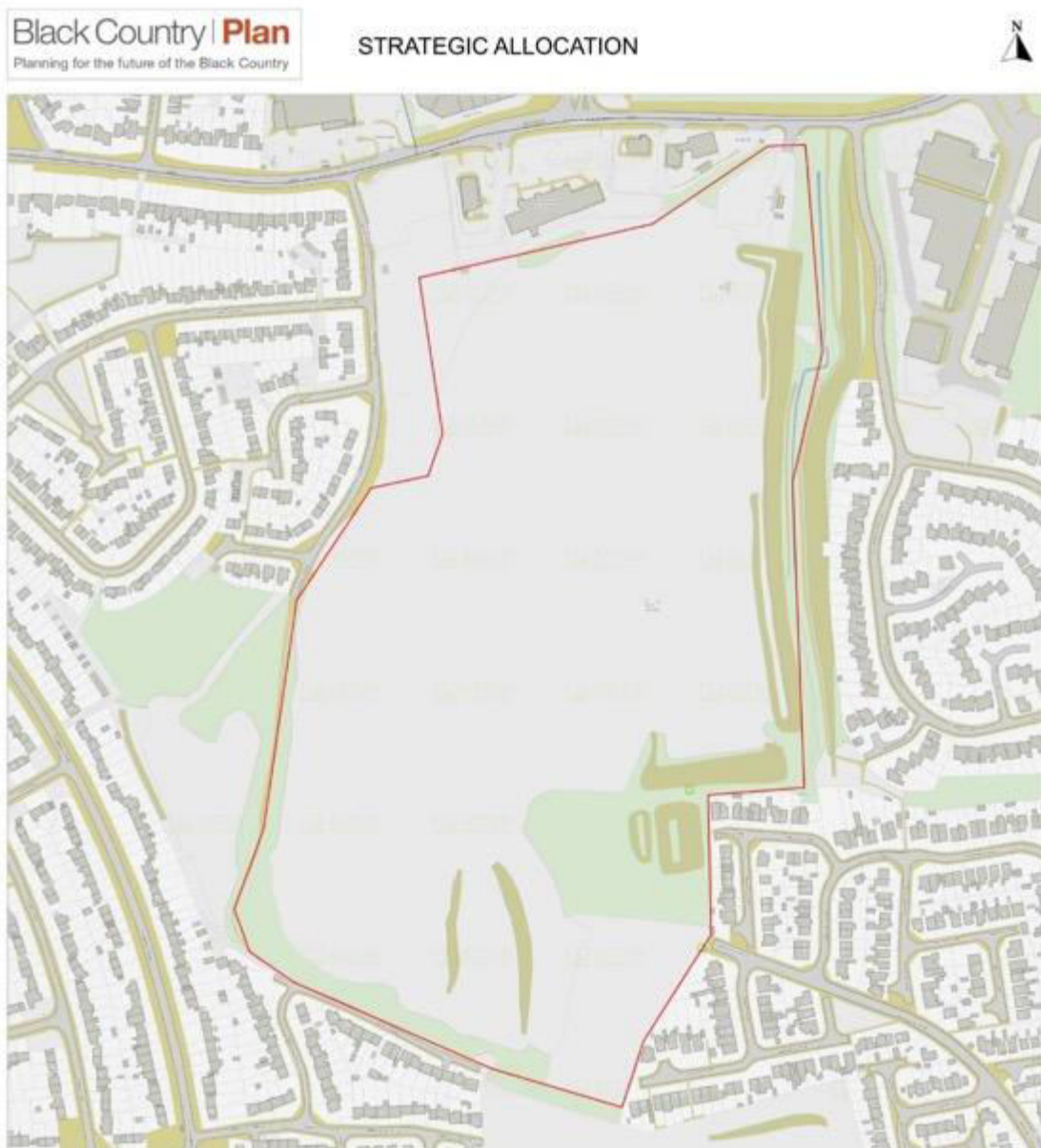
minor positive impact is anticipated in relation to Transport and Accessibility (SA Objective 9). The proposed measures to *"provide quality walking and cycle routes within the developments that provide easy, quick and safe access to nearby open spaces and the countryside"* would also be anticipated to have a beneficial effect with respect to health and climate change mitigation objectives (SA Objectives 4 and 12).

- J.13.3.9 Minor positive for pedestrian access to secondary schools and public transport access to secondary schools were identified at the pre-mitigation stage of the SA assessment process (See Appendix F) with a minor adverse impact identified for pedestrian access to primary school (with a proportion of the site lying outside of a 15-minute walking distance from a local primary school). The policy text notes that *"Pedestrian and public transport improvements to increase accessibility to local primary and secondary schools may be required in accordance with Policy HOU2. Should it be determined that some form of primary school provision is required as the BCP progresses towards adoption, this may need to be accommodated on the site and land will need to be allocated to accommodate a two-form entry primary school (approx 2.4ha)."* Assuming that these measures are put in place, this would lead to an overall positive impact on Education (SA Objective 14).
- J.13.3.10 As noted in the policy text cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area including consideration of highways impacts; delivery of green belt loss mitigation; delivery of biodiversity net gain; delivery of recreational open space improvement. Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.



### J.13.4 Policy DSA3 - Land at Ketley Quarry, Kingswinford

#### Policy DSA3 - Land at Ketley Quarry, Kingswinford



- A97 Land at Ketley Quarry, Kingswinford will be allocated for new residential growth and will form part of the North West Regeneration Core Area covering BCP Allocations DUH203 and DUH221. The site's gross area is 20.81ha, of which 13.52ha of the site is developable for 600 dwellings based on 40 - 45dph.
- A98 The estimated phasing of delivery is:
- 2024 – 2029 50 homes
  - 2030 - 2035 250 homes
  - 2035- 2039 300 homes
- A99 There will be a requirement for the development of the site to be of the highest quality and to accommodate the necessary infrastructure provision in appropriate locations. The key planning requirements for the Ketley Quarry Strategic Allocation are set out below. Other standard policy

### **Policy DSA3 - Land at Ketley Quarry, Kingswinford**

requirements, as set out in the BCP and Dudley Local Plan documents and SPDs, will also apply. A master plan will be prepared to guide the development of the strategic allocation. This will provide further detail on the requirements set out in this Policy and will provide a spatial framework for development.

- A100 The Quarry and adjacent sites are in separate ownership and are situated in close proximity to strategic sites identified Policy DSA1: South of Holbeache Lane / Wolverhampton Road and Policy DSA2: land at Swindon Road, Wall Heath. The cumulative impact of these sites (and other housing /employment allocations) on local infrastructure provision will need to be considered, in terms of:
- school place impacts;
  - highways impacts;
  - delivery of biodiversity net gain;
  - delivery of recreational open space improvements
- A101 Once the BCP has been adopted, allocations should be developed in accordance with the criteria identified in respect of each site and all other relevant general policy requirements, including any necessary developer contributions.

#### **School Place Requirements**

- A102 It is currently anticipated that both primary and secondary school place requirements arising from housing developments in the north west of Dudley over the Plan period will be capable of being met through extensions to existing primary and secondary schools. Pedestrian and public transport improvements to increase accessibility to local primary and secondary schools may be required in accordance with Policy HOU2.
- A103 Should it be determined that some form of primary school provision is required as the BCP progresses towards adoption, this may need to be accommodated on the site and land will need to be allocated to accommodate a two-form entry primary school (approximately 2.4ha).

#### **Highways Requirements**

- A104 Highway infrastructure is necessary for any development to function effectively and to minimise impacts on surrounding road junctions. It is considered that there should be vehicular access, of Dudley Road with a possible secondary access of Ketley Road, by Ketley Farm. The number of access points required, and their precise location should be subject to further detailed transport assessment. Pedestrian and cycle infrastructure should form a key part of the site layout providing connections to all nearby local amenities, including local primary schools and local centres. Details will be set out in the master plan.

#### **Nature Conservation and Net Biodiversity Gain Requirements**

- A105 There is a statutory designation relating to features of geological significance(SSSI) at the north of the site and two non-statutory geological designations (SINC) within its boundaries. The SSSI designation is a geological outcrop of the Etruria Formation, created during the Carboniferous Period (359-299 million years ago). The wider site is designated as a SLINC. The vast majority of the site is a disused quarry and is made up of bare ground and large mounds of quarry spoil. Parts of the quarry have become vegetated with early successional species and tall ruderal vegetation. The disused Tansy Green branch railway line runs to the east of the site, providing a further link to Fens Pools Nature Reserve to the south. Dawley Brook to the east of the site is designated as a SINC.

### **Policy DSA3 - Land at Ketley Quarry, Kingswinford**

The site also contains three distinct areas of woodland, with the belt to the east and southwest of the site acting as a boundary feature.

A106 Bat and bird surveys, including for barn owls, will need to be carried out in the abandoned farmhouse and surrounding buildings. Other surveys such as reptile and badger surveys may also be required.

A107 Policy ENV3 will apply to this site.

#### **Historic Environment Requirements**

A108 This allocation is the site of the former Ketley Colliery (HER 7963) recorded as being mostly abandoned by the production of the first edition OS in 1884. It also contains the site of Ketley Quarry (also recorded on the first edition OS), which is one of the 'Geo-sites' located within the Black Country Geopark, (please also see Policy ENV6 and for more information, click on the following link: <https://blackcountrygeopark.dudley.gov.uk/sites-to-see/ketley-quarry/>).

A109 Located in the north-west corner of this allocation, adjacent to the road, is the site of a weighbridge and its associated Weights and Measures building (HER15424). The buildings first appeared on the Fourth Edition OS (1937-1948). Any proposed development should seek to incorporate these heritage assets into any future proposals for this part of the site along with suitable interpretation information.

A110 Located in the southern part of the allocation is the site of Stourbridge Extension Canal (HER 7385), built during the 1830's and opened in 1840. Proposals for the site should seek to include within it sympathetic ways of revealing the significance of this heritage asset.

#### **Recreational Open Space Requirements**

A111 It will be necessary to provide good-quality walking and cycle routes within the developments, which can provide easy, quick and safe access to nearby open spaces and the countryside.

#### **Sustainable Drainage Requirements**

A112 Naturalised sustainable drainage systems that are sufficient to retain greenfield runoff rates should be provided for the site, in accordance with Policy CC5. An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the master plan is prepared.

#### **Local Wastewater Treatment Capacity**

A113 This site is served by Roundhill Wastewater Treatment Works and it is not anticipated that there are any issues with the site handling additional flow during the Plan period.

#### **Design principles**

A114 New development will have a density of no more than 40-45dph and will also retain a network of public open space across the site. Any proposed development should create a permeable layout by connecting the surrounding vehicle roads and pedestrian routes with a network of public open space and tree-lined streets. Layouts should incorporate 'back to back garden' housing and avoid the rear or sides of gardens facing the streets and public realm. Existing trees and on-site biodiversity value (according to the outcome of robust surveys) must be safeguarded and incorporated into the proposed layouts. These assets should form part of the publicly-accessible open space and should not be located within any private plots, except in exceptional circumstance. Corner plots should be

**Policy DSA3 - Land at Ketley Quarry, Kingswinford**

designed to address both aspects e.g. consider and propose a dual building frontage to minimise blank / dead frontages. All public open space should be overlooked by housing.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DSA3	0	-	+/-	+	0	-	-	-	+	++	0	+	+	+

J.13.4.1 The land at Ketley Quarry, Kingswinford will be allocated for new residential growth and will form part of the North West Regeneration Core Area and does not form part of the Green Belt. Approximately 600 homes are proposed at an average net density of 40-45 dph. Overall, a major positive impact on housing and minor positive impact on the economy would be expected as a result of the proposed development at this strategic location.

J.13.4.2 No Scheduled Monuments, Listed Buildings, Registered Parks and Gardens or Conservation Areas are located in the immediate vicinity of the site, however as noted in the policy text *“This allocation is the site of the former Ketley Colliery (HER 7963) recorded as being mostly abandoned by the production of the first edition OS in 1884. It also contains the site of Ketley Quarry (also recorded on the first edition OS), which is one of the ‘Geo-sites’ located within the Black Country Geopark...Located in the north-west corner of this allocation, adjacent to the road, is the site of a weighbridge and its associated Weights and Measures building (HER15424). The buildings first appeared on the Fourth Edition OS (1937-1948). Any proposed development should seek to incorporate these heritage assets into any future proposals for this part of the site along with suitable interpretation information. Located in the southern part of the allocation is the site of Stourbridge Extension Canal (HER 7385), built during the 1830’s and opened in 1840. Proposals for the site should seek to include within it sympathetic ways of revealing the significance of this heritage asset.”* With considerate planning, it is likely that there would be sufficient scope within this strategic location to direct development towards locations that would minimise effects on heritage resources. Overall a negligible impact on cultural heritage is expected. The provisions to provide interpretative information may also have the potential to raise awareness of heritage assets in the locality.

J.13.4.3 The site is located outside of the greenbelt and has not been assessed as part of the Landscape Sensitivity Assessment or Greenbelt Assessment as a brownfield site. A number of trees subject to Tree Preservation Orders (TPOs) are located along the eastern boundary of the site. Views of the site may potentially be available for local residents and

users of PRoW (minor adverse impacts identified at the pre-mitigation stage). It is envisaged that a masterplan will be prepared to guide the development of the Strategic Location. It is envisaged that a masterplan will be prepared to guide the development of the Strategic Location. Policy DSA 1 states that *"New development will have a density of no more than 40-45dph and will also retain a network of public open space across the site. Any proposed development should create a permeable layout by connecting the surrounding vehicle roads and pedestrian routes with a network of public open space and tree-lined streets. Layouts should incorporate 'back to back garden' housing and avoid the rear or sides of gardens facing the streets and public realm. Existing trees and on-site biodiversity value (according to the outcome of robust surveys) must be safeguarded and incorporated into the proposed layouts. These assets should form part of the publicly-accessible open space and should not be located within any private plots, except in exceptional circumstance. Corner plots should be designed to address both aspects e.g. consider and propose a dual building frontage to minimise blank / dead frontages. All public open space should be overlooked by housing."* Subject to clarification on trees and woodland and assuming measures such as this are taken into account, it is considered that on balance there would be potential to minimise impacts on landscape and visual receptors at this strategic location. A residual minor adverse impact is identified in respect to Landscape (SA Objective 2) pending further details to be specified in the pre submission plan.

- J.13.4.4 Potential major adverse effect in relation to biodiversity were identified in the pre-mitigation SA assessment due to Ketley Claypit SSSI being located almost wholly within northeastern site area, which is designated for its geological interest. Ketley Quarry SINC, SLINC and geological site also lies within the site area along with deciduous woodland which is identified as a habitat of principal importance under the Natural Environment and Rural Communities Act 2006<sup>76</sup>. Fens Pools SAC is located 1.3km east of site. The full implications of development proposed within the BCP on European sites will be considered in greater detail in the HRA (applies to all proposed strategic site allocations). The policy text notes that *"There is a statutory designation relating to features of geological significance (SSSI) at the north of the site and two non-statutory geological designations (SINC) within its boundaries. The SSSI designation is a geological outcrop of the Etruria Formation, created during the Carboniferous Period (359-299 million years ago). The wider site is designated as a SLINC. The vast majority of the site is a disused quarry and is made up of bare ground and large mounds of quarry spoil. Parts of the quarry have become vegetated with early successional species and tall ruderal vegetation. The disused Tansy Green branch railway line runs to the east of the site, providing a further link to Fens Pools Nature Reserve to the south. Dawley Brook to the east of the site is designated as a SINC. The site also contains three distinct areas of woodland, with the belt to the*

<sup>76</sup> Natural Environment and Rural Communities Act 2006. Available at:  
<https://www.legislation.gov.uk/ukpga/2006/16/contents> [Date Accessed: 12/04/21]

*east and southwest of the site acting as a boundary feature. Bat and bird surveys, including for barn owls, will need to be carried out in the abandoned farmhouse and surrounding buildings. Other surveys such as reptile and badger surveys may also be required.* Where possible, it is recommended that all developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. The policy text also states that *Existing trees and on-site biodiversity value (according to the outcome of robust surveys) must be safeguarded and incorporated into the proposed layouts.* At this stage it is considered that impacts on biodiversity are uncertain, based on the information available to date and that development within a proportion of the strategic location has the potential to result in adverse impacts on the geological features for which this SSSI has been designated as well as potentially direct and indirect impacts on biodiversity assets. Uncertain and potentially mixed effects are therefore identified in respect to biodiversity (SA Objective 3).

- J.13.4.5 It is noted that the site forms a former quarry. Sites which would include development of less than 20ha of undeveloped land has been assessed as having a potential minor negative on Natural Resources (SA Objective 6) in the pre mitigation SA assessment. It should be noted that the SA assessment adheres to a precautionary approach to the definition of previously developed land in the glossary of the NPPF<sup>77</sup>.
- J.13.4.6 The site is located within Flood Zone 1. There are scattered areas of low, medium and high water flood risk throughout the site, focussed in the eastern area. It is anticipated that Sustainable Drainage Systems (SuDS) *sufficient to retain greenfield runoff rates will be provided for the site, in accordance with Policy CC5. An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the master plan is prepared.* Integration with Sustainable Drainage Systems (SuDS) would be expected to minimise the extent of surface water flooding. Appropriate allowances should be put in place for climate change. Assuming that these measures are put in place, this would lead to an overall negligible impact on flooding and climate change adaptation (SA Objective 5).

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<sup>77</sup> NPPF definition of Previously developed land "Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape."

- J.13.4.7 The site is located within an AQMA and within 200m of a Main Road. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site-specific assessments. A minor adverse impact in respect to Pollution (SA Objective 7) is identified at this stage of the assessment.
- J.13.4.8 Minor positive impacts in relation to proximity to bus stops, site pedestrian access, site road access and public transport access to local services were identified in the SA assessment at the pre mitigation stage (See Appendix F). Minor adverse impacts were identified in relation to access to a railway station (>2km) and pedestrian access to food and local services (nearest identified 910m west of site). The policy text states that *"It is considered that there should be vehicular access, Dudley Road with a possible secondary access of Ketley Road, by Ketley Farm. The number of access points required, and their precise location should be subject to further detailed transport assessment. Pedestrian and cycle infrastructure should form a key part of the site layout providing connections to all nearby local amenities, including local primary schools and local centres."* On balance, a positive impact is identified in relation to Transport and Accessibility (SA Objective 9), Health (SA Objective 12) and Climate Change Mitigation (SA Objective 4).
- J.13.4.9 Minor positive impacts were identified at the pre-mitigation stage of the SA assessment process for pedestrian access to primary school, pedestrian access to secondary school and public transport access to secondary school (See Appendix F).
- J.13.4.10 As noted in the policy text cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area including consideration of highways impacts; delivery of green belt loss mitigation; delivery of biodiversity net gain; delivery of recreational open space improvement. Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

J.13.5 Policy DSA4 – Corbett Meadow Local Green Space

**Policy DSA4 - Corbett Meadow Local Green Space**

**Black Country | Plan**  
 Planning for the future of the Black Country

STRATEGIC ALLOCATION



**Key:**

- Strategic Allocation
- Conservation Area
- ▲ Listed Buildings
- Individual Tree Preservation Order (TPO)
- Grouped TPO
- Sites of Importance for Nature Conservation (SINC)
- Sites of Local Importance for Nature Conservation (SLINCs)
- Sites of Local Importance for Nature Conservation (SLINCs)
- Green Belt

<b>Strategic Allocation:</b>	DSA.6
<b>Site Assessment Reference:</b>	10516
<b>Site Names:</b>	Corbett Meadow
<b>Local Authority:</b>	Dudley
<b>Ward:</b>	Amblecote





A116 The area shown on the Proposals Map is allocated as Corbett Meadow Local Green Space. In line with national policy the site will be protected from inappropriate development, unless there are very special circumstances that outweigh the harm to the site.

A117 The views of the local community will also need to be taken into account when considering any development proposals on the site.

A118 Designation of land as Local Green Space is set out in the NPPF, allowing communities to identify and protect green areas of particular importance to them. It has been demonstrated that Corbett Meadow meets the criteria set out in Paragraph 100 of the NPPF (2019). The site of the meadow was purchased by local philanthropist John Corbett in 1892 to provide a hospital and the gardens and public grounds were to be used for the purposes of a public park. The site supports a variety of wildlife and is made up of flower-rich lowland meadow pasture, many wooded areas of veteran age and natural ponds.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DSA4	0	0	+	0	0	+	0	0	0	0	0	+	0	0

J.13.5.1 Policy DSA 4 identifies Corbett Meadow as a Local Green Spaces (LGS) of importance to the local community which should be conserved for the use of present and future residents.

J.13.5.2 LGSs can help to provide important wildlife habitats and corridors within built-up areas and form part of the local green infrastructure network. The policy text notes that the site “*supports a variety of wildlife and is made up of flower-rich lowland meadow pasture, many wooded areas of veteran age and natural ponds*” which are likely to be particularly valuable in terms of local biodiversity. Protecting green spaces through LGSs would be likely to result in a minor positive impact on biodiversity (SA Objective 3).

J.13.5.3 Policy DSA.4 seeks to ensure that Corbett Meadow LGS is “*protected from inappropriate development*”. This would be anticipated to have a minor positive impact on natural resources (SA Objective 6). The NPPF recognises the benefits of open space in terms of its contribution to creating sustainable patterns of urban and rural development, its role in maintaining strong and vibrant communities and the associated promotion of health and well-being. Corbett Meadow LGS as a “*public park*” would be anticipated to help contribute to this and therefore a minor positive impact on health (SA Objective 12) could be expected.

J.13.5.4 This policy could be strengthened in some areas. Consideration could be given to the following the following amendments: “*Development that would harm the identified qualities and demonstrated special characteristics of this LGS will not be supported unless*

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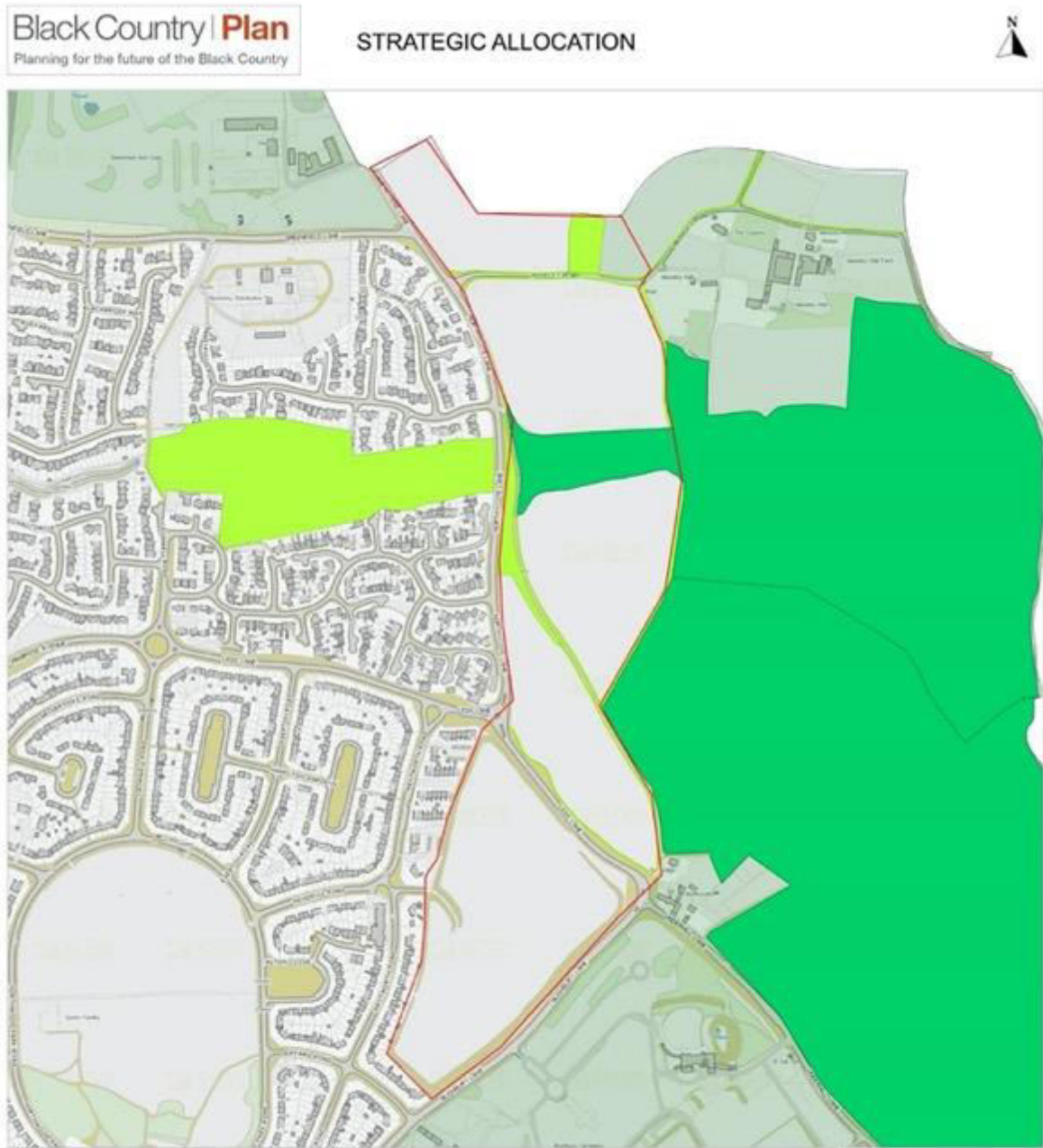
*there are exceptional circumstances which outweigh the harm to the LGS. In these cases alternative and appropriate green space should be provided” and “Development in the immediate vicinity of this Local Green Space should demonstrate how it respects, and where possible, enhances the character or setting of the Local Green Space.”* Specification could be provided of the types of criteria that may need to be met in order to demonstrate exceptional circumstances.

- J.13.5.5 Proposals for the enhancement and long term management of the LGS as part of the Green Infrastructure network could also be more explicitly set out within this policy or supporting text.

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J.13.6 Policy CSA1 – Bushbury Strategic Allocation

Policy CSA1 – Bushbury Strategic Allocation



**Key:**

- Strategic Allocation
- Conservation Area
- ▲ Listed Buildings
- Individual TPO
- Grouped TPO
- Sites of Importance for Nature Conservation (SINC)
- Sites of Local Importance for Nature Conservation (SLINC)
- Greenway
- Green Belt

<b>Strategic Allocation:</b>	CSA.1
Site Assessment Reference:	SA-0001-WOL and SA-0002-WOL
Site Names:	Bushbury Strategic Allocation
Local Authority:	Wolverhampton
Ward:	Bushbury North



D30 The Bushbury Strategic Allocation falls within the Bushbury Neighbourhood Growth Area and covers BCP Housing Allocations WOH257, WOH258, WOH259 and WHO260.

### Policy CSA1 – Bushbury Strategic Allocation

These sites have been removed from the green belt and allocated to deliver 532 homes in total, at an average net density of 40 dph, together with sufficient space to provide a two- form entry primary school.

The estimated phasing of delivery is:

- By 2029: 348 homes and primary school (if necessary)
- 2029-34: 184 homes

D31 The sites are currently in two separate ownerships; however, they require an integrated and comprehensive approach to development because they are adjacent to each other and have joint infrastructure needs, in terms of:

- school place impacts;
- highways impacts;
- delivery of mitigation for green belt loss ;
- delivery of biodiversity net gain;
- delivery of improvements to recreational open space

D32 The potential new primary school could also serve the needs of the Fallings Park Strategic Allocation (see Policy CSA2).

D33 The key planning requirements for the Bushbury Strategic Allocation are set out below. Other standard policy requirements, as set out in the BCP and Wolverhampton Local Plan documents and SPDs, will also apply. A masterplan will be prepared to guide comprehensive development of the Bushbury Strategic Allocation. This will provide further detail on the requirements set out in this Policy and will provide a spatial framework for developments.

#### School Place Requirements

D34 Current school place projections indicate that an additional single form entry primary school is required to serve the Bushbury Neighbourhood Growth Area and other planned housing developments in the north east of Wolverhampton. Therefore, 2.3ha of Site WOH260 has been set aside for a potential primary school. If this site is not ultimately required for provision of a primary school, it will be brought forward for additional housing. In this event, improvements to increase accessibility to nearby primary schools may be required in accordance with Policy HOU2.

D35 It is currently anticipated that secondary school place requirements arising from housing developments in the north east of Wolverhampton over the plan period will be capable of being met through extensions to existing secondary schools and / or provision of new secondary schools within Wolverhampton. Public transport improvements to increase accessibility to secondary schools may be required in accordance with Policy HOU2.

#### Highways Requirements

D36 To avoid adverse impacts on the wider road network, improvements to highway junctions along the Northcote Lane / Legs Lane / Bushbury Lane route will be required. Part of Moseley Road will also need to be upgraded to provide access to Sites WOH258 and WOH259, which will need to be brought forward together. Details will be set out in the masterplan.

## **Policy CSA1 – Bushbury Strategic Allocation**

### **Green Belt Loss Mitigation Requirements**

- D37 The following measures will together form sufficient mitigation for the loss of green belt at Sites WOH257, WOH258, WOH259 and WOH260:
- a) accessibility, biodiversity and environmental quality improvements to Northcote Farm Country Park, which falls within the green belt and is owned and managed by City of Wolverhampton Council;
  - b) accessibility, biodiversity and environmental quality improvements to 10.4ha of land designated as the Northcote Farm Country Park Extension Area, which is currently in the control of the owner of Sites WOH257, WOH258 and WOH259.
- D38 There will be a requirement for all green belt loss mitigation works and any necessary transfer of land ownership to be completed before substantial completion of development at sites WOH257, WOH258, WOH259 and WOH260.
- D39 The green belt boundary has been redrawn around the development sites to exclude them from it. In most cases there is an existing landscaped buffer or road that will provide a defensible new green belt boundary. However, the northern boundary of Site WOH259 abuts agricultural land in South Staffordshire. To provide a defensible new green belt boundary in this location, it is important to ensure that the design of development on the site incorporates a significant landscaped buffer along this northern boundary.
- D40 Developments should be designed to minimise potential harm to the integrity of remaining green belt areas and landscape character, as identified in the Black Country Green Belt Study and Black Country Landscape Sensitivity Assessment.

### **Nature Conservation and Net Biodiversity Gain Requirements**

- D41 All existing SINCs, SLINCs, tree preservation orders, hedgerows, woodland and significant trees, both within and adjoining the development sites, should be retained, protected and incorporated sympathetically into the design of development (see Policy ENV4). Sufficient buffer zones should be provided at the edge of these habitat areas, particularly where there are mature trees and hedgerows, to allow them to thrive following development.
- D42 It is anticipated that biodiversity net gain requirements for the developments will be met through delivery of the green belt loss mitigation requirements set out above, and subject to the minimum 10% requirement identified in the Environment Bill / Act and the requirements of Policy ENV3.

### **Historic Environment Requirements**

- D43 The design of developments should respect the existence of historic environment designations in areas to the north, east and south of the sites, specifically: Moseley Old Hall (National Trust); Northcote Farm Grade II Listed Building; Moseley Mill and Fishponds Area of High Historic Landscape Value; Moseley Court Bushbury Designed Landscape of High Historic Value; Moseley Historic Rural Settlement Area of High Historic Townscape Value and Bushbury Hill Conservation Area.

### **Recreational Open Space Requirements**

- D44 Subject to satisfactory delivery of the green belt loss mitigation requirements set out above, it is judged that the local area will have good access to existing recreational open space, allotments and

### Policy CSA1 – Bushbury Strategic Allocation

play and sports facilities that have the capacity to meet the varied needs of residents, in line with adopted open space standards. Therefore, no new on-site open space will be required, beyond that necessary to protect existing nature conservation value and to provide sufficient natural, sustainable drainage systems. However, it will be necessary to provide quality walking and cycle routes within the developments, which provide easy, quick and safe access to nearby open spaces and the countryside, and incorporate existing rights of way, including the existing footpath / cycleway track currently dividing the two parts of Site WOH257.

#### Sustainable Drainage Requirements

D45 Naturalised sustainable drainage systems that are sufficient to retain greenfield runoff rates should be provided separately for each site, in accordance with Policy CC5. An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the masterplan is prepared.

#### Local Wastewater Treatment Capacity

D46 The Black Country Water Cycle Study concludes that there is limited headroom / capacity at the Coven Heath wastewater treatment works serving the area. Severn Trent have identified this constraint and have indicated that they will be able to deliver the upgrades required to local wastewater treatment capacity in a timely manner to support the delivery of developments within Bushbury Neighbourhood Growth Area, and also other developments in the north of Wolverhampton and parts of South Staffordshire, over the Plan period.

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSA1	-	-	+/-	+	0	-	-	-	+	++	0	+	+	++

J.13.6.1 The Bushbury Strategic Allocation falls within the Bushbury Neighbourhood Growth Area and covers equivalent SA references SA0003WOL, SA0002WOL, SA0001WOL, SA0005WOL). The proposed Bushbury housing allocation is a composite of a number of smaller sites which have been assessed individually as part of the SA process at the 'pre mitigation stage' (See Appendix I). The site is proposed to be released from the Green Belt. Approximately 532 homes are proposed at an average net density of 40 dph, together with sufficient space to provide a two- form entry primary school. Overall, a major positive impact on housing and minor positive effect on the Economy would be expected as a result of the proposed development at this strategic location.

- J.13.6.2 The site is located in the vicinity of a number of Grade II\* and Grade II listed buildings (with varying degrees of separation by buildings or woodland) and parts of the site are located outside of, but in proximity to, Bushy Conservation Area. Areas of high historic landscape value also occur in environs around the site. The policy text states that “*The design of developments should respect the existence of historic environment designations in areas to the north, east and south of the sites, specifically: Moseley Old Hall (National Trust); Northycote Farm Grade II Listed Building; Moseley Mill and Fishponds Area of High Historic Landscape Value; Moseley Court Bushbury Designed Landscape of High Historic Value; Moseley Historic Rural Settlement Area of High Historic Townscape Value and Bushbury Hill Conservation Area.*” This policy (and other policies within the BCP) would be expected to ensure that cultural heritage resources across the Black Country are suitably protected, however minor adverse impacts cannot be ruled out at this stage of the assessment process due to the level of information available at this time.
- J.13.6.3 The strategic site is located in an area of moderate landscape sensitivity based on the Landscape Sensitivity Assessment and area of very high sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents and users of PRoW on or near to the site. It is envisaged that a masterplan will be prepared to guide the development of the Strategic Location. The policy text notes that “*it important to ensure that the design of development on the site incorporates a significant landscaped buffer along [the] northern boundary*” and “*Developments should be designed to minimise potential harm to the integrity of remaining green belt areas and landscape character, as identified in the Black Country Green Belt Study and Black Country Landscape Sensitivity Assessment.*” A number of further measures are set out in the policy text to mitigate effects on the greenbelt including “*accessibility, biodiversity and environmental quality improvements to Northycote Farm Country Park, which falls within the green belt and is owned and managed by City of Wolverhampton Council; b. accessibility, biodiversity and environmental quality improvements to 10.4ha of land designated as the Northycote Farm Country Park Extension Area, which is currently in the control of the owner of Sites WOH257, WOH258 and WOH259. This area falls within the green belt and is a designated SINC, which is currently not accessible to the public. The area will be subject to sensitive improvements, opened up for public access.*” Together these measures are envisaged to help provide a degree of mitigation to the greenbelt and provide for a number of beneficial effects associated with the strategic site including access to areas which are not currently accessible to the public as well as biodiversity enhancements. A minor residual adverse impact is identified in respect to Landscape (SA Objective 2).
- J.13.6.4 Minor adverse effects in relation to biodiversity were identified in the pre-mitigation SA assessment due to the site lying within 15km on Cannock Chase SAC, the site lying within an IRZ of a SSSI where ‘any residential developments with a total net gain in residential units’ should be consulted on with Natural England and parts of the site lying adjacent to or within 100m of Moseley Hall & Northycote Farm SINC. The proposed development at

this location could potentially result in adverse impacts on these surrounding biodiversity assets, due to increased development-related threats and pressures. The full implications of development proposed within the BCP on European sites will be considered in greater detail in the HRA. The section under 'Green Belt Loss Mitigation Requirements' of this policy sets out a number of enhancements that are proposed in relation to adjacent biodiversity assets including SINCs. Further provisions within the policy text state that "*All existing SINCs, SLINCs, tree preservation orders, hedgerows, woodland and significant trees, both within and adjoining the development sites, should be retained, protected and incorporated sympathetically into the design of development (see Policy ENV4). Sufficient buffer zones should be provided at the edge of these habitat areas, particularly where there are mature trees and hedgerows, to allow them to thrive following development. It is anticipated that net biodiversity gain requirements for the developments will be met through delivery of the green belt loss mitigation requirements set out above, subject to the minimum 10% requirement identified in the Environment Bill / Act and the requirements of Policy ENV3.*" The proposed development of approximately 532 homes at Bushbbury as a greenfield site would be likely to result in a loss of biodiversity features, to some extent. It is also anticipated that the measures set out in this policy would help to contribute towards maintaining habitat connectivity and enhancement. Where possible, it is recommended that all developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. Both potential positive and negative / uncertain effects are therefore identified in respect to biodiversity (SA Objective 3).

- J.13.6.5 The site is identified as being located within predominantly Grade 3 land with a smaller component of Grade 2 land based on regional ALC Natural England mapping. The site is not located within an MSA. The site would lead to the loss of less than 20ha of undeveloped land which would lead to permanent impacts on the loss of natural resources associated with the change in use from the site's existing greenfield status and therefore a minor residual adverse impact is identified in relation to Natural Resources (SA Objective 6).
- J.13.6.6 The site is located within Flood Zone 1 and does not co-incide with areas identified at low, medium or high surface water flood risk. It is anticipated that Sustainable Drainage Systems (SuDS) "*sufficient to retain greenfield runoff rates will be provided for the site, in accordance with Policy CC5*". The policy text notes that "*An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the master plan is prepared.*" Integration with Sustainable Drainage Systems (SuDS) would be expected to minimise the extent of surface water flooding. Upgrades to local wastewater treatment capacity are



also envisaged as part of this development in association with Severn Trent Water, as specified in the policy text. Assuming that these measures are put in place this would lead to an overall negligible impact on flooding and climate change adaptation (SA Objective 5).

- J.13.6.7 The site is located within an AQMA and within a Groundwater Source Protection Zone. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site-specific assessments.
- J.13.6.8 Minor adverse impacts were identified at the pre-mitigation stage of the SA assessment process (See Appendix I) in terms of access to education facilities for component parts of the strategic allocation. Parts of the strategic allocation lie outside of a 15 minute walking distance from a local primary school, 25 minutes walking distance from a local secondary school and outside of a 25 minute journey by public transport to a secondary school. The policy text notes that "*Current school place projections indicate that an additional single form entry primary school is required to serve the Bushbury Neighbourhood Growth Area and other planned housing developments in the north east of Wolverhampton. Therefore, 2.3ha of Site C27 has been set aside for a potential primary school. If this site is not ultimately required for provision of a primary school, it will be brought forward for additional housing. In this event, improvements to increase accessibility to nearby primary schools may be required in accordance with Policy HOU2. It is currently anticipated that secondary school place requirements arising from housing developments in the north east of Wolverhampton over the plan period will be capable of being met through extensions to existing secondary schools and / or provision of new secondary schools within Wolverhampton. Public transport improvements to increase accessibility to secondary schools may be required in accordance with Policy HOU2.*" Assuming that these measures are put in place this would lead to an overall major positive impact on education (SA Objective 14).
- J.13.6.9 Minor positive impacts in relation to proximity to bus stops (<400m) were identified in the SA assessment at the pre mitigation stage (See Appendix I). Minor adverse impacts were identified in relation to access to a railway station (>2km) and parts of the site (Parcels SA-0002-WOL & SA-0003-WOL) being located outside of 15 minutes walking distance to food and local services as well pedestrian access to parts of the site. The policy text states that "*To avoid adverse impacts on the wider road network, improvements to highway junctions along the Northcote Lane / Legs Lane / Bushbury Lane route will be required. Part of Moseley Road will also need to be upgraded to provide access to Sites C24 and C25, which will need to be brought forward together. Details will be set out in the masterplan.*" Further reference is made within the policy to "*providing quality walking and cycle routes within the developments, which provide easy, quick and safe access to nearby open spaces and the countryside, and incorporate existing rights of way, including the*

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*existing footpath / cycleway track currently dividing the two parts of Site C26.*" On balance, a positive impact is identified in relation to Transport and Accessibility (SA Objective 9), Health (SA Objective 12) and Climate Change Mitigation (SA Objective 4).

- J.13.6.10 As noted in the policy text cumulative impacts will need to be considered in relation to the site being within two separate ownerships and other strategic housing allocations in the surrounding area including consideration of school place impacts, highways impacts; delivery of green belt loss mitigation; delivery of biodiversity net gain; and delivery of recreational open space improvement. Cumulative impacts will be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

J.13.7 Policy CSA2 – Fallings Park Strategic Allocation



## **Policy CSA2 – Fallings Park Strategic Allocation**

of high-quality recreational open space, including play facilities, on Site WOH262, to serve existing and new residents. The sites are suitable for an average density of 40 dph, with the exception of Site WOH271. Due to the linear shape of this site, the rural character of the local area and the need to create a defensible green belt boundary, a development of no more than 25 dph is appropriate.

D48 The estimated phasing of delivery is:

- By 2029: 200 homes and recreational open space
- 2029-34: 103 homes

D49 The sites are currently in four separate ownerships; however they require an integrated and comprehensive approach to development because they are adjacent to each other and have joint infrastructure needs, in terms of:

- school place impacts;
- highways impacts;
- delivery of green belt loss mitigation;
- delivery of biodiversity net gain;
- delivery of recreational open space

D50 The potential new primary school on the Bushbury Strategic Allocation could also serve the needs of the Fallings Park Strategic Allocation (see Policy CSA1 above).

D51 The key planning requirements for the Fallings Park Strategic Allocation are set out below. Other standard policy requirements, as set out in the BCP and Wolverhampton Local Plan documents and SPDs, will also apply. A masterplan will be prepared to guide the comprehensive development of the Fallings Park Strategic Allocation. This will offer further detail on the requirements set out in this Policy and will also provide a spatial framework for developments.

### **School Place Requirements**

D52 Current school place projections indicate that an additional single form entry primary school is required to serve the Fallings Park Neighbourhood Growth Area and other housing developments over the Plan period in the north east of Wolverhampton. Therefore, 2.3ha of Site WOH260 has been set aside for a potential primary school.

D53 It is currently anticipated that secondary school place requirements arising from housing developments in the north east of Wolverhampton over the Plan period will be capable of being met through extensions to existing secondary schools and / or provision of new secondary schools within Wolverhampton.

### **Highways Requirements**

D54 To avoid adverse impacts on the wider road network, major improvements will be required to Grassy Lane, Wood Hayes Road, the Grassy Lane \ Wood Hayes Road junction and the Wood Hayes Road \ Wood End Road signal-controlled junction. Development would also contribute towards increasing congestion on Cannock Road, which has been identified as a pinch point requiring medium term investment.

D55 Therefore, major improvements along the routes of Cannock Road and Wood Hayes Road are likely to be required. Details will be set out in the masterplan.

## **Policy CSA2 – Fallings Park Strategic Allocation**

### **Green Belt Loss Mitigation Requirements**

- D56 Mitigation for the loss of green belt at Sites WOH262, WOH263, WOH264 and WOH271 will be provided through accessibility, biodiversity and environmental quality improvements to the significant areas of recreational open space located in the nearby Bushbury Hill area, which fall within the green belt and are owned and managed by City of Wolverhampton Council. These cover: Tennyson Road Neighbourhood Park; Bushbury Hill Amenity Area; and Sandy Lane Allotments.
- D57 There will be a requirement for all green belt loss mitigation works and any necessary transfer of land ownership to be completed before substantial completion of development at sites WOH262, WOH263, WOH264 and WOH271.
- D58 The green belt boundary has been redrawn around the development sites to exclude them and to align with the administrative boundary between Wolverhampton and South Staffordshire. To the north and east this lies along a culvert / brook and hedgerows and through agricultural fields. To provide a defensible new green belt boundary in this location, it is important that the design of development incorporates significant landscaped buffers, which will also enhance the nature conservation value of existing habitats.
- D59 Developments should be designed to minimise potential harm to the integrity of remaining green belt areas and landscape character, as identified in the Black Country Green Belt Study and Black Country Landscape Sensitivity Assessment.

### **Nature Conservation and Net Biodiversity Gain Requirements**

- D60 All existing hedgerows, woodland and significant trees both within and adjoining the development sites should be retained, protected and incorporated sympathetically into the design of development (see Policy ENV4). Sufficient buffer areas should be provided at the edge of these habitat areas, particularly where mature trees and hedgerows exist, to allow them to thrive following development.
- D61 It is anticipated that biodiversity net gain requirements for the developments will be met on-site or through the green belt mitigation measures set out above, and subject to the minimum 10% requirement identified in the Environment Bill / Act and the requirements of Policy ENV3.

### **Recreational Open Space Requirements**

- D62 1ha of recreational open space, including play facilities, will be provided on Site WOH262 to deliver a park to serve residents. Following this provision, the local area will benefit from good access to recreational open space, allotments, play and sports facilities that together have the capacity to meet the varied needs of residents, in line with adopted open space standards. No additional new on-site open space is likely to be required, beyond that necessary to protect existing nature conservation value and provide sufficient natural, sustainable drainage systems. However, it will be necessary to provide quality walking and cycle routes within the developments that provide easy, quick and safe access to nearby open spaces and the countryside, and which also incorporate existing rights of way.

### **Sustainable Drainage Requirements**

- D63 Naturalised sustainable drainage systems that are sufficient to retain greenfield runoff rates should be provided in accordance with Policy CC5. Allowances for the space necessary to accommodate these systems, and a culvert standoff zone, have been made when defining the indicative net developable area. These allowances may be adjusted when the masterplan is prepared.

## Policy CSA2 – Fallings Park Strategic Allocation

### Local Wastewater Treatment Capacity

D64 The Black Country Water Cycle Study concludes that there is limited headroom / capacity at the Coven Heath wastewater treatment works that serve this area. Severn Trent have identified this constraint and have indicated that they are able to deliver the upgrades required to local wastewater treatment capacity in a timely manner to support the delivery of developments within the Fallings Park Neighbourhood Growth Area, and also other developments in the north of Wolverhampton and parts of South Staffordshire, over the Plan period.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSA 2	0	-	+/-	+	0	-	-	-	+	++	0	+	+	+

J.13.7.1 The Fallings Park Strategic Allocation falls within the Fallings Park Neighbourhood Growth Area and covers equivalent SA references SA0009WOL, SA0010 WOL, SA0015WOL, SA0030WOL. The proposed Fallings Park Strategic housing allocation is a composite of a number of smaller sites which have been assessed individually as part of the SA process at the 'pre mitigation stage' (See Appendix I). The land is proposed to be released from the Green Belt. Approximately 303 homes are proposed at an average net density of between 25-40 dph, responding to the characteristics of each of the site parcels. Overall, a major positive impact on housing would be expected as a result of the proposed development at this strategic location (taking all aggregate site parcels into account) alongside a minor positive impact on the economy.

J.13.7.2 No Scheduled Monuments, Listed Buildings or Registered Parks and Gardens are located in the immediate vicinity of the site and the site is not located in proximity to areas of high historic landscape value. Potential impacts on heritage resources, including the setting of heritage assets and the archaeological potential of the site would be addressed as part of the planning process and would be subject to other policies in the BCP. With considerate planning, it is likely that there would be sufficient scope within this strategic location to direct development towards locations that would minimise effects on heritage resources. Overall a negligible impact on cultural heritage is expected. The site is located in an area of low-moderate landscape sensitivity based on the Landscape Sensitivity Assessment and located within an area of low-moderate sensitivity in relation to greenbelt harm. No PRoW cross the site. Views towards the site from adjacent residential areas form an important consideration. It is envisaged that a masterplan will be prepared to guide the development of the Strategic Location. The proposed development and housing densities has been

designed to respond to the landscape characteristics on respective parts of the site. Policy CSA2 states that *"The sites are suitable for an average density of 40 dph, with the exception of Site C31. Due to the linear shape of this site, the rural character of the local area and the need to create a defensible green belt boundary, a development of no more than 25 dph is appropriate."* This policy also states that *"Mitigation for the loss of green belt at Sites WOH262, WOH263, WOH264 and WOH271 will be provided through accessibility, biodiversity and environmental quality improvements to the significant areas of recreational open space located in the nearby Bushbury Hill area, which fall within the green belt and are owned and managed by City of Wolverhampton Council. These cover: Tennyson Road Neighbourhood Park; Bushbury Hill Amenity Area; and Sandy Lane Allotments..... It is important that the design of development incorporates significant landscaped buffers, which will also enhance the nature conservation value of existing habitats."* Overall, these measures are envisaged to help integrate the development into the existing local landscape context. A residual minor adverse impact is identified in respect to Landscape (SA Objective 2).

J.13.7.3 Minor adverse effect in relation to biodiversity were identified in the pre-mitigation SA assessment due to parts of the site lying within 15km on Cannock Chase SAC, the site lying within an IRZ of a SSSI where 'any residential developments with a total net gain in residential units' should be consulted on with Natural England. The proposed development at this location could potentially result in adverse impacts on these surrounding biodiversity assets, due to increased development-related threats and pressures. Both potential positive and negative / uncertain effects are therefore identified in respect to biodiversity (SA Objective 3). The full implications of development proposed within the BCP on European sites will be considered in greater detail in the HRA (applies to all proposed strategic site allocations).

J.13.7.4 The site is located within Flood Zone 1. Small parts of the site co-incide with areas of low, medium and / or high surface water flood risk. Mitigation measures should be informed by the site-specific Flood Risk Assessment including consideration of site accesses and appropriate climate change allowances. It is anticipated that Sustainable Drainage Systems (SuDS) *"sufficient to retain greenfield runoff rates will be provided for the site, in accordance with Policy CC5. An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the master plan is prepared."* Integration with Sustainable Drainage Systems (SuDS) would be expected to minimise the extent of surface water flooding. Upgrades to local wastewater treatment capacity are also envisaged as part of this development in association with Severn Trent Water, as specified in the policy text. Assuming that these measures are put in place this would lead to an overall negligible impact on climate change adaptation (SA Objective 5).

- J.13.7.5 The site is located within an AQMA, within 200m of a Main Road and parts of the site are located within 10m of a watercourse. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site specific assessments.
- J.13.7.6 Minor positive impacts in relation to proximity to bus stops (<400m) were identified in the SA assessment at the pre mitigation stage (See Appendix I). Minor adverse impacts were identified in the SA assessment at the pre mitigation stage in relation to access to a railway station (>2km), road and pedestrian access to parts of the site. The policy text states that *"To avoid adverse impacts on the wider road network, major improvements will be required to Grassy Lane, Wood Hayes Road, the Grassy Lane | Wood Hayes Road junction and the Wood Hayes Road | Wood End Road signal-controlled junction. Development would also contribute towards increasing congestion on Cannock Road, which has been identified as a pinch point requiring medium term investment. The policy text also states that "it will be necessary to provide quality walking and cycle routes within the developments that provide easy, quick and safe access to nearby open spaces and the countryside, and which also incorporate existing rights of way."* The policy provides that 1ha of recreational open space, including play facilities, will be provided on Site WOH262 to deliver a park to serve new and existing residents. On balance, a minor positive impact is identified in relation to Transport and Accessibility (SA Objective 9) and Climate Change Mitigation (SA Objective 4).
- J.13.7.7 Minor positive impacts were identified at the pre-mitigation stage of the SA assessment process (See Appendix I) in terms of access to education facilities for the strategic allocation. The site lies 15 minute walking distance from a local primary school, 25 minutes walking distance from a local secondary school and within a 25 minute journey by public transport to a secondary school. The policy text notes that *"Current school place projections indicate that an additional single form entry primary school is required to serve the Fallings Park Neighbourhood Growth Area and other housing developments over the Plan period in the north east of Wolverhampton. Therefore, 2.3ha of Site WOH260 [relating to Bushbury Strategic Allocation] has been set aside for a potential primary school. It is currently anticipated that secondary school place requirements arising from housing developments in the north east of Wolverhampton over the Plan period will be capable of being met through extensions to existing secondary schools and / or provision of new secondary schools within Wolverhampton."* A minor positive impact is identified in relation to Education (SA Objective 14).
- J.13.7.8 As noted in the policy text cumulative impacts will need to be considered in relation to the site being within two separate ownerships and other strategic housing allocations in the surrounding area including consideration of school place impacts, highways impacts; delivery of green belt loss mitigation; delivery of biodiversity net gain; and delivery of recreational open space improvement. Cumulative impacts will be assessed at the



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Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

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J.13.8 Policy WSA1 (Walsall Strategic Allocation) – Home Farm, Sandhills, Walsall Wood

Policy WSA1 – Home Farm, Sandhills, Walsall Wood

**Black Country Plan**  
 Planning for the future of the Black Country

STRATEGIC ALLOCATION



**Key:**

Strategic Allocation	Environmental Agency (EA) Flood Zone 2
Conservation Area	EA Flood Zone 3
Listed Buildings	JBA Indicative Flood Zone 2
Individual Tree Preservation Order (ITPO)	JBA Indicative Flood Zone 3a
Grouped TPO	JBA Indicative Flood Zone 3b
Sites of Importance for Nature Conservation (SINCS)	
Sites of Local Importance for Nature Conservation (SLINCS)	
Greenway	
Green Belt	

<b>Strategic Allocation:</b>	WSA.1
Site Assessment Reference:	SA-0022-WAL
Site Names:	Home Farm, Sandhills, Walsall Wood, Walsall, West Midlands
Local Authority:	Walsall
Ward:	Aldridge North and Walsall Wood



### Policy WSA1 – Home Farm, Sandhills, Walsall Wood

- C33 Home Farm is located on the northern boundary of Walsall with Lichfield. The northwest boundary is defined by the Wyrley and Essington Canal, with housing beyond and industrial uses to the far northwest corner. The northeast boundary follows the boundary to Lichfield District with more land in agricultural use beyond. The southwest boundary meets the rear garden boundaries to houses on Chester Road. The southeast boundary meets the Lichfield Road with houses on the opposite side.
- C34 The developable area is 54 hectares.
- C35 The estimated capacity of the site is 1890 houses.
- C36 Mixed tenure housing is suitable on the site, with higher densities of at least 45dph and affordable housing provision.

#### Design principles:

- Deliver appropriate local facilities to support the new residents and to enhance the sustainability of the existing area, including a new primary school and local health centre.
- Investigation and detailed proposals for remediation of contaminated land.
- A transport strategy that includes:
  - unconnected access to and from the site along Chester Road and Lichfield Road,
  - necessary capacity mitigation and improvements to the junction at Lichfield Road and Chester Road,
  - provides a new traffic light junction between Lindon Road and Chester Road and
  - provides opportunities for bus routes to serve the development.
  - Enhanced provision for pedestrians and cyclists, including enhanced connectivity with the district centre.
- Develop a site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.
- A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character or on protected animal species
- The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
WSA 1	-	--	+/-	+	0	--	0	-	+	++	0	++	+	++

- J.13.8.1 The land at Home Farm is located on the northern boundary of Walsall with Lichfield and is proposed to be released from the Green Belt. Approximately 1890 houses are proposed with higher densities of at least 45dph and affordable housing provision. Overall, a major positive impact on housing and minor positive impact on the economy would be expected as a result of the proposed development at this strategic location.
- J.13.8.2 The proposed development is located approximately 230m from Wyrley and Essington Canal Footbridge at Ogley Junction and 280m from Sandhills Pumping Station Grade II listed buildings. The proposal also lies adjacent to an area of High Historic Townscape Value. Where there is potential for development to adversely affect a heritage asset, including the setting of that asset, an assessment should be undertaken to establish the extent of this potential effect as per guidelines provided by Historic England<sup>78</sup>. There is likely to be some scope within the strategic location to direct development away from heritage assets and use sensitive layout and design to minimise the impacts of development. No reference is made to heritage resources in the policy text. Where impacts on designated and non-designated heritage assets remains uncertain at this stage, overall it is considered that the large scale of proposed development at this strategic location could potentially have a minor negative impact on heritage resources (SA Objective 1). Further reference could be made to a requirement to produce a Statement of Heritage Significance in accordance with other site allocation policies.
- J.13.8.3 The site is located in an area of moderate landscape sensitivity based on the Landscape Sensitivity Assessment and an area of high sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents. Due to the large scale of development proposed at approximately 1890 dwellings, it is considered likely that there would be an overall major residual negative impact on the local landscape (SA Objective 2). It is however anticipated that there would be opportunities at the Home Farm Strategic Location to limit the visual impact of development through design and incorporation of GI, alongside measures to retain and enhance existing landscape features and integrate the development into the local landscape context. This is set out in the policy text which states that the proposed development should include "*A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character or on protected animal species.*" It is anticipated that further details may be specified in the pre submission plan including an Indicative Concept Plan and Green Belt Loss Mitigation Requirements.

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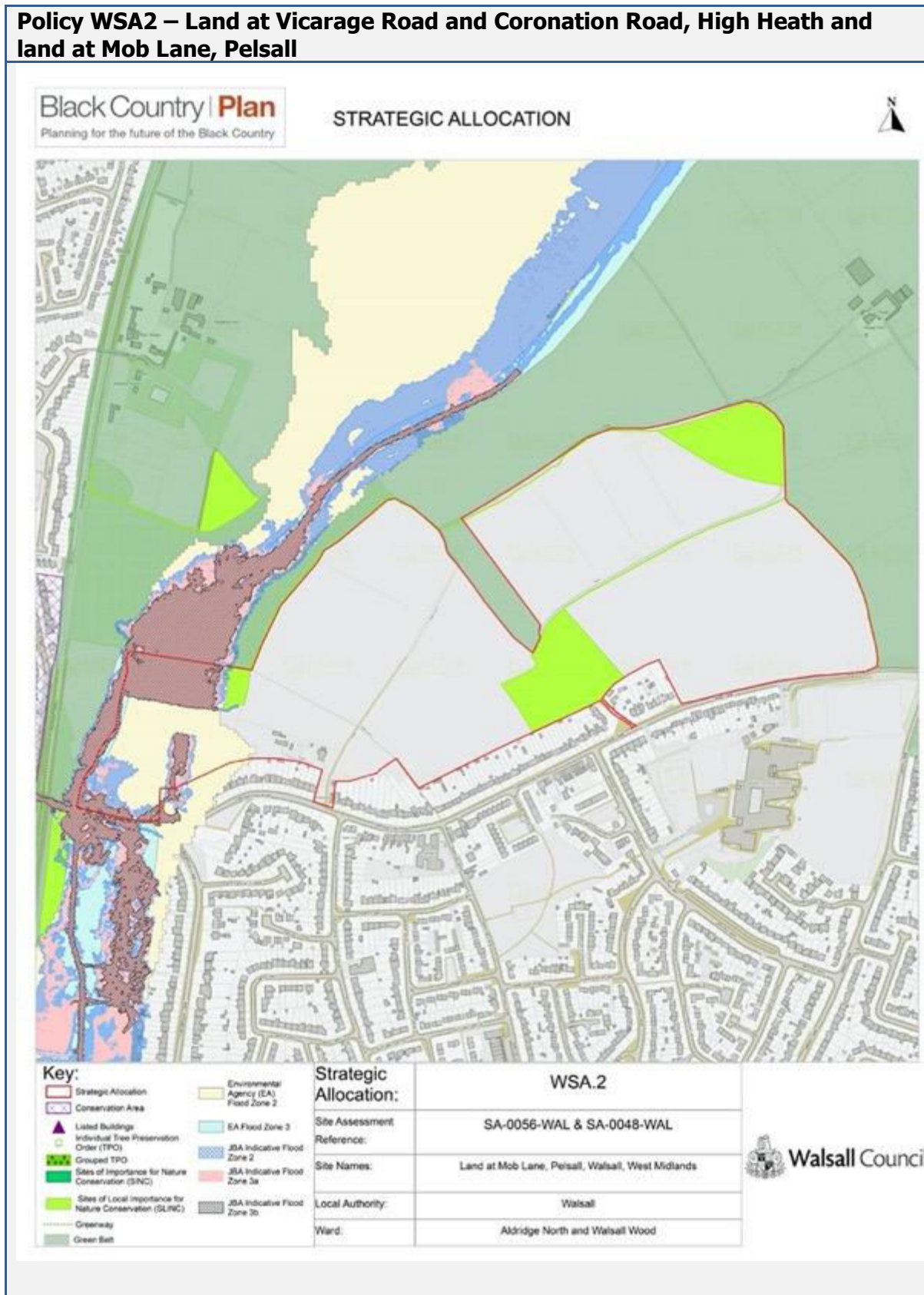
<sup>78</sup> Historic England (2017) The Setting of Heritage Assets - Historic Environment Good Practice Advice in Planning: 3.  
Available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/> [Date Accessed: 20/04/21]

- J.13.8.4 Minor adverse effect in relation to biodiversity were identified in the pre-mitigation SA assessment due to parts of the site lying within 15km of Cannock Chase SAC, the site lying within an IRZ of a SSSI where 'any residential developments with a total net gain in residential units' should be consulted on with Natural England and the site lying approximately 200m from Shire Oak Park Local Nature Reserve. Parts of the site also coincide with Wyrley and Essington Canal SLINC, with a small proportion of the site contains deciduous woodland which is identified as a habitat of principal importance under the Natural Environment and Rural Communities Act 2006. The proposed development of approximately 1890 dwellings at Home Farm could potentially increase development-related threats and pressures to these biodiversity assets. Provision of a strategy for landscape and habitat creation at the strategic location could also potentially help to contribute towards maintaining habitat connectivity and enhancement. Opportunities should be sought for delivering net gains in biodiversity. Where possible, it is recommended that all developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. The SLINC should be retained and integrated into GI measures for the site. Taking into consideration the scale of development proposed it is anticipated that with appropriate habitat planning overall there would be mixed positive and negative impacts on biodiversity (SA Objective 3).
- J.13.8.5 The site is located within Flood Zone 1. A large proportion of the site coincides with areas of low and/or medium surface water flood risk, and a small proportion of the site coincides with areas of high surface water flood risk. Policy WSA1 states that proposals should "*Develop a site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.*" Assuming that these measures are put in place this would lead to an overall negligible impact on Climate Change Adaptation (SA Objective 5). Options to minimise surface water flood risk and other sources of flooding should be assessed as part of the Flood Risk Assessment (FRA) that will be prepared for the site, including access options and potential allowances for climate change.
- J.13.8.6 The site is located within an AQMA, within 200m of a Main Road, within a Groundwater Source Protection Zone and within 10m of a watercourse. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site specific assessments. The policy includes a requirement for "*Investigation and detailed proposals for remediation of contaminated land*" for this site which would help to minimise impacts on water pollution and provide remediation of contaminated land (compared to the existing

- baseline situation). Assuming that these measures are put in place an overall negligible impact in relation to pollution is therefore anticipated (SA Objective 7).
- J.13.8.7 The site is identified as being located within predominantly Grade 3 land with a smaller component of 'urban' land based on regional ALC Natural England mapping. The site is also located within an MSA. The site would lead to the loss of more than 20ha of undeveloped land and therefore a major residual adverse impact is identified in relation to Natural Resources (SA Objective 6). Mitigation to minimise impacts on mineral resources is provided in the policy text which states that "*Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.*"
- J.13.8.8 It is anticipated that a new primary school and local health centre would be incorporated into the proposed development and provide all residents with good access to education and health services. Therefore, a major positive impact on education (SA Objective 14) and Health (SA Objective 12) would be expected, following development at this location.
- J.13.8.9 Development at this strategic location would also be expected to provide "*Opportunities for bus routes to serve the development*" and "*Enhanced provision for pedestrians and cyclists, including enhanced connectivity with the district centre.*" Assuming that these measures are put in place an overall minor positive impact on Transport and Accessibility (SA Objective 9) and Climate Change Mitigation (SA Objective 4) would be expected.
- J.13.8.10 Cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area. Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

J.13.9 Policy WSA2 – Land at Vicarage Road and Coronation Road, High Heath and land at Mob Lane, Pelsall

**Policy WSA2 – Land at Vicarage Road and Coronation Road, High Heath and land at Mob Lane, Pelsall**



**Policy WSA2 – Land at Vicarage Road and Coronation Road, High Heath and land at Mob Lane, Pelsall**

- C37 Land at Vicarage Road and Coronation Road and land at Mob Lane is located along the northern urban edge of High Heath. To the north are fields with Pelsall and Clayhanger urban areas beyond, to the east fields and a sewage works, to the south is proposed allocation WSA3, High Heath and an area of housing that is characterised by predominantly traditional semi-detached houses, and to the west is Pelsall and a former railway line.
- C38 The developable site area is 27.21ha.
- C39 The estimated capacity of the site is 713 houses.
- C40 Mixed tenure housing is suitable with higher densities of at least 35dph and affordable housing provision.

Design principles:

- Deliver appropriate local facilities to support the new residents and to enhance the sustainability of the existing area, including a new primary school and local health centre.
- Investigation of and detailed proposals for the remediation of contaminated land.
- A transport strategy that includes improvements to Mob Lane and Green Lane.
- A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and that is designed to deliver landscape, biodiversity and amenity benefits.
- A strategy for landscape and habitat creation that provides enhancement, retention and / or mitigation for established trees and hedges, to ensure there are no significant adverse impacts on visual amenity and character or on protected animal species.
- The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
WSA 2	-	--	+/-	+/-	0	--	0	-	+/-	++	0	++	+	++

J.13.9.1 The land at Vicarage Road is located along the northern urban edge of High Heath and is proposed to be released from the Green Belt. The proposed housing allocation is a composite of two sites (SA-0048-WAL and SA-0056-WAL) which have been assessed individually as part of the SA process at the 'pre mitigation stage' (See Appendix ). The Approximately 713 houses are proposed with higher densities of at least 35 dph and affordable housing provision. Overall, a major positive impact on housing and minor



positive impact on the economy would be expected as a result of the proposed development at this strategic location.

- J.13.9.2 The proposed development is located approximately 60m west of Pelsall Common Conservation Area, separated by open space/some development and adjacent to Pelsall Burnt Mound Archaeological Priority Area. There is likely to be some scope within the strategic location to direct development away from heritage assets and use sensitive layout and design to minimise the impacts of development. No reference is made to heritage resources in the policy text. Where impacts on designated and non-designated heritage assets (including the potential for below ground archaeological remains) is uncertain at this stage, overall it is considered that the scale of the proposed development at this strategic location could potentially have a minor negative impact on heritage resources.
- J.13.9.3 The site is located in an area of moderate landscape sensitivity based on the Landscape Sensitivity Assessment and an area of high to very high sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents and users of the PRoW network which cross parts of the site. It is considered that well designed development could potentially provide opportunities to limit the impact of the development on the surrounding landscape and visual receptors. This could include landscaped buffers to maintain separation between the existing settlements, and retention or enhancement of key landscape features. However, the scale of development proposed at approximately 713 dwellings would be expected to result in major negative impact on the landscape (SA Objective 2). The policy text states that development should include *"A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character or on protected animal species."* It is anticipated that further details may be specified in the pre submission plan including an Indicative Concept Plan and Green Belt Loss Mitigation Requirements.
- J.13.9.4 Minor adverse effect in relation to biodiversity were identified in the pre-mitigation SA assessment due to parts of the site lying within 15km of Cannock Chase SAC, the site lying within an IRZ of a SSSI where 'any residential developments with a total net gain in residential units' should be consulted on with Natural England and the site lying approximately 150m east of Jockey Fields SSSI. Ford Brook SLINC is also located adjacent to the western area of the site and a small proportion of the site contains Coastal and Floodplain grazing marsh which is identified as a habitat of principal importance under the Natural Environment and Rural Communities Act 2006. It is understood that candidate SLINCs also form part of the site. The proposed development of approximately 713 dwellings at Vicarage Road could potentially increase development-related threats and pressures to these biodiversity assets. Provision of a strategy for landscape and habitat creation at the strategic location could also potentially help to contribute towards maintaining habitat connectivity and enhancement. Opportunities should be sought for

delivering net gains in biodiversity. Where possible, it is recommended that all developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. Taking into consideration the scale of development proposed it is anticipated that with appropriate habitat planning overall there would be mixed positive and negative impacts on biodiversity (SA Objective 3).

- J.13.9.5 Parts of the site are located in Flood Zones 2 and 3a which coincides with western site area linking to Ford Brook. A proportion of the site is also located in 'Indicative Flood Zone 3b' in the southwestern area in the vicinity of Ford Brook. Policy WSA 2 states that proposals should "*Develop a site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.*" Assuming appropriate layout, GI and SUDS are put in place, it is likely that there would be both positive and negative impacts with regard to climate change adaptation (SA Objective 5). Taking this into consideration, an overall negligible impact would be anticipated at this strategic location. These considerations should be assessed as part of the Flood Risk Assessment (FRA) and Drainage Strategy that will be prepared for the site, including access options and potential allowances for climate change.
- J.13.9.6 The site is located within an AQMA and within 10m of a watercourse. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site-specific assessments. The policy includes a requirement for "*Investigation and detailed proposals for remediation of contaminated land*" for this site which would help to minimise impacts on water pollution and provide remediation of contaminated land (compared to the existing baseline situation). Assuming that these measures are put in place an overall positive impact in relation to pollution is therefore anticipated (SA Objective 7).
- J.13.9.7 The site is identified as being located within predominantly Grade 3 land based on regional ALC Natural England mapping. A large proportion of the site is also located within an MSA. The site would lead to the loss of more than 20ha of undeveloped land and therefore a major residual adverse impact is identified in relation to Natural Resources (SA Objective 6). Mitigation to minimise impacts on mineral resources is provided in the policy text which states that "*Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.*"
- J.13.9.8 It is anticipated that a new primary school and local health centre would be incorporated into the proposed development and provide all residents with good access to education

and health services. Therefore, a major positive impact on education (SA Objective 14) and Health (SA Objective 12) would be expected, following development at this location.

J.13.9.9 Uncertain impacts are recorded in relation to Transport and Accessibility (SA Objective 9) and Climate Change Mitigation (SA Objective 4) based on the level of information available at this time.

J.13.9.10 Cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

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J.13.10 Policy WSA3 – Land north of Stonnall Road, Aldridge

**Policy WSA3 – Land north of Stonnall Road, Aldridge**



C41 Land north of Stonnall Road is located along the eastern urban edge of Aldridge. To the north are houses; to the east agricultural fields; to the south is proposed allocation SA-309-WAL and agriculture beyond; and to the west are houses. The predominant character of houses here are a mix of detached bungalows and houses, modern but traditionally styled.

### Policy WSA3 – Land north of Stonnall Road, Aldridge

- C42 The estimated capacity of the site is 13.82ha.
- C43 The site is proposed to be allocated for 483 houses.
- C44 Mixed tenure housing is suitable, with higher densities of at least 35dph and affordable housing provision.

#### Design principles:

- Improvements to local facilities, to support residents and to enhance the sustainability of the existing area, in particular improved capacity at the primary school and local health centre.
- Investigation of and detailed proposals for remediation of contaminated land.
- A transport strategy that includes widening to Stonnall Road for the extent of the site allocation and improves pedestrian access.
- Develop a site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.
- Develop a strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character or on protected animal species.
- The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
WSA 3	0	--	+/-	+/-	0	-	0	-	+/-	++	0	+	+	+

J.13.10.1 The land north of Stonnall Road is located along the eastern urban edge of Aldridge and is proposed to be released from the Green Belt. Approximately 483 houses are proposed with higher densities of at least 35 dph and affordable housing provision. Overall, a major positive impact on housing and minor positive impact on the economy would be expected as a result of the proposed development at this strategic location.

J.13.10.2 No Scheduled Monuments, Listed Buildings, Registered Parks and Gardens or Conservation Areas are located in the immediate vicinity of the site and the site is not located in proximity to areas of high historic landscape / townscape landscape value. Potential impacts on heritage resources, including the setting of heritage assets and the archaeological potential of the site would be addressed as part of the planning process and would be subject to other policies in the BCP. With considerate planning, it is likely that there would be sufficient scope within this strategic location to direct development towards locations that

- would minimise effects on heritage resources. Overall a negligible impact on cultural heritage is expected (SA Objective 1).
- J.13.10.3 The site is located in an area of moderate-high landscape sensitivity based on the Landscape Sensitivity Assessment and an area of high sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents. It is considered that well designed development could potentially provide opportunities to limit the impact of the development on the surrounding landscape and visual receptors. This could include landscaped buffers to maintain separation between the existing settlements, and retention or enhancement of key landscape features. However, the scale of development proposed at approximately 483 dwellings would be expected to result in major negative impact on the landscape (SA Objective 2). The policy text states that development should include "*A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character or on protected animal species.*" It is anticipated that further details may be specified in the pre submission plan including an Indicative Concept Plan and Green Belt Loss Mitigation Requirements.
- J.13.10.4 Minor adverse effect in relation to biodiversity were identified in the pre-mitigation SA assessment due to parts of the site lying within 15km of Cannock Chase SAC, the site lying within an IRZ of a SSSI where 'any residential developments with a total net gain in residential units' should be consulted on with Natural England. Opportunities should be sought for delivering net gains in biodiversity. Where possible, it is recommended that all developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. Taking into consideration the scale of development proposed it is anticipated that with appropriate habitat planning overall there would be mixed positive and negative impacts on biodiversity (SA Objective 3).
- J.13.10.5 The site is located within Flood Zone 1. A small proportion of the site coincides with areas of low surface water flood risk. Policy WSA 3 states that proposals should "*Develop a site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.*" Assuming that these measures are put in place this would lead to an overall negligible impact on Climate Change Adaptation (SA Objective 5).
- J.13.10.6 The site is located within an AQMA and within a Groundwater Source Protection Zone. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site-specific assessments. The policy includes a requirement for "*Investigation and*

*detailed proposals for remediation of contaminated land'* for this site which would help to minimise impacts on water pollution and provide remediation of contaminated land (compared to the existing baseline situation). Assuming that these measures are put in place an overall negligible impact in relation to pollution is anticipated (SA Objective 7).

- J.13.10.7 The site is identified as being located within predominantly Grade 3 land with a smaller component of 'urban' land based on regional ALC Natural England mapping. The site is also located within an MSA. The site would lead to the loss of less than 20ha of undeveloped land and therefore a minor residual adverse impact is identified in relation to Natural Resources (SA Objective 6). Mitigation to minimise impacts on mineral resources is provided in the policy text which states that "*Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.*"
- J.13.10.8 The policy text states that the proposed development would include "*Improvements to local facilities, to support residents and to enhance the sustainability of the existing area, in particular improved capacity at the primary school and local health centre.*" Pending further details this would likely have a minor positive impact on Education (SA Objective 14) and Health (SA Objective 12), following development at this location.
- J.13.10.9 Uncertain impacts are recorded in relation to Transport and Accessibility (SA Objective 9) and Climate Change Mitigation (SA Objective 4) based on the level of information available at this time.
- J.13.10.10 Cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area. Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

J.13.11 Policy WSA4– Yieldsfield Farm (sometimes recorded as Yieldfields farm), Stafford Road, Bloxwich

Policy WSA4– Yieldsfield Farm (sometimes recorded as Yieldfields farm), Stafford Road, Bloxwich





**Policy WSA4– Yieldsfield Farm (sometimes recorded as Yieldfields farm), Stafford Road, Bloxwich**

- C45 Yieldsfield Farm is located along the northern urban edge of Bloxwich. To the north are fields with Newtown and Landywood beyond in South Staffordshire District. To the east lie fields and to the south is Bloxwich Golf Course. To the west is the Turnberry housing estate, composed of predominantly modern, traditionally styled detached houses. Within this site is Yieldsfield Hall, a Grade II listed building.
- C46 The developable site area is 32.3ha.
- C47 The estimated capacity of the site is 1304 houses.
- C48 Mixed tenure housing is suitable on the site with higher densities of at least 35dph and affordable housing provision.

**Design principles:**

- High quality, sensitive design and layout that conserves and enhances the setting and significance of Yieldsfield Hall, a Grade II listed building; this must be informed by a detailed heritage character assessment for the proposal.
- Delivery of appropriate local facilities to support residents and to enhance the sustainability of the existing area, including a new primary, school and local health centre.
- Contribution to improvements for secondary school provision in North Bloxwich.
- Investigation and detailed proposals for remediation of contaminated land.
- A transport strategy that includes new crossing points on the A34 and a new vehicular junction to serve the development.
- A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.
- A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character, in particular that might be experienced from the north and west, and to ensure there is no significant adverse impact on protected animal species.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
WSA 4	-	--	+/-	+/-	0	--	0	-	+/-	++	0	++	+	++

J.13.11.1 Yieldsfield Farm is located along the northern urban edge of Bloxwich and is proposed to be released from the Green Belt. Approximately 1034 houses are proposed with higher densities of at least 35 dph and affordable housing provision. Overall, a major positive

impact on housing and minor positive impact on the economy would be expected as a result of the proposed development at this strategic location.

- J.13.11.2 Yieldfields Hall Farmhouse Grade II listed building coincides with the south western area of the Site. Bloxwich Golf Club Clubhouse Grade II listed building is also located approximately 190m south of site separated by open space. Policy WSA 4 would be expected to ensure that heritage assets within Walsall are conserved in a manner appropriate to their significance, in line with national policy, and that the setting of historic assets are conserved. Where development proposals may present risks to the significance of an asset, Policy WSA 4 would require an accompanying statement to be prepared to describe the how the assessment has considered impacts on the significance of the asset and any mitigating actions that are proposed. The policy text states that *“High quality, sensitive design and layout that conserves and enhances the setting and significance of Yieldsfield Hall, a Grade II listed building; this must be informed by a detailed heritage character assessment for the proposal.”* This policy would be expected to ensure that cultural heritage resources across the Black Country are suitably protected, however minor adverse impacts cannot be ruled out at this stage of the assessment process (SA Objective 1).
- J.13.11.3 The site is located in an area of low-moderate landscape sensitivity based on the Landscape Sensitivity Assessment and an area of very high sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents. Due to the large scale of development proposed at approximately 1034 dwellings, it is considered likely that there would be an overall major residual negative impact on the local landscape (SA Objective 2). It is however anticipated that there would be opportunities at the Yieldsfield Farm Strategic Location to limit the visual impact of development through design and incorporation of GI, alongside measures to retain and enhance existing landscape features and integrate the development into the local landscape context. This is set out in the policy text which states that the proposed development should include *“A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character, in particular that might be experienced from the north and west, and to ensure there is no significant adverse impact on protected animal species.”* It is anticipated that further details may be specified in the pre submission plan including an Indicative Concept Plan and Green Belt Loss Mitigation Requirements.
- J.13.11.4 Minor adverse effect in relation to biodiversity were identified in the pre-mitigation SA assessment due to parts of the site lying within 15km of Cannock Chase SAC, the site lying within an IRZ of a SSSI where ‘any residential developments with a total net gain in residential units’ should be consulted on with Natural England. The site is located across the road from Newtown Pool SINC and a strip of deciduous woodland is present to the north of the site which is identified as a habitat of principal importance under the Natural

Environment and Rural Communities Act 2006. It is understood that a candidate SLINC may also form part of the site. The proposed development of approximately 1034 dwellings at Yieldsfield Farm could potentially increase development-related threats and pressures to these biodiversity assets. Provision of a strategy for landscape and habitat creation at the strategic location could also potentially help to contribute towards maintaining habitat connectivity and enhancement. Opportunities should be sought for delivering net gains in biodiversity. Where possible, it is recommended that all developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. Taking into consideration the scale of development proposed it is anticipated that with appropriate habitat planning overall there would be mixed positive and negative impacts on biodiversity (SA Objective 3).

- J.13.11.5 The site is located within Flood Zone 1. There are scattered areas of low, medium and high surface water flood risk across the site. Policy WSA4 states that proposals should “*Develop a site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.*” Assuming that these measures are put in place this would lead to an overall negligible impact on Climate Change Adaptation (SA Objective 5). Options to minimise surface water flood risk and other sources of flooding should be assessed as part of the Flood Risk Assessment (FRA) that will be prepared for the site, including access options and potential allowances for climate change.
- J.13.11.6 The site is located within an AQMA and within 200m of a Main Road. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site specific assessments. The policy includes a requirement for “*Investigation and detailed proposals for remediation of contaminated land*” for this site which would help to minimise impacts on water pollution and provide remediation of contaminated land (compared to the existing baseline situation). Assuming that these measures are put in place an overall negligible impact in relation to pollution is anticipated (SA Objective 7).
- J.13.11.7 The site is identified as being located within predominantly Grade 3 land with a smaller component of Grade 4 land to the north of the site based on regional ALC Natural England mapping. The site would lead to the loss of more than 20ha of undeveloped land and therefore a major residual adverse impact is identified in relation to Natural Resources (SA Objective 6).
- J.13.11.8 It is anticipated that a new primary school and local health centre would be incorporated into the proposed development and provide all residents with good access to education and health services. The policy also states that proposals should include “*Contribution to*

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*improvements for secondary school provision in North Bloxwich.*" Assuming that these measures are put in place an overall major positive impact on education (SA Objective 14) and Health (SA Objective 12) would be expected, following development at this location.

J.13.11.9 Uncertain impacts are recorded in relation to Transport and Accessibility (SA Objective 9) and Climate Change Mitigation (SA Objective 4) based on the level of information available at this time.

J.13.11.10 Cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area. Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

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J.13.12 Policy WSA5– Land at Yorks Bridge, Lichfield Road, Pelsall



**Policy WSA5– Land at Yorks Bridge, Lichfield Road, Pelsall**

- C50 The developable site area is 21.4ha.
- C51 The estimated capacity of the site is 774 houses.
- C52 Mixed tenure housing is suitable with higher densities of at least 35dph and affordable housing provision.

**Design principles:**

- Delivery of appropriate local facilities to support residents and to enhance the sustainability of the existing area, including a new primary school and local health centre.
- Investigation and detailed proposals for the remediation of contaminated land.
- A transport strategy that includes the widening of Lichfield Road to allow for a ghost turn into the site, and which includes necessary capacity mitigation and improvements to the junction at Lichfield Road, Wolverhampton Road, Lime Lane and Walsall Road.
- A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits whilst protecting existing SLINC designated areas.
- A strategy for landscape and habitat creation, which provides enhancement, retention and mitigation for protected and established trees and hedges, to ensure there is no significant adverse impact on ecology, biodiversity, visual amenity and character and protected animal species.

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
WSA 5	-	--	+/-	+/-	0	--	0	-	+/-	++	0	++	+	++

J.13.12.1 The land at Yorks Bridge is located on the northern urban edge of Pelsall and is proposed to be released from the Green Belt. Approximately 774 houses are proposed with higher densities of at least 35 dph and affordable housing provision. Overall, a major positive impact on housing and minor positive impact on the economy would be expected as a result of the proposed development at this strategic location.

J.13.12.2 The Grade II listed Wyrely and Essington Canal Footbridge at Pelsall Junction is located approximately 310m west of site. The proposal also lies adjacent to an area of High Historic Townscape Value. Where there is potential for development to adversely affect a heritage asset, including the setting of that asset, an assessment should be undertaken to

establish the extent of this potential effect as per guidelines provided by Historic England<sup>79</sup>. There is likely to be some scope within the strategic location to direct development away from heritage assets and use sensitive layout and design to minimise the impacts of development. No reference is made to heritage resources in the policy text. Where impacts on designated and non-designated heritage assets remains uncertain at this stage, overall it is considered that the scale of proposed development at this strategic location could potentially have a minor negative impact on heritage resources (SA Objective 1).

- J.13.12.3 The site is located in an area of moderate-high landscape sensitivity based on the Landscape Sensitivity Assessment and an area of high sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents and users of the PRoW network in proximity to the site. A number of trees subject to Tree Preservation Orders (TPOs) are located within the boundaries of the site. It is considered that well designed development could potentially provide opportunities to limit the impact of the development on the surrounding landscape and visual receptors. This could include landscaped buffers to maintain separation between the existing settlements, and retention or enhancement of key landscape features. However, the scale of development proposed at approximately 774 dwellings would be expected to result in major negative impact on the landscape (SA Objective 2). The policy text states that development should include *"A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character or on protected animal species."* It is anticipated that further details may be specified in the pre submission plan including an Indicative Concept Plan and Green Belt Loss Mitigation Requirements.
- J.13.12.4 Cannock Chase SAC is located approximately 9.4km northwest of the site with the development lying within the 15km Zone of Influence for the SAC and Cannock Extension Canal SAC is located approximately 320m west of site. The full implications of development proposed within the BCP on European sites will be considered in greater detail in the HRA (applies to all proposed strategic site allocations). The site also lies within an IRZ of a SSSI where 'any residential developments with a total net gain in residential units' should be consulted on with Natural England and the site is located approximately 30m west of Pelsall North Common Local Nature Reserve. Parts of the site to the southwest also coincide with Wyrley and Essington Canal SLINC and a small proportion of the site contains deciduous woodland which is identified as a habitat of principal importance (formerly known as priority habitats) under the Natural Environment and Rural Communities Act 2006. The proposed development of approximately 774 dwellings at Yorks Bridge could potentially increase development-related threats and

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<sup>79</sup> Historic England (2017) The Setting of Heritage Assets - Historic Environment Good Practice Advice in Planning: 3. Available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/> [Date Accessed: 20/04/21]

pressures to these biodiversity assets. Provision of a strategy for landscape and habitat creation at the strategic location could also potentially help to contribute towards maintaining habitat connectivity and enhancement. Opportunities should be sought for delivering net gains in biodiversity. The SLINC should be retained and integrated into GI measures for the site. At this stage it is considered that impacts on biodiversity are uncertain, based on the information available to date and that development at the strategic location has the potential to result in direct and indirect impacts on biodiversity assets. Mixed / uncertain effects are therefore identified in respect to biodiversity (SA Objective 3).

- J.13.12.5 The site is located within Flood Zone 1. There are scattered areas of low, medium and high surface water flood risk to the south and north of the site. The site is located within Flood Zone 1. A small proportion of the site coincides with areas of low, medium and high surface water flood risk. Policy WSA 5 states that proposals should “*Develop a site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.*” Assuming that these measures are put in place this would lead to an overall negligible impact on Climate Change Adaptation (SA Objective 5). Options to minimise surface water flood risk and other sources of flooding should be assessed as part of the Flood Risk Assessment (FRA) that will be prepared for the site, including access options and potential allowances for climate change.
- J.13.12.6 The site is located within an AQMA, within 200m of a Main Road and within 10m of a watercourse. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site-specific assessments. The policy includes a requirement for “*Investigation and detailed proposals for remediation of contaminated land*” for this site which would help to minimise impacts on water pollution and provide remediation of contaminated land (compared to the existing baseline situation). Assuming that these measures are put in place an overall minor positive impact in relation to pollution is anticipated (SA Objective 7).
- J.13.12.7 The site is identified as being located within predominantly Grade 3 land with a smaller component of ‘urban’ land based on regional ALC Natural England mapping. The site is also located within an MSA (Fire Clay and Wood). The site would lead to the loss of more than 20ha of undeveloped land and therefore a major residual adverse impact is identified in relation to Natural Resources (SA Objective 6).
- J.13.12.8 It is anticipated that a new primary school and local health centre would be incorporated into the proposed development and provide all residents with good access to education and health services. Therefore, a major positive impact on education (SA Objective 14) and Health (SA Objective 12) would be expected, following development at this location.



- J.13.12.9 Uncertain impacts are recorded in relation to Transport and Accessibility (SA Objective 9) and Climate Change Mitigation (SA Objective 4) based on the level of information available at this time.
- J.13.12.10 Cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area. Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

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J.13.13 Policy WSA6– Land off Sutton Road, Longwood Lane, Walsall

**Policy WSA6– Land off Sutton Road, Longwood Lane, Walsall**



<b>Key:</b> Strategic Allocation Conservation Area Listed Buildings Individual Tree Preservation Order (TPO) Grouped TPO Sites of Importance for Nature Conservation (SINC) Sites of Local Importance for Nature Conservation (SLINC) Greenway Green Belt Environmental Agency (EA) Flood Zone 2 EA Flood Zone 3 JBA Indicative Flood Zone 2 JBA Indicative Flood Zone 3a JBA Indicative Flood Zone 3b		<b>Strategic Allocation:</b> WSA.6 Site Assessment: SA-0012-WAL Reference: Land off Sutton Road, Longwood Lane, Walsall Site Names: Local Authority: Walsall Ward: Pheasey Park Farm	Walsall Council
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C53 Land off Sutton Road, Longwood Lane is located along the very northern part of Pheasey Park Farm. To the north are fields, to the east and south are houses and to the west is the canal with Arboretum Park beyond it. The character of the immediate area is defined by predominantly traditionally-styled detached houses. The site has recently been designated a SLINC.

**Policy WSA6– Land off Sutton Road, Longwood Lane, Walsall**

- C54 The developable site area is 11.9ha.
- C55 The estimated capacity of the site is 270 houses.
- C56 Mixed tenure housing is suitable in this location, with higher densities of at least 35dph and affordable housing provision.

**Design principles:**

- Improvements to local facilities, to support residents and to enhance the sustainability of the existing area, in particular improved capacity at the primary school and local health centre.
- Investigation of and detailed proposals for the remediation of contaminated land.
- A transport strategy that includes single access onto Sutton Road, and which ensures that the transport impacts of the development are appropriately managed and mitigated.
- Enhanced provision for pedestrians and cyclists, including enhanced connectivity with cycle route CR012.
- A site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and that are designed to deliver landscape, biodiversity and amenity benefits, which also takes full account of existing watercourses.
- A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for existing SLINC features and established trees, to ensure there is no significant adverse impact on ecology, biodiversity, visual amenity and character or on protected animal species.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
WSA 6	-	--	+/-	+	0	-	0	-	+	++	0	+	+	+

J.13.13.1 The land off Sutton Road is located along the very northern part of Pheasey Park Farmland and is proposed to be released from the Green Belt. Approximately 270 houses are proposed with higher densities of at least 35 dph and affordable housing provision. Overall, a major positive impact on housing and minor positive impact on the economy would be expected as a result of the proposed development at this strategic location.

J.13.13.2 The south of site coincides with Wood End Moated Site Archaeological Priority Area and the majority of the site is located within an area of High Historic Landscape Value. No reference is made to heritage resources in the policy text. Where impacts on heritage assets (including the potential for below ground archaeological remains) is uncertain at this stage, overall it is considered that the scale of the proposed development at this strategic location could potentially have a minor negative impact on heritage resources.

- J.13.13.3 The site is located in an area of moderate-high landscape sensitivity based on the Landscape Sensitivity Assessment and an area of high sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents. At this stage of the assessment, it is considered that the development could have a potential major negative impact on the landscape (SA Objective 2). It is however considered that well designed development could potentially provide opportunities to limit the impact of the development on the surrounding landscape and visual receptors. This could include landscaped buffers to maintain separation between the existing settlements, and retention or enhancement of key landscape features. The policy text states that development should include "A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for existing SLINC features and established trees, to ensure there is no significant adverse impact on ecology, biodiversity, visual amenity and character or on protected animal species." It is anticipated that further details may be specified in the pre submission plan including an Indicative Concept Plan and Green Belt Loss Mitigation Requirements.
- J.13.13.4 Minor adverse effect in relation to biodiversity were identified in the pre-mitigation SA assessment due to Wood End Farm SLINC coinciding with the western part of the site and a small proportion of the site containing good quality semi improved grassland which is identified as a habitat of principal importance (formerly known as priority habitats) under the Natural Environment and Rural Communities Act 2006. It is understood that a candidate SLINC now also covers the entirety of the site. The proposed development of approximately 270 dwellings at Sutton Road could potentially increase development-related threats and pressures to these biodiversity assets. The policy text notes that provision for "*retention and mitigation for existing SLINC features*" should form part of any development proposals. Opportunities should be sought for delivering net gains in biodiversity. Taking into consideration the scale of development proposed it is anticipated that with appropriate habitat planning overall there would be mixed positive and negative impacts on biodiversity (SA Objective 3).
- J.13.13.5 The site is located within Flood Zone 1. Scattered areas of low, medium and high surface water flood risk occur in the north and south of the site. Policy WSA 6 states that proposals should develop "*A site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and that are designed to deliver landscape, biodiversity and amenity benefit.*" Assuming appropriate layout, GI and SUDS are put in place, an overall negligible impact would be anticipated at this strategic location with regard to climate change adaptation (SA Objective 5).
- J.13.13.6 The site is located within an AQMA and within 10m of a watercourse. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site specific assessments. The policy includes a requirement for "*Investigation and detailed proposals*

*for remediation of contaminated land'* for this site which would help to minimise impacts on water pollution and provide remediation of contaminated land (compared to the existing baseline situation). Assuming that these measures are put in place an overall positive impact in relation to pollution is therefore anticipated (SA Objective 7).

- J.13.13.7 The site is identified as being located within predominantly Grade 3 land based on regional ALC Natural England mapping with a small proportion of 'urban' land. The site would lead to the loss of less than 20ha of undeveloped land and therefore a minor residual adverse impact is identified in relation to Natural Resources (SA Objective 6).
- J.13.13.8 The policy text states that the proposed development should include "*Improvements to local facilities, to support residents and to enhance the sustainability of the existing area, in particular improved capacity at the primary school and local health centre.*" Pending further details this would likely have a minor positive impact on Education (SA Objective 14) and Health (SA Objective 12) following development at this location.
- J.13.13.9 Development at this strategic location would also be expected to provide "*Enhanced provision for pedestrians and cyclists, including enhanced connectivity with cycle route CR012.*" Assuming that these measures are put in place an overall minor positive impact on Transport and Accessibility (SA Objective 9) and Climate Change Mitigation (SA Objective 4) would be expected as well as positive impacts on health and wellbeing.
- J.13.13.10 Cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

J.13.14 Policy WSA7 – Calderfields West, Land at Aldridge Road, Walsall

**Policy WSA7 – Calderfields West, Land at Aldridge Road, Walsall**



C57 The site at Calderfields West, on land at Aldridge Lane, is located along the eastern urban edge of St. Matthews. To the north are fields, to the east is Calderfields Golf Club, to the south is the Arboretum and to the west are houses. The character of the area is a mix of traditional and modern

**Policy WSA7 – Calderfields West, Land at Aldridge Road, Walsall**

styled detached houses. Within the developable site area is Calderfields Farm, which provides seven existing barn conversion properties with gated access from Aldridge Road.

C58 The developable site area is 18.6ha.

C59 The estimated capacity of the site is 651 houses.

C60 Mixed tenure housing is suitable with higher densities of at least 35dph and affordable housing provision.

**Design principles:**

- Deliver appropriate local facilities to support the new residents and to enhance the sustainability of the existing area, including a new primary school and local health centre.
- Investigation and detailed proposals for the remediation of contaminated land.
- A transport strategy that ensure that the transport impacts of the development are appropriately managed and mitigated.
- Enhanced provision for pedestrians and cyclists, including enhanced connectivity with the town centre.
- A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.
- A strategy for landscape and habitat creation, in particular along the southern boundary to the Arboretum, providing new tree planting to ensure there is no significant adverse impact on the visual amenity and character of the Arboretum, nor on protected animal species.

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
WSA 7	-	--	+/-	+	0	-	0	-	+	++	0	++	+	++

J.13.14.1 The land at Calderfields West, is located along the eastern urban edge of St. Mathews and is proposed to be released from the Green Belt. Approximately 651 houses are proposed with higher densities of at least 35 dph and affordable housing provision. Overall, a major positive impact on housing and minor positive impact on the economy would be expected as a result of the proposed development at this strategic location.

J.13.14.2 A potential minor negative impact is identified in respect to cultural heritage resources (SA Objective 1) due to the proposed development being located in proximity to Walsall Arboretum Registered Park and Garden (RPG). There is also likely to be scope within the land available at the strategic location to incorporate a sensitive layout and design to minimise the impacts of development on the RPG. The policy text reinforces this by stating that proposals should include "A strategy for landscape and habitat creation, in particular

*along the southern boundary to the Arboretum, providing new tree planting to ensure there is no significant adverse impact on the visual amenity and character of the Arboretum, nor on protected animal species.”* Mitigation requirements should be informed by the landscape and heritage assessments for the site and an arboricultural survey.

- J.13.14.3 The site is located in an area of moderate-high landscape sensitivity based on the Landscape Sensitivity Assessment and an area of high sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents and users of the PRoW network located near to the site. It is considered that well designed development could potentially provide opportunities to lessen the impact of the development on the surrounding landscape and visual receptors through design and incorporation of GI. However, due to the scale of development proposed, it is considered likely that there would be an overall major negative impact on the local landscape (SA Objective 2). It is anticipated that further details may be specified in the pre submission plan including an Indicative Concept Plan and Green Belt Loss Mitigation Requirements.
- J.13.14.4 A proportion of the site is identified as containing habitats of principal importance (formerly known as priority habitats) under the Natural Environment and Rural Communities Act 2006 in the form of deciduous woodland and traditional orchards. The proposed development of approximately 651 dwellings at Calderfields West as a greenfield site would be likely to result in a loss of biodiversity features, to some extent. It is also anticipated that the measures set out at the strategic location could potentially help to contribute towards maintaining habitat connectivity and enhancement to address some of these impacts. Where possible, it is recommended that all developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. Both potential positive and negative are therefore identified in respect to biodiversity (SA Objective 3).
- J.13.14.5 The site is located within Flood Zone 1. A small proportion of the site also contains areas of low, medium and high surface water flood risk. Policy WSA 7 states that proposals should develop *“A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.”* Taking this into account, an overall negligible impact would be anticipated at this strategic location with regard to climate change adaptation (SA Objective 5).
- J.13.14.6 The site is located within an AQMA and within 200m of a main road. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site specific assessments. The policy includes a requirement for *“Investigation and detailed proposals*



*for remediation of contaminated land'* for this site which would help to minimise impacts on water pollution and provide remediation of contaminated land (compared to the existing baseline situation). Assuming that these measures are put in place an overall negligible impact in relation to pollution is anticipated (SA Objective 7).

- J.13.14.7 The site is identified as being located within predominantly Grade 3 land with a small proportion of 'urban' based on regional ALC Natural England mapping. The site would lead to the loss of less than 20ha of undeveloped land and therefore a minor residual adverse impact is identified in relation to Natural Resources (SA Objective 6).
- J.13.14.8 It is anticipated that a new primary school and local health centre would be incorporated into the proposed development and provide all residents with good access to education and health services. Therefore, a major positive impact on education (SA Objective 14) and Health (SA Objective 12) would be expected, following development at this location.
- J.13.14.9 Development at this strategic location would also be expected to provide "*Enhanced provision for pedestrians and cyclists, including enhanced connectivity with the town centre.*" Assuming that these measures are put in place an overall minor positive impact on Transport and Accessibility (SA Objective 9) and Climate Change Mitigation (SA Objective 4) would be expected.
- J.13.14.10 Cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

J.13.15 Policy WSA8 – Land between Queslett Road, Doe Bank Lane and Aldridge Road, Pheasey

**Policy WSA8 – Land between Queslett Road, Doe Bank Lane and Aldridge Road, Pheasey**



C61 Land between Queslett Road, Doe Bank Lane and Aldridge Road is made up of fields between the Pheasey Estate and Streedy. To the north are agricultural fields, to the east, south and west lies

### Policy WSA8 – Land between Queslett Road, Doe Bank Lane and Aldridge Road, Pheasey

housing. The site surrounds Doe Bank Lane Farmhouse and farm buildings to the west, which are Grade II listed.

C62 The developable site area is 42.27ha.

C63 The estimated capacity of the site is 2024 houses.

C64 Mixed tenure housing is suitable with higher densities of at least 35dph and affordable housing provision.

#### Design principles:

- High quality, sensitive design and layout that conserves and enhances the setting and significance of Doe Bank Lane Farmhouse and farm buildings, which are Grade II listed buildings; this must be informed by a detailed heritage character assessment undertaken for the proposal.
- Deliver appropriate local facilities to support the new residents and to enhance the sustainability of the existing area, including a new primary school and local health centre.
- Investigation and detailed proposals for remediation of contaminated land.
- A transport strategy that ensures that the transport impacts of the development are appropriately managed and mitigated.
- A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and designed to deliver landscape, biodiversity and amenity benefits.
- A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character, nor on protected animal species.
- The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
WSA 8	-	--	+/-	+/-	0	-	0	-	+/-	++	0	++	+	++

J.13.15.1 Land between Queslett Road, Doe Bank Lane and Aldridge Road is made up of fields between the Pheasey Estate and Streetly and is proposed to be released from the Green Belt. Approximately 2024 houses are proposed with higher densities of at least 35 dph and affordable housing provision. Overall, a major positive impact on housing and minor positive impact on the economy would be expected as a result of the proposed development at this strategic location.

- J.13.15.2 Grade II listed buildings at Doe Bank Farmhouse are located approximately 30m and 40m from the site boundary and the site is located wholly within Great Barr Conservation Area. Policy WSA 7 and other policies within the BCP would be expected to ensure that heritage assets within Walsall are conserved in a manner appropriate to their significance, including consideration of setting. When considering any planning application that affects a Conservation Area the local planning authority must pay special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area under the Planning (Listed Buildings and Conservation Areas) Act 1990. Where development proposals may present risks to the significance of an asset, Policy WSA 7 would require an accompanying statement to be prepared to describe the how the assessment has considered impacts on the significance of the asset and any mitigating actions that are proposed. The policy text states that the design principles should provide "*High quality, sensitive design and layout that conserves and enhances the setting and significance of Doe Bank Lane Farmhouse and farm buildings, which are Grade II listed buildings; this must be informed by a detailed heritage character assessment undertaken for the proposal.*" This policy and other policies within the BCP would be expected to ensure that cultural heritage resources across the Black Country are suitably protected, however minor adverse impacts cannot be ruled out at this stage of the assessment process (SA Objective 1). The design of the proposed development should respond to recommendations contained in of the Conservation Area Appraisal and be designed to be in keeping with local character and distinctiveness.
- J.13.15.3 The site is located in an area of moderate-high landscape sensitivity based on the Landscape Sensitivity Assessment and an area of very high sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents. Due to the large scale of development proposed at approximately 2024 dwellings, it is considered likely that there would be an overall major residual negative impact on the local landscape (SA Objective 2). It is however anticipated that there would be opportunities at the Strategic Location to limit the visual impact of development through design and incorporation of GI, alongside measures to retain and enhance existing landscape features and integrate the development into the local landscape context. This is set out in the policy text which states that the proposed development should include "*A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character, nor on protected animal species.*" It is anticipated that further details may be specified in the pre submission plan including an Indicative Concept Plan and Green Belt Loss Mitigation Requirements.
- J.13.15.4 The sites is located within an IRZ of a SSSI where 'any residential development of 50 or more houses outside existing settlements/urban areas' should be consulted on with Natural England. The site is not located within or immediately adjacent to any designated biodiversity assets but is likely to contain various assets on-site which provide essential

habitats for many species, including hedgerows, trees, and field boundaries. Provision of a strategy for landscape and habitat creation at the strategic location could also potentially help to contribute towards maintaining habitat connectivity and enhancement. Opportunities should be sought for delivering net gains in biodiversity and strategic scale Green Infrastructure improvements, considering the size of development proposed. Where possible, it is recommended that all developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. Taking into consideration the scale of development proposed it is anticipated that with appropriate habitat planning overall there would be mixed positive and negative impacts on biodiversity (SA Objective 3).

- J.13.15.5 The site is located within Flood Zone 1. A small proportion of the site is subject to low surface water flood risk. Policy WSA 7 states that proposals should "*Develop a site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.*" Assuming that these measures are put in place this would lead to an overall negligible impact on Climate Change Adaptation (SA Objective 5).
- J.13.15.6 The site is located within an AQMA and within 200m of a Main Road. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site-specific assessments. The policy includes a requirement for "*Investigation and detailed proposals for remediation of contaminated land*" for this site which would help to minimise impacts on water pollution and provide remediation of contaminated land (compared to the existing baseline situation). Assuming that these measures are put in place an overall negligible impact in relation to pollution is anticipated (SA Objective 7).
- J.13.15.7 The site is identified as being located within predominantly Grade 3 land with a smaller component of urban land based on regional ALC Natural England mapping. The site is also located within an MSA. The site would lead to the loss of more than 20ha of undeveloped land and therefore a major residual adverse impact is identified in relation to Natural Resources (SA Objective 6). Mitigation to minimise impacts on mineral resources is provided in the policy text which states that "*Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.*"
- J.13.15.8 It is anticipated that a new primary school and local health centre would be incorporated into the proposed development and provide all residents with good access to education and health services. Assuming that these measures are put in place an overall major positive impact on education (SA Objective 14) and Health (SA Objective 12) would be expected, following development at this location.

- J.13.15.9 Uncertain impacts are recorded in relation to Transport and Accessibility (SA Objective 9) and Climate Change Mitigation (SA Objective 4) based on the level of information available at this time. It is recommended that further information should be provided on measures designed to promote active travel, reduce reliance on the private car and measures designed to mitigate impacts on climate change emissions prior to the pre submission stage of the BCP, given the scale of development proposed.
- J.13.15.10 Cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area. Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

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J.13.16 Policy WSA9– Land to the east of Chester Road, north of Pacific Nurseries, Hardwick

**Policy WSA9– Land to the east of Chester Road, north of Pacific Nurseries, Hardwick**



<b>Key:</b> Strategic Allocation Conservation Area Listed Buildings Individual Tree Preservation Order (ITPO) Grouped TPO Sites of Importance for Nature Conservation (SINC) Sites of Local Importance for Nature Conservation (SLINC) Greenway Green Belt Environmental Agency (EA) Flood Zone 2 EA Flood Zone 3 JBA Indicative Flood Zone 2 JBA Indicative Flood Zone 3a JBA Indicative Flood Zone 3b	<b>Strategic Allocation:</b> WSA.9
	Site Assessment Reference: SA-0006-WAL, SA-0187-WAL & SA-0312-WAL
	Site Names: Land to the East of Chester Road, North of Pacific Nurseries, Hardwick, Walsall, WS9 0PH
	Local Authority: Walsall
	Ward: Streetly



C65 Land to the east of Chester Road and north of Pacific Nurseries is part of a cluster of three sites, this one being the largest. To the north is proposed site allocation SA- 0006-WAL, currently used for

**Policy WSA9– Land to the east of Chester Road, north of Pacific Nurseries, Hardwick**

horsiculture; to the east is a railway line with a golf course beyond it; to the south lies Pacific Nurseries, part of which is subject to proposed site allocation SA-0312-WAL; and to the west are agricultural fields.

C66 The developable site area is 8.69ha.

C67 The estimated capacity of the site is 304 houses.

C68 Mixed tenure housing is suitable with higher densities of at least 35dph and affordable housing provision.

Design principles:

- Deliver appropriate local facilities to support the new residents and to enhance the sustainability of the existing area, including a new primary school and local health centre.
- Investigation and detailed proposals for remediation of contaminated land.
- A transport strategy that ensures the transport impacts of the development are appropriately managed and mitigated.
- Enhanced provision for pedestrians and cyclists, including enhanced connectivity with the local centre.
- A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and that is designed to deliver landscape, biodiversity and amenity benefits.
- A strategy for landscape and habitat creation which provides enhancement, retention and mitigation for established trees, to ensure there is no significant adverse impact on visual amenity and character nor on protected animal species.
- The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
WSA 9	0	--	+/-	+/-	0	-	0	-	+/-	++	0	++	+	++

J.13.16.1 The land east of Chester Road and north of Pacific Nurseries is proposed to be released from the Green Belt. Approximately 304 houses are proposed with higher densities of at least 35 dph and affordable housing provision. Overall, a major positive impact on housing and minor positive impact on the economy would be expected as a result of the proposed development at this strategic location.

J.13.16.2 No Scheduled Monuments, Listed Buildings, Registered Parks and Gardens or Conservation Areas are located in the immediate vicinity of the site and the site is not located in proximity



to areas of high historic landscape / townscape landscape value. Potential impacts on heritage resources, including the setting of heritage assets and the archaeological potential of the site would be addressed as part of the planning process and would be subject to other policies in the BCP. With considerate planning, it is likely that there would be sufficient scope within this strategic location to direct development towards locations that would minimise effects on heritage resources. Overall a negligible impact on cultural heritage is expected (SA Objective 1).

- J.13.16.3 The site is located in an area of moderate-high landscape sensitivity based on the Landscape Sensitivity Assessment and an area of moderate-high sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents. At this stage of the assessment, it is considered that the development could have a potential major negative impact on the landscape (SA Objective 2). It is however considered that well designed development could potentially provide opportunities to limit the impact of the development on the surrounding landscape and visual receptors. This could include landscaped buffers to maintain separation between the existing residences, and retention or enhancement of key landscape features. The policy text states that development should include *"A strategy for landscape and habitat creation which provides enhancement, retention and mitigation for established trees, to ensure there is no significant adverse impact on visual amenity and character nor on protected animal species."* It is anticipated that further details may be specified in the pre submission plan including an Indicative Concept Plan and Green Belt Loss Mitigation Requirements.
- J.13.16.4 The site may support various assets on-site which provide essential habitats for many species, including hedgerows, trees, and field boundaries. Provision of a strategy for landscape and habitat creation at the strategic location could also potentially help to contribute towards maintaining habitat connectivity and enhancement. Opportunities should be sought for delivering net gains in biodiversity and strategic scale Green Infrastructure improvements, considering the size of development proposed. Where possible, it is recommended that all developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. Taking into consideration the scale of development proposed it is anticipated that with appropriate habitat planning overall there would be mixed positive and negative impacts on biodiversity (SA Objective 3).
- J.13.16.5 The site is located within Flood Zone 1. A small proportion of the site also contains areas of low, medium and high surface water flood risk. Policy WSA 9 states that proposals should develop *"A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and*

- amenity benefits.” Taking this into account, an overall negligible impact would be anticipated at this strategic location with regard to climate change adaptation (SA Objective 5).
- J.13.16.6 The site is located within an AQMA, within 200m of a main road and within a Groundwater Source Protection Zone. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site-specific assessments. The policy includes a requirement for “Investigation and detailed proposals for remediation of contaminated land” for this site which would help to minimise impacts on water pollution and provide remediation of contaminated land (compared to the existing baseline situation). Assuming that these measures are put in place an overall negligible impact in relation to pollution is anticipated (SA Objective 7).
- J.13.16.7 The site is identified as being located within predominantly Grade 3 land based on regional ALC Natural England mapping. The site would lead to the loss of less than 20ha of undeveloped land and therefore a minor residual adverse impact is identified in relation to Natural Resources (SA Objective 6).
- J.13.16.8 It is anticipated that a new primary school and local health centre would be incorporated into the proposed development and provide all residents with good access to education and health services. Therefore, a major positive impact on education (SA Objective 14) and Health (SA Objective 12) would be expected, following development at this location.
- J.13.16.9 Uncertain impacts are recorded in relation to Transport and Accessibility (SA Objective 9) and Climate Change Mitigation (SA Objective 4) based on the level of information available at this time.
- J.13.16.10 Cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

# Appendix K: Gypsy, Traveller and Travelling Showpeople Site Assessments

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# K.1 Introduction

## K.1.1 Overview

K.1.1.1 This appendix provides an appraisal of 13 proposed Gypsy, Traveller and Travelling Showpeople (GTTS) sites within the Black Country, ten of which are 'carried forward' (CF) from existing development plans. There are six GTTS sites located within Dudley, five within Walsall, one within Sandwell and one within Wolverhampton.

K.1.1.2 Each of the sites appraised within this report have been assessed for likely impacts on each of the 14 SA Objectives, as outlined in the SA Framework (see **Appendix A**). Likely sustainability impacts have been set out in **Tables K.2.1 – K.14.1** within each SA Objective chapter, in accordance with the methodology set out in **Chapter 5** of the main SA Report.

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

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

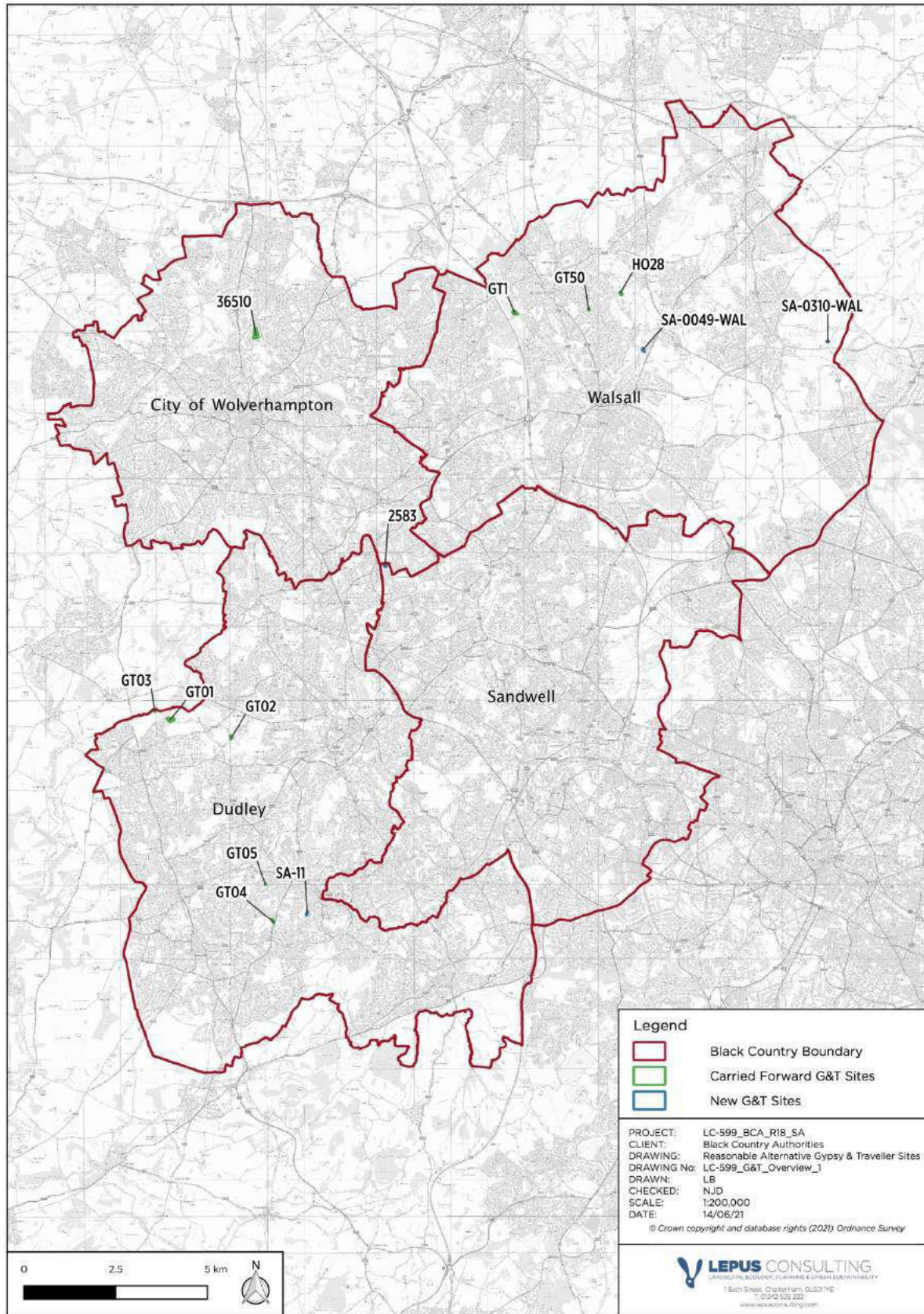


Figure K.1.1: Location of reasonable alternative GTTS Sites in the Black Country

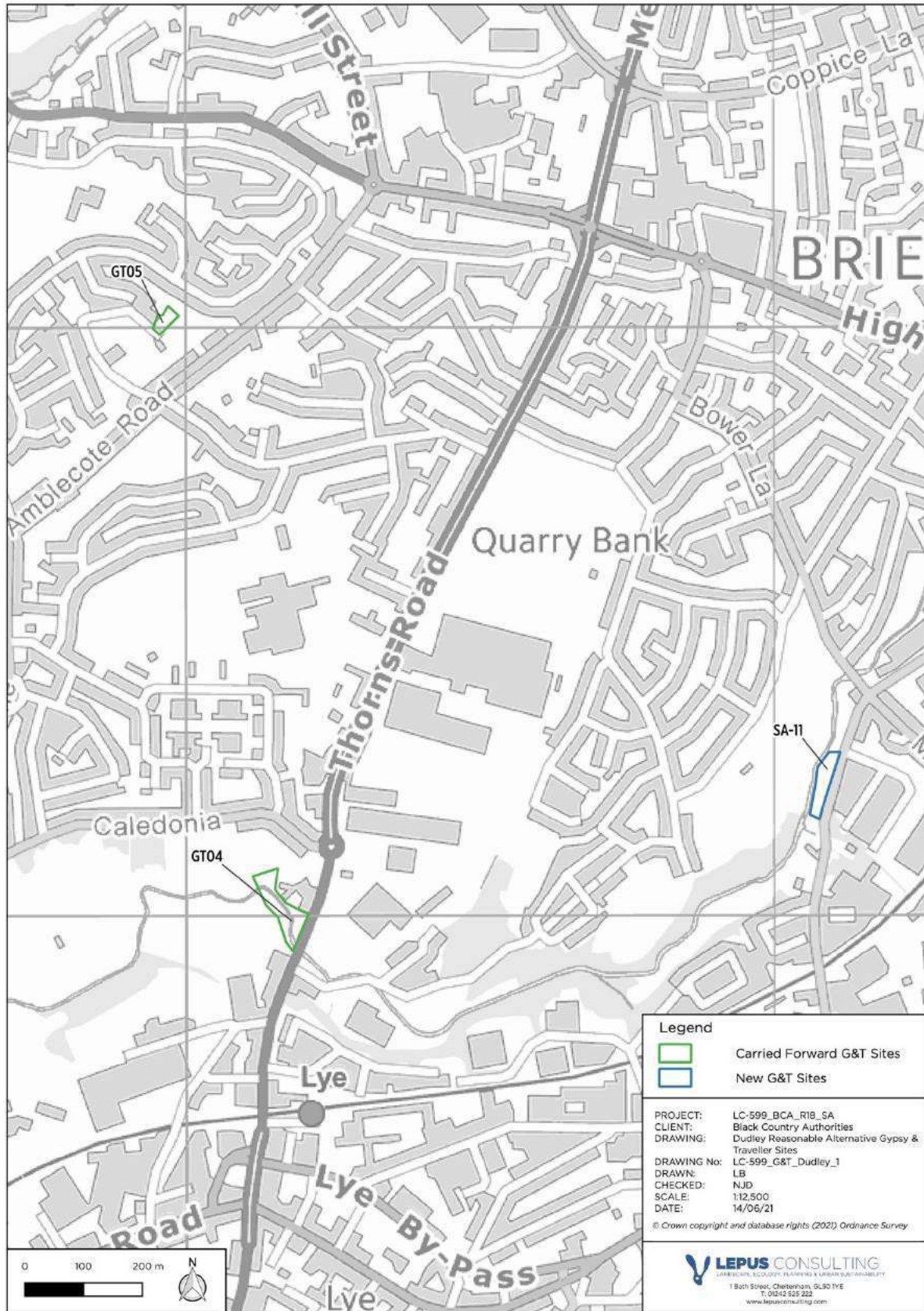


Figure K.1.2: Location of GTTS Sites GT04, GT05 and SA-11 in Dudley



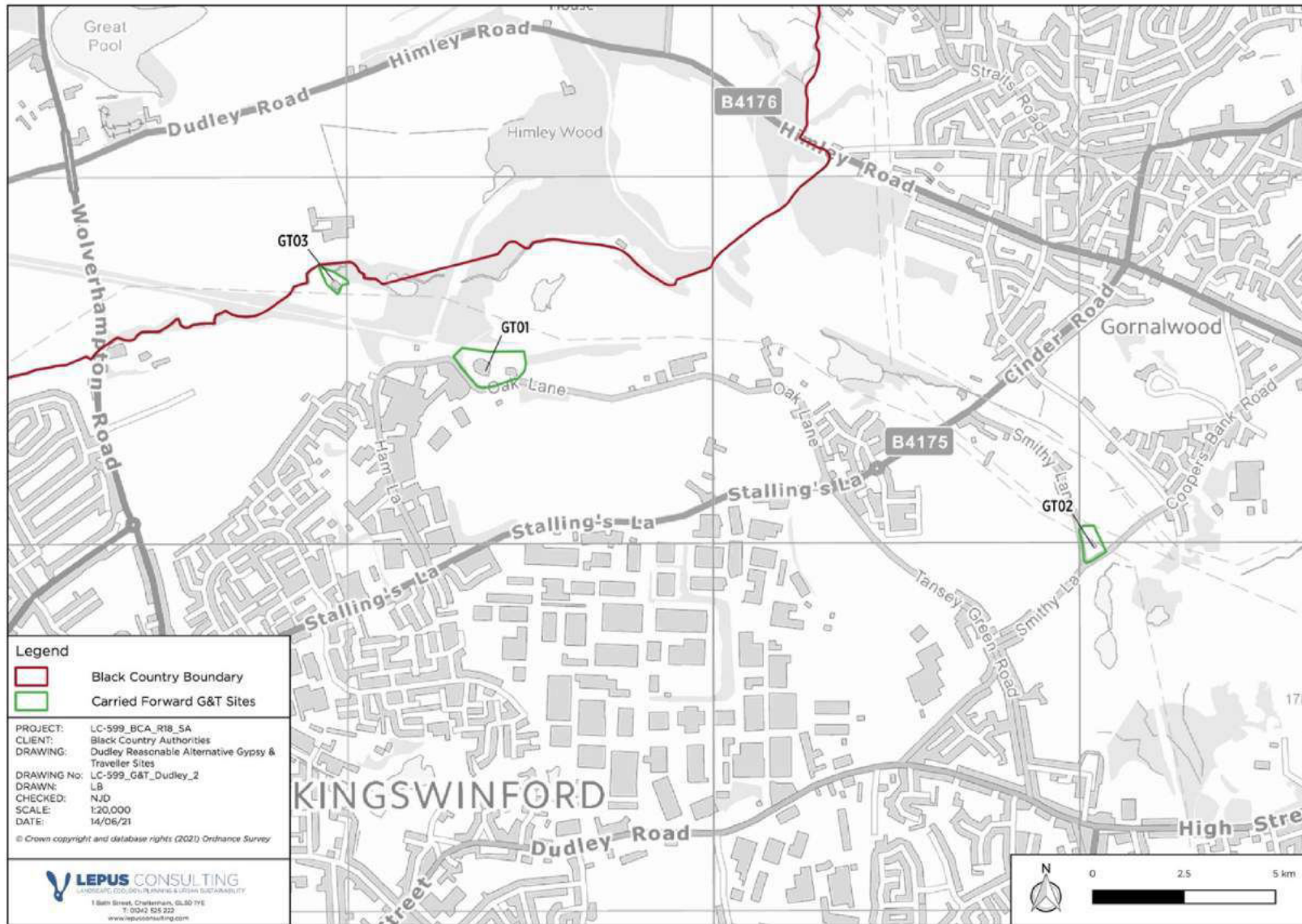


Figure K.1.3: Location of GTTS Sites GT01, GT02 and GT03 in Dudley

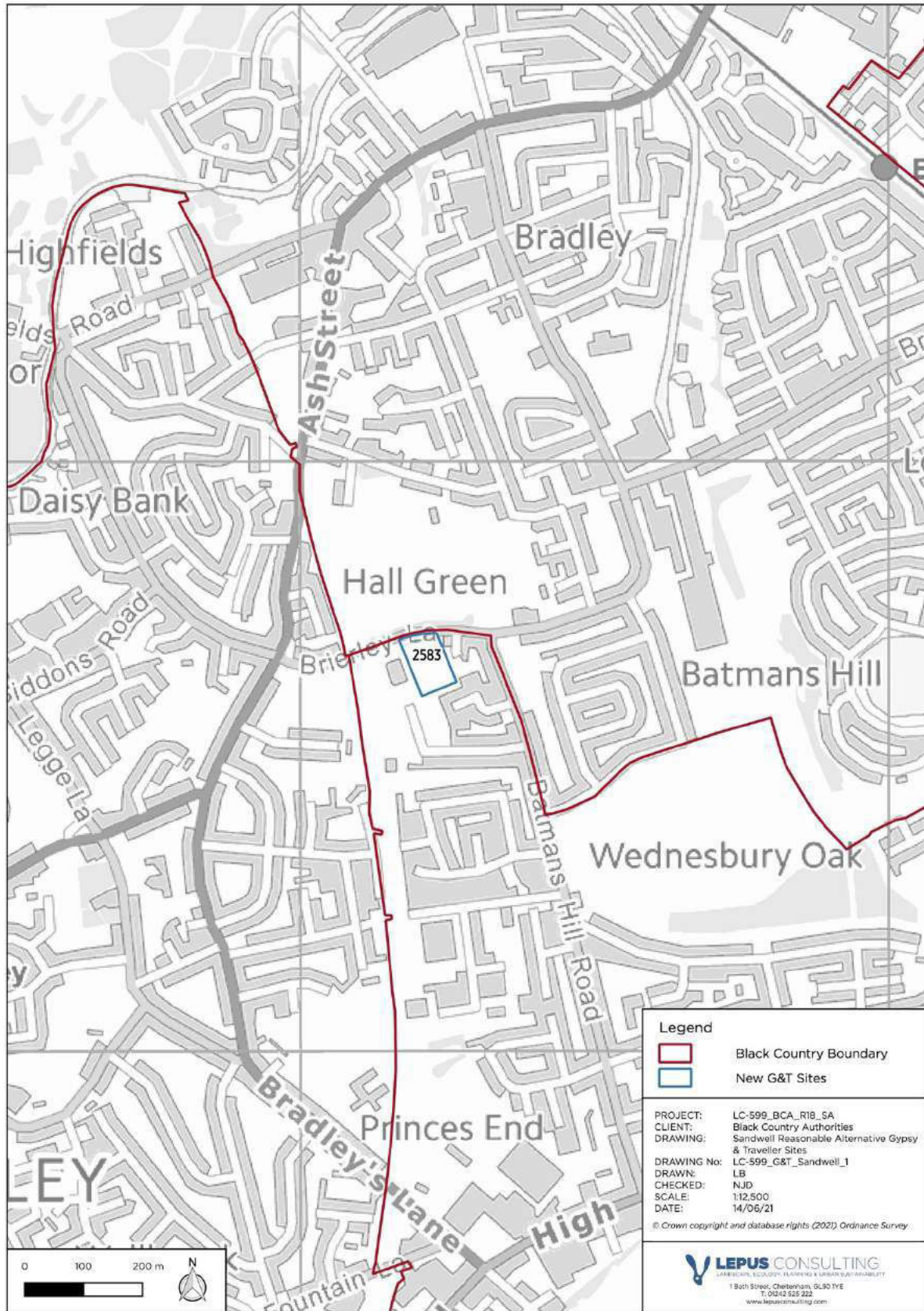


Figure K.1.4: Location of GTTS Site 2583 in Sandwell



Figure K.1.5: Location of GTTS Site SA-0310-WAL in Walsall

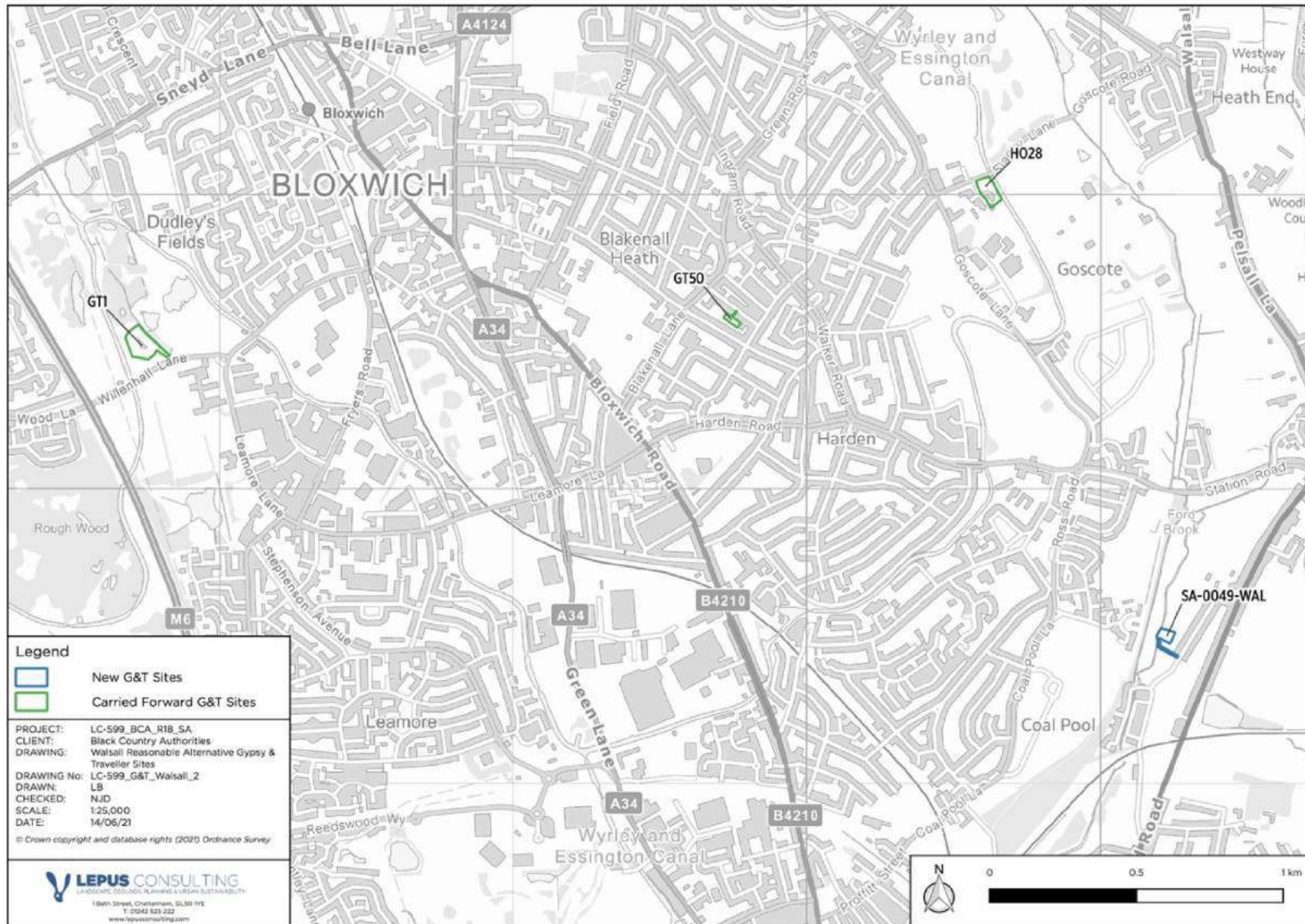


Figure K.1.6: Location of GTTS Sites GT1, GT50, H028 and SA-0049-WAL in Walsall



Figure K.1.7: Location of GTTS Site 36510 in Wolverhampton

**Table K.1.1: Reasonable alternative Gypsy, Traveller and Travelling Showpeople sites**

Site Reference	Site Address	Local Authority	Site use	Gross Area (ha)	Net Area (ha)	No. of Pitches
GT01	Oak Lane	Dudley	Carried Forward (CF) Gypsy, Traveller & Travelling Showpeople (GTTS)	1.10	1.10	22
GT02	Smithy Lane	Dudley	CF GTTS	0.45	0.45	15
GT03	Holbeache Lane, Wall Heath	Dudley	CF GTTS	0.24	0.24	4
GT04	Dudley Road, Lye	Dudley	CF GTTS	0.23	0.23	6
GT05	Delph Lane	Dudley	CF GTTS	0.12	Unknown	4
SA-11	Saltbrook Scrapyard, Saltbrook Road, Halesowen	Dudley	CF GTTS	2.92	2.19	2
GT1	Willenhall Lane Caravan Site, Willenhall Lane, Bloxwich	Walsall	CF GTTS	0.88	Unknown	2
GT50	Rear of 48-72 Foster Street, Blakenall	Walsall	CF GTTS	0.12	Unknown	3
HO28	Dolphin Close (Goscote Site C), Goscote	Walsall	CF GTTS	0.48	Unknown	10
36510	Former Bushbury Reservoir, Showell Road	Wolverhampton	CF GTTS	2.42	0.3	12
SA-0049-WAL	56 Cartbridge Lane	Walsall	GTTS	0.27	Unknown	4
SA-0310-WAL	34-38 Gould Firm Lane	Walsall	GTTS	0.20	Unknown	4
2583	Extension to Caravan Site, Brierley Lane, Bilston, WV14 8TU	Sandwell	GTTS	1.38	0.62	10

## K.2 SA Objective 1: Cultural Heritage

### K.2.1 Grade I Listed Buildings

K.2.1.1 None of the proposed GTTS sites are located in close proximity to Grade I Listed Buildings. The proposed development at all 13 sites would be unlikely to significantly impact the setting of Grade I Listed Buildings.

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

K.2.2.1 Site GT03 is located approximately 500m from the Grade II\* Listed Building 'Holbeache House'. This site comprises an existing GTTS site and is separated from the Listed Building by trees. The proposed development at this site would be expected to result in a negligible impact on the setting of this Listed Building. No other proposed GTTS sites are located in close proximity to a Grade II\* Listed Building, and as such, all sites would be likely to result in a negligible impact.

### K.2.3 Grade II Listed Buildings

K.2.3.1 Several of the proposed GTTS sites are located in close proximity to various Grade II Listed Buildings across the Black Country. For example, Site SA-11 is located approximately 400m from 'Unitarian Chapel', Site 36510 is located within 500m from several Listed Buildings along the canal including 'Birmingham Canal No 14 Lock' and 'Viaduct on Stour Valley Line', and Site GT50 is located approximately 300m from 'Christ Church'. However, these sites either comprise existing GTTS sites and/or are separated from nearby Listed Buildings by built form. Therefore, the proposed development at these sites, and all other proposed GTTS sites, would be expected to result in a negligible impact on the setting of Grade II Listed Buildings.

### K.2.4 Conservation Area

K.2.4.1 None of the proposed GTTS sites are located within or adjacent to a Conservation Area (CA). Site 2583 is located approximately 400m from 'Bilston Canal Corridor' CA, Site SA-0049-WAL is located approximately 430m from 'Old Rushall' CA, and Site 36510 is located approximately 410m from 'Wolverhampton Locks' CA. However, these sites are separated from the CAs by existing built form. The proposed development at these three sites, and all other proposed GTTS sites, would be expected to result in a negligible impact on the setting of CAs.

## **K.2.5 Scheduled Monument**

K.2.5.1 None of the proposed GTTS sites are located in close proximity to Scheduled Monuments (SMs). The proposed development at all 13 sites would be unlikely to significantly impact the setting of SMs.

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

K.2.6.1 Site GT03 is located approximately 480m south of ‘Himley Hall’ Registered Park and Garden (RPG), and Site GT01 is located approximately 830m from this RPG. These two sites comprise existing GTTS sites and are likely to be screened from view of the RPG by the adjacent tree lines. Therefore, the proposed development at these two sites would be expected to result in a negligible impact on the setting of this RPG. No other proposed GTTS sites are located in close proximity to an RPG.

## **K.2.7 Archaeological Priority Area**

K.2.7.1 None of the proposed GTTS sites are located in close proximity to identified Archaeological Priority Areas (APAs). Therefore, the proposed development at all 13 sites would be expected to have a negligible impact on the setting of APAs.

## **K.2.8 Historic Landscape Characterisation**

K.2.8.1 The Black Country Historic Landscape Characterisation (HLC) Study<sup>1</sup> has identified a range of Historic Environment Area Designations within the Black Country, including areas of High Historic Landscape Value (HHLV).

K.2.8.2 Five of the proposed GTTS sites coincide with identified areas of HHLV: Site GT02 is located within ‘Barrow Hill’ HHLV; Site GT03 is located within ‘Oak Farm Wedge’ HHLV; Sites GT04 and SA-11 are located within ‘River Stour Corridor’ HHLV; and Site GT1 is located within ‘Rough Wood Country Park’ HHLV. The proposed development at these five sites could potentially result in a minor negative impact on the surrounding historic environment. The remaining sites do not coincide with any identified areas of high historic value, and therefore, would be expected to have a negligible impact on the local historic environment.

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<sup>1</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: [https://blackcountryplan.dudlev.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-lr\\_redacted.pdf](https://blackcountryplan.dudlev.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf) [Date Accessed: 20/04/21]



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

Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
<b>GTTS Sites</b>								
GT01	0	0	0	0	0	0	0	0
GT02	0	0	0	0	0	0	0	-
GT03	0	0	0	0	0	0	0	-
GT04	0	0	0	0	0	0	0	-
GT05	0	0	0	0	0	0	0	0
SA-11	0	0	0	0	0	0	0	-
GT1	0	0	0	0	0	0	0	-
GT50	0	0	0	0	0	0	0	0
HO28	0	0	0	0	0	0	0	0
36510	0	0	0	0	0	0	0	0
SA-0049-WAL	0	0	0	0	0	0	0	0
SA-0310-WAL	0	0	0	0	0	0	0	0
2583	0	0	0	0	0	0	0	0

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## K.3 SA Objective 2: Landscape

### K.3.1 Cannock Chase AONB

K.3.1.1 The closest proposed GTTS site to Cannock Chase AONB is Site H028, which is located approximately 9.2km south of the AONB. The proposed development at GTTS sites in the Black Country would be unlikely to significantly impact the AONB, in terms of altering views of/from the AONB or altering the setting of the AONB. The sites are small-scale and are situated amongst the existing urban areas. Therefore, a negligible impact has been identified across all sites.

### K.3.2 Landscape Sensitivity

K.3.2.1 The Black Country Landscape Sensitivity Assessment<sup>2</sup> identified the extent to which the character and quality of Black Country Green Belt land is susceptible to change as a result of future development.

K.3.2.2 Sites located in the existing urban area (GT01, GT03, GT04, GT05, SA-11, GT50, H028, 36510 and 2583) would be expected to result in a negligible impact on the local landscape. Site GT1 is located within areas of ‘Moderate’ landscape sensitivity, and therefore, the proposed development at this site could potentially result in a minor negative impact on the local landscape. Sites GT02, SA-0049-WAL and SA-0310-WAL are located within areas of ‘Moderate-High’ landscape sensitivity, and therefore, the proposed development at these three sites could potentially result in a major negative impact on the local landscape.

K.3.2.3 Please note the Landscape Sensitivity study has been designed to consider sensitivity of land parcels to housing and employment development as set out in paras 3.28-3.31 of the Landscape Sensitivity Study<sup>3</sup>. This should be noted and considered when interpreting the assessment findings in the context of scale of GTTS sites proposed and any extant permissions that may be present on site.

### K.3.3 Alter Views for PRow Network Users

K.3.3.1 The Black Country’s Public Right of Way (PRow) network is fragmented, with the majority of footpaths restricted to the Green Belt and areas of parkland/open space within the urban areas. Site H028 is located approximately 15m across the canal from a PRow, and Site 36510 is located approximately 10m from a PRow. These two sites comprise largely undeveloped land, and as such, the proposed development at these sites could potentially alter the views

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<sup>2</sup> LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: [https://blackcountryplan.dudlev.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr\\_redacted.pdf](https://blackcountryplan.dudlev.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf) [Date Accessed: 20/04/21]

<sup>3</sup> Ibid

of open space currently experienced by users of the nearby PRow network, resulting in a minor negative impact on the local landscape. The remaining GTTS sites, which contain existing development and/or are separated from PRow by existing built form, would be unlikely to significantly alter views and are assessed as negligible.

### **K.3.4 Alter Views for Local Residents**

K.3.4.1 The proposed development at Sites H028, 36510 and 2583 could potentially alter the views currently experienced by local residents, primarily due to their location with respect to existing residential zones. Site H028 currently contains trees/scrub, Site 36510 comprises an area of grassland (former reservoir), and Site 2583 comprises an area of hardstanding. A minor negative impact could therefore be expected following development at these three sites.

K.3.4.2 The remaining GTTS sites comprise previously developed land and/or are located away from existing residential zones. As such, the proposed development at these sites would not be expected to significantly change views from surrounding residential properties.

### **K.3.5 Green Belt Harm**

K.3.5.1 The Green Belt Study<sup>4</sup> classified parcels of Green Belt land into different ‘harm’ ratings, based on the assessment of potential harm caused by removing each parcel from the Green Belt based on a range of criteria.

K.3.5.2 The majority of proposed GTTS sites are located in the existing urban area and would be expected to result in a negligible impact on the Green Belt (Sites GT01, GT02, GT03, GT04, GT05, SA-11, GT50, H028, 36510 and 2583). According to the Green Belt Study, Sites GT1 and SA-0049-WAL are located within areas where ‘Moderate-High’ Green Belt harm could be expected if developed. Site SA-0310-WAL is located within an area where ‘Very High’ Green Belt harm could be expected if developed. Therefore, the proposed development at these three sites could potentially result in a major negative impact on the landscape objective.

K.3.5.3 It should be noted that the scope of the Green Belt Study does not incorporate GTTS sites and hence the limitations of the assessment for these purposes are noted. This should be considered when interpreting the assessment findings in the context of scale of GTTS sites proposed and any extant permissions that may be present on site.

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<sup>4</sup> LUC (2019) Black Country Green Belt Study. Available at: [https://blackcountryplan.dudlev.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced\\_redacted.pdf](https://blackcountryplan.dudlev.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced_redacted.pdf) [Date Accessed: 20/04/21]

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

Site Ref	Cannock Chase AONB	Landscape Sensitivity	Alter Views for PRow Network Users	Alter Views for Local Residents	Green Belt Harm
<b>GTTS Sites</b>					
GT01	0	0	0	0	0
GT02	0	--	0	0	0
GT03	0	0	0	0	0
GT04	0	0	0	0	0
GT05	0	0	0	0	0
SA-11	0	0	0	0	0
GT1	0	-	0	0	--
GT50	0	0	0	0	0
HO28	0	0	-	-	0
36510	0	0	-	-	0
SA-0049-WAL	0	--	0	0	--
SA-0310-WAL	0	--	0	0	--
2583	0	0	0	-	0

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

### K.4.1 Natura 2000 Sites

K.4.1.1 European sites are a network of nature protection areas which include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). 'Fens Pools' SAC is situated in the centre of Dudley, and a proportion of 'Cannock Extension Canal' SAC is situated in the north of Walsall. 'Cannock Chase' SAC is located approximately 3.8km north of Walsall, with an identified Zone of Influence (ZoI) of 15km where recreational impacts could potentially arise as a result of new development.

K.4.1.2 Sites GT1, GT50, H028, SA-0049-WAL and SA-0310-WAL are located within 15km of 'Cannock Chase SAC', and therefore, the proposed development at these five sites could potentially result in a minor negative impact on this SAC. No ZoI has currently been identified for 'Fens Pools' or 'Cannock Extension Canal' SACs or other surrounding European sites, and therefore, the impact that development at Sites GT01, GT02, GT03, GT04, GT05, SA-11, 36510 and 2583 may have on European sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

### K.4.2 Sites of Special Scientific Interest

K.4.2.1 There are 18 Sites of Special Scientific Interest (SSSIs) located within the Plan area, all of which fall within Dudley or Walsall. These include 'Daw End Railway Cutting', 'Swan Pool & The Swag' and 'Jockey Fields' SSSIs.

K.4.2.2 Sites GT1, GT50, H028, SA-0049-WAL and SA-0310-WAL are located within SSSI Impact Risk Zones (IRZ) which state that "*any residential development with a total net gain in residential units*" should be consulted on with Natural England. Therefore, the proposed development at these five sites could potentially result in a minor negative impact on nearby SSSIs.

K.4.2.3 The remaining proposed GTTS sites are located within IRZs which do not indicate the proposed use as a threat to nearby SSSIs, and as such, would be likely to have a negligible impact.

### K.4.3 National Nature Reserves

K.4.3.1 There are two National Nature Reserves (NNRs) in the Black Country, located within Dudley, both of which are geological NNRs called 'Wren's Nest' and 'Saltwells'. None of the proposed

GTTS sites are located in close proximity to these NNRs. Therefore, the proposed development at all 13 sites would be expected to have a negligible impact on NNRs.

#### **K.4.4 Ancient Woodland**

K.4.4.1 Ancient woodlands are sparsely distributed throughout the Black Country. Site GT1 is located approximately 300m from ‘Rough Wood’, and Site GT02 is located approximately 400m from a stand of ancient woodland. However, both of these sites comprise existing GTTS sites, and as such, further development at these sites would not be expected to result in a significant impact on nearby ancient woodlands. None of the remaining GTTS sites are located in close proximity to these ancient woodlands. Therefore, the proposed development at these 13 sites would be expected to have a negligible impact.

#### **K.4.5 Local Nature Reserves**

K.4.5.1 There are 28 Local Nature Reserves (LNRs) within the Black Country. Site GT1 is located adjacent to ‘Rough Wood Chase’ LNR. The proposed development at this site could potentially result in a minor negative impact on this LNR, due to an increased risk of development related threats and pressures. The remaining GTTS sites are deemed unlikely to significantly impact nearby LNRs, primarily due to being separated by existing built form.

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

K.4.6.1 A total of 168 Sites of Importance for Nature Conservation (SINCs) can be found within the Black Country, the majority of which are in Dudley. Site GT03 is located wholly within ‘Oak Farm’ SINC. The proposed development at this site could potentially have a direct major negative impact on this SINC.

K.4.6.2 Site GT01 is located adjacent to ‘Oak Farm’ SINC, and Site GT1 is adjacent to ‘Rough Wood Chase’ SINC. The proposed development at these two sites could potentially have a minor negative impact on these SINCs, due to an increased risk of development related threats and pressures. None of the remaining sites coincide with or are located adjacent to SINCs, and therefore, the proposed development at these ten sites would be unlikely to significantly impact any SINC.

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

K.4.7.1 There are many Sites of Local Importance for Nature Conservation (SLINCs) located throughout the Black Country, many of which comprise semi-natural open spaces within the highly urbanised area. A small proportion of Site GT01 coincides with ‘Oak Farm’ SLINC. Site GT02 coincides with ‘Land off Chase Road’ SLINC. Site GT04 coincides with ‘Stour Valley’ SLINC, and Site SA-11 is located adjacent to this SLINC. Site H028 is located adjacent to ‘Wyrley and Essington Canal’ SLINC. Site SA-0049-WAL coincides with ‘Ford Brook’ SLINC.

The proposed development at these six sites could potentially result in a minor negative impact on these SLINCs, due to an increased risk of development related threats and pressures.

K.4.7.2 Site 36510 coincides with ‘Bushbury Junction Reservoir’ SLINC; however, it is understood that this reservoir has since been landfilled. It is unknown whether this site is still of any importance for biodiversity; therefore, the impact of the proposed development at this site is uncertain.

K.4.7.3 The remaining GTTS sites are located further away from SLINCs, and as such, the proposed development at these six sites would be less likely to significantly impact any SLINC.

#### **K.4.8 Geological Sites**

K.4.8.1 Geological sites have been identified throughout the borough, which form part of the Black Country Global Geopark<sup>5</sup>. These sites include a range of notable geological features and formations. None of the proposed GTTS sites coincide with geological sites, and therefore, a negligible impact would be expected.

#### **K.4.9 Priority Habitats**

K.4.9.1 There are a number of priority habitats, protected under the 2006 NERC Act<sup>6</sup>, distributed throughout the Black Country. The entirety of Site SA-11 and a small proportion of Site GT01 coincide with deciduous woodland priority habitat. A small proportion of Sites GT04 and GT1 coincide with coastal and floodplain grazing marsh priority habitat. Therefore, the proposed development at these four sites could potentially result in a minor negative impact on the overall presence of priority habitats across the Plan area. The sites which do not coincide with any identified priority habitat are likely to have a negligible impact.

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<sup>5</sup> Black Country Geopark (2021) Black Country Geopark. Available at: <https://blackcountrygeopark.dudley.gov.uk/bcg/> [Date Accessed: 07/05/21]

<sup>6</sup> Natural Environment and Rural Communities Act 2006. Available at: <http://www.legislation.gov.uk/ukpga/2006/16/contents> [Date Accessed: 14/06/21]

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

Site Ref	Natura 2000 Sites	SSSIs and IPZs	NNRs	Ancient Woodland	LNRS	SINCs	SLINCs	Geological Sites	Priority Habitats
<b>GTTS Sites</b>									
GT01	+/-	0	0	0	0	-	-	0	-
GT02	+/-	0	0	0	0	0	-	0	0
GT03	+/-	0	0	0	0	--	0	0	0
GT04	+/-	0	0	0	0	0	-	0	-
GT05	+/-	0	0	0	0	0	0	0	0
SA-11	+/-	0	0	0	0	0	-	0	-
GT1	-	-	0	0	-	-	0	0	-
GT50	-	-	0	0	0	0	0	0	0
HO28	-	-	0	0	0	0	-	0	0
36510	+/-	0	0	0	0	0	+/-	0	0
SA-0049-WAL	-	-	0	0	0	0	-	0	0
SA-0310-WAL	-	-	0	0	0	0	0	0	0
2583	+/-	0	0	0	0	0	0	0	0

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

### K.5.1 Potential Increase in Carbon Footprint

K.5.1.1 Residential-led development is likely to result in an increase in carbon emissions, to some extent. However, the nature and design of GTTS pitches which could be developed at each site is unknown at present. Therefore, potential increases in carbon emissions as a result of the construction and occupation of dwellings is uncertain.

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

Site Ref	Potential Increase in Carbon Footprint
<b>GTTS Sites</b>	
GT01	+/-
GT02	+/-
GT03	+/-
GT04	+/-
GT05	+/-
SA-11	+/-
GT1	+/-
GT50	+/-
HO28	+/-
36510	+/-
SA-0049-WAL	+/-
SA-0310-WAL	+/-
2583	+/-

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

### K.6.1 Flood Zones

K.6.1.1 Watercourses that pass through the Black Country include the River Tame, River Stour and Ford Brook, as well as 15 canals. Fluvial flood risk across the four districts is primarily associated with the River Tame and Stour and their tributaries, in particular along the River Tame in Sandwell and Walsall. Sites GT02, GT03, GT04, SA-11 and GT1 are located partially within Flood Zone 3a and/or 3b, and therefore, the proposed development at these five sites could potentially have a major negative impact on flooding in the area and exacerbate existing issues of flooding.

K.6.1.2 Sites GT01, GT05, GT50, H028, 36510, SA-0049-WAL, SA-0310-WAL and 2583 are located wholly within Flood Zone 1. Development at these eight sites would be expected to have a minor positive impact on flooding, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

### K.6.2 Indicative Flood Zone 3b

K.6.2.1 Indicative Flood Zone 3b is present in areas where flooding will potentially worsen in future due to climate change. Sites GT02, GT03 and GT1 partially coincide with Indicative Flood Zone 3b. Therefore, the proposed development at these three sites could potentially have a major negative impact on flooding and may exacerbate existing issues of flooding in Dudley. The remaining sites which do not coincide with Indicative Flood Zone 3b may have a negligible impact on contributing to flooding issues in the future, although further site-specific assessments and reference to emerging data would help to provide a more accurate picture of changing flood risk due to climate change.

### K.6.3 Surface Water Flood Risk

K.6.3.1 Surface Water Flood Risk (SWFR) is categorised into low (1/1000), medium (1/100) and high (1/30) in relation to the probability of surface water flooding occurring in a given area. A proportion of Sites GT04, 36510 and 2583 coincide with areas of high SWFR, and therefore, the proposed development at these three sites could potentially have a major negative impact on flooding, as development would be likely to locate site end users in areas at high risk of surface water flooding as well as exacerbate pluvial flood risk in surrounding locations. Sites GT01, GT02, GT1, H028 and SA-0049-WAL coincide with areas of low and/or medium SWFR, and therefore, the proposed development at these five sites could potentially have a minor negative impact on surface water flooding.

K.6.3.2 The remaining sites which do not coincide with any significant areas of SWFR (GT03, GT05, SA-11, GT50 and SA-0310-WAL) would be expected to have a negligible impact on surface water flooding.

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

Site Ref	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
<b>GTTS Sites</b>			
GT01	+	0	-
GT02	--	--	-
GT03	--	--	0
GT04	--	0	--
GT05	+	0	0
SA-11	--	0	0
GT1	--	--	-
GT50	+	0	0
HO28	+	0	-
36510	+	0	--
SA-0049-WAL	+	0	-
SA-0310-WAL	+	0	0
2583	+	0	--

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## K.7 SA Objective 6: Natural Resources

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

K.7.1.1 The Black Country is predominately urban with some scattered pockets of undeveloped land and greenspace found throughout the area, including parcels of Green Belt land in the outskirts of the Plan area.

K.7.1.2 Sites GT01, GT02, GT03, GT05, SA-11, GT1, SA-0049-WAL, SA-0310-WAL and 2583 comprise previously developed land which would be likely to have little or no environmental value. The proposed development at these nine sites would be expected to have a minor positive impact on natural resources as development would be classed as an efficient use of land.

K.7.1.3 Sites GT04, GT50, H028 and 36510 wholly or partially comprise undeveloped land, and/or contain areas likely to be of environmental value such as hedgerows, trees and scrub that may be lost or further fragmented if developed. The proposed development at these four sites would be expected to have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land.

### K.7.2 Agricultural Land Classification

K.7.2.1 The majority of the Black Country comprises land classified as 'Urban' in accordance with the Agricultural Land Classification (ALC). As such, it can be assumed that development located within the urban area would not result in the loss of BMV land. Sites GT04, GT50, H028 and 36510 are located on areas of 'Urban' land, and therefore, the proposed development at these four sites could potentially have a minor positive impact on natural resources as development at these sites would help to prevent the loss of BMV land across the Plan area.

K.7.2.2 The proposed development at Sites GT01, GT02, GT03, GT05, SA-11, GT1, SA-0049-WAL, SA-0310-WAL and 2583 which are located wholly on previously developed land would be likely to have a negligible impact on agricultural land.

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

K.7.3.1 The Black Country contains potentially important mineral resources, which should be safeguarded against loss or sterilisation by non-mineral development<sup>7</sup>. The mineral resources of local and national importance in accordance with the definition set out in the NPPF include sand, gravel, brick clay and fireclay. The Review of the Evidence Base for

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<sup>7</sup> wood (2020) Review of the Evidence Base for Minerals to support preparation of the Black Country Plan. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4f/> [Date Accessed: 11/06/21]

Minerals<sup>8</sup> recommended the BCA to adopt more tightly defined MSAs focused on these resources. Furthermore, a number of ‘Areas of Search’ (AOS) have been identified within the west of Dudley, and the north east of Walsall.

K.7.3.2 Sites GT01 and GT02 are located wholly within an AOS in Dudley; therefore, the proposed development at these two sites could have the potential to sterilise the brick clay resources within this area. Site SA-0310-WAL is located wholly within an MSA in Walsall; therefore, the proposed development at this site could potentially sterilise the sand and gravel resources within this area. A minor negative impact could be expected at these three sites. The remaining GTTS sites would be expected to result in a negligible impact on mineral resources.

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

Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Areas / Areas of Search
<b>GTTS Sites</b>			
GT01	+	0	-
GT02	+	0	0
GT03	+	0	-
GT04	-	+	0
GT05	+	0	0
SA-11	+	0	0
GT1	+	0	0
GT50	-	+	0
HO28	-	+	0
36510	-	+	0
SA-0049-WAL	+	0	0
SA-0310-WAL	+	0	-
2583	+	0	0

<sup>8</sup> “Minerals resources of local and national importance: Minerals which are necessary to meet society’s needs, including aggregates, brickclay (especially Etruria Marl and fireclay), silica sand (including high grade silica sands), cement raw materials, gypsum, salt, fluorspar, shallow and deep-mined coal, oil and gas (including conventional and unconventional hydrocarbons), tungsten, kaolin, ball clay, potash, polyhalite and local minerals of importance to heritage assets and local distinctiveness”.

## K.8 SA Objective 7: Pollution

### K.8.1 Air Quality Management Area

K.8.1.1 All four districts are designated as Air Quality Management Areas (AQMAs); ‘Dudley AQMA’, ‘Sandwell AQMA’, ‘Walsall AQMA’ and ‘Wolverhampton AQMA’. All GTTS sites are wholly within one of these AQMAs. The proposed development at all 13 sites would be likely to locate site end users in areas of existing poor air quality and have a minor negative impact on air pollution.

### K.8.2 Main Road

K.8.2.1 There are a large number of motorways and A-roads which cross the Plan area, each of which represent traffic-related sources of air pollution. Site GT04 is located wholly within 200m of the A4036, Site SA-0310-WAL is located wholly within 200m of the A454 and the majority of Site SA-0049-WAL is located within 200m of the A461. The proposed development at these three sites could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using these main roads would be expected to have a minor negative impact on air quality and noise at these sites. The proposed development at the remaining ten sites which are over 200m from a main road would be expected to have a negligible impact on transport associated air and noise pollution associated with main roads.

### K.8.3 Watercourse

K.8.3.1 Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact upon the quality of the water. Watercourses that pass through the Black Country include the River Tame, River Stour and Ford Brook.

K.8.3.2 The River Stour passes through Site GT04 and adjacent to Site SA-11. Site GT1 is located adjacent to the Sneyd Brook. Site H028 is located adjacent to the Wyrley and Essington Canal. Site SA-0049-WAL is located adjacent to the Rough Brook. Site GT03 is located adjacent to a minor watercourse. The proposed development at these six sites would be likely to increase the risk of contamination of these watercourses, and therefore have a minor negative impact on water quality. Sites which are located over 10m from watercourses are less likely to have a significant impact on the quality of watercourses however each site would need to be evaluated according to land use type, size of development and exact location.

### K.8.4 Groundwater Source Protection Zone

K.8.4.1 Source Protection Zones (SPZs) for groundwater within the Black Country are located to the west of Dudley and Wolverhampton, the east of Walsall and the south east of Sandwell. SPZs are grouped from 1 to 3 based on the level of protection that the groundwater requires. Sites GT03, 36510 and SA-0310-WAL are located within the total catchment (zone 3) of a SPZ. The proposed development at these three sites could potentially increase the risk of groundwater contamination within the SPZs and have a minor negative impact on the quality or status of groundwater resources. The remaining sites do not coincide with the catchment of on any SPZ, and therefore, the proposed development at these ten sites may have a negligible impact on groundwater quality.

### K.8.5 Potential Increase in Air Pollution

K.8.5.1 Residential-led development is likely to result in an increase in air pollution, to some extent. However, the nature and design of GTTS pitches which could be developed at each site is unknown at present. Therefore, potential increases in air pollution as a result of the construction and occupation of dwellings is uncertain.

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

Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
<b>GTTS Sites</b>					
GT01	-	0	0	0	+/-
GT02	-	0	0	0	+/-
GT03	-	0	-	-	+/-
GT04	-	-	-	0	+/-
GT05	-	0	0	0	+/-
SA-11	-	0	-	0	+/-
GT1	-	0	-	0	+/-
GT50	-	0	0	0	+/-
HO28	-	0	-	0	+/-
36510	-	0	0	-	+/-
SA-0049-WAL	-	-	-	0	+/-
SA-0310-WAL	-	-	0	-	+/-
2583	-	0	0	0	+/-

## K.9 SA Objective 8: Waste

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

K.9.1.1 Residential-led development is likely to result in an increase in household waste generation, to some extent. However, the nature and design of GTTS pitches which could be developed at each site is unknown at present. Therefore, potential increases in household waste generation as a result of the construction and occupation of dwellings is uncertain.

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

Site Ref	Increase in household waste generation
<b>GTTS Sites</b>	
GT01	+/-
GT02	+/-
GT03	+/-
GT04	+/-
GT05	+/-
SA-11	+/-
GT1	+/-
GT50	+/-
HO28	+/-
36510	+/-
SA-0049-WAL	+/-
SA-0310-WAL	+/-
2583	+/-



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

### K.10.1 Bus Stop

K.10.1.1 The Black Country is served by regular bus links across the area provided by a number of bus operators acting within the West Midlands Bus Alliance. Sites GT02, GT04, GT05, SA-11, GT1, GT50, H028, 36510, SA-0049-WAL, SA-0310-WAL and 2583 are situated within 400m of a bus stop; therefore, the proposed development at these eleven sites would be expected to have a minor positive impact on access to sustainable transport. Sites GT01 and GT03 are located outside of the sustainable distance of 400m from a bus stop providing regular services, and therefore, the proposed development at these two sites could potentially have a minor negative impact on site end users' access to sustainable transport.

### K.10.2 Railway Station

K.10.2.1 A number of railway lines pass through the four districts in the Black Country, providing good rail links to Birmingham and Stafford. There are four passenger rail lines within the Plan area, in addition to the Midland Metro light rail system that operates between Birmingham and Wolverhampton. Sites GT04, GT05, SA-11, GT1, GT50 and 2583 are located within 2km of various railway stations including Lye Station, Bloxwich Station and Coseley Station. Therefore, the proposed development at these six sites would be expected to have a minor positive impact on site end users' access to rail services. Sites GT01, GT02, GT03, H028, 36510, SA-0049-WAL and SA-0310-WAL are located outside of the sustainable distance of 2km from a railway station, and therefore, the proposed development at these seven sites could potentially have a minor negative impact on site end users' access to rail services.

### K.10.3 Pedestrian Access

K.10.3.1 Sites with good pedestrian access can be described as those with existing pavements or pathways which are segregated from traffic use in the area, which are found throughout the majority of built-up areas of the Black Country. Sites GT04, GT05, SA-11, GT1, GT50, H028, 36510, SA-0049-WAL and 2583 are well connected to the existing footpath networks, and therefore, the proposed development at these nine sites would be likely to have a minor positive impact on local transport and accessibility, by encouraging travel by foot and reducing the requirement for new pedestrian access to be created. However, Sites GT01, GT02, GT03 and SA-0310-WAL are situated in areas which currently have poor access to the existing footpath network. Therefore, the proposed development at these four sites could potentially have a minor negative impact on local accessibility for pedestrians.

#### **K.10.4 Road Access**

K.10.4.1 There are many major and minor roads which run through the Black Country allowing for good transport and accessibility in the local area and nationally. All GTTS sites are adjacent to existing roads, and therefore the proposed development at all 13 sites would be expected to provide site end users with good access to the existing road network, resulting in a minor positive impact on transport and accessibility.

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

K.10.5.1 Sites with sustainable pedestrian access to local fresh food and services are considered to be those within a 15-minute walking distance. Accessibility modelling data indicates the distribution of local services across the Black Country, showing a total of 184 locations, which are generally found in existing centres with more sparse services found towards the outskirts.

K.10.5.2 Sites GT03, GT04, GT05, SA-11, GT1, GT50, H028 and SA-0049-WAL are identified to be within 15-minute walking distance to these services, and therefore, the proposed development at these eight sites would be expected to have a minor positive impact on sustainable access to local services. Sites GT01, GT02, 36510, SA-0310-WAL and 2583 are located outside of a 15-minute walking distance to these services, and therefore, the proposed development at these five sites could potentially have a minor negative impact on the access of site end users to local services, based on current infrastructure.

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

K.10.6.1 Accessibility modelling data indicates that almost the entirety of the Black Country would be expected to provide good sustainable transport access to local fresh food and services, within a 15-minute travel time via public transport. All GTTS sites meet these criteria, and therefore the proposed development at these 13 sites could potentially have a minor positive impact on the access of site end users to local services, based on existing infrastructure.

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

Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
<b>GTTS Sites</b>						
GT01	-	-	-	+	-	+
GT02	+	-	-	+	-	+
GT03	-	-	-	+	+	+
GT04	+	+	+	+	+	+
GT05	+	+	+	+	+	+
SA-11	+	+	+	+	+	+
GT1	+	+	+	+	+	+
GT50	+	+	+	+	+	+
HO28	+	-	+	+	+	+
36510	+	-	+	+	-	+
SA-0049-WAL	+	-	+	+	+	+
SA-0310-WAL	+	-	-	+	-	+
2583	+	+	+	+	-	+

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# K.11 SA Objective 10: Housing

## K.11.1 Housing Provision

K.11.1.1 All sites are proposed for the development of pitches for Gypsies, Travellers and Travelling Showpeople, ranging from two to 22 pitches at each site. Therefore, the proposed development at all 13 sites would be expected to contribute towards meeting the accommodation needs of Gypsies, Travellers and Travelling Showpeople, and result in a minor positive impact on housing provision.

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

Site Ref	Housing provision
<b>GTTS Sites</b>	
GT01	+
GT02	+
GT03	+
GT04	+
GT05	+
SA-11	+
GT1	+
GT50	+
HO28	+
36510	+
SA-0049-WAL	+
SA-0310-WAL	+
2583	+

## K.12 SA Objective 11: Equality

### K.12.1 Index of Multiple Deprivation

K.12.1.1 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England<sup>9</sup>. Out of 317 Local Authorities in England, Dudley is ranked as the 91<sup>st</sup> most deprived, Sandwell 12<sup>th</sup>, Walsall 25<sup>th</sup> and Wolverhampton 24<sup>th</sup><sup>10</sup>. Overall deprivation is relatively high across the Black Country, with 21 of the LSOAs in Dudley, 36 in Sandwell, 42 in Walsall and 33 in Wolverhampton ranked among the 10% most deprived in England.

K.12.1.2 Sites GT1, GT50, H028, 36510 and a proportion of Site GT04 are located within the 10% most deprived LSOAs, and therefore, the proposed development at these five sites could potentially have a minor negative impact on equality by exacerbating existing social pressures faced by current residents and place increased pressure on local services. The remaining sites are located outside of the most deprived 10% LSOAs, and therefore, the proposed development at these eight sites may have a negligible impact on equality.

K.12.1.3 It should be noted that there is a degree of uncertainty in regard to the impacts of each site on equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.

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

Site Ref	IMD 10% Most Deprived
<b>GTTS Sites</b>	
GT01	0
GT02	0
GT03	0
GT04	-
GT05	0
SA-11	0
GT1	-
GT50	-
H028	-
36510	-
SA-0049-WAL	0
SA-0310-WAL	0
2583	0

<sup>9</sup> Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date Accessed: 06/05/21]

<sup>10</sup> Black Country Consortium (2019) The English Indices of Deprivation 2019. Available at: <https://www.the-blackcountry.com/upload/BC%20IMD%202019.pdf> [Date Accessed: 06/05/21]

## K.13 SA Objective 12: Health

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

K.13.1.1 There are four NHS hospitals with A&E departments located within the Black Country: Russells Hall Hospital in Dudley, Sandwell General Hospital in Sandwell, Manor Hospital in Walsall and New Cross Hospital in Wolverhampton.

K.13.1.2 Sites GT01, GT02, GT03, GT04, GT05, SA-11, GT1, GT50, H028, 36510 and SA-0049-WAL are located within 5km of one of these hospitals, and therefore, the proposed development at these eleven sites could potentially have a minor positive impact on access to emergency healthcare. However, Sites SA-0310-WAL and 2583 are located over 5km from a hospital, and therefore, the proposed development at these two sites could potentially have a minor negative impact on access to emergency healthcare.

### K.13.2 Pedestrian Access to GP Surgery

K.13.2.1 The BCA have provided Lepus with information regarding the location of local healthcare facilities and accessibility modelling data. According to this data, there are a total of 325 GP surgeries located across the Plan area. A large proportion of the Black Country is located within a 15-minute walking distance from a GP surgery, including Sites GT02, GT04, GT05, SA-11, GT50, H028, 36510, SA-0049-WAL and 2583. The proposed development at these nine sites would be expected to have a minor positive impact on access to healthcare, based on existing infrastructure. However, Sites GT01, GT03, GT1 and SA-0310-WAL are located outside of this travel time to a GP and are therefore identified as potentially having a minor negative impact on sustainable access to healthcare.

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

K.13.3.1 Sustainable public transport access to a local GP surgery is identified to be within a 15-minute journey. Accessibility modelling data indicates that the majority of the Black Country is located within this distance. All GTTS sites are located within this travel time to a GP surgery via public transport, and therefore, the proposed development at these 13 sites would be expected to have a minor positive impact on sustainable access to healthcare.

### K.13.4 Air Quality Management Area

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

### **K.13.5 Main Road**

K.13.5.1 There are a large number of motorways and A-roads which cross the Plan area, each of which represent traffic-related sources of air pollution. Site GT04 is located wholly within 200m of the A4036, Site SA-0310-WAL is located wholly within 200m of the A454 and the majority of Site SA-0049-WAL is located within 200m of the A461. The proposed development at these three sites could potentially have a minor negative impact on site end users' health, due to the vicinity of the main roads and likely higher levels of transport associated air pollution. On the other hand, the proposed development at the remaining ten sites which are over 200m from a main road could potentially have a minor positive impact on health, as site end users in these locations would be situated away from major sources of traffic related air pollution.

### **K.13.6 Access to Greenspace**

K.13.6.1 Within the Black Country, there is a rich and diverse range of public open spaces, formal parks, outdoor recreational spaces, as well as the PRow network and the canal system. There are two Country Parks located within the Plan area: 'Roughwood' Country Park in Walsall and 'Sandwell Valley' Country Park in Sandwell. All GTTS sites are located within 600m of one or more greenspaces. Therefore, a minor positive impact would be expected at these 13 sites, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.

### **K.13.7 Net Loss of Greenspace**

K.13.7.1 None of the proposed GTTS sites are identified as coinciding with a greenspace. A negligible impact on the provision of greenspace across the BCA would be expected as a result of development at these sites.

### **K.13.8 Public Right of Way / Cycle Path**

K.13.8.1 There is an extensive PRow and cycle network in the Black Country. This includes many routes along the canal network and disused railway lines, which provide a recreational resource as well as links to other modes of transport. All proposed GTTS sites are located within 600m of the PRow and/or cycle network. The proposed development at these 13 sites would be likely to provide site end users with good pedestrian and/or cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

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

Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
<b>GTTS Sites</b>								
GT01	+	-	+	-	+	+	0	+
GT02	+	+	+	-	+	+	0	+
GT03	+	-	+	-	+	+	0	+
GT04	+	+	+	-	-	+	0	+
GT05	+	+	+	-	+	+	0	+
SA-11	+	+	+	-	+	+	0	+
GT1	+	-	+	-	+	+	0	+
GT50	+	+	+	-	+	+	0	+
H028	+	+	+	-	+	+	0	+
36510	+	+	+	-	+	+	0	+
SA-0049-WAL	+	+	+	-	-	+	0	+
SA-0310-WAL	-	-	+	-	-	+	0	+
2583	-	+	+	-	+	+	0	+

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## K.14 SA Objective 13: Economy

### K.14.1 Employment Floorspace Provision

K.14.1.1 Employment floorspace provision has been assessed with consideration of current land use and the proposed development at each site.

K.14.1.2 None of the GTTS sites coincide with any identified employment sites and would not be expected to result in a net change in employment floorspace. Therefore, the proposed development at these 13 sites would be likely to have a negligible impact on the provision of employment opportunities.

### K.14.2 Pedestrian Access to Employment Opportunities

K.14.2.1 Accessibility modelling data has been provided to Lepus by the BCA, mapping key employment locations and areas within a sustainable travel time. According to the modelling data, the majority of the Plan area is within a 30-minute walk to an employment location. All of the proposed GTTS sites are located within this identified sustainable travel time to employment opportunities, and therefore, a minor positive impact on pedestrian access to employment could be expected.

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

K.14.3.1 Accessibility modelling data indicates that the majority of the Plan area is located within a sustainable travel time via public transport to employment opportunities, identified as being within a 30-minute journey. All of the proposed GTTS sites are located within this identified sustainable travel time to employment opportunities, and therefore, a minor positive impact on public transport access to employment could be expected.

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

Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
<b>GTTS Sites</b>			
GT01	0	+	+
GT02	0	+	+
GT03	0	+	+
GT04	0	+	+
GT05	0	+	+
SA-11	0	+	+
GT1	0	+	+
GT50	0	+	+
HO28	0	+	+
36510	0	+	+
SA-0049-WAL	0	+	+
SA-0310-WAL	0	+	+
2583	0	+	+

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

### K.15.1 Pedestrian Access to Primary School

K.15.1.1 Accessibility modelling data has been provided to Lepus by the BCA, mapping the location of primary schools and areas within a sustainable travel time to these schools. There are a total of 406 primary schools across the four authorities.

K.15.1.2 Sites GT04, GT05, SA-11, GT1, GT50, H028, 36510, SA-0049-WAL and 2583 are located within a 15-minute walking distance to a primary school. Therefore, the proposed development at these nine sites could potentially have a minor positive impact on pedestrian access to primary schools. However, Sites GT01, GT02, GT03 and SA-0310-WAL are located outside of a 15-minute walk to a primary school. Therefore, the proposed development at these four sites could potentially have a minor negative impact on access to primary schools due to the likely increased reliance on less sustainable travel methods.

### K.15.2 Pedestrian Access to Secondary School

K.15.2.1 Accessibility modelling data has been provided to Lepus by the BCA, mapping the location of secondary schools and areas within a sustainable travel time to these schools. There are a total of 127 secondary schools across the four authorities.

K.15.2.2 Sites GT04, GT05, GT1, GT50, 36510, SA-0049-WAL and 2583 are located in areas within a 25-minute walk to a secondary school, and therefore, the proposed development at these seven sites could be expected to encourage pedestrian access to secondary schools and have a minor positive impact on education, skills and training. However, Sites GT01, GT02, GT03, SA-11, H028 and SA-0310-WAL are situated in the areas of the Plan area outside of a 25-minute walk to a secondary school, and as such, the proposed development at these six sites could potentially have a minor negative impact on sustainable access to education.

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

K.15.3.1 Existing public transport within the Black Country is widespread and would be expected to provide residents with good access to the local and wider area. Accessibility modelling data indicates only localised pockets of the Plan area where public transport access to secondary schools is limited.

K.15.3.2 Sites GT01, GT02, GT03, GT04, GT05, GT1, GT50, H028, 36510, SA-0049-WAL, SA-0310-WAL and 2583 are located within a 25-minute public transport journey to a secondary school, and therefore, the proposed development at these 12 sites would be expected to have a minor positive impact on sustainable access to education, based on current infrastructure.

However, Site SA-11 is located outside of this sustainable travel time to a secondary school, and therefore, the proposed development at this site could potentially have a minor negative impact on new residents' access to education, based on current infrastructure.

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

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
<b>GTTS Sites</b>			
GT01	-	-	+
GT02	-	-	+
GT03	-	-	+
GT04	+	+	+
GT05	+	+	+
SA-11	+	-	-
GT1	+	+	+
GT50	+	+	+
HO28	+	-	+
36510	+	+	+
SA-0049-WAL	+	+	+
SA-0310-WAL	-	-	+
2583	+	+	+

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## APPENDIX D Public Consultation Engagement Techniques

### August/September 8 week consultation

- Focus on online consultation
- Hard to reach groups – ensuring information is accessible
- Draft Plan documents to be displayed in key buildings
- Summary document/leaflet to be displayed in key buildings and online
- Social media – key engagement tool
- Press releases/Legal Notice/Radio coverage
- Pre-recorded online video - Introduction and key issues to the BCP
- Online Q and A session with officers
- FAQs and summary documents on the website for the consultation.
- Face to face meetings (appointments with officers, drop-in sessions) to be considered subject to relaxation of Covid restrictions

## Cabinet – 7 July 2021

### Assistance with the Acceleration of the UK Afghan Locally Employed Staff (LES) Relocation scheme

**Portfolio:** Councillor Andrew – Deputy Leader, Regeneration

**Related portfolios:** Councillor Craddock – Health and Wellbeing  
Councillor Martin – Adult Social Care  
Councillor Perry – Deputy Leader, Resilient Communities  
Councillor Wilson – Children’s

**Service:** Money Home Job (MHJ)

**Wards:** All

**Key decision:** No

**Forward plan:** No

#### 1. Aim

To assist the national Acceleration of the UK Afghan Locally Employed Staff (LES) Relocation scheme (“the Scheme”) to safely relocate Afghan nationals who have supported the armed forces.

#### 2. Summary

2.1 Assistance is being sought from local authorities by central government to support the Scheme as a matter of urgency. The Scheme has been in place since 2013 and its aim is to safely relocate Afghan nationals (and their families) who have assisted our armed forces to the United Kingdom. This has now become an urgent situation due to the withdrawal of our armed forces from Afghanistan.

2.2 Involvement in the Scheme is on a voluntary basis. A number of local authorities have recently pledged support to the Scheme, including local authorities in the Black Country. The requirement of the scheme is for the local authority to source properties, make them ready, and support the Afghan families on arrival. Government offer a financial package of support for the first 12 months following arrival of the families, to include locating and furnishing properties, rental payments, and integration support. Following this time, any further financial requirements will need to be met from mainstream funding.

#### 3. Recommendations

- 3.1 That Cabinet pledges to assist with the relocation of 80 Afghan individuals (which includes immediate family) through the Acceleration of the UK Afghan Locally Employed Staff (LES) Relocation scheme
- 3.2 That Cabinet delegates to the Executive Director for Children's Services, in consultation with the Portfolio Holder Regeneration, authority to agree additional tranches of individuals to be relocated in Walsall.

#### **4. Report detail - know**

##### ***Context***

- 4.1 The Scheme has been in place since 2013. It enables all interpreters who served for a year or more continuously on the frontline in Helmand from 1 May 2006, and were made redundant, the option to apply for relocation to the UK (those who were dismissed or resigned are not eligible). The Scheme is run in recognition of their commitment and bravery shown supporting UK forces in dangerous and challenging situations. Whilst the Scheme will continue to remain open, in line with the plans for the withdrawal of UK troops from Afghanistan later in 2021, there is a pressing need to accelerate the pace of relocations to the UK for families currently in Afghanistan who are eligible to participate. The Home Office are seeking to relocate 1500 individuals by the end of June 2021 with a total of approximately 5000 before the final withdrawal of the troops later this year. The Home Office are therefore seeking to relocate all those eligible as soon as possible, between June and September 2021. The latest advice is that there will be flights at least weekly from Afghanistan from July 2021, with an urgent need for accommodation for these families.
- 4.2 There are four areas in the UK that have been participating in the Scheme including Coventry in the West Midlands who are assisting 150 individuals through the Scheme. Recently, a commitment in principle had been given by Wolverhampton, and Dudley have pledged to take 20 families. The West Midlands Strategic Migration Partnership (WMSMP) are seeking pledges from LAs as a matter of urgency, and on this basis Walsall council gave a commitment to support families in principle subject to further clarity and scheme details.
- 4.3 Walsall is already supporting a number of resettlement schemes:
  - since 2017, aided 20 individuals through the Syrian resettlement schemes (SVPRS) and committed to helping a further 20 individuals through this route (now called UKRS) in 2021/22,
  - in 2021, introduced a Cabinet approved process for Community Sponsorship, where the community provide a property and support to help resettle refugees,
  - has been a voluntary asylum seeker dispersal area for many years, which currently houses approximately 500 individuals.
- 4.4 The Scheme is different to the resettlement schemes above, including shorter mobilisation times, shorter funding periods, and therefore potentially more reliance on mainstream funded services. The Scheme includes:



- Support funding for the first 12 months on arrival. This financial support was set at only four months until recently. The detailed tariffs for the 12 month offer have therefore not yet been published, and as such the four month tariffs detailed in Figure 1 in 4.7 are still used as an indicative guide. The tariffs are set at different rates for persons who are single, or within couples or families. This report has used the rates for persons who are within families. Primarily this provides a lump sum for integration, a lump sum for setup costs (e.g. void costs, purchase furnishings etc), and rent which has to be claimed as necessary. The previous four month tariff scheme did not provide any education or health tariffs, it is unclear whether this will change with the new 12 month tariff offer.
- The need to house families rather than individuals. Previously, the scheme, as has been run for some time in Coventry for example, has required that the interpreter is housed, and at a later date his/her family may join them. However, due to the urgency of the situation, families will be travelling together. Based on the flow of arrivals the average family size is 5 individuals, ranging from 1 to 8 individuals.
- A requirement that the local authority sources properties in advance, notifies the Homes Office of the properties, and holds them whilst a match is sought – as mentioned above, void loss (and set up costs) is covered up to £1,250 per person (families) threshold. The requirement will generally be 2 to 4 bed properties to meet the family sizes above, albeit it should be noted that it is very difficult to access affordable 4 bed homes in Walsall, and so it is likely we will only be able to assist families with two and three bed homes. There will be active engagement with both local private rented sector landlords, and housing associations, to source properties, noting that due to the urgency and tight timescales, we will need to work with whichever responsible landlords have properties available. The tariffs in 4.7 also show that a rent contribution of £15 per person per day is provided for up to 4 months to cover any period whilst benefits are put in place, after which it is assumed that the families will be in receipt of the housing element of universal credit to cover their housing costs. As noted, there will now be a 12 month tariff offer, but there are no further details on what this will include.
- Most of the interpreters are likely to be able to speak English, however this may not be the case for their families and we would potentially need to provide English for Speakers of Other languages (ESOL) support.
- Families are likely to be matched to properties by the Home Office with very short notice. This means the local authority will need to be prepared in advance, and have support in place, within a very tight timeframe.
- The information provided by the Home Office about these families (e.g. health needs etc) is likely to be more basic than with the other resettlement schemes. This means most of the additional needs can only be scoped upon arrival of the individuals.

### ***Council Corporate Plan priorities***

4.5 The Scheme will contribute to the Council's priorities as follows:

- Economic growth for all people, communities and businesses – the support provider will work with incoming service users in particular working to increase employment prospects and to provide access to education opportunities.

- People have increased independence, improved health and can positively contribute to their communities – the support provider will be required to ensure prevention of homelessness, support in maintaining a tenancy, promoting independence and can improve mental and physical health and wellbeing.
- Communities are prospering and resilient with all housing needs met in safe and healthy places that build a strong sense of belonging and cohesion – the support provider will be responsible for ensuring the families are integrated into communities and therefore will enhance community cohesion.

### **Risk Management**

- 4.6 There is a financial burden risk to the Council and partners, as the package of financial assistance from the government is limited to 12 months only, after which any further additional costs will need to be met through existing funded services. However it should be noted that this risk has recently been reduced by central government increasing the tariffs from a four month to 12 month period. There is a potential that there will be only a basic level of information regarding the families health and education needs, prior to arrival in the UK.

### **Financial Implications**

- 4.7 The Council will claim a number of tariffs, which will be used to help support the resettlement of the household in line with the Home Office Funding Grant. These tariffs were in place for four months only as shown in Figure 1, and didn't include any health or education tariffs. However, it has recently been confirmed that the tariff offer will be increased to cover a 12 month period following arrival, albeit no further details on the breakdown are available at the time of writing this report, and it is unclear whether this will now include any assistance for health and education services. After the 12 month tariff period, any further additional costs will need to be met through mainstream funded services. The previous four month tariff funding rates are as follows:

<b>Figure 1: Tariffs</b>		<b>Accommodation</b>		
Set-up and void costs (lump-sum)	Per person rate for families	Per person rate for couples	Per person rate for singles	
		£1250	£1425	£2850
Rent (up to 4 months)	£15 per person, per day			
1 night hotel accommodation (if needed, dependant on time of arrival)	£50 per person			
Baby pack comprising cot, high chair etc	£225 per any child under two years of age			
<b>Integration</b>				
To provide integration support (lump-sum)	Per person rate for families	Per person rate for couples	Per person rate for singles	
	£4500	£6000	£7500	
<b>Cash support</b>				
Weekly cash support rates (up to 4 months)	Single (under 25)	Single (25 or over)	Couples	Child (under 18)
	£58.90	£74.35	£117.10	37.75
<b>Transport</b>				

Transfer from airport to accommodation	£40 per person
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### ***Legal Implications***

- 4.8 Participation in the Scheme is on a voluntary basis, and is not a statutory requirement.

### ***Procurement Implications/Social Value***

- 4.9 Support for this Scheme will require support from external suppliers. Any contracting activity will be undertaken in compliance with Public Contract Regulations 2015 (the Regulations) and the Council's Contract Rules. Where appropriate Local Sourcing will be used to support this Scheme.

### ***Property Implications***

- 4.10 There will be no direct implications for council owned property. However the Scheme will require the sourcing of suitable properties from the social or private rented sector, based on property availability and standard. On arrival, the families will enter into a tenancy directly with the landlord, in that the council would not be involved in any long term leasing arrangement. However there may be a requirement for the council, or contracted property sourcing agent, to sign short term suitable legal agreements with housing providers, to secure empty properties in advance, to be held pending families being matched to properties by the home office and arriving in Walsall. At that point the landlord would offer the tenancy direct to the family.

### ***Health and Wellbeing Implications***

- 4.11 The health and wellbeing prospects for these families and their children will potentially be much improved by relocation to Walsall. National research has demonstrated many refugees have been faced with health inequalities and can often be subjected to mental health issues. Therefore the support for these households will need to ensure pathways are in place into health services and appropriate outcomes are achieved.

### ***Staffing Implications***

- 4.12 MHJ officers will project manage the Walsall response to the Scheme.

### ***Reducing Inequalities***

- 4.13 An Equality impact Assessment (EQIA) is attached at Appendix A and shows the need to ensure the support element of the service meets the needs of the community and is culturally appropriate. The support element will encompass the support provider forging close links with local community groups who will help support the family and provide cultural intelligence and will also work with relevant faith groups to support integration. The EQIA will ensure regular support plan monitoring by the council to ensure all service user requirements relevant protected characteristics are met suitably.

### ***Consultation***

4.14 The Council has consulted with, and been consulted by WMSMP. The Council has also consulted with the Refugee and Migrant Centre, who deliver the existing Syrian Refugee Support contract, as a potential support provider for this project.

## **5. Decide**

5.1 The following options below need consideration:

- There is a 'do nothing' option. The scheme is voluntary, and the Council can decide not to take part. This would reduce any financial risk, however this course of action would mean the Council were not assisting potentially vulnerable families.
- The Council could support the Scheme. Possible options could include to support:
  - 20 individuals (approximately 4 to 5 families), the same as the previous commitment made for the Syrian refugee scheme
  - 80 individuals, potentially equating to between 15 to 20 families, to match the similar pledge from Dudley
  - Any other number

5.2 It is recommended that 80 individuals are supported. The greater the number of families helped, the bigger contribution that the Council would make to this national scheme, but could also mean potentially greater pressure on mainstream services in the future.

## **6. Respond**

6.1 Subject to approval, officers would proceed to notify the Home Office of our pledge, carry out relevant procurement processes, engage with the support provider, and ensure properties are sourced

## **7. Review**

7.1 The project will be monitored by a dedicated MHJ project lead, and reported back on a weekly basis through the connected working platform. The support will be reviewed weekly throughout the contract period ensuring robust outcomes are achieved and the family units are able to integrate.

### **Background papers**

None

### **Author**

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Sally Rowe  
Executive Director Children's Services

29 June 2021

Councillor Andrew  
Portfolio holder Regeneration

29 June 2021

## Equality Impact Assessment (EqIA) for Policies, Procedures and Services

<b>Proposal name</b>	<b>Acceleration of the UK Afghan Locally Employed Staff (LES) Relocation scheme</b>		
<b>Directorate</b>	Childrens Services		
<b>Service</b>	Money Home Job (MHJ)		
<b>Responsible Officer</b>	Rashida Hussain		
<b>Proposal planning start</b>	09/06/2021	<b>Proposal start date (due or actual date)</b>	01/07/2021

1	<b>What is the purpose of the proposal?</b>	<b>Yes / No</b>	<b>New / revision</b>
	Show which category the proposal is and whether it is new or a revision.		
	Policy	<b>Yes</b>	<b>New</b>
	Procedure		
	Guidance		
	Is this a service to customers/staff/public?	<b>Yes</b>	
	If yes, is it contracted or commissioned?	<b>Yes</b>	
Other - give details			
2	<b>What is the business case for this proposal? Please provide the main purpose of the service, intended outcomes and reasons for change?</b>		
	<p>The UK Afghan Locally Employed Staff (LES) Relocation Scheme has been in place since 2013. It enables all interpreters who served for a year or more continuously on the frontline in Helmand from 1 May 2006, and were made redundant, the option to apply for relocation to the UK (those who were dismissed or resigned are not eligible). The Scheme is run in recognition of their commitment and bravery shown supporting UK forces in dangerous and challenging situations. Whilst the Scheme will continue to remain open, in line with the plans for the withdrawal of UK troops from Afghanistan by September 2021, there is a pressing need to accelerate the pace of relocations to the UK for families currently in Afghanistan who are eligible to participate. The Home Office are seeking to relocate 1500 individuals by the end of June with a total of approximately 5000 before the final withdrawal of the troops later this year. The Home Office are therefore seeking to relocate all those eligible as soon as possible, between June and September 2021. The latest advice is that there will be flights at least weekly from Afghanistan from July 2021, with an urgent need for accommodation for these families.</p> <p>There are four areas in the UK that have participated in the Scheme including Coventry in the West Midlands. Recently, a commitment in principle had been given by Wolverhampton, and Dudley have pledged to take 20 families. The WMSMP are seeking pledges from LAs as a matter of urgency, and on this basis Walsall council gave a commitment to support families in principle subject to further clarity and scheme details. Subsequently, due to the urgent nature of the situation, all of the WMCA Metropolitan councils have confirmed their pledges:</p>		

Birmingham – 80 individuals  
Coventry – previously committed to 150 individuals  
Dudley – 20 families  
Sandwell – 20 to 25 families  
Solihull – 0 families  
Walsall - TBC  
Wolverhampton – 80 individuals/20 families

Walsall has already supported a number of resettlement schemes:

- since 2017, aided 20 individuals through the Syrian resettlement schemes (SVPRS) and committed to helping a further 20 individuals through this route (now called UKRS) in 2021/22,
- in 2021, introduced a Cabinet approved process for Community Sponsorship, where the community provide a property and support to help resettle refugees,
- has been a voluntary asylum seeker dispersal area for many years, which currently houses approximately 500 individuals. It should be noted that further procurement of properties is currently suspended across the West Midlands.

The Scheme is quite different to the resettlement schemes above, including shorter mobilisation times, shorter funding periods, and therefore potentially more reliance on mainstream funded services.

The Scheme includes:

Support funding for the first 4 months on arrival, with the tariffs detailed in Figure 1 in 3.7. The tariffs are set at different rates for persons who are single, or within couples or families. This briefing note has used the rates for persons who are within families. Primarily this provides a lump sum for integration, and housing (rent, void loss, and setup costs) to be claimed as necessary. There are no education or health tariffs. The tariff elements appear to be up to 4 months, other than the lump sum for integration. Confirmation has now been received from the Home Office that it's acceptable to spend the integration funding over a longer period of time.

The need to house families rather than individuals. Previously, the scheme, as has been run for some time in Coventry for example, has required that the interpreter is housed, and at a later date his/her family may join them. However, due to the urgency of the situation, families will be travelling over together. Based on the flow of arrivals the average family size is 5 individuals, ranging from 1 to 8 individuals.

A requirement that the local authority sources properties in advance, notifies the Homes Office of the properties, and holds them whilst a match is sought – as mentioned above, void loss (and set up costs) is covered up to £1,250 per person (families) threshold. The requirement will generally be 2 to 4 bed properties to meet the family requirements above, albeit it should be noted that it is very difficult to access 4 bed homes in Walsall, either in the social or private rented sector. The tariffs as part of the scheme show that a rent contribution of £15 per person per day is provided for up to 4 months to cover any period whilst benefits are put in place, after which it is assumed that the families will be in receipt of the housing element of universal credit to cover their housing costs. However, as, if they are in private rented accommodation there may be a rent shortfall, which may be covered if the adult individuals access employment, or may be considered through an application to the Council for a Discretionary Housing Payment.

	<p>Most of the interpreters are likely to be able to speak English, however this may not be the case for their families and we would potentially need to provide English for Speakers of Other languages (ESOL) support.</p> <p>Families are likely to be matched to properties by the Home Office with very short notice. This means the local authority will need to be prepared in advance, and have support in place, within a very tight timeframe.</p>		
<b>3</b>	<b>Who is the proposal likely to affect?</b>		
	<b>People in Walsall</b>	<b>Yes / No</b>	<b>Detail</b>
	All	No	The policy will affect various community organisations who may support the Afghan nationals.
	Specific group/s	Yes	
	<b>Council employees</b>		
	<b>Other (identify)</b>		
<b>4</b>	<b>Please provide service data relating to this proposal on your customer's protected characteristics.</b>		
	<p>A refugee is a person who has been accepted by the UK government as a refugee under the UN Convention relating to the Status of Refugees 1951. There are no restrictions on a refugee being employed in any type of job, having full access to public services, receiving housing support, and generally enjoying the same entitlements, and subject to the same conditions, for access to services or to higher education as UK citizens.</p> <p>Iqbal et al (2011) state individuals from Culturally and Linguistically Diverse (CALD) backgrounds confront a variety of unique problems when adjusting and resettling to life in a new country. For individuals from refugee backgrounds, difficulties associated with language and cultural differences are frequently compromised by prior experiences of discrimination, stigma, human right violation, and trauma which potentially exacerbate mental health problems. The findings of this study highlighted the importance of maintaining and building connections with members of their own community and with the broader community. Many of the cultural impacts identified in this study are related to being female, as this potentially influences the clothing that many of them wear, the activities they can participate in, and the amount of educational support they receive from their family.</p> <p>Women and children have been particularly affected. Antenatal care entitlement checks and charging put women at increased risk of pregnancy-associated complications; care was frequently received late and women received fewer antenatal appointments than the minimum standards for England (Shortall et al 2015). Among migrants, Black African women had a mortality rate four times that of White women in the UK (Cantwell et al., 2011). Charging undocumented migrant children for secondary healthcare potentially prevents health professionals from</p>		



identifying child protection and safeguarding concerns (The Children's Society, 2015).

The Migration Observatory (University of Oxford) found:

- People who originally came to the UK to seek asylum made up an estimated 0.6% of the UK population in 2019.
- COVID-19 has had a major impact on asylum seeking and refugee resettlement in the UK.
- On 30 June 2020, around 56,000 people were awaiting an outcome on their asylum claim.
- The distribution of asylum seekers and resettled refugees is highly uneven across the UK.
- In 2019, the top five most common countries of nationality of people seeking asylum in the UK were Iran, Albania, Iraq, Pakistan, and Afghanistan.
- Of all refugees resettled in the UK from January 2010 to May 2020, around 70% were Syrian nationals.
- Of the roughly 29,500 refugees resettled in the UK from 1 January 2010 to 30 June 2020 under the country's four resettlement schemes, 75% were nationals of Middle Eastern countries, and 18% were nationals of sub-Saharan African countries.
- In 2019, the UK ranked 6th among the EU-28 in the absolute number of people to whom it granted asylum-related protection (excluding resettled refugees).
- In 2019, around 7,500 people were issued with a refugee family reunion visa, and around 2,500 unaccompanied asylum-seeking children were granted asylum or other leave.

The West Midlands Strategic Migration partnership (WMSMP) data for September 2020:

- There were 29,456 asylum applications (main applicants only) in the UK in 2020, an 18% decrease from the previous year. This latest figure will have been impacted by the measures taken in response to COVID-19 which have impacted migrants' movements globally.
- The biggest percentage increase in applications was seen from Yemen (286 to 518, +81%), other increases were seen from Syria (+43.5%), Sudan (+33.9%) and "stateless" (+31.87%). For all other nationalities there were fewer asylum applications than the previous year.
- In the West Midlands there were 5,875 asylum seekers in receipt of Section 95 support. The nationalities with the highest numbers receiving this support are Iraq (1,154), Iran (691), Albania (540), Pakistan (411) and Eritrea (288).

As at February 2021 this borough has:

- 469 Asylum Seeker Placements
- 20 Under VPRS (Syrian) – Refugees

	<ul style="list-style-type: none"> <li>• 1 – child under VCRS</li> <li>• 12 – UASCs</li> <li>• 17,580 EU resettlement applications</li> </ul> <p>The majority of those being placed through the scheme will be from the Helmand province which:</p> <ul style="list-style-type: none"> <li>• Population Estimate: 940,200</li> <li>• Capital: Lashkar Gah</li> <li>• Ethnic Groups: Pashtun majority, Baluch minority in the south, Nalaquin (in Pashtun, "<i>migrant</i>" and usually eastern Pashtun tribes).</li> <li>• Tribal Groups: 32% Barakzai, 16% Noorzai, 9% Alokzai, 5.2% Eshaqzai.</li> <li>• Religious Groups: Sunni, Shi'a.</li> <li>• Literacy Rate: 4%</li> </ul> <p>Source: <a href="https://nps.edu/web/ccs/helmand">https://nps.edu/web/ccs/helmand</a> , Accessed (10/06/21)</p>																
5	<p><b>Please provide details of all engagement and consultation undertaken for this proposal. (Please use a separate box for each engagement/consultation).</b></p> <p><b>Consultation Activity</b></p> <table border="1"> <tr> <td data-bbox="244 969 667 1037"><b>Type of engagement/consultation</b></td> <td data-bbox="667 969 1158 1037">Internal Consultation on the proposal for Afghan LES Scheme</td> <td data-bbox="1158 969 1310 1037"><b>Date</b></td> <td data-bbox="1310 969 1463 1037">01/21</td> </tr> <tr> <td data-bbox="244 1037 667 1294"><b>Who attended/participated?</b></td> <td colspan="3" data-bbox="667 1037 1463 1294">Informal consultation with 2 community organisations (Afghan Community Association, Refugee and Migrant Centre) and WMSMP alongside a third participant who works with housing refugee. Feedback demonstrated a support for the scheme and a drive to ensure communities are placed in suitable areas in Walsall.</td> </tr> <tr> <td data-bbox="244 1294 667 1361"><b>Protected characteristics of participants</b></td> <td colspan="3" data-bbox="667 1294 1463 1361">Limited to staff including those from different ethnic, age, gender groups</td> </tr> <tr> <td colspan="4" data-bbox="244 1361 1463 1440"><b>Feedback</b> Added into report as part of consultation process.</td> </tr> </table>	<b>Type of engagement/consultation</b>	Internal Consultation on the proposal for Afghan LES Scheme	<b>Date</b>	01/21	<b>Who attended/participated?</b>	Informal consultation with 2 community organisations (Afghan Community Association, Refugee and Migrant Centre) and WMSMP alongside a third participant who works with housing refugee. Feedback demonstrated a support for the scheme and a drive to ensure communities are placed in suitable areas in Walsall.			<b>Protected characteristics of participants</b>	Limited to staff including those from different ethnic, age, gender groups			<b>Feedback</b> Added into report as part of consultation process.			
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6	<p><b>Concise overview of all evidence, engagement and consultation</b></p> <p>The Afghan scheme has been in place since 2013. It enables all interpreters who served for a year or more continuously on the frontline in Helmand from 1 May 2006 and were made redundant the option to apply for relocation to the UK, (those who were dismissed or resigned are not eligible). The scheme is run in recognition of their commitment and bravery shown supporting UK forces in dangerous and challenging situations. Whilst the scheme will continue to remain open, in line with the plans for the withdrawal of UK troops from Afghanistan, there is a pressing need to accelerate the pace of relocations to the UK for families currently in Afghanistan who are eligible to participate. They are seeking to relocate <b>1500 individuals by the end of June with a total of approximately 5000 before the final</b></p>																

**withdrawal of the troops** later this year. The Home Office are therefore seeking to relocate all those eligible as soon as possible, preferably between June and September 2021.

There are four areas in the UK that have participated in the scheme including Coventry in the West Midlands. Recently, a commitment has been given by Wolverhampton, and Dudley have pledged to take 20 families. On the basis of an average family size of 5, this will be up to 100 individuals housed in Dudley. The WMSMP are seeking pledges from LAs as a matter of urgency, and on this basis Walsall council recently gave a commitment to support families in principle subject to further clarity and scheme details.

Walsall has already supported a number of resettlement schemes:

- since 2017 aided 20 individuals through the Syrian resettlement schemes (SVPRS) and further committed to 20 helping individuals through this route (now called UKRS) in 2021/22,
- in 2021, introduced a Cabinet approved process for Community Sponsorship, where the community provide a property and support to help resettle refugees
- has been a voluntary asylum seeker dispersal area for many years, which currently houses approximately 500 individuals. It should be noted that further procurement of properties is currently suspended across the West Midlands.

The Acceleration of the UK Afghan Locally Employed Staff Relocation scheme is fundamentally different to resettlement schemes above, including, shorter mobilisation times, lower levels of financial support and therefore potentially more reliance on mainstream funded services.

The scheme includes:

- For the first 4 months on arrival support funding, with the tariffs detailed in 3.7. Primarily this provides a lump sum for integration, and housing (rent, void loss, and setup costs) to be claimed as necessary. There are no education or health tariffs.
- The need to house families rather than individuals. Previously, the scheme, as has been run for some time in Coventry for example, has required that the interpreter is housed, and at a later date his/her family may join them. However, due to the urgency of the situation, families will be travelling over together. Based on the flow of arrivals the average family size is 5 individuals, ranging from 1 to 7 individuals
- A requirement that the local authority sources properties in advance, notifies the Homes office of the properties, and holds them whilst a match is sought – as mentioned above, void loss (and set up costs) is covered up to £1,250 per person (families) threshold. The requirement will generally be 2 to 4 bed properties to meet the family requirements above, albeit it should be noted that it is very difficult to access 4 bed homes in Walsall, either in the social or private rented sector
- Most of the interpreters are likely to be able to speak English, however this may not be the case for their families and we would potentially need to provide English for Speakers of Other languages (ESOL) support
- Families are likely to be matched to properties by the Home Office with very short notice. This means the local authority will need to be prepared in advance, and have support in place, within a very tight timeframe. The support could be offered through variations to existing

	<p>contract, consideration of any in house options, or a (quick) competitive procurement exercise. It should be noted that already two organisations have expressed an interest to work with these families</p> <ul style="list-style-type: none"> <li>The information provided by the Home Office about these families (e.g. health needs etc) is likely to be more basic than with the other resettlement schemes. This means most of the addiotnal needs can only be scoped upon arrival of the individuals.</li> </ul> <p>The local authority will need to carry out its own community safety checks as part of due diligence in property sourcing.</p>			
<b>7</b>	<p><b>How may the proposal affect each protected characteristic or group? The effect may be positive, negative, neutral or not known. Give reasons and if action is needed.</b></p>			
	<b>Characteristic</b>	<b>Affect</b>	<b>Reason</b>	<b>Action needed Yes / No</b>
	Age	Positive	<p>United Nation's data suggests At least 79.5 million people around the world have been forced to flee their homes. Among them are nearly 26 million refugees, around half of whom are under the age of 18.</p> <p>Those accessing the scheme internationally will likely be subject to rigorous checks and will be family units.</p>	N
	Disability	Positive	<p>When assessing families the UN look at health and the need for healthcare as part of their criteria.</p> <p>Migrant groups in general are more likely to be affected by health inequalities. National research demonstrates refugees are at an increased risk of mental health problems and low subjective well-being.</p>	N
	Gender reassignment	neutral	<p>Those fleeing political and persecution due to their identities are amongst the groups considered under the scheme.</p> <p>There is no reason to consider that the proposed actions would have a negative impact upon individuals with these protected characteristics.</p>	Y

			Data to be collected where possible.	
	Marriage and civil partnership	neutral	Many of those seeking help through the United Nations will include family units and it is likely these households are in a married/civil partnership.	Y
	Pregnancy and maternity	Positive	<p>We do not have sufficiently robust data at this stage to do any meaningful analysis as social housing is allocated on the basis of overall housing need rather than this specific characteristic.</p> <p>Families with children who will be deemed to be at risk of harm forms part of the UN's criteria for assistance.</p>	Y
	Race	Positive	<p>Those accessing the scheme will be from a Black and Minority Ethnic group. In particular of Afghani descent and will be from the Helmand province, national data suggests Helmand's population is mainly made up of Pashtuns, Afghanistan's largest ethnic group. Source: <a href="https://www.reuters.com/article/idUSSP506492">https://www.reuters.com/article/idUSSP506492</a>, Accessed 10/06/21</p>	Y
	Religion or belief	Positive	No information specific data is available and so the impact is not currently known. However, the Helmand province is home to a majority Muslim population along with small Sikh and Hindu population who have previously marginalised.	Y
	Sex	Positive	Women and girls fleeing harassment are amongst the groups fleeing persecution.	Y

	Sexual orientation	neutral	No information specific data is available and so the impact is not currently known.	Y
8	Does your proposal link with other proposals to have a cumulative effect on particular equality groups? If yes, give details.			(Delete one) <b>No</b>
	None that we are aware of.			
9	Which justifiable action does the evidence, engagement and consultation feedback suggest you take?			
	A	No major change required		
	B	Adjustments needed to remove barriers or to better promote equality		
	C	Continue despite possible adverse impact		
	D	Stop and rethink your proposal		
<b>Action and monitoring plan</b>				
Action Date	Action	Responsibility	Outcome Date	Outcome

<p><b>Monitor from</b></p> <p><b>Project start date</b></p> <p><b>Then qtrly</b></p> <p>Procurement of service</p>	<ul style="list-style-type: none"> <li>• Collect data around protected characteristics of incoming households as defined by the Equality Act 2010</li> <li>• Total number of individuals placed in Walsall</li> <li>• Ensure outcome starts form part of any commission and reviewed weekly over 4 month period</li> <li>• <b>Ensure procurement ensures effective move on and support planning once a household is placed. Also ensure specification meets the needs of all protected characteristics.</b></li> </ul>	<p>MHJ</p> <p>MHJ</p>	<p><b>Qtrly</b></p>	<p>What outcomes have been achieved and service usage</p>

Update to EqIA	
Date	Detail

**Contact us**

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