

Cabinet

Wednesday 22 June 2022 at 6.00 p.m.

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

Livestream <https://aisapps.sonicfoundry.com/AuditelScheduler/CreateSchedules/Past/41>

Portfolios

Councillor M.A. Bird,
Leader of the Council



Councillor G. Perry,
Deputy Leader
Resilient Communities



Councillor A. Andrew
Deputy Leader and
Regeneration



Councillor Ken
Ferguson
Internal Services



Councillor K. Pedley
Adult Social Care



Councillor Gary Flint
Health and Wellbeing



Councillor T. Wilson
Children's



Councillor M. Statham
Education and Skills



Councillor K. Murphy
Clean and Green



Councillor Gaz
Ali
Customer



Quorum 3 members

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Democratic Services, The Council House, Walsall, WS1 1TW

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www.walsall.gov.uk

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>

Schedule 12A to the Local Government Act, 1972 (as amended)

Access to information: Exempt information

Part 1

Descriptions of exempt information: England

1. Information relating to any individual.
2. Information which is likely to reveal the identity of an individual.
3. Information relating to the financial or business affairs of any particular person (including the authority holding that information).
4. Information relating to any consultations or negotiations, or contemplated consultations or negotiations, in connection with any labour relations matter arising between the authority or a Minister of the Crown and employees of, or office holders under, the authority.
5. Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.
6. Information which reveals that the authority proposes:
 - (a) to give any enactment a notice under or by virtue of which requirements are imposed on a person; or
 - (b) to make an order or direction under any enactment.
7. Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.
8. Information being disclosed during a meeting of a Scrutiny and Performance Panel when considering flood risk management functions which:
 - (a) Constitutes a trades secret;
 - (b) Its disclosure would, or would be likely to, prejudice the commercial interests of any person (including the risk management authority);
 - (c) It was obtained by a risk management authority from any other person and its disclosure to the public by the risk management authority would constitute a breach of confidence actionable by that other person.

Part I – Public session

1. Apologies
2. Minutes – 20 April 2022
3. Declarations of interest
4. **Local Government (Access to Information) Act, 1985 (as amended):**

To agree that the public be excluded from the private session during consideration of the agenda items indicated for the reasons shown on the agenda.
5. **Petitions.**

(Note: For advice on how to submit petitions, contact Democratic Services. Contact details on the front page of the agenda).
6. **Questions**

(30 minutes will be allowed for pre-submitted questions from non-executive members and the public. All questions will have been submitted at least 7 clear days before the meeting. Answers will be provided at the meeting - no supplementary questions will be allowed.)
7. Forward plan

Leader of the Council: Councillor Bird

Non-key decisions

8. Pre-Audit Outturn 2021/22 and Covid-19 update
9. Corporate Plan 2021/22 – Markers of Success Quarter 4 and Annual Summary
10. Corporate Performance Management Framework

Deputy Leader and Regeneration: Councillor Andrew

Key decisions

11. Black Country Plan: Additional Sites Consultation
12. Walsall Revised Local Development Scheme

Adult Social Care – Councillor K. Pedley

Key decision

13. Adult Social Care Charging Policy, Minimising Debt and Maximising Income

Customer – Councillor G. Ali

Key Decisions

14. Housing Renewal Assistance Policy

15 Housing Retro-fit 2022/23 scheme

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Cabinet

Wednesday 20 April 2022

Minutes of the meeting held in the Council Chamber at the Council House, Lichfield Street, Walsall at 6pm.

Present – in person

Councillor Bird	Leader of the Council
Councillor Andrew	Deputy Leader and Regeneration
Councillor Perry	Deputy Leader, Resilient Communities
Councillor Pedley	Adult Social Care
Councillor Towe	Education and skills
Councillor Craddock	Health and Wellbeing
Councillor Statham	Internal Services

In attendance – in person

Dr. H. Paterson, Chief Executive
Mr C. Goodall, Principal Democratic Services Officer
Mrs H. Owen, Democratic Services Officer

In attendance – remote

Mrs D. Hindson, Executive Director, Resources and Transformation
Mrs K. Allward, Executive Director, Adults, Public Health and Hub
Ms P. Venables, Director, Regeneration and Economy
Mrs S. Rowe, Executive Director, Children's and Customer
Mr S. Gunther, Director of Public Health
Mr S. Portman, Head of Law

3901 Welcome

Councillor Bird opened the meeting by welcoming everyone, and explaining that the Cabinet was meeting that evening in person with appropriate social distancing requirements and would be conducted using the hybrid meeting system to enable it to be streamed and to enable officers to contribute remotely if required. He said that voting would be by way of a show of hands which would be witnessed and recorded by the Democratic Services officer in attendance; and that the agenda and reports for this meeting were available on the Council's website. Introductions took place and a quorum was established.

3902 Apologies

Apologies for non-attendance were received from Councillors Butler and Wilson.

3903 Minutes

The minutes of the last meeting were submitted

Resolved

That the minutes of the meeting held on 16 March 2022 a copy having been sent to each member of the Cabinet be approved and signed as a correct record.

3904 Declarations of interest

There were no declarations of interest

3905 Local Government (Access to Information) Act, 1985

Resolved

That the public be excluded from the meeting during consideration of the items set out in the private part of the agenda for the reasons set out therein and Section 100A of the Local Government Act, 1972.

3906 Petitions

No petitions were submitted.

3907 Questions

No questions were submitted

3908 Forward plan

The forward plan as at April 2022 was submitted:

(see annexed)

Resolved (by assent)

That the forward plan be noted.

At this point, the Leader brought forward item 13 on the agenda – Resilient Communities – Safer Streets programme as there were a number of speakers attending for this item.

3909 Resilient Communities – Safer Streets programme

Councillor Perry presented a report which provided an update on the implementation of the programme which had been approved by Cabinet at its meeting on 20 October 2021.

(see annexed)

Councillor Bird then paid tribute to the many organisations across the borough which had been engaged in, and delivered projects supported by this programme. He introduced the following persons who were in attendance and wished to address the Cabinet on behalf of two of those organisations.

Residents R Us Beechdale:

Kayleigh Street, Vice-Chair and Toni Atkins, Treasurer.

Lest We Forget:

John Elwell and Rob Baker

Residents R Us Beechdale: Ms Street addressed the Cabinet and explained the background to the organisation which had begun in 2010 with support from the Council. She explained the variety of activities the organisation provided, as set out in the report and expanded upon those, particularly the creation and running of a food bank for residents of Beechdale and the surrounding areas; a charity shop; book exchange to encourage more reading; a café whose profits are used to support the food bank; and the regular, seasonal outdoor and indoor events and activities for all ages. She said that the organisation linked with other local clubs to support each other and explained the types of activities they wished to provide in the future.

Lest we forget: Mr Elwell addressed the Cabinet. He began by thanking Councillor Hicken for encouraging and supporting the organisation to expand from supporting veterans to help the wider community. He said that the organisation had formed as a Community Interest Company which he said gave them more freedom to donate funds to other local community organisations. Mr Elwell explained in more detail the activities provided as set out in the report and was particularly enthusiastic about the work being done in conjunction with a local school to bring together veterans and young people. He gave examples of activities planned for the future and thanked everyone for their support.

Councillor Bird thanked the speakers of both organisations and commended them for their hands-on approach which he said had demonstrated a community coming together and had made a difference to those communities. He also commended the Director of Resilient Communities and his team for their support and Councillor Perry as portfolio holder.

Resolved (unanimously)

- 1) That Cabinet notes the progress made with the Safer Streets Programme pilot as part of its commitment to delivering Resilient Communities.
- 2) That Cabinet approves a revenue budget of £50,000 for 2022/23 to support the Safer Streets Programme pilot.
- 3) That Cabinet receives a report in October 2022 on the delivery of the pilot areas

3910 **Corporate Plan Performance: Markers of Success Q3**

Councillor Bird presented a report which presented Quarter 3 performance of the 2021/22 Corporate Plan Markers of Success – highlighting achievements for that period; identified interdependencies and any support requirements to ensure the Markers were met.

(see annexed)

In presenting the report, Councillor Bird said that as Councillors Butler, Craddock and Towe would not be members of the Cabinet next year he wished to record his personal thanks to their work over their time as Cabinet members. Those members reciprocated and thanked officers for their support.

Resolved (unanimously)

- 1) That Cabinet note the overall improved performance in Q3 relating to the period October – December 2021 (Appendix 1)
- 2) That Cabinet note the key achievements (appendix 2) identified interdependencies (Appendix 3) and support required to achieve the Outcomes, which are set out in the report.

3911 **Disabled Facilities Grant Building and other Housing related works and services – award of contract**

Councillor Andrew presented a report which sought authority to award contracts to provide continuity of service for installation of Disabled Facility Grant (DFG) building works, handyperson services and other works.

(see annexed)

Note: Decision taken in the private session following consideration of confidential information. See minute number 3917

3912 **Consolidation of Agreements for the Revenue and Benefit processing system**

Councillor Andrew presented a report which sought approval to consolidate current contracts with the existing supplier to ensure continuity of service.

(see annexed)

Resolved (unanimously)

- 1) That Cabinet approve the award of a contract to NEC Software Solutions UK Limited, T/A Northgate Public Services under Lot 2A (Business Applications) of Crown Commercial Service (CCS) framework RM3821 (Data and Application Solutions) for the period 1 June 2022 to 31 May 2027 with an estimated total value of £981,340.

- 2) That Cabinet delegate, to the Executive Director for Children & Customer Services, the sealing of any deeds or signing of contracts and any other related documents in order to enter into the proposed contract and to subsequently authorise any variations to the contractual arrangements, should this be required, throughout the duration of the contract term provided they are in line with the Council's Contract Rules and any relevant legislation, including Public Contracts Regulations 2015.

3913 **Walsall Council Strategic Asset Plan**

Councillor Andrew presented a report which sought approval for the Strategic Asset Plan, being the key document which sets out the Council's vision and approach for the management of its property portfolio.

(see annexed)

Resolved (unanimously)

That Cabinet approves the Strategic Asset Plan 2022-27 as attached in Appendix A including the governance arrangements, strategies and processes contained in the appendices to the Strategic Asset Plan as attached in Appendices A1, A3, A4, A5, A6, A7 and A8 but excluding Appendix A2 which will be brought to a future Cabinet meeting for approval

3914 **Black Country Ultra-Low emission Vehicle Strategy**

Councillor Andrew presented a report which sought approval for the adoption of the strategy to support the council's commitment to becoming a net zero carbon authority by 2050.

(see annexed)

Resolved (unanimously)

- 1) That Cabinet approve the adoption of the Black Country Ultra-Low Emission Vehicle Strategy, including the 2021 Advisory Note, set out at **Appendices A and B** respectively.
- 2) That Cabinet endorse the future delivery of infrastructure in line with the targets identified in the strategy, subject to all relevant legal, financial, and planning approvals.
- 3) That Cabinet delegates authority to the Executive Director for Economy, Environment and Communities, in consultation with the Portfolio Holder for Regeneration, to award the contract for the provision of on-street residential chargepoints, as part of the Office for Zero Emission Vehicles' On-street Residential Chargepoint Scheme.

- 4) That Cabinet delegates authority to the Executive Director for Economy, Environment and Communities to subsequently authorise the sealing of deeds and/or signing of the concession contract and any other related contracts and/or documents for the provision of such services, as well as any extension and variation of the contractual arrangements should this be required throughout the duration of the contract

3915 Walsall Early Help Community Activity Reducing Exploitation Programme (CARE)

Councillor Towe presented a report which sought approval to pilot an innovative approach to provide respite care/short breaks to young people aged between 11 and 18 yrs. who have disabilities and/or additional learning needs who due to their vulnerabilities are at risk of low level exploitation and poorer outcomes compared to their peers.

(see annexed)

Resolved (unanimously)

That Cabinet:

- 1) Delegates authority to accept tenders and award contracts for the provision of Early Help Community Activities Reducing Exploitation (CARE) services, for a period from 20 June 2022 to 31 March 2023 with the option to extend on an annual basis for a further period of up to two years (subject to securing funding) to the Executive Director of Children's Services, in consultation with the Portfolio Holder for Children's Services, following completion of the tender.
- 2) Delegates authority to the Executive Director of Children's Services in consultation with the Portfolio Holder for Children's Services to enter into contracts for these services and to subsequently authorise the sealing of any deeds, contracts or other related documents for such services.
- 3) Delegates authority to the Executive Director of Children's Services in consultation with the Portfolio Holder for Children's Services to authorise any variations to the contractual arrangements or other related documents for such services should this be required throughout the duration of the term of any contracts, provided they are in line with the Council's Contract Rules and any relevant legislation, including Public Contract Regulations 2015

3916 Exclusion of public

Resolved

That during consideration of the remaining items on the agenda, the Cabinet considers that the items for consideration are exempt information by virtue of the appropriate paragraph(s) of Part I of Schedule 12A of the Local Government Act, 1972, and accordingly resolves to consider the items in private.

Public summary of decisions taken in the private session

3917 **Disabled Facilities Grant Building and other Housing related works and services – award of contract**

See Minute number 3911

The Cabinet approved the award of new contracts for the period 1 May 2022 up to 31 March 2026 for works and services set out in Table 1, below:

Table 1			
Lot 1	Building works associated with Disabled Facility Grants and adaptations	1. SRC Group Ltd 2. Dolphinlifts Midlands Ltd 3. Hardyman Group Ltd 4. Starrant Ltd 5. Eden Adoptions Ltd 6. Hindley Contractors Ltd	Up to £1.6m per annum
Lot 3	Building works including but not limited to repair, refurbishment and improvements to housing (including empty homes) and other council stock.	1. SRC Group Ltd 2. Hindley Contractors Ltd 3. Hardyman Group Ltd 4. Dolphinlifts Midlands Ltd	Up to £0.6m per annum

The Cabinet also delegated authority to the Executive Director of Children's Services, to enter into a new contract/s to deliver the 'Disabled Facility Building Works and other Housing related Works and Services' by using the most appropriate procedures and to subsequently authorise the sealing or signing of any contract, deeds or other related documents for such works and services

(Exempt information under paragraph 3 of Part I of Schedule 12A of the Local Government Act, 1972 (as amended))

3918 **Sale of land on Spout Lane, Caldmore**

Councillor Andrew presented a report in detail which sought approval for the disposal of a piece of land in the Council's ownership on Spout lane Caldmore. The land had a history of problems arising from fly tipping and anti-social behaviour and therefore the Council was seeking to dispose of the land for the development and provision of affordable housing.

The Cabinet approved the disposal for the restricted use of affordable housing only at less than best consideration and undervalue on the basis that the proposed affordable housing development will contribute to the objective to promote economic and social well-being; and delegated authority to the Executive Director, Resources and Transformation in consultation with the Cabinet portfolio holder for Regeneration to approve the final terms for the disposal to the highest affordable housing bidder

(Exempt information under paragraph 3 of Part I of Schedule 12A of the Local Government Act, 1972 (as amended))

The meeting terminated at 6.58 p.m.

Chair:

Date:



Walsall Council

FORWARD PLAN OF KEY DECISIONS

**Council House,
Lichfield Street,
Walsall, WS1 1TW**
www.walsall.gov.uk

6 June 2022

FORWARD PLAN

The forward plan sets out decisions that are termed as “key decisions” at least 28 calendar days before they are due to be taken by the Executive (Cabinet). Also included on the plan are other decisions to be taken by the Cabinet (“non-key decisions”). Preparation of the forward plan helps the Council to programme its work. The purpose of the forward plan is to give plenty of notice and an opportunity for consultation on the issues to be discussed. The plan is updated each month with the period of the plan being rolled forward by one month and republished. Copies of the plan can be obtained from Democratic Services, Walsall MBC, Council House, Walsall, WS1 1TW craig.goodall@walsall.gov.uk and can also be accessed from the Council’s website at www.walsall.gov.uk. The Cabinet is allowed to make urgent decisions which do not appear in the forward plan, however, a notice will be included on the agenda for the relevant Cabinet meeting which explains the reasons why.

Please note that the decision dates are indicative and are subject to change. Please contact the above addressee if you wish to check the date for a particular item.

The Cabinet agenda and reports are available for inspection by the public 7 days prior to the meeting of the Cabinet on the Council’s website. Background papers are listed on each report submitted to the Cabinet and members of the public are entitled to see these documents unless they are confidential. The report also contains the name and telephone number of a contact officer. These details can also be found in the forward plan.

Meetings of the Cabinet are open to the public. Occasionally there are items included on the agenda which are confidential and for those items the public will be asked to leave the meeting. The forward plan will show where this is intended and the reason why the reports are confidential. Enquiries regarding these reasons should be directed to Democratic Services (craig.goodall@walsall.gov.uk).

“Key decisions” are those decisions which have a significant effect within the community or which involve considerable expenditure or savings. With regard to key decisions the Council’s Constitution states:

- (1) A key decision is:
 - (i) any decision in relation to an executive function which results in the Council incurring expenditure which is, or the making of savings which are, significant, having regard to the Council’s budget for the service or function to which the decision relates or
 - (ii) any decision that is likely to have significant impact on two or more wards within the borough.
- (2) The threshold for “significant” expenditure/savings is £500,000.
- (3) A decision taker may only make a key decision in accordance with the requirements of the Executive Procedure Rules set out in Part 4 of this Constitution.

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**FORWARD PLAN OF KEY DECISIONS
JULY 2022 TO OCTOBER 2022 (6.6.22)**

1	2	3	4	5	6	7
Reference No./ Date first entered in Plan	Decision to be considered (to provide adequate details for those both in and outside the Council)	Decision maker	Background papers (if any) and Contact Officer	Main consultees	Contact Member (All Members can be written to at Civic Centre, Walsall)	Date item to be considered
97/22 (7.3.22)	Corporate Plan 2021/22: To note the Quarter 4 (outturn) performance against the Measures of Success in the Corporate Plan 2021/22	Cabinet Non-key decision	Stephen Gunther Stephen.gunther@walsall.gov.uk	Internal Services	Cllr Bird	22 June 2022
99/22 (4.4.22)	Corporate Performance Management Framework: To present the refreshed framework which is part of the Council's governance arrangements along with feedback from Audit Committee following its consideration of the robustness of the framework.	Cabinet Non-key Decision	Helen Dudson Helen.dudson@walsall.gov.uk	Internal Services	Cllr Bird	22 June 2022
100/22 (4.4.22)	Pre-Audit Outturn 2021/22 and Covid-19 Update: To receive the pre-audit revenue and capital financial outturn position for 2021/22 and approve recommended carry forwards, and financial and treasury indicators for 2021/22, along with an updated assessment of Covid-19 funding allocations to address cost pressures and income losses	Cabinet Key Decision	Vicky Buckley Vicky.buckley@walsall.gov.uk	Internal Services	Cllr Bird	22 June 2022

106/22 (24.5.22)	Local Development Scheme: An amendment to the timetable is required to accommodate the proposed additional Black Country Plan Regulation 18 consultation and delegated authority. Approval is also sought for delegated authority to make factual changes to the document.	Cabinet Key Decision	Stuart Crossen stuart.crossen@walsall.gov.uk	Internal services	Cllr Bird	22 June 2022
101/22 (4.4.22)	Corporate Financial Performance 2022/23, approach to Budget Setting for 2023/24, and changes to the council's Tax Strategy: To report the financial position based on 2 months to May 2022, including the impact of Covid-19, and to set out our approach and timeline for the 2023/24 budget process and amendments to the Tax Strategy.	Cabinet Key Decision	Vicky Buckley Vicky.buckley@walsall.gov.uk	Internal Services	Cllr Bird	20 July 2022
106/22 (6.6.22)	Treasury Management Annual Report: To note and forward to Council, for consideration and noting (and in line with the requirements of the Treasury Management Code of Practice (2017)), the annual report for treasury management activities 2021/22 including prudential and local indicators.	Council Non-Key Decision	Treasury Management Code of Practice. Richard Walley Richard.walley@walsall.gov.uk	Internal Services	Cllr Bird	7 September 2022

110/22 (6.6.22)	Draft Revenue Budget and Draft Capital Programme 2023/24 to 2026/27: To provide an updated medium term financial outlook, draft revenue budget and capital programme for 2023/24 to 2026/27, including savings proposals, and to set out the process and timescales for setting a legally balanced budget for 2023/24.	Cabinet Non-key decision	Vicky Buckley Vicky.Buckley@walsall.gov.uk	Public, Internal Services	Cllr Bird	19 October 2022
111/22 (6.6.22)	Corporate Financial Performance 2022/23: To report the financial position based on 5 months to August 2022, including the impact of Covid-19.	Cabinet Non-key decision	Vicky Buckley Vicky.Buckley@walsall.gov.uk	Public, Internal Services	Cllr Bird	19 October 2022
102/22 (9.5.22)	Housing Renewal Assistance Policy 2022-25: To approve an updated policy governing delivery of capital housing funds.	Cabinet Key Decision	David Lockwood David.lockwood@walsall.gov.uk	Public, Internal Services	Cllr Andrew	22 June 2022
103/22 (9.5.22)	Cannock Chase Special Area of Conservation: To consider options for mitigation strategies in response to the requirement that all developments that would have Likely Significant Effects on the SAC need to provide mitigation for their impacts.	Cabinet Key Decision	Stuart Crossen Stuart.crossen@walsall.gov.uk John Raine John.raine@walsall.gov.uk	Internal Services	Cllr Andrew	22 June 2022

104/22 (9.5.22)	Black Country Plan: To approve additional draft Black Country Plan regulation 18 consultation for additional suitable development sites.	Cabinet Key Decision	Stuart Crossen Stuart.crossen@walsall.gov.uk	Internal Services	Cllr Andrew	22 June 2022
105/22 (9.5.22)	Housing Retro-fit 2022/23 schemes- Appointment of contractors: To approve appointment of contractors to deliver grant funded works to home in the borough to ensure that the council can use time-limited Local Authority Delivery Scheme (LADS) and Home Upgrade Grant (HUGs) funding to improve the energy efficiency of dwellings in the borough and help tackle fuel poverty, excess winter deaths and domestic carbon emissions	Cabinet Key Decision	David Lockwood David.lockwood@walsall.gov.uk Mark England Mark.england@walsall.gov.uk	Internal Services	Cllr Andrew	22 June 2022
107/22 (6.6.22)	Procurement of Corporate Landlord Strategic Partner: To seek approval to the appointment of a strategic partner to support the programme of capital schemes related to the council's property portfolio.	Cabinet Key Decision	Nick Ford Nick.ford@walsall.gov.uk	Internal Services	Cllr Andrew	20 July 2022

108/22 (6.6.22)	Town Deal: To agree submission of business cases for Town Deal projects to secure funding.	Cabinet Key Decision	Philippa Venables Philippa.Venables@walsall.gov.uk	Internal Services, Town Deal Board members	Cllr Andrew	20 July 2022
94/22 (6.2.22)	Adult Social Care Charging Policy: To consider and approve the revised Charging Policy, within ASC, following completion of the Public Consultation.	Cabinet Key decision	Anne Doyle Anne.doyle@walsall.gov.uk	Internal Services	Cllr Pedley	22 June 2022
98/22 (7.3.22)	Statutory Advocacy Services: To receive an update on the recommissioning of these services and delegate authority to accept and award a contract	Cabinet Key decision	Tracy Simcox Tracy.simcox@walsall.gov.uk	Internal Services	Cllr Pedley	20 July 2022
109/22 (6.6.22)	Schools Mainstream Local Funding Formula 2023/24: That Cabinet approves a full consultation with all schools for the Mainstream Local Funding Formula, to be used for the allocation of mainstream funding to schools in Walsall	Cabinet	Schools Forum ESFA – Schools revenue funding operation guide Richard Walley Richard.walley@walsall.gov.uk	Schools Forum Cabinet	Cllr M. Statham	19 October 2022

Cabinet – 22 June 2022

Pre-Audit Outturn 2021/22 and Covid-19 update

Portfolio: Councillor M Bird – Leader of the Council (Lead Portfolio)

Related Portfolio: All

Service: Finance – council wide

Wards: All

Key decision: Yes

Forward plan: Yes

1. Aim

- 1.1 To inform Cabinet of the pre-audit revenue and capital outturn position for 2021/22 and financial and treasury indicators for 2021/22, including the impact of Covid-19 funding and costs/income losses.

2. Summary

2.1 *Pre-audit outturn 2021/22*

The overall net revenue pre-audit outturn is £131.06m against a budget of £132.55m, an underspend variance of £1.49m (0.23% of gross expenditure), allowing a transfer to earmarked reserves of this underspend to help further manage the potential impact of the pay and price inflation on services in 2022/23. The pre-audit capital outturn is an underspend of £4.16m, net of carry forwards of £153.31m.

2.2 *Treasury Management*

The report confirms that treasury management activity has been undertaken in accordance with the Code of Practice on Treasury Management and Walsall complied with all statutory Prudential Indicators.

2.3 *Financial Impact of Covid-19*

Government has since March 2020 allocated £76.73m of funding (plus £5.37m of support to Walsall residents and £150.73m for Walsall businesses) to help support the impact of the pandemic in Walsall. As well as the initial costs of funding the council's response, the impact of Covid-19 continues to include significant loss of income following closure of services and facilities, loss of income to the council's collection fund, and some delays to the delivery of approved budget savings.

- 2.4 This report provides a summary position on the 2021/22 financial impact of Covid-19 of income losses and additional general Covid-19 costs and the grant position, including the balance of unspent grant that is permitted to be carried forward into 2022/23. A further update in relation to 2022/23 will be reported to Cabinet in July. Covid-19 funding continues to require careful management to ensure the council is not put under any financial strain.
- 2.5 Regular updates are provided to Cabinet on the financial implications for Walsall Council, including any recommendations for additional actions to be taken to manage the evolving situation.

3. Recommendations

That Cabinet:

- 3.1 Note the pre-audit revenue outturn underspend of £1.49m and note the S151 Officers action under delegations to transfer this to earmarked reserves in 2022/23 to assist in managing the potential impact of pay and price inflation on council services in 2022/23.
- 3.2 Note the service positions (**table 1** and **Appendix 1**) and the carry forward of undelivered 2021/22 savings (**Appendix 5**) to 2022/23 and that 2022/23 savings delivery will be kept under review and progress reported to Cabinet in July.
- 3.3 Note the transfers from and to earmarked reserves as set out in **table 2** and **Appendix 2**.
- 3.4 Note that the opening general reserves balance will be £17.69m as at 1 April 2022.
- 3.5 Note the additional funding allocated to Walsall as set out in sections 4.7 to 4.13 and **Appendix 3** of this report, which has been sufficient to cover the additional costs of supporting the council's Covid-19 response in 2021/22; the final outturn position by activity as shown in **table 4** and **Appendix 4**, and the financial impact on the delivery of 2021/22 approved savings as set out at **Appendix 5**.
- 3.6 Approve amendments to the 2021/22 capital programme since the last update to Cabinet in February 2022, as set out in **table 8** in section 4.17.
- 3.7 Note the pre-audit capital outturn underspend of £4.16m, net of carry forwards of £153.31m (**table 9** and **Appendices 6 and 7**).
- 3.8 Note and approve the capital re-profiling/carry forwards from 2021/22 to 2022/23 as set out in **Appendices 6 and 7**.
- 3.9 Note the financial health indicators for 2021/22 as summarised in **Appendix 8**.
- 3.10 Note the 2021/22 prudential indicators in **Appendix 9** of this report and Walsall's compliance with these indicators.

4. Know - Context

- 4.1 Cabinet received regular financial reports to allow it to monitor the financial position of the council and consider plans for corrective action during 2021/22. Maintaining

financial stability is a key requirement of the Medium Term Financial Framework (MTFF). This report contains the pre-audit revenue and capital outturns for 2021/22 and a financial update on Covid-19 grant allocations.

Pre-Audit Revenue Outturn 2021/22

- 4.2 Managers are required to deliver their service targets and improvements within budget. Small variations are normal and not material on a gross revenue budget of £660.04m. The council wide pre-audit net revenue outturn is an underspend of £1.49m, summarised by directorate in **table 1** below. Further detail at service level is found in **Appendix 1**.
- 4.3 The previous revenue position reported to Cabinet on 9 February 2022 forecast an overspend of £1.08m (as at the December 2021 reporting position), a variance of £2.57m to the final (pre-audit) position. The reason for this is mainly the following:
- Adult Social Care – reduction of overspend by £360k mainly as a result of additional income from direct payment refunds, offsetting increased staffing within locality teams and increased bad debt provision;
 - Customer Engagement – further underspend of £200k mainly due to staffing and housing benefit subsidy/overpayments;
 - Economy, Environment and Communities – further underspend of £220k mainly due to additional trade waste income and reduction in vehicle and leading costs within Clean and Green;
 - Resources and Transformation – further underspend of £650k, including £272k in Integrated Facilities Management from a reduction in utilities and maintenance, and £351k within ICT for an adjustment to prepayment forecasts;
 - Central (non service specific) budgets – underspend of £1.23m mainly due to the non-utilisation of revenue implications of capital of £910k; £341k review of other central budgets; partly offset by a £757k payment into the Insurance Fund;
 - The balance on central contingency of £753k (as reported to Cabinet and CMT as part of January/February forecasting).

Table 1: Pre-audit Revenue Outturn 2021/22

Directorate	Net Budget	Year end forecast prior to transfer to / (from) earmarked reserves	Year end variance to budget prior to transfer / (From) earmarked reserves	Use of earmarked reserves	Transfer to earmarked reserves	Year end forecast
	£m	£m	£m	£m	£m	£m
Adult Social Care, Public Health & Hub	58.90	66.01	7.11	(9.01)	6.39	4.49
Children's Services						
- Children's and Education	84.63	91.73	7.10	(8.76)	1.66	(0.00)
- Customer Engagement	6.54	5.51	(1.03)	(1.58)	1.04	(1.57)
Economy, Environment & Communities	53.39	53.19	(0.20)	(4.04)	3.29	(0.95)
Resources & Transformation	31.75	33.14	1.39	(4.21)	1.78	(1.05)
Services Position	235.20	249.58	14.37	(27.60)	14.15	0.92
Capital Financing	(5.25)	(8.43)	(3.17)	(2.75)	4.72	(1.20)
Central budgets	(97.41)	(117.15)	(19.75)	(31.34)	49.86	(1.22)
Total council tax requirement	132.55	124.00	(8.55)	(61.68)	68.74	(1.49)

Earmarked Reserves

- 4.4 The year-end forecast includes the use of earmarked reserves of £61.68m and transfers to earmarked reserves of £68.74m. These are shown at **Appendix 2**.

Earmarked reserves are created for specified purposes. These are all planned to be used, although the period over which they are to be used may vary. Covid-19 costs funded from the S31 Covid-19 Response Fund, Sales, Fees and Charges grant (SFC) and other Covid-19 related grants carried forward from 2020/21 are recorded as expenditure within services, with a corresponding transfer in of grant from earmarked reserves to fund the costs and these total £44.89m of the £61.68m planned use of reserves.

Of the £68.74m of transfers to reserves £20.29m relates to Covid-19 grants, and £15.45m grants received in advance. The full breakdown is shown in **Table 2** below and by reserve in **Appendix 2**.

Table 2 : Earmarked Reserves					
	Opening Balance	Transfers from Reserves	Transfers to Reserves	Movement	Closing Balance
	£m	£m	£m	£m	£m
Treasury Reserves	22.67	(0.26)	4.72	4.46	27.13
Grant / Contributions received in advance	18.03	(6.83)	15.45	8.63	26.65
Improvement projects	33.67	(3.90)	9.55	5.64	39.31
Cost Pressures	10.66	(1.48)	2.20	0.72	11.38
Council Liabilities	43.14	(3.45)	14.40	10.95	54.09
Covid-19 grants	45.02	(44.89)	20.29	(24.60)	20.42
Public Finance Initiatives	22.04	(0.45)	0.46	0.01	22.04
Risk	7.64	-	1.09	1.09	8.73
Other	7.27	(0.42)	0.57	0.15	7.42
Total Balance 31.03.2022	210.12	(61.68)	68.74	7.05	217.17

Reserves are categorised for the purposes of reporting as follows:

- **Treasury reserves.** These reserves are to minimise the impact of interest rate changes and finance early redemption of loans to reduce the council's future interest exposure;
- **Grants / contributions received in advance.** This is where the council has received money in advance of the next accounting period or covers more than one accounting period. These amounts will be spent in line with the grant conditions;
- **Improvement projects.** These reserves are to finance service modernisation; specific projects such as pilot street cleansing initiatives, Cloud services, Oracle development, economic growth programme; and costs in relation to the council's transformation programme;
- **Cost pressures.** To include review of working practices including blended working, fluctuations in service demand such as in adult social care, crisis support and LAC;

- **Council liabilities.** These reserves cover expenditure where the council has a legal obligation to pay costs, such as equal pay claims and redundancies. In addition to these there are reserves for business rate appeals, pensions and insurance claims;
- **Covid-19 grants.** The carry forward of specific government grants to cover Covid pressures, including expanded retail relief for businesses;
- **Public Finance Initiatives.** Liabilities for our PFI's with Street Lighting and St Thomas More;
- **Risk.** To cover unforeseen risks in 2022/23 at the time the budget was set;
- **Other.** These reserves are to support a wide range of future costs such as partnership working with other external bodies.

4.5 Directorate Variances to Budget

The following sections provide a summary of the major variances (unders and overs) to budget for each directorate, which have been well reported during the year. Services overall reported an overspend of £920k, offset by underspends within capital financing and central budgets.

Adults Social Care, Public Health and Hub (£4.49m overspend after use of and transfers to reserves)

The pre-audit outturn position, after the net use of reserves is an overspend of £4.49m, the main areas of significant variance being:

- £529k – Management Support general bad debt provision and interim staffing;
- £140k – Mental Health Services additional staffing costs including agency staff within locality teams;
- £288k – Partnerships interim staffing and agency costs;
- £3.74m – Demand Management due to a delay in achieving approved 2021/22 savings. This includes £1.24m associated with reviewing and reducing existing older people care packages and £1.14m associated with reducing the number of clients entering the care system (front door), both of which were delayed due to additional demand on the Adult Social Care service resulting in a lack of capacity to progress the savings, and the ability of service areas outside of Adult Social Care to support the delivery e.g., Customer Access Management and Resilient Communities, due to their competing priorities. A further £1.76m associated with income shortfall from the joint funding income arrangements with CCG was delayed due to ongoing discussions with the CCG and variation of Section 75 agreement. Note, these in year pressures are in part mitigated via one-off Covid-19 funding where deemed appropriate;
- (£307k) – Resources underspend due to vacant posts and non-staffing costs;
- £702k – Access Assessment and Care Management additional staffing costs including agency staff within locality teams;
- (£320k) – Health and Social Care impact of prior year accruals and underspend on non-staffing costs;
- (£307k) – Print and Design, Communications and Procurement underspend due to vacant posts and recovery of costs from Covid-19 specific grants;
- £32k - Other variances on general costs.

Children's Services (£4k underspend after use of and transfers to reserves)

The pre-audit outturn position, after the net use of reserves is an underspend of £4k, the main areas of significant variance being:

- (£478k) – Access and Achievement within home to school transport and changes in demand and implementation of route optimisation;
- (£345k) – Children's Social Care Core primarily as a result of underspends on agency staff, delay in recruitment and reduced spend on car mileage;
- £875k – Children's Social Care Demand due to the non delivery of some approved savings in year, ongoing demand pressures on changes in legislation, placement sufficiency, increase in complex cases and subsequent increasing placement costs;
- £9k – Other variances on general costs.

Customer Engagement (£1.57m underspend after use of and transfers to reserves)

The pre-audit outturn position, after the net use of reserves is an underspend of £1.57m, the main areas of significant variance being:

- (£1.50m) – Money Home Job - underspends on housing benefit subsidy/overpayments, staffing and general running costs, partly offset by shortfalls within Crisis Support, general fees and charges and Customer Access Management;
- (£70k) – Housing Standards and Improvement general reduction in staffing and running costs.

Economy, Environment and Communities (£947k underspend after use of and transfers to reserves)

The pre-audit outturn position, after the net use of reserves is an underspend of £947k, the main areas of significant variance being:

- (£178k) – Planning Services, due to a reduction in agency costs, and additional planning income;
- (£466k) – Clean and Green net underspend, with increased costs for vehicle maintenance and agency staff within the grounds, trees and street cleansing service, offset by underspends in vehicle hire and leases, reduced recycling centre management and haulage fees, reduction in waste disposal costs and additional income from recycling materials, with a general reduction on staffing and running costs;
- £118k – Bereavement Services increased costs of agency staff and coroners costs, partly offset by reductions on general running costs;
- (£410k) – Resilient Communities increased costs in Community Protection and Area Partnerships which are offset by increased licences income and general reduction in running costs, particularly in Libraries due to the delay in holding vacancies in advance of the restructure of the service;
- (£11k) - Other variances on general costs.

Resources and Transformation (£1.05m underspend after use of and transfers to reserves)

The pre-audit outturn position, after the net use of reserves is an underspend of £1.05m, the main areas of significant variance being:

- (£536k) – Integrated Facilities Management - increased costs on centralised maintenance and under-recovery of catering and caretaking income, offset by increased fee income from capital schemes and licences, and a general reduction in staffing and running costs;
- £207k – Human Resources, mainly due to increased interim staffing and One Source project costs;
- (£463k) – ICT mainly due to an accounting adjustment to prepayments;
- (£174k) – General reduction in staffing and running costs across other support services.

Capital Financing (£1.2m underspend after use of and transfers to reserves)

Borrowing to be taken out to cover the 2020/21 capital programme was expected to take place but following a review of cash balances it was considered more prudent to allow for a planned delay in undertaking borrowing, which reduced the cost as well as reducing counterparty risk. This resulted in a saving against budget of £1.20m.

Central Budgets (£1.22m underspend after use of and transfers to reserves)

Central budgets are non service specific budgets and include items which are planned to be transferred to earmarked reserves to manage corporate costs and liabilities, such as workforce planning, pensions, insurance fund, and to replenish transformation reserves. Central budgets also includes a net transfer to earmarked reserves of £24.78mm in relation to Covid-19 grants.

The reported position for central budgets is a net underspend of £1.22m.

- 4.6 As a result of the year-end position, opening general fund balances will be £17.69m as at 1 April 2022, which although is £1.1m more than approved in the budget report, is considered a prudent amount for 2022/23 given the ongoing cost pressures and risks to savings delivery.

Financial impact of Covid-19

- 4.7 At Budget March 2020 the Chancellor announced a Covid-19 Response grant to fund local authority actions to support social care services and vulnerable people; alongside the need for the NHS to treat Coronavirus patients including maintaining staffing levels; and funding to ensure other public services are prepared and protected. A number of ringfenced and unringfenced grants have been announced since that date, and regular updates have been provided to Cabinet throughout the year.
- 4.8 There have continued to be significant additional costs associated with our response to Covid-19, including staffing, support to residents and council tax payers and businesses and support to the elderly and vulnerable particularly in relation to adult social care and children's. In addition, the council has faced significant reductions in sources of income, especially while fee generating services were closed or scaled back following Government advice on restrictions e.g. leisure, car parking and traded services income. Given councils' reliance on this income, the ability to balance the budget beyond the short term (2021/22) is challenging, as whilst Government has made a commitment to funding some of the income losses through the sales, fees and charges grant. It did not cover all of them. Lost income was reimbursed for only the first 3 months of 2021/22, to June 2021. Total lost income for 2021/22 totaled £1.76m

with only £631k being reimbursed, meaning the council had to fund the £1.13m shortfall through remaining general Covid-19 grant.

- 4.9 Since March 2020, Government has allocated £76.73m of funding (plus £5.37m of support to Walsall residents and £150.73m for Walsall businesses) to help support Covid-19 pressures in Walsall. Of this, **£38.85m** relates to 2021/22 as summarised at **Appendix 3**, which sets out the draft outturn position by grant for 2021/22; an underspend of c£7.51m, of which £7.11m will be carried forward into 2022/23, with the reminder of £405k to be repaid, as summarised below:

Grants expected to be carried forward to 2022/23, subject to confirmation of grant conditions (£7.11m) include:

- Covid unringfenced support funding – expected underspend of £2.97m as summarised in 4.10;
- New Burdens Funding (Business Rates Administration) – expected underspend of £452k;
- Wellbeing for Education Funding – expected underspend of £22k;
- Contain Outbreak Management Fund – expected underspend of £2.95m;
- Clinically Extreme Vulnerable - expected underspend of £148k;
- Community Champions – expected underspend of £209k;
- Adult Social Care Omicron Support Fund – expected £358k not to be utilised in 2021/22.

Grant expected to be repaid (£405k) include:

- Winter Support / Local Support Grant – underspend of £37k. Claims from residents has now ceased as this was time limited funding;
- Welcome Back Fund / Reopening High Streets Safely – underspend of £17k. Funding was time limited for the period to March 2022;
- Local Authority practical support grant – underspend of £277k due to defined grant conditions around individuals self-isolating. Self-isolation is now no longer required so this will not be utilised and funding will be returned. This is in line with the separate Government return which is submitted alongside COMF to Department of Health & Social Care;
- Household Support fund – underspend of £39k. Funding was time limited for the period October to March 2022;
- Protect and Vaccinate for Rough Sleepers – grant of £35k confirmed as not required as we have no related spend on rough sleeping to match against this allocation. This funding will be repaid.

The outturn shown in this report matches the return made to the Department of Levelling Up, Housing and Communities (DLUHC) on 13 May 2022. Since the end of the financial year, following a reconciliation by Adult Social Care providers of their use of the Infection Control and Testing fund, there will be a requirement to repay £112k to the Department of Health and Social Care.

- 4.10 Of the **£38.85m** grant identified at **Appendix 3**, £24.02m relates to grants ringfenced for specific activity, £631k relates to sales, fees and charges loss of income grant for the period April to June 2021, with a further £14.20m being unringfenced Covid-19 grant funding (£4.97m relates to grant carried over from 2020/21 and £9.23m for 2021/22). **Table 3** below summarises the financial impact of continued income losses

and additional Covid-19 costs against the £14.20m unringfenced grant, totalling c£11.23m for 2021/22, after expected receipt of the income loss grant.

Table 3 : Covid-19 pressures	Outturn 2021/22 £m
Loss of income due to service closures / changes - services part covered by income grant	1.76
Loss of income - other service closures / changes	0.12
Loss of income - commercial	0.11
Loss of income - dividends and investment returns	1.85
Cabinet, Gold and Silver approvals for additional cost pressures (see Table 4 and Appendix 4)	8.02
Total Pressures	11.86
Government grant for loss of income (April to June 2022 only)	(0.63)
Total pressures net of expected grant for loss of income	11.23

This results in an underspend on the unringfenced funding of c£2.97m against the £14.20m allocation, which will be carried forward to support any unfunded costs in 2022/23.

A summary of Cabinet / CMT (and Gold/Silver) approvals for additional cost pressures in 2021/22 is summarised at **Appendix 4**, including the full year impact for 2021/22. **Table 4** summarises the main reasons for the movement in the outturn from the approvals given during 2021/22.

Table 4 : Movement in approvals	£m
Total approved schemes for 2021/22	10.76
Less funding allocated from Contain Outbreak Management Funding (COMF)	(0.96)
Less funding allocated from Workforce and Infection Control grants	(0.47)
Less funded from existing service budgets from underspends	(0.57)
Less waste tonnage costs which did not materialise	(0.73)
Plus additional spend above budget due to increased demand	0.02
Less reductions in spend on other schemes	(0.03)
Outturn 2021/22	8.02

- 4.11 The Covid-19 response fund and other known ringfenced grant allocations, have been sufficient to fund the impact of Covid-19 during 2021/22. An estimate of the continuing known impact for 2022/23 was included within the 2022/23 budget approved by Council in February 2022. Any emerging / unknown costs will need to be accommodated within the remaining £2.97m balance of general grant. Should costs exceed this then the council's own reserves will be impacted, resulting in action being required. Pressures will continue to be reviewed to ensure the full grant will be utilised in year, minimising the call on council reserves should the allocation be exceeded.

Support to Walsall residents and businesses

- 4.12 Since March 2020, a further £5.37m of support to Walsall residents and £150.73m for Walsall businesses has been awarded in the form of specific grants.

Support to Walsall residents has mainly been in the form of Hardship funding and Test and Trace support payments, as summarised below. Test and Trace payments have now exceeded our allocation but we have assurances from DWP that the additional funding will be given.

Table 5: Support to residents	<u>Allocation</u> £m	<u>Spend to date</u> £m	<u>Variance</u> £m	<u>Notes</u>
Hardship Fund	3.88	3.55	(0.33)	Scheme closed – balance to be used to fund any deficit on council tax income
Test & Trace main payments	0.85	1.08	0.23	Scheme closed – extra funding to be received
Test & Trace discretionary payments	0.64	0.87	0.23	Scheme closed – extra funding to be received
Total support to Walsall residents	5.37	5.50	0.13	

Support to Walsall businesses – the council continues to actively support local businesses directly affected by forced closures, partial closures or have had their trade affected by imposed restrictions, as summarised below.

Table 6: Support to businesses	<u>Allocation</u> £m	<u>Spend to date</u> £m	<u>Variance</u> £m	<u>Notes</u>
Grant to businesses	53.55	46.45	(7.10)	Repaid 16/02/21
Expanded retail discount – to fund shortfall in loss of Non Domestic Rates (NNDR) income	27.78	29.00	1.22	Per NNDR3 2020/21 - extra grant expected
Nursery discount	0.11	0.11	0.00	Per NNDR3 2020/21
Extension to rate relief 2021/22*	11.94	8.03	(3.91)	Per NNDR1 2021/22 – final position to be reported in NNDR3
Covid additional relief fund (CARF)**	4.86	1.43	(3.43)	
Local restrictions grants (Closed) (5 Nov - 2 Dec)	3.95	1.95	(2.00)	Scheme closed - Difference to be repaid
Local restrictions grants (Open) (2 Dec - 19 Dec)	0.51	0.29	(0.22)	Scheme closed - Difference to be repaid
Christmas grant for 'wet led' pubs	0.12	0.12	0	Scheme closed
Additional restrictions grant	9.66	9.66	0	Scheme closed
Local restrictions support (2 Dec - 4 Jan)	1.36	0.85	(0.51)	Scheme closed - Difference to be repaid
Local restrictions support grant (16 Feb - 31 March)	12.14	6.35	(5.79)	Scheme closed - Difference to be repaid
Further lockdown grants	11.85	6.20	(5.65)	Scheme closed - Difference to be repaid
Restart programme	11.17	8.73	(2.44)	Scheme closed - Difference to be repaid
Additional restrictions grant – phase 4	0.35	0.35	0.00	Scheme closed
Omicron Hospitality & Leisure Grant	1.38	1.04	(0.34)	Scheme closed - Difference to be repaid
Total support to Walsall businesses	150.73	120.56	(30.17)	

*Current position, although subject to amendment

**Rate relief scheme being developed

- 4.13 The above summarises the increased support to residents and businesses due to the impact of Covid-19. Further to this, the Government have awarded the following grants as a result of cost of living and fuel increases:
- Energy rebate core scheme - £15.89m allocation of which £8.74m has been disbursed to date;
 - Energy rebate discretionary scheme – an £0.73m allocation of which £0.13m has been disbursed to date;
 - Household Support Fund extension for the period 1 April 2022 to 30 September 2022 – an allocation of £2.82m. This was to provide support to vulnerable households in most need of support to help with significantly rising living costs. Although this was an extension to the original Household Support Fund, it was a new grant subject to its own grant conditions as set out in the Grant Determination letter. Any underspends from the previous scheme cannot be carried forward

Collection Fund

- 4.14 *Business Rates Retention Scheme* - 2021/22 was the fifth year the council participated in the 100% Business Rates Retention pilot with the six other West Midlands Metropolitan Authorities, with each billing authority now retaining 99% of Non-Domestic Rates (NDR) received with the remaining 1% for the West Midlands Fire Service. A shortfall in income due to changes in rateable value, successful appeals, exemptions and discounts resulted in a deficit on the collection fund. The council bears 99% of the overall deficit, which will reduce the councils local share income for 2022/23.

The outturn position for 2021/22 on the collection fund is an in year deficit of £15.23m. The deficit in the collection fund is exceptionally high mainly as a result of Covid-19 reliefs being given to businesses in year. However the council has received a grant equal to the reliefs. The final outturn includes a brought forward deficit of £5.34m (of which £5.20m was attributable to Walsall Council) from 2020/21, resulting in a net deficit being carried forward into 2022/23 of £5.20m (£4.91m attributable to Walsall).

Following the introduction of new legislation for Covid-19, authorities are able to spread estimated deficits over three financial years to reduce any one-off large pressures on budgets. Any surplus or deficit arising will impact the following year's budget setting process and not the in-year general fund position. The council has a three year plan in place to manage this, subject to any changes in assumptions.

- 4.15 *Council Tax* – The collection fund showed a total surplus in 2021/22 of £1.38m for council tax including preceptor's (Fire and Police) amounts. After taking into account a brought forward surplus totalling £280k and transfers out to the general fund and preceptors during 2021/22 totalling £1.34m, there is a closing surplus for 2021/22 of £330k (of which £290k is attributable to Walsall).

Walsall Proud Programme (WPP) Savings

- 4.16 The 2021/22 budget was predicated on delivery of £28.90m of savings / cost reductions, income and efficiencies from the directorates using Proud ways of working and thinking across the council, significantly enhancing our enabling technology capabilities, and improving our service efficiency and performance. A robust risk assessment of the 2021/22 budget was undertaken prior to the budget being set in February 2021. Action was taken corporately in-year to address ongoing demand and

cost pressures within services, mainly within Children's Services and Adult Social Care. The direct impact of Covid-19 has resulted in the delay in a small number of savings totalling £598k as shown in the summary at **Appendix 5**, funded from the use of Covid-19 unringfenced grant as approved by Cabinet. This is in the main due to an inability to generate some fee and charge increases due to facility closures and a delay in the commencement of consultation on a number of organisational redesigns.

As shown in **Table 7**, of the £28.90m benefits budgeted, £21.13m were fully delivered in year and £7.76m were not fully achieved. Of this, £2.93m were mitigated in year through alternate actions or service underspends. Undelivered benefits are now planned to be delivered in 2022/23. Further details are provided in **Appendix 5**, including those savings carried forward. The impact is that the total savings required to be delivered increases by this amount, requiring robust delivery plans in place to ensure full delivery in 2022/23.

Table 7: Delivery of Savings by Proud Workstream 2021/22			
Workstream	Delivered £	Delayed £	Total £
Customer Access & Management	1,145,423	3,682,127	4,827,550
Connected Working (Perform Plus)	259,809	56,416	316,225
Third Party Spend	8,682,030	884,701	9,566,731
Income Generation & Cost Recovery	6,370,869	2,611,057	8,981,926
Corporate Landlord	400,397	0	400,397
Designing Ways of Working - Hubs	243,402	172,874	416,276
Designing Ways of Working - Enabling Support Services (Admin & Business Support)	650,667	223,395	874,062
Designing Ways of Working - Enabling Support Services	3,381,748	133,333	3,515,081
Total	21,134,345	7,763,903	28,898,248

Pre-Audit Capital Outturn 2021/22

- 4.17 The revised capital programme for 2021/22, as approved by Cabinet on 9 February 2022 was £230.90m. **Table 8** summaries further amendments to the end of March 2022, resulting in a revised programme of £235.85m, subject to Cabinet approval.

Table 8: Amendments to Capital Programme 2021/22	
Project	£m
Capital programme 2021/22 per Cabinet 9 February 2022	230.90
Council Funded	
Resurfacing of Church Street Car Park (revenue contribution)	0.06
Memorial safety (additional revenue contribution)	0.01
Land at Reedswood project aborted (landowner decided not to pursue) - virement from pipeline investment)	(0.71)
Pipeline Investment	0.71
Externally Funded	
Future High Streets Fund – amended allocation	0.13
Towns Fund – amended allocation	(0.06)
Growth Deal – amended allocation	1.62

Project	£m
Broadway West Playing fields – external funding not received	(0.15)
Darlaston Baths	0.15
Local Authority Delivery Scheme – amended allocation	0.15
Active Travel – amended allocation	(0.06)
Warm Homes – amended allocation	(0.08)
Black Country Local Enterprise Partnership – amended allocation	0.71
Replacement footbridge Coalpool Lane – returned funding	(0.14)
Canal and river trust	0.06
Phoenix 10 Homes England – amended allocation	0.59
Health through warmth – amended allocation	0.02
School capital – amended allocation	1.94
Final revised capital programme 2021/22	235.85

- 4.18 The draft pre-audit position is split between council funded schemes (**Appendix 6**) and external funded schemes (**Appendix 7**), and summarised in **table 9**.

Table 9 : Pre-audit Capital Outturn 2021/22					
Funding	Budget £m	Outturn £m	Variance £m	Re-Profiling / Carry Forward to 2022/23 £m	Underspend £m
Council Funded	98.31	20.50	(77.81)	73.66	(4.15)
Externally Funded	137.54	57.88	(79.66)	79.65	(0.01)
Total	235.85	78.38	(157.47)	153.31	(4.16)

- 4.19 The underspend of £4.16m will be utilised to support the capital programme in 2022/23. The following summarises the main schemes shown as underspends at **Appendix 6**:
- New Rail Stations – allocation of £1.48m in 2021/22 not required. This related to a part contribution to the delivery of two new train stations in Darlaston and Willenhall, which is now fully funded from the Combined Authority, subject to a business case;
 - Council House Rewiring – project now completed resulting in an underspend of £142k;
 - Town Centre Strategic Acquisition for Town Centre Properties – underspend of £2.47m in 2021/22. Scoping of this scheme has been changed and scaled down.
- 4.20 In year re-profiling, leading to carry forwards into the following year, is a routine and normal practice. Capital carry forward is defined as a means to carry capital resources from one year to another to cover identifiable commitments that have moved from one year to another, or for where a project spans more than one year. In any large organisation dealing with construction projects, procurement regulations, etc, a level of carry forward is expected and built into resourcing assumptions. It is recognised that capital projects can cross over years and it is often difficult to be accurate in the estimation of which year the expenditure will be incurred.
- 4.21 As indicated above, 50.6% or £79.66m of the total variance relates to grant/external funded schemes. Of these, £29.44m relates to schools/children's, £3.48m for supporting independent living (disabled facilities, energy), £42.86m to major regeneration schemes, £150k for leisure schemes, and £3.73m to transport / highways

schemes. These schemes tend to require carry forward due to the timing of the receipt of the grant versus the actual spend, which in school's is often during the summer of the next financial year.

Financial Health Indicators 2021/22

- 4.22 The annual review of financial health indicators is shown at **Appendix 8**. This summarises the following:
- Strong treasury management performance for 2021/22.
 - Strong balance sheet financial performance.
 - Council tax and business rate collection rates as expected.
 - Strong sundry debtor collection rates, showing an overall average number of 24 days.
 - Strong creditor performance, showing an overall average number of 8 days.
 - Revenue and capital position for 2021/22 – as outlined in the sections above.

Treasury Management

- 4.23 The pre-audit prudential and local indicators as at 31 March 2022 are shown in **Appendix 9**. The S151 Officer confirms that borrowing was only undertaken for cash flow and capital purposes and the statutory borrowing limit (the authorised limit) was not breached.
- 4.24 During 2021/22, the council complied with all legislative and regulatory requirements, as well as local indicators. Notable variances include:
- L3a - Net borrowing costs as % of net council tax requirement (variance of -64.27%). The target figure of 20.00% represents an upper limit of affordable net borrowing costs as a percentage of the net council tax requirement for the authority. The actual level of net borrowing costs is currently less than the upper limit, which in the main is linked to the work undertaken by the service to seek to secure favourable rates on investments and reduced costs on borrowing, thus reducing the overall net borrowing costs;
 - L3b - Net borrowing costs as % of Tax Revenue (variance of -63.23%). The target figure of 12.50% represents an upper limit of affordable net borrowing costs as a percentage of tax revenues for the authority. The actual level of net borrowing costs is currently less than the upper limit, which in the main is linked to the work undertaken by the service to seek to secure favourable rates on investments and reduced costs on borrowing, thus reducing the overall net borrowing costs;
 - L5 & L6 – The targets set at the beginning of the year factored in borrowing at lower rates for capital expenditure. This borrowing was not required to be taken out during this financial year which has impacted upon this variance adversely as the rate for this year would have included the new borrowing at lower rates;
 - L8 – Average rate achieved on Short Term Interest vs At Call Rate – The target is to achieve a 50% better rate on short term investments vs the current At Call rate (i.e. do nothing other than leave all cash in overnight At Call accounts). The average At Call rate was 0.10%, creating a 50% above target of 0.15%. The short term interest rate achieved was actually 0.38%, which results in a 280% adverse variance below the At Call rate. Although seemingly an adverse variance, this is due to the At-Call rate doubling in performance between February and March which is a positive outcome, with the short term rate remaining the same. This

increase is due to the Bank of England Base Rate increases of 0.25% in December 21, February 22, and March 22 which have had an impact on At-Call rates rising, with the expectation that Short Term and Long Term rates will follow this trend;

- L9d - Property Fund investment rates – The interest rate on the dividend provided by the Property Fund has fell below the expected target for 2021/22, but the overall valuation of the property fund has increased by £2.264m as at 31/03/22, so the fund is performing well.

- 4.25 The authorised limit for external debt was approved by Council on the 24 February 2022 and the CIPFA Code of Practice only allows these limits to be changed by Council and therefore the actual limit and the target remain the same. The actual debt position for the Council as at 31 March 2022 is £328.971m.
- 4.26 A comprehensive Annual Treasury Report will be reported to Cabinet in August 2022 and on to Council in September 2022.

Council Corporate Plan priorities

- 4.27 The councils financial strategy and annual budget process is designed to ensure that resources follow council priorities as set out in the Council Plan. Delivery of services within budget is fundamental to ensuring and maintaining financial stability. Covid-19 creates risk, in that resources may need to be redirected to support the council's response, if Government funding is insufficient to fully cover costs.

Risk management

- 4.28 During 2021/22, the council has had to make decisions that had a financial impact without a guarantee that the costs would be fully compensated for by the Government. The most obvious financial risk during the year was that the council would, if not fully reimbursed for all of its direct and indirect costs, overspend its 2021/22 budget, and reduce its general reserves. Through careful management, this has been avoided.
- 4.29 The 2021/22 budget and level of operating reserves were set following a robust financial risk assessment. The level of reserves can only be set based on a set of realistically foreseeable or predicted parameters. Due regard is made to the strategic and operational risks facing the council. Some of these relate to the current economic condition, others to potential regulatory or national issues, which may have a local impact. Best professional judgement and estimates are applied in terms of the continuing impact of the global pandemic and there is therefore a risk that reserves are insufficient if costs continue to increase without the corresponding allocation of funding to meet this from Government.
- 4.30 This has been and continues to be managed through close management and reporting of costs, loss of income, and other indirect impacts to CMT and Cabinet.
- 4.31 As well as financial risk, the council maintains a register that highlights key themes of organisational risk which is reported to Audit Committee as part of their annual work programme. The Strategic Risk Register (SRR) was amended during 2021/22 and kept under review and amended as appropriate to reflect the impact of Covid-19. The SRR has been reported to CMT and oversight in relation to this rests with Audit Committee, which have received a number of reports during 2021/22.

- 4.32 Managers are required to deliver service and improvement targets on time, to standard and within budget. The resource allocation process is governed by the overarching Medium Term Financial Framework. Risk management is an integral part of this activity and is embedded in budget preparation, monitoring and forecasting to enable potential variances and risks to be identified early and addressed.
- 4.33 Delays in the delivery of some 2021/22 savings (**Appendix 5**) has resulted in an increased level of savings to be delivered in 2022/23, leading to additional risk in relation to capacity etc to deliver these. All savings are required to have delivery plans in place and progress in relation to delivery will be tracked on a monthly basis and will be reported to management and Cabinet throughout 2022/23, along with any actions to address any delays.
- 4.34 Pay and price inflation risk has been considered and accommodated within the 2022/23 budget, based on best professional assumptions. The outturn for 2021/22 includes a transfer of the £1.5m underspend to earmarked reserves to assist in managing the potential impact of pay and price inflation on council services in 2022/23.

Financial implications

- 4.35 The outturn position will affect the overall financial standing of the council. The aim is to ensure the councils balances are at a level consistent with the requirements of the MTFF. The council has a statutory responsibility to set a balanced budget and to ensure it has an adequate level of reserves. The council takes a medium term policy led approach to all decisions on resource allocation. This report sets out that the council has delivered on its financial strategy and outturned with reserves intact for 2021/22.
- 4.36 The total final cost of Covid-19 is unknown at this stage. Costs for 2021/22 were covered in full from identified Government grant funding made available, with unspent allocations carried forward, where grant conditions allowed, be utilised in 2022/23. Covid-19 may still impact on the council's reserve levels, with knock-on implications on the council's ability to set future budgets and this remains under review.

Legal implications

- 4.37 The council is required to set and operate within a balanced budget. Section 114 of the Local Government Finance Act 1988 requires the Chief Finance Officer (CFO), in consultation with the council's Monitoring Officer, to make a report under this section if it appears to him or her that the expenditure of the authority incurred (including expenditure it proposes to incur) in a financial year is likely to exceed the resources (including sums borrowed) available to it to meet that expenditure. In practice, this is most likely to be required in a situation in which reserves have become depleted and it is forecast that the council will not have the resources to meet its expenditure in a particular financial year. Walsall is not in this position.
- 4.38 The council has due regard to its statutory responsibilities in proposing any changes to service provision and its statutory responsibilities in relation to setting a balanced budget.

Procurement Implications / Social Value

- 4.39 All procurement activity is being reviewed as part of the Proud 'Commissioning, Procurement & Contract Management' workstream. This workstream focuses on identifying opportunities that will enable us to financially support our current and future services, especially those developed by Walsall Proud. It will do this by reviewing and reducing third party spend and improving the 'Procure to Pay' process and systems.

The Third Party Spend Board has been created to support and challenge services through the gateways of the commissioning and procurement process, with the ultimate aim of achieving best value for money. The workstream has also achieved "Efficient Council" benefits through reduction in demand in areas including printing, postage and fleet.

Property implications

- 4.40 The impact of Covid-19 has meant that many council premises were required to close or remain open with restricted access to essential workers during the early stages of 2021/22. Following the easing of restrictions, the council has reviewed its ways of working approach, emphasised on 'it's the work that we do, not where we do it'.

Cabinet in December 2021 approved the Council's Strategic Asset Plan 2022-27. The Strategic Asset Plan is the key document which sets out the council's vision and approach for the management of its property portfolio under the new Corporate Landlord model.

The Corporate Landlord model approach takes a more strategic approach to property and asset management across the council, bringing together property, facilities management and commissioning responsibilities into a key enabling service under the council's new functional model. This will ultimately enable the development and implementation of an estate that supports Proud and the wider corporate objectives of the council.

Health and wellbeing implications

- 4.41 There are no direct implications arising from this report.

Staffing implications

- 4.42 There are no direct implications arising from this report.

Reducing inequalities

- 4.43 The 2010 Equality Act lays a requirement to have due regard to the equality impact when exercising its function. As a public body, the council is required to comply with the Public Sector Equality Duty (PSED), as set out in the Equality Act, 2010. The PSED requires the council to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. Failure to meet these requirements may result in the council being exposed to costly, time-consuming and reputation-damaging legal challenges.

Climate Change

- 4.44 There are no direct implication arising from this report.

Consultation

- 4.45 The report is prepared in consultation with the s151 Officer, relevant managers and CMT.

5. Decide

- 5.1 Cabinet are asked to note the outturn position and to consider and support the recommendations contained within this report in relation to capital carry forwards.

6. Respond

- 6.1 Approved capital carry forwards, as outlined in this report, will be allocated as a variation to the 2022/23 capital programme, and managed during 2022/23.

7. Review

- 7.1 Capital carry forwards, earmarked and general reserves will be managed alongside the approved 2022/23 revenue budget and capital programme.
- 7.2 Regular monitoring reports will be presented to Cabinet to inform them and enable them to challenge service delivery against budget, and will include the ongoing impact of Covid-19 and an update on risks to the budget for 2022/23 and beyond.

Background papers: Various financial working papers.

Appendices:-

- 1 Pre-audit Revenue Outturn position by service for 2021/22;
- 2 Details of (use of) / transfer to reserves;
- 3 Covid-19 Funding;
- 4 Cabinet / CMT (Former Gold and Silver) Covid-19 approvals;
- 5 Walsall Proud - Benefits 2021/22 with delayed delivery;
- 6 Pre-audit Capital Outturn by scheme for 2021/22 – council funded schemes;
- 7 Pre-audit Capital Outturn by scheme for 2021/22 – externally funded schemes;
- 8 Financial Health Indicators 2021/22;
- 9 Pre-audit Prudential and Treasury Indicators 2021/22.

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Deborah Hindson
Interim Executive Director / S151 Officer

22 June 2022



Councillor M Bird
Leader of the Council

22 June 2022

Appendix 1 – Pre-audit revenue outturn position 2021/22

SERVICE	ANNUAL BUDGET	DRAFT OUTTURN AFTER USE OF AND TRANSFER TO EARMARKED RESERVES	VARIANCE TO BUDGET (UNDER) / OVER
	£	£	£
Adult Social Care and Public Health			
Access, Assessment & Care Management 1	3,480,638	3,648,047	167,409
Access, Assessment & Care Management 2	3,500,651	4,035,381	534,730
ASC Partnerships	966,414	1,254,479	288,065
Complex Needs	378,684	323,837	(54,847)
Demand Management	43,743,294	47,480,024	3,736,730
Health & Social Care	552,019	231,474	(320,545)
Intelligence & Delivery	1,364,918	1,343,055	(21,863)
Management Support & Other	(9,587,062)	(9,058,075)	528,987
Mental Health Services	1,509,698	1,650,298	140,600
Older People	8,738,733	8,712,063	(26,670)
Resources	2,245,297	1,938,254	(307,043)
Safeguarding SCI	586,725	588,333	1,608
Strategy, Commissioning & Delivery Support	1,008,371	1,142,682	134,311
Public Health	368,122	368,118	(4)
Print & Design / Communications / Procurement	44,715	(262,308)	(307,023)
Total Adult Social Care and Public Health	58,901,217	63,395,662	4,494,445
Children, Education and Customer Engagement			
Access & Achievement	25,082,212	24,603,594	(478,618)
Children's Social Care	52,711,428	53,176,755	465,327
Children's Wide	994,595	1,003,501	8,906
Early Help	5,840,317	5,840,317	0
Customer Engagement	6,536,609	4,964,171	(1,572,438)
Total Children, Education and Customer Engagement	91,165,161	89,588,339	(1,576,822)
Economy, Environment & Communities			
Clean and Green Services	22,965,759	22,506,722	(459,037)
Regeneration & Development	1,569,958	1,569,789	(169)
Engineering & Transportation	16,510,061	16,475,222	(34,839)
Leisure & Bereavement Services	564,274	615,286	51,012
Planning & Building Control	1,821,582	1,643,323	(178,259)
EE & C management	597,234	642,335	45,101
Cultural Services	1,709,879	1,549,048	(160,831)
Resilient Communities	7,649,084	7,439,001	(210,083)
Total Economy, Environment & Communities	53,387,831	52,440,726	(947,105)
Resources and Transformation			
Black Country LEP	6,705,472	6,705,472	(0)
Democratic Services	1,764,038	1,716,482	(47,556)

SERVICE	ANNUAL BUDGET	DRAFT OUTTURN AFTER USE OF AND TRANSFER TO EARMARKED RESERVES	VARIANCE TO BUDGET (UNDER) / OVER
	£	£	£
Legal	415,153	202,348	(212,805)
Electoral Services	620,958	647,101	26,143
Finance (including CMT/Internal Audit)	2,998,281	3,083,544	85,263
Corporate Assurance	(61,974)	(83,351)	(21,377)
Human Resources	4,392,886	4,600,070	207,184
Integrated Facilities Management (Hard)	4,918,688	4,011,757	(906,931)
Integrated Facilities Management (Soft)	1,283,941	1,655,097	371,156
Asset management	4,569,280	4,321,899	(247,381)
Programme Management	1,077,377	1,079,050	1,673
Payroll & Pensions	(83,264)	(9,451)	73,813
ICT	2,221,549	1,758,952	(462,597)
Programme Delivery	13,321	(9,015)	(22,336)
Proud	914,102	1,023,931	109,829
Total Resources and Transformation	31,749,808	30,703,885	(1,045,923)
Sub Total Services	235,204,017	236,128,612	924,595
Capital Financing	(5,250,831)	(6,450,832)	(1,200,001)
Central Budgets / Central Covid-19 grants	(97,407,405)	(98,626,583)	(1,219,178)
TOTAL	132,545,781	131,051,197	(1,494,584)

Appendix 2 – Details of (use of) / transfer to reserves

Reserve	Use of Reserve £	Transfer to Reserve £	Details of use of reserve
Adult Social Care, Public Health and Hub			
improved Better Care Fund 2 (iBCF2)	(987,519)	240,964	Costs associated with social care activity/intermediate Care.
Better Care Fund	(368,968)	897,987	Funding of the Quality in Care Team and Integrated Community Equipment Service system upgrade.
Housing 21	(43,197)	0	Funding of the affordability model
Public Health	(686,961)	2,552,395	Funding of various one-off projects i.e., Homelessness, Housing First and Mental Health. Transfer to reserve is mainly due to under spend on staffing and contracts.
Social Care Grant - Doctors assessments	(61,729)	0	To support back log of Best Interest Assessors / Deprivation of Liberty safeguard assessments.
Covid-19 – unringfenced funding	(3,457,565)	0	Additional placement costs relating to a significant increase in domiciliary care numbers during the pandemic and a shortfall of client contributions.
Covid-19 – Contain Outbreak Management Fund	(2,731,640)	0	Costs to support local test, trace and contain activities as well as wider measures to protect public health and local economies.
Covid 19 - Omicron	0	357,956	Grant received late in 2021/22 and carried forward to 2022/23 and will be used to support adult social care including on-going cost pressures arising from the impact of COVID.
IFRS*	(37,000)	571,610	Support for homelessness within the borough. Transfer to reserve relates to funding held in relation to custom card and grant funding for mental health, drugs and crime and weight management
Mediation	0	1,709,303	To cover costs of ongoing partner negotiations
Redundancy and Pension	(431,990)	0	Funding of redundancy and pension costs linked to approved budget reductions
Proud	(202,647)	0	To cover investment linked to Proud
Custom card credit balances	0	61,690	To fund repayment of clients overpayments
Total Adult Social Care, Public Health and Hub	(9,009,216)	6,391,905	
Children's Services			
Covid-19 – unringfenced funding	(3,784,359)	0	Primarily used to offset pressures relating to children and young people in care resulting from Covid-19.
Proud – invest to save	(91,934)	0	Funding development posts linked to transformation plan benefits.
IFRS*	(1,696,805)	1,372,194	Relates to grant funding for School Improvements, Safeguarding Families, Protecting Children, Regional Recovery, Rough sleepers, Personal Advisors.

Reserve	Use of Reserve £	Transfer to Reserve £	Details of use of reserve
Looked after children complex cases	(302,890)	0	To fund pressures, including social workers and placement costs, of complex cases relating to young people in care.
Looked after children demand	(1,179,881)	0	To fund risks relating to volatility of costs relating to children and young people in care.
External partner contributions	0	179,694	Transfer of contributions on Safeguarding Partnership and Youth Justice Board to reserves, as both services are significantly funded by external partner contributions
Children's NASS Grant	(34,380)	0	One off grant received in March 2019 towards the funding of training and relevant related costs to assist social workers to obtain the new National Accreditation award
Children's USAC migration fund	(3,057)	0	UASC migration fund awarded in December 2018 to plan for the future increase in demand with the providers
Covid-19 - Wellbeing for education	(40,416)	22,107	Grant funding that seeks to better equip education settings to support children and young people's wellbeing, resilience and recovery in the context of Covid-19.
Dedicated Schools Grant (DSG)	(1,594,772)	0	Funding of pressures within the schools high needs block
St Thomas More PFI	0	39,138	Rescheduling of PFI contract
Truancy fine income	0	32,127	Ringfenced income generated from attendance fines
Redundancy and Pension	(20,260)	14,837	Funding of redundancy and pension costs linked to approved budget reductions
Localities moves	(12,639)	0	To fund relocation of localities across the borough
Total Children's Services	(8,761,393)	1,660,097	
Children's - Customer Engagement			
Covid-19 – Business rates administration	(240,721)	442,940	To cover the additional admin work undertaken to award payments for the grants / discounts awarded to businesses during the pandemic.
Houses in multiple occupation (HMO) licences	0	25,180	To fund staff support costs relating to HMO licences in future years.
IFRS*	(522,582)	568,236	Grant funding for Housing First scheme, Controlling Migration, Refugee costs and other smaller projects.
Redundancy and Pension	(817,290)	0	Funding of redundancy and pension costs linked to approved budget reductions
Consultation for selective licensing	(2,074)	0	Used to fund consultation costs for selective licensing
Total Children's - Customer Engagement	(1,582,667)	1,036,356	
Economy, Environment & Communities			
Covid-19 – unringfenced funding	(1,887,129)	0	Costs associated with the response to Covid-19 including loss of income for active living centres, car parks, libraries, licencing

Reserve	Use of Reserve £	Transfer to Reserve £	Details of use of reserve
Covid-19 – Clinically extremely vulnerable	(304,134)	0	Covid-19 funding used to support clinically extremely vulnerable residents during the pandemic.
Covid-19 – Community champions	(223,962)	0	Used to fund costs of supporting residents who were most at risk of Covid-19.
Brexit funding	(50,000)	0	Support for European union residents applying for settled status.
Building control fees – statutory account	0	86,862	Required to breakeven over a 3 year period which is reviewed annually. Any under/over recovery transferred to/from reserves.
Bus lane enforcement ring fenced income	0	652,813	Funding to be used for highways i.e. road markings.
Street Lighting PFI	(1,532)	418,591	Grant funding to be utilised over the life of the project.
External donations	(1,400)	0	Public donations - planned expenditure by the leather museum.
On Street Car Parking income (ringfenced)	0	324,998	To be used to offset pressures in parking income shortfalls or maintenance of car parking areas in accordance with the legislation.
Economic growth programme (EGP)	(468,498)	490,205	To support costs within service to continue functions as per Cabinet report October 2020. Extended to 2023.
IFRS*	(553,900)	889,996	Primarily relates to grants / contributions carried forward where spend was delayed due to Covid-19 or spend spans more than 1 financial year.
Growth Deal - pipeline works	(22,989)	0	Support for research & development of future projects including Willenhall masterplan.
Street cleansing initiatives	(133,854)		Enhancements to the street cleansing service.
Town Centre Master Plan	(201,314)		Costs associated with the Town Centre Master Plan redevelopment
Redundancy and Pension	(188,532)		Funding of redundancy and pension costs linked to approved budget reductions
Enforcement	0	100,000	Carry forward of one off investment not used due to delay in recruitment.
Levelling Up Fund	0	125,000	Government funding to level up north/south divide to be used in 2022/23
Queens Jubilee	0	80,000	Community activities and involvement for Jubilee celebrations across Walsall
Resilient Communities Projects	0	120,000	To be used to tackle crime in hotspot areas of the borough.
Total Economy, Environment & Communities	(4,037,244)	3,288,465	
Resources and Transformation			
Covid-19 – unringfenced funding	(872,095)	0	Costs associated with the response to Covid-19 including legal support and loss of income in Catering, Bistro and box office.

Reserve	Use of Reserve £	Transfer to Reserve £	Details of use of reserve
Redundancy and Pension	(187,924)	0	Funding of redundancy and pension costs linked to approved budget reductions
Proud investment plan / PWC costs	(1,527,608)	0	PWC support costs and investment to drive Proud
IFRS*	(135,720)	54,912	Primarily relates to grants carried forward in relation to the Black Country LEP that span more than 1 financial year
Corporate landlord	(89,668)	0	Funding of an asset condition survey post.
Economic growth programme	(616,144)	0	To support costs within service to continue functions as per Cabinet report October 2020. Extended to 2023.
Elections	(256,000)	0	Elections delayed due to Covid-19 – c/f to fund costs in 2021/22.
External partner contributions	(81,741)	0	Contributions to support Technical Assistance Programme.
Enterprise Zones	0	1,579,982	Generated from surplus business rates to fund the costs of future capital schemes.
Growing Places Fund	(70,137)	0	Funding received to support the Growing Places LEP programme management costs.
Growth Deal Programme	(30,354)	0	To fund any necessary staff costs linked to closure of programme
Improvement projects	(289,518)	0	Funding for projects including asset management software, ICT Cloud costs and One Source.
Pleck boxing club	(12,137)	0	Contribution towards club rent.
Walsall works	(11,422)	0	To support apprenticeships and care leavers into work.
Youth Employment Initiative (YEI) Overheads	0	94,616	15% overhead costs claimed on YEI, this is used to support any ineligible costs going forward.
HR - Adult social care training	(30,005)	0	To fund additional training in relation to legislation changes
Appointeeships	0	46,837	Carry forward of one off investment not used due to delays.
Total Resources and Transformation	(4,210,473)	1,776,347	
Capital Financing			
Borrowing re-scheduling	0	4,719,729	To fund borrowing re-scheduling costs.
Minimum revenue provision	(259,912)	0	To smooth MRP costs as per approved MRP policy.
Pensions – upfront payment borrowing costs	(632,532)	0	To fund borrowing costs of funding pension payments upfront for 3 years to release savings.
Covid-19 – unringfenced funding	(1,853,000)	0	To cover loss of dividend income.
Total Capital Financing	(2,745,444)	4,719,729	

Reserve	Use of Reserve £	Transfer to Reserve £	Details of use of reserve
Centrally Held			
Transformation one off investment	(157,668)	0	Funding of one-off investment in relation to transformation.
Irrecoverable losses income (collection fund)	(2,560,517)	0	Government grant used to fund collection fund losses arising from Covid-19.
PFI Street lighting	(450,000)	0	One off funding to cover savings delayed till 2022/23.
Contractual obligations	(62,711)	0	To cover shortfall of commercial income arising from Covid-19.
Mediation	(27,270)	0	To cover legal costs.
Redundancy	0	3,000,000	To fund future redundancy and pension costs.
Transformation	0	6,404,708	Investment costs relating to the Proud programme.
Enterprise Zones (EZ) - proportion of section 31 grant	0	18,338	Transfer of business rates income relating to EZ.
Pensions	0	1,414,896	Transferred to smooth pension increases in future years.
Crisis Support scheme	0	1,000,000	To fund the scheme in 2022/23 and 2023/24.
Covid-19 – unringfenced funding	0	9,713,440	Transfer of unringfenced Covid-19 funding received in 2021-22 to the reserve.
Covid-19 - Expanded retail discount	(26,933,649)	9,763,199	Reliefs to be used in 2021/22 and 2022/23 to fund reductions in NNDR income
Social Care Grant / Demand	0	4,460,990	To fund emerging pressures within demand led services
Improvement Projects	0	746,200	To cover future years costs in relation to Cloud project
Council Tax support grant	0	3,520,651	To fund council tax pressures / hardship
Carbon management reduction project	0	187,611	To fund carbon management projects / Carbon Action Plan
Insurance Fund	(336,368)	756,651	To cover claims paid above budget and to provide future claims.
Audit and inspection	0	56,704	To fund external and internal inspections and any changes required following the reviews.
Business rates retention scheme	(809,597)	2,695,317	To fund volatility of business rates income due to the pandemic and any appeals. Also to smooth future changes to the scheme.
Buy not lease	0	286,417	To be used to purchase vehicles / equipment when the costs are calculated to be cheaper than leasing.
Risk	0	1,089,000	To fund financial risks that materialise during the year
Delivery of connected gateway	0	4,750,000	Contribution to the funding of the connected gateway scheme
Total Centrally Held	(31,337,780)	49,864,122	
TOTAL RESERVES	(61,684,217)	68,737,021	

**IFRS – this relates in the main to grants and contributions received in prior years where spend spans more than one financial year and any balance is carried forward as a reserve in line with accounting standards.*

Appendix 3 – Covid-19 funding 2021/22

Source of Funding	Lead Officer	Costed plan in place	Walsall allocation			Forecast 2021/22	
			Carried forward from 2020/21 £	2021/22 allocation £	Total funding £	Forecast Outturn 2021/22 £	Variance £
Unringfenced grant							
COVID-19 Support Package (1) **	Vicky Buckley*		4,971,738	9,225,164	14,196,902	11,222,709	(2,974,193)
Loss of income grant							
Forecast recoverable income for Qtr 1 2021/22 - submitted (2)	Vicky Buckley		0	631,440	631,440	631,440	0
Ringfenced grant							
Test and Trace support payments (3) - grant for admin of scheme	Mark Fearn	Y	0	135,768	135,768	135,768	0
New Burdens Funding - Business rates admin (4) **	Elise Hopkins	Y	240,721	494,080	734,801	282,601	(452,200)
Wellbeing for Education funding (5) **	Trudy Wyatt	Y	40,416	35,107	75,523	53,416	(22,107)
Contain Outbreak Management Fund (6) **	Stephen Gunther	Y	5,677,654	2,380,687	8,058,341	5,112,287	(2,946,054)
Winter support package / Local Support Grant (7)	Elise Hopkins	Y	62,061	1,334,995	1,397,056	1,360,089	(36,967)
Clinically Extreme Vulnerable support grant (8) **	Paul Gordon	Y	572,014	0	572,014	423,607	(148,407)
Community Testing (9)	Stephen Gunther	Y	0	1,178,276	1,178,276	1,178,276	0
Community Champions (10) **	Paul Gordon	Y	432,500	0	432,500	223,962	(208,538)
Elections (11)	Susan Wright	Y	0	70,306	70,306	70,306	0
Welcome Back Fund (12) / Reopening High Streets Safely Fund	Dave Brown	Y	239,226	253,601	492,827	475,882	(16,945)
LA Practical Support or those self isolating / Self isolation Support Framework (13)	Paul Gordon	Y	0	681,646	681,646	405,057	(276,589)
Infection Control & Testing Fund (14) – Infection & Prevention Control	Tracy Simcox	Y	0	2,474,373	2,474,373	2,474,373	0
ASC rapid testing			0	1,626,557	1,626,557	1,626,557	0
Vaccine testing			0	115,924	115,924	115,924	0
Household Support Fund (6 Oct 2021 - 31 March 2022) (15)	Elise Hopkins	Y	0	2,819,810	2,819,810	2,780,323	(39,487)
Workforce Recruitment and Retention Fund for Adult Social Care (16)	Tracy Simcox	Y	0	2,759,246	2,759,246	2,759,246	0
Protect & Vaccinate for rough sleepers (17)	Elise Hopkins	N	0	34,717	34,717	0	(34,717)
Adult Social Care Omicron Support Fund (18) **	Tracy Simcox	Y	0	357,956	357,956	0	(357,956)
Total unringfenced and ringfenced grants for Walsall (excluding support to businesses)			12,236,330	26,609,653	38,845,983	31,331,823	(7,514,160)

*Via approval by Cabinet / CMT

** Expected carry forward of unspent allocations into 2022/23

- 1 **Covid-19 Response Fund / Support Package** – unringfenced funding to support additional costs / pressures arising from the pandemic.
- 2 **Grant for reimbursement of lost income** - to reimburse lost income during the pandemic and boost cash flow. Where losses are more than 5% of a council's planned income from sales, fees and charges, the Government will cover 75p in every pound lost for the period April – June 2021.
- 3 **Test and Trace Support payments** – to cover payments of £500 to support people on low incomes who have been told to self-isolate who are unable to work from home and will lose income as a result. This includes parents and guardians who are not required to self-isolate, but who have to take time off work to care for a child who is self-isolating because they are unable to work from home and will lose income as a result.
- 4 **New Burdens funding / business rates admin** – MHCLG (now DLUHC) recognised that implementing new business rates measures will place some additional burden on billing authorities and confirms that it will provide New Burdens funding to cover matters such as IT costs, additional staff costs and rebilling.
- 5 **Wellbeing for Education funding** - to support the Wellbeing for Education Return project which seeks to better equip education settings to support pupils and students' wellbeing and psychosocial recovery as they return to full-time education.
- 6 **Contain Outbreak Management Fund (COMF)** – based on population numbers, to support local test, trace and contain activities as well as wider measures to protect public health and local economies.
- 7 **Winter Grant Scheme / Covid-19 Local Support Grant** – Scheme to support children, families and the most vulnerable with food and utility bills including food vouchers and help with heating costs during winter. Support in each area is designed by local councils to make sure the needs of the community are met.
- 8 **Clinically Extreme Vulnerable support Grant** – to support the clinically extremely vulnerable, specifically to provide support, such as access to food deliveries and signposting to local support of befriending services to those most at risk and to enable them to stay at home as much as possible.
- 9 **Community Testing** – to provide support to the Local Authority towards expenditure incurred in relation to Community Testing in response to the Covid-19 outbreak.
- 10 **Community Champions** - aims to support a range of interventions to build upon, increase or improve existing activities to work with residents who are most at risk of Covid-19 - helping to build trust and empower at-risk groups to protect themselves and their families. The broader aim is to reduce the impact of the virus on all communities, beyond just the target areas that we will work with through this scheme.
- 11 **Elections** - allocated funding to cover the additional costs of implementing the required Covid-19 measures in May elections.
- 12 **Welcome Back Fund** - to help councils boost tourism, improve green spaces and provide more outdoor seating areas, markets and food stall pop-ups – giving people more, safer options to reunite with friends and relatives.
- 13 **LA Practical support for those self isolating / Self Isolation Support Framework** - to provide funding to local authorities to provide practical support for those self-isolating. This funding stream is ring-fenced for public health purposes to tackle Covid-19 working to break the chains of transmission and protecting people.

- 14 Infection Control and Testing Fund** – the purpose of this fund is to support adult social care providers to:
1. reduce the rate of Covid-19 transmission within and between care settings through effective infection prevention and control (IPC) practices and increase uptake of staff vaccination, and;
 2. conduct rapid testing of staff and visitors in care homes, high risk supported living and extra care settings, to enable close contact visiting where possible
- 15 Household Support Fund** – to help vulnerable households and individuals most in need over the winter months as we enter the final stages of recovery. This is a new grant to replace Covid-19 Local Support and Winter grant. At least 50% of the total funding must be spent on families with children. It should primarily be used to support households in the most need with food, energy and water bills. It can also be used to support households with essential costs related to those items and with wider essential costs. In exceptional cases of genuine emergency, it can additionally be used to support housing costs where existing housing support schemes do not meet this exceptional need.
- 16 Workforce Recruitment and Retention Fund for Adult Social Care** – part of the adult social care winter plan to meet the challenges it faces this winter. The plan includes a commitment to providing workforce recruitment and retention funding to support local authorities and providers to recruit and retain sufficient staff over winter, and support growth and sustain existing workforce capacity.
- 17 Protect and Vaccinate for Rough Sleepers** – to help to increase vaccine uptake among people who are homeless and sleeping rough, supporting those who are hesitant about getting their vital booster jabs and funding emergency accommodation to get people off the streets.
- 18 Adult Social Care Omicron Support Fund** - the purpose of this fund is to support the adult social care sector with measures already covered by the IPC allocation of the Infection Control and Testing Fund (round 3) to reduce the rate of Covid-19 transmission within and between care settings. Additionally, this funding may also be used to increase ventilation in care homes, and to enhance local authorities' current direct payment offer particularly when the only way a person's care needs can be met is by a friend or family member, or to enhance support for carers. It may also be used to pay for temporary staffing to cover increased staff absence caused by Covid-19 and maintain staffing levels and workforce capacity.

Appendix 4 – Cabinet / CMT (Former Gold / Silver) Covid-19 Approvals

		Approved allocation 2021/22			
Date	Approval	Carried forward from 2020/21	2021/22 allocation	Total approval	2021/22 Outturn
Cabinet approvals		£	£	£	£
19/05/2020 & 09/12/2020	Adult Social Care provider payments, and additional supplier relief for contracted and non-contracted providers. Continuation of 'payment by plan' (except where there is no evidence of care having taken place) for domiciliary care services until the 31 March 2021, with delegated authority to the Executive Director of ASC approved 09 December. £319,000 approved by Cabinet on 19 May and £1,359,324 on 9 December (2021/22 expenditure funded from COMF) .	307,829	0	307,829	0
12/08/2020 & 10/02/2021	Adult Social Care provider payments, and additional supplier relief for contracted and non-contracted providers – £500,000 approved by Cabinet on 12 August 2020 and £900,000 approved by Cabinet on 10 February 2021. Further to the £200,000 approved by Cabinet on 19 May 2020 (2021/22 expenditure funded from COMF) .	651,237	0	651,237	0
19/04/2021	Expected shortfall in 2021/22 savings requirement for Money Home Job, given the increased work for managing Covid business grants – Savings target of £925,268 with £421,818 expected to be delivered plus £197,000 use of Homelessness Prevention grant, leaving shortfall of £306,450. Initial Gold approval on 15/04/21, and subsequent approval by Leader 19/04/21, and Cabinet 21 July 2021. Funded from service underspend.	0	306,450	306,450	0
21/07/2021 & 20/10/2021	Additional placement costs relating to a significant increase in domiciliary care numbers during the pandemic and a shortfall of client contributions - £2.2m approved by Cabinet on 21/07/21 and a further £1.15m for approval by Cabinet on 20/10/21.	0	3,358,953	3,358,953	3,358,563
21/07/2021	Increased workforce costs above the current budget due to increased demand in safeguarding and backlog of assessments. Safeguarding has seen an increase in number of concerns every month over the last six months resulting in additional agency staff being required to cover the additional demand - includes £80,074 Add workload in ASC learning disabilities and £265,014 agency social workers to address demand in safeguarding as approved by Gold on 24/06/21 and 01/07/21 respectively. (2021/22 expenditure funded from Workforce and Infection Control grants) .	0	502,421	502,421	31,500
21/07/2021	Increased costs relating to circa 53 looked after children due to delays in children stepping down and leaving care and reduced availability of appropriate placements. Underspend to part fund other LAC costs approved by CMT below.	0	2,068,756	2,068,756	2,046,451
21/07/2021	Increase in waste disposal costs based on 2020/21 tonnage arising from people being home more and continuation of blended working. Increase did not materialise in year	0	735,000	735,000	0
21/07/2021	Funding of one-off shortfall in 2021/22 savings - total £904,942 less £306,450 MHJ approved by Leader on 19/04/21 as above. Funded from service underspend.	0	598,492	598,492	478,492
20/10/2021	Legal support - Barristers fees - approved by Gold 16/09/21.	0	292,682	292,682	292,682
Total Cabinet approvals to date		959,066	7,862,754	8,821,820	6,207,688
Gold Control approvals >£50k					
02/11/2020	Social distancing measures, signage etc.	52,623	0	52,623	28,881
18/03/2021	EHC assessment – managing the backlog of Education Health Care Plans – April to June 2021.	0	191,950	191,950	191,950
24/06/2021	Vaccination bus costs for 10 weeks - £85,370 was approved but was funded from the Contain Outbreak Management Fund 2021/22 allocation.	0	0	0	0
05/08/2021	Vaccination bus – Option 3 to extend bus programme for a further 4 weeks for 1st vaccination uptake and continue buses for a further 8 weeks beyond this to support 2nd vaccinations (total 19 weeks) £248,831 - this was then funded as follows: £137,572 funded from COMF and £111,259 from CCG.	0	0	0	0

Date	Approval	Carried forward from 2020/21 £	2021/22 allocation £	Total approval £	2021/22 Outturn £
23/09/2021	Additional costs in soft IFM (Cleaning, Caretaking and Catering 2021/22 schools related).	0	136,178	136,178	136,178
Total Gold approvals to date		52,623	328,128	380,751	357,009
Silver Control approvals <£50k					
28/01/2021	Administration of One Source Programme – extension of experienced ICT Project Management contractor (in place since Nov 2019) to cover the implementation phase for the payroll module Feb – May 2021 and the wrapping up of the programme (May – June 2021). Funded from service underspend.	29,250	0	29,250	0
08/02/2021	Additional Vodafone charges being incurred whilst working remotely for the period April 2021 – September 2021. Funded from service underspend.	0	32,400	32,400	0
15/02/2021	ICT resource to enhance customer service – included ICT traded services to schools – April 2021 – March 2022. Funded from service underspend.	0	32,863	32,863	0
15/03/2021	Children's system development – project support resource to implement changes to Capita and Mosaic.	0	50,000	50,000	50,000
30/03/2021	Support to domiciliary care market – additional capacity by bringing extra providers onto the community based services framework – Q1 2021/22.	0	16,002	16,002	16,002
12/04/2021	Shared lives - £1,000 per 27 households who receive long term shared lives carers to receive recognition and recompense for and due to the ongoing Covid restrictions and in light of their continued support to individuals in placement – April 2020 – March 2021.	27,000	0	27,000	27,000
28/04/2021	Bulk email costs - for emailing monthly update newsletter to citizens Apr-2021 - March 2022. Funded from service underspend.	0	4,200	4,200	0
Total Silver approvals to date		56,250	135,465	191,715	93,002
CMT approvals <£250k					
23/12/2021	Elongation of the implementation period for the council's early payment scheme - April to September 2021.	0	18,000	18,000	18,000
23/12/2021	Additional Vodafone charges which are being incurred whilst we are working remotely - October 2021 to March 2022. Funded from service underspend.	0	32,400	32,400	0
23/12/2021	Consultancy costs which have been incurred in order to implement a room/workspace booking system. Funded from service underspend.	0	13,177	13,177	0
23/12/2021	Finance staffing - April 2021 to March 2022.	0	146,360	146,360	146,360
03/03/2022	EHC assessment team - Education, health and care plans backlog - Further approval of 195,191 in addition to £191,950 approved by Gold 18/03/21. CMT approval on 03/03/22, and approval by Leader/Portfolio Holder 09/03/22.	0	195,191	195,191	195,191
03/03/2022	LAC - delays due to sufficiency in placements - Further approval in addition to £2.069m approved by Cabinet 21/07/21. CMT approval on 03/03/22, and approval by Leader 09/03/22. Increased cost part funded from underspend on LAC approved by Cabinet above.	0	821,730	821,730	844,230
03/03/2022	LAC - delays in adoption placements due to court hearings and assessments - Further approval in addition to £2.069m approved by Cabinet 21/07/21. CMT approval on 03/03/22, approval by Leader 09/03/22. Increased cost part funded from underspend on LAC approved by Cabinet above.	0	144,430	144,430	160,545
Total Silver approvals to date		0	1,371,288	1,371,288	1,364,326
Total Cabinet / CMT (Former Gold / Silver) approvals for additional cost pressures 2021/22		1,067,939	9,697,635	10,765,574	8,022,026

Appendix 5 – Walsall Proud – Benefits 2021/22 with delayed delivery

Benefit	Proud Workstream	Original Full Benefit £	Benefit identified as high risk of non-delivery £	Value to be funded by Covid-19 Grant £	Value mitigated by service in year £	Reason and Mitigating Action taken in year	Value carried forward to 2022/23 £	Action taken
Resources and Transformation								
HR restructure	Enabling Support Services	100,000	100,000	-	100,000	Restructure delayed until Enabling & Support Service review is completed - a number of posts held vacant deliberately whilst the restructure work is being finalised.	100,000	Expected to be delivered alongside development in Enabling & Support Services review.
Consolidation of shadow IT and ITOM efficiencies	Third Party Spend	64,000	64,000	-	64,000	Revision of ITOM blueprint has put delivery of these benefits at risk in year. Benefit is dependent on the implementation of full original ITOM blueprint - the full ITOM blueprint was revised with an affordable model addressing the priority of cyber security, enterprise architecture and business relationship management to be implemented.	64,000	Expected to be delivered alongside development in Enabling & Support Services review.
Infrastructure & Technology Changes - Cloud Navigation / Fibre	Third Party Spend	150,000	120,000	120,000	-	Behind schedule due to increased working from home, power cuts and other impact of Covid-19. Focus was on delivering essential services to keep the core business of the council running - progress delayed by Covid-19 and benefit requested to be funded via Covid-19 unringfenced grant.	120,000	Tamworth data centre now closed, benefit will therefore now be achieved full year in 2022/23.

Benefit	Proud Workstream	Original Full Benefit £	Benefit as high risk of non-delivery £	Value funded by Covid-19 £	Value mitigated by service in year £	Reason and Mitigating Action taken in year	Value carried forward to 2022/23 £	Action taken
Efficiencies savings within legal services	Enabling Support Services	66,666	33,333	-	33,333	Further efficiencies yet to be identified - efficiencies identified from legal non-staffing budgets but under review to confirm if savings need to be realigned.	33,333	Expected to be delivered alongside development in Enabling & Support Services review.
Consider ceasing of physio contract	Third Party Spend	12,000	3,341	-	3,341	Physio contract is still valid on a pay as you go basis, some expenditure in year - no intention to use contract from October 2021.	3,341	Full year effect of benefit expected in 2022/23.
Council wide efficiencies relating to Customer Access Management	Customer Access & Mgt	78,433	78,433	-	34,378	Next phase of work not identified in year, planning commenced - £18k mitigated corporately in year with a further £16k mitigated by service underspends.	78,433	Expected to be delivered alongside development in Enabling & Support Services review.
Admin & business support cross council efficiencies	Enabling Support Services	47,060	34,496	-	8,064	Next phase of work not identified in year, planning commenced - mitigated corporately in year.	34,496	Expected to be delivered alongside development in Enabling & Support Services review.
Total Resources and Transformation		518,159	433,603	120,000	243,116		433,603	
Children's Services								
Mother & Baby - Daisy Project	Third Party Spend	739,980	348,546	295,992	32,306	Implementation of project delayed due to issues with recruitment relating to Covid-19 - Gold/Cabinet proforma was presented for approval from Covid-19 unringfenced grant for 2021/22.	348,546	Directorate to review delivery as part of wider service plans to achieve ongoing mitigation.

Benefit	Proud Workstream	Original Full Benefit £	Benefit as high risk of non-delivery £	Value funded by Covid-19 £	Value mitigated by service in year £	Reason and Mitigating Action taken in year	Value carried forward to 2022/23 £	Action taken
Change, Grow, Live Contract - bring service back in house	Third Party Spend	122,714	42,833	-	42,833	Walsall Council pay scales are higher than CGL, this created a cost pressure not originally anticipated - funded from uncommitted Troubled Families Grant.	42,833	Directorate to review delivery as part of wider service plans to achieve ongoing mitigation.
Strengthening Families, Protecting Children. This is cost avoidance scheme for future placement projections which will reduce future growth need.	Third Party Spend	189,783	118,603	-	-	Launch delayed due to Covid-19 - Children in Care overspend (£119k) in period 12, so no mitigating action.	118,603	Directorate to review delivery as part of wider service plans to achieve ongoing mitigation.
Family Drugs and alcohol court	Third Party Spend	88,183	72,012	-	72,012	Delays to the courts due to Covid-19 - Offset with specific service Covid-19 funding.	72,012	Directorate to review delivery as part of wider service plans to achieve ongoing mitigation.
Placement sufficiency - recruitment & retention	Third Party Spend	150,797	42,313	-	-	Await allocation for new foster carers. LAC overspend (£42k) in period 12 - 12, so no mitigating action.	42,313	Full year effect of benefit expected in 2022/23.
Grandparents plus - build in for future years	Third Party Spend	67,235	8,713	-	8,713	CAFCASS prioritisation changes delaying the conversion of SGO placements - Offset with specific service Covid-19 funding.	8,713	Directorate to review delivery as part of wider service plans to achieve ongoing mitigation.
Independent living	Third Party Spend	250,000	123,703	-	123,703	Vacant management post plus an increase in complex cases - additional UASC income received to offset this.	123,703	Directorate to review delivery as part of wider service plans to achieve ongoing mitigation.

Benefit	Proud Workstream	Original Full Benefit £	Benefit as high risk of non-delivery £	Value funded by Covid-19 £	Value mitigated by service in year £	Reason and Mitigating Action taken in year	Value carried forward to 2022/23 £	Action taken
Council wide efficiencies relating to Customer Access Management	Customer Access & Mgt	169,706	169,706	-	169,706	Next phase of work not identified in year, planning commenced - £40k mitigated corporately in year.	169,706	Directorate to review delivery as part of wider service plans to achieve ongoing mitigation.
Admin & business support cross council efficiencies	Enabling Support Services	101,823	101,823	-	101,823	Next phase of work not identified in year, planning commenced - £24k mitigated corporately in year.	101,823	Directorate to review delivery as part of wider service plans to achieve ongoing mitigation.
Total Children's Services		1,880,221	1,028,252	295,992	551,096		1,028,252	
Customer Engagement								
Restructure within Money Home Job	Customer Access & Mgt	690,266	206,408	-	206,408	Up to six month delay in completion of restructure within MHJ due to Covid-19 as officers are required to deal with the unusual circumstances at present - funded by grant contributions and vacant posts.	206,408	Full implementation now expected in 2022/23.
Introduce council tax penalty charges for failing to notify a change of circumstance	Income Generation & Cost Recovery	150,000	150,000	-	-	Policy has been approved but no charges have been raised as yet.	150,000	Charging policy to be implemented when cases identified.

Benefit	Proud Workstream	Original Full Benefit £	Benefit as high risk of non-delivery £	Value funded by Covid-19 £	Value mitigated by service in year £	Reason and Mitigating Action taken in year	Value carried forward to 2022/23 £	Action taken
Court income	Income Generation & Cost Recovery	100,000	100,000	-	-	Following closure due to Covid-19 the courts re-opened in June. However, income is not sufficient to cover saving required.	100,000	Service will monitor court income levels as system returns to full capacity.
Council wide efficiencies relating to Customer Access Management	Customer Access & Mgt	43,462	10,161	-	10,161	Next phase of work not identified in year, planning commenced - mitigated corporately in year.	10,161	Service to review opportunities to deliver from within existing budgets.
Admin & business support cross council efficiencies	Enabling Support Services	26,076	6,095	-	6,095	Next phase of work not identified in year, planning commenced - mitigated corporately in year.	6,095	Service to review opportunities to deliver from within existing budgets.
Total Customer Engagement		1,009,804	472,664	-	222,664		472,664	
Adult Social Care								
Older People & Front Door	Customer Access & Mgt	3,989,701	2,273,435	-	-	Work being undertaken to identify and understand the enablers required to reduce inflow into social care. Further work is being undertaken by the directorate to refresh their STP and identify a mitigating action plan.	2,273,435	ASC Continuous Improvement Programme Board created to support delivery of benefits, CAM process review also acting as enabler.
Staff reconfiguration in relation to Access Team	Connected Working (Perform Plus)	112,988	56,416	-	-	Further work is being undertaken by the directorate to refresh their STP and identify a mitigating action plan.	56,416	ASC Continuous Improvement Programme Board created to support delivery of benefits.

Benefit	Proud Workstream	Original Full Benefit £	Benefit as high risk of non-delivery £	Value funded by Covid-19 £	Value mitigated by service in year £	Reason and Mitigating Action taken in year	Value carried forward to 2022/23 £	Action taken
Joint Funding Arrangements	Income Generation & Cost Recovery	3,218,831	1,746,783	-	-	Awaiting variation of Section 75 agreement with CCG. Ongoing discussion and dialog with CCG linked to joint funding tool.	1,746,783	Ongoing discussion and dialog with CCG linked to joint funding tool.
Benefit maximisation project	Income Generation & Cost Recovery	783,000	184,719	-	-	Shortfall of income following completion of project.	184,719	Ongoing mitigation by various full year effects of other savings from 2021/22.
Council wide efficiencies relating to Customer Access Management	Customer Access & Mgt	113,401	113,401	-	42,212	Next phase of work not identified in year, planning commenced - mitigated corporately in year.	113,401	ASC Continuous Improvement Programme Board created to support delivery of benefits.
Admin & business support cross council efficiencies	Enabling Support Services	68,042	36,517	-	36,517	Next phase of work not identified in year, planning has commenced - £36k is mitigated corporately in year.	36,517	ASC Continuous Improvement Programme Board created to support delivery of benefits.
Total Adult Social Care		8,285,963	4,411,271	-	78,729		4,411,271	
Economy, Environment and Communities								
Fee increases within resilient communities	Income Generation & Cost Recovery	96,663	96,663	-	96,663	Review required taking into account the impact of Covid-19 on these sectors - Mitigated by a combination of holding vacant posts open in the Directorate and other service underspends. £20k mitigated on an ongoing basis through deep dive review of budgets, replacing previous benefit proposal.	96,663	Mitigated on an ongoing basis through deep dive review of budgets, replacing previous benefit proposal. Delivered.

Benefit	Proud Workstream	Original Full Benefit £	Benefit as high risk of non-delivery £	Value funded by Covid-19 £	Value mitigated by service in year £	Reason and Mitigating Action taken in year	Value carried forward to 2022/23 £	Action taken
Charging for pre licensing – business licenses	Income Generation & Cost Recovery	7,350	7,350	-	7,350	Review of fee increases required taking into account the impact of Covid-19 on these sectors - mitigated through deep dive review of budgets.	7,350	Mitigated on an ongoing basis through deep dive review of budgets, replacing previous benefit proposal. Delivered.
Review of CCTV contract	Third Party Spend	42,772	42,772	-	42,772	Pressure for more activity from service has led to increased costs – mitigated by general service underspends.	42,772	Service to review demand and alternatives to achieve benefit within budgets.
Restructure within resilient communities	Customer Access & Mgt	679,767	523,471	-	523,471	12 month delay of implementation across various elements of restructure within resilient communities - mitigated by a combination of holding vacant posts open in the Directorate and other service underspends.	523,471	Implementation to be completed in 2022/23.
Consider ceasing of pest and animal control service	Income Generation & Cost Recovery	87,606	61,958	-	61,958	Delay in implementation of new structure - mitigated by a combination of holding vacant posts open in the Directorate and other service underspends.	61,958	Implementation to be completed in 2022/23.
Bereavement services – the sale of keepsake memorials and a range of personal memorabilia	Income Generation & Cost Recovery	1,000	1,000	-	1,000	Delay in implementation and not expected to ever be achieved - Mitigated by service underspends.	1,000	Replaced by a reduction in operational budgets for 2022/23. Delivered.
Efficiency savings within Community protection service	Customer Access & Mgt	52,135	52,135	-	52,135	12 month delay due to the implementation of the restructure - mitigated by a combination of vacant posts open and other service underspends.	52,135	Implementation to be completed in 2022/23.

Benefit	Proud Workstream	Original Full Benefit £	Benefit as high risk of non-delivery £	Value funded by Covid-19 £	Value mitigated by service in year £	Reason and Mitigating Action taken in year	Value carried forward to 2022/23 £	Action taken
Increase in fee paying services for building control and planning development	Income Generation & Cost Recovery	37,000	16,384	-	16,384	Uptake currently below the level expected - mitigated by underspends elsewhere in the Service.	16,384	Service will monitor income levels and mitigate if demand remains lower than expected.
Restructure of planning services	Customer Access & Mgt	85,000	70,833	-	70,833	Implementation was delayed whilst a revised structure was agreed. New structure now in place as 1st March 2022 - mitigated by service underspends for 2021/22.	70,833	New structure approved and is now operational. Delivered.
Alternative funding / maximisation of external funding	Income Generation & Cost Recovery	70,000	41,610	-	41,610	Vacant posts have reduced amount of staff time that can be capitalised - Mitigated by underspends (due to vacant posts).	41,610	Recruitment to posts planned, any delay mitigated by vacancy underspend.
Increased membership retention across active living centres (ALC)	Income Generation & Cost Recovery	45,000	45,000	45,000	-	Delay in implementation due to Covid-19 and ALC's being closed, impact on sector being reviewed - mitigated by Covid-19 loss of income grant.	45,000	Service will monitor membership and income levels and any ongoing impact of fear of Covid-19.
External marketing and promotion partnership across active living centres	Designing Ways of Working - Hub	62,000	62,000	62,000	-	Delay to implementation due to Covid-19 and ALC restrictions. Expected that the service will need time to build usage/membership numbers back up to pre Covid-19 levels - mitigated by Covid-19 loss of income grant.	62,000	Service will monitor membership and income levels and any ongoing impact of fear of Covid-19.
Management restructure across active living centres (ALC's)	Customer Access & Mgt	28,762	28,762	-	28,762	Delay due to recruitment to Head of Service post, who will lead on implementation - mitigated by underspends elsewhere in the Service.	28,762	Implementation to be completed in 2022/23.

Benefit	Proud Workstream	Original Full Benefit £	Benefit as high risk of non-delivery £	Value funded by Covid-19 £	Value mitigated by service in year £	Reason and Mitigating Action taken in year	Value carried forward to 2022/23 £	Action taken
increasing out of hours burial services and associated fees	Income Generation & Cost Recovery	6,346	6,346	-	6,346	Discussions are ongoing re viability of implementation - mitigated through deep dive review of budgets.	6,346	Deep dive review of budgets, replacing previous benefit proposals. Delivered.
Increasing the number of fixed penalty notices issued	Income Generation & Cost Recovery	50,000	23,214	12,500	10,714	The service are currently refocused on Covid-19 priorities - mitigated partly by Covid-19 unringfenced grant and by underspends elsewhere in the Service.	23,214	Full year effect of benefit expected in 2022/23.
Increase MOT charges	Income Generation & Cost Recovery	19,975	8,184	-	8,184	Saving not achieved due to reduced level of demand - mitigated by underspends elsewhere in the Service.	8,184	Service to review demand and income levels.
Events Income Generation	Income Generation & Cost Recovery	10,000	4,495	-	4,495	Cancellation of some events due to Covid-19 - mitigated by underspends elsewhere in the Service.	4,495	End to Covid-19 restrictions should allow benefit to be achieved in 2022/23.
Covid-19 reset of the Street Cleansing service	Designing Ways of Working - Hub service	49,320	1,765	-	1,765	Unable to achieve full saving - mitigated by underspends elsewhere in the Service.	1,765	Service to review and mitigate and shortfall from existing budgets.
Private sector or sponsorship funding of Christmas lights	Income Generation & Cost Recovery	5,000	5,000	-	5,000	Understanding contractor would pay but not formally agreed and no payment received - mitigated by underspends elsewhere in the Service.	5,000	Service to have further dialogue with contractor.
Review of permit scheme with utilities companies	Income Generation & Cost Recovery	40,000	40,000	-	40,000	Formal consultation with utility companies not yet initiated - mitigated by income generated from increased volume of permit applications at current charges.	40,000	After delay, implementation now planned for 2022/23.

Benefit	Proud Workstream	Original Full Benefit £	Benefit as high risk of non-delivery £	Value funded by Covid-19 £	Value mitigated by service in year £	Reason and Mitigating Action taken in year	Value carried forward to 2022/23 £	Action taken
Heritage and culture / Arts and events fees and charges increase	Income Generation & Cost Recovery	9,351	9,351	-	9,351	Reduced number of services customers are willing to attend (due to Covid-19), plus 2021 price frozen rather than increased (again due to Covid-19) - mitigated by underspends elsewhere in the Service.	9,351	End to Covid-19 restrictions should allow benefit to be achieved in 2022/23.
Biodiversity	Designing Ways of Working - Hub	88,249	88,249	-	88,249	Refocus from wild to managed sites will impact level of benefit achievable - mitigated by underspends elsewhere in the Service.	88,249	After delay, implementation now planned for 2022/23.
ALC - Concessionary 'Move it' leisure scheme fee increase	Income Generation & Cost Recovery	63,000	63,000	63,000	-	Fees increased, however sites operating at reduced capacity, with longer delay expected until usage/ membership back up to pre Covid-19 levels - mitigated by Covid-19 unringfenced grant and loss of income grant.	63,000	Service will monitor membership and income levels and any ongoing impact of fear of Covid-19.
Council wide efficiencies relating to Customer Access Management	Customer Access & Mgt	94,998	74,107	-	74,107	Next phase of work not identified in year, planning has commenced - £22k mitigated corporately in yea	74,107	Deep dive review of budgets, replacing previous benefit proposals. Delivered.
Admin & business support cross council efficiencies	Enabling Support Services	56,999	44,464	-	44,464	Next phase of work not identified in year, planning has commenced - £31k mitigated corporately in year.	44,464	Deep dive review of budgets, replacing previous benefit proposals. Delivered.
Total Economy, Environment and Communities		1,788,293	1,418,113	182,500	1,235,613		1,418,113	
Total		13,482,440	7,763,903	598,492	2,331,218		7,763,903	

Appendix 6 – Pre-audit Capital Outturn by Scheme 2021/22 – council funded schemes

COUNCIL FUNDED SCHEMES	2021/22 Budget £	2021/22 Outturn £	Variance £	Carry forward to 2022/23 £	(Underspend) / Overspend £
ADULT SOCIAL CARE, PUBLIC HEALTH AND HUB					
All age disability hub	34,841	31,798	(3,043)	0	(3,043)
ADULT SOCIAL CARE, PUBLIC HEALTH AND HUB COUNCIL FUNDED TOTAL	34,841	31,798	(3,043)	0	(3,043)
CHILDREN'S, EDUCATION AND CUSTOMER ENGAGEMENT					
Schools capital using schools grant (DSG)	2,171,018	2,171,018	0	0	0
School temporary classrooms	250,000	230,935	(19,065)	0	(19,065)
School estate condition survey	250,000	230,000	(20,000)	0	(20,000)
Redesign of Children's Homes	971,000	215	(970,785)	(970,785)	0
Children's services locality project	65,268	44,062	(21,206)	(21,206)	0
Looked after children out of borough placements	204,350	99,727	(104,623)	(104,623)	0
Aids And Adaptations (Statutory Element)	821,637	436,325	(385,312)	(385,312)	0
Health Through Warmth And Related Retro-fit schemes	88,178	15,000	(73,178)	(73,178)	0
Social Housing Decarbonisation	20,000	0	(20,000)	(20,000)	0
CHILDREN'S, EDUCATION AND CUSTOMER ENGAGEMENT COUNCIL FUNDED TOTAL	4,841,451	3,227,282	(1,614,169)	(1,575,104)	(39,065)
ECONOMY, ENVIRONMENT AND COMMUNITIES					
New Homes Bonus	76,999	0	(76,999)	(76,999)	0
Regenerating Walsall	223,206	0	(223,206)	(223,206)	0
Town And District Centres Public Realm improvements	520,500	0	(520,500)	(520,500)	0
Walsall Market	40,516	0	(40,516)	(40,516)	0
Enterprise Zones	6,822,089	265,227	(6,556,862)	(6,556,862)	0
Future High Street Fund	600,000	0	(600,000)	(600,000)	0
Open Water safety schemes	2,125	0	(2,125)	(2,125)	0
St Peter Church Repairs To Surrounding Walls	32,784	0	(32,784)	(32,784)	0
Walsall Arboretum Car Park	4,896	0	(4,896)	0	(4,896)

COUNCIL FUNDED SCHEMES	2021/22 Budget £	2021/22 Outturn £	Variance £	Carry forward to 2022/23 £	(Underspend) / Overspend £
Walsall Arboretum Restoration Programme	5,242	0	(5,242)	0	(5,242)
Willenhall Memorial Park	3,076	0	(3,076)	(3,076)	0
Regional Materials Recycling Facility	7,007,057	4,604,805	(2,402,252)	(2,402,252)	0
Middlemore Lane Waste Recycling Centre (HWRC)	10,835,022	1,465,882	(9,369,140)	(9,369,140)	0
Bentley Greenway Footpath Improvements	1,902	1,902	(0)	(0)	0
Workshop Breakdown Vehicle	66,991	0	(66,991)	(66,991)	0
Allotment Boundary Improvement Works	260,000	0	(260,000)	(260,000)	0
Walsall Arboretum Extension	190,000	0	(190,000)	(190,000)	0
Barr Beacon Security & Infrastructure Works	72,000	31,605	(40,395)	(40,395)	0
Headstone Safety In Cemeteries (Revenue contribution)	28,243	28,242	(1)	(1)	0
Willenhall Lawn Cemetery Extension	14,908	14,908	(0)	(0)	0
Replacement Cemeteries Administration System	75,000	0	(75,000)	(75,000)	0
Streetly Cemetery Extension	430,293	25,280	(405,013)	(405,013)	0
North Walsall Cemetery Flooding	185,785	80,935	(104,850)	(104,850)	0
Walsall Gala Pool Filters	104,000	103,953	(47)	(47)	0
Bloxwich Landing Development	230,000	228,931	(1,069)	0	(1,069)
Community Dropped Crossings	21,671	21,221	(450)	(450)	0
District Town Centres Public Realm Improvements	358,738	358,738	0	0	0
Highways Maintenance	2,800,000	2,693,306	(106,694)	(106,694)	0
Hatherton Road Car Park	211,456	0	(211,456)	(211,456)	0
Promotion Of Community Health & Safety	278,338	267,413	(10,925)	(10,925)	0
Replacement Of Obsolete Analogue Weather equipment	38,596	38,596	(0)	(0)	0
Replacement Of Obsolete Traffic Signals	200,000	200,000	0	0	0
Hatherton Road Multi-storey car park structural maintenance	200,000	0	(200,000)	(200,000)	0
Darlaston Strategic Development Authority (DSDA)	9,801	0	(9,801)	(9,801)	0
Walsall Town Centre Public Realm Improvements	362,081	495	(361,586)	(361,586)	0

COUNCIL FUNDED SCHEMES	2021/22 Budget £	2021/22 Outturn £	Variance £	Carry forward to 2022/23 £	(Underspend) / Overspend £
New Rail Stations - Local Contributions	1,479,537	0	(1,479,537)	0	(1,479,537)
Resurfacing Of Church Road Car Park (revenue contribution)	61,039	61,039	(0)	(0)	0
Transit Site	630,211	567,492	(62,719)	(62,719)	0
Lighting Invest To Save	220,128	217,802	(2,326)	(2,326)	0
CCTV	288,183	288,183	(0)	(0)	0
Single Library Management System	39,757	0	(39,757)	(39,757)	0
Darlaston Library Integration	78,542	17,956	(60,586)	(60,586)	0
Replacement PC's	34,000	0	(34,000)	(34,000)	0
Radio frequency identification self issue	93,000	0	(93,000)	(93,000)	0
ECONOMY, ENVIRONMENT & COMMUNITIES COUNCIL FUNDED TOTAL	35,237,712	11,583,910	(23,653,802)	(22,163,058)	(1,490,744)
RESOURCES AND TRANSFORMATION					
Procurement System For Human Resources / Finance	1,158,049	940,807	(217,242)	(217,242)	0
Oracle EBS Archive	334,356	195,080	(139,276)	(139,276)	0
Asbestos Removal	13,591	13,591	(0)	(0)	0
Planned Property Maintenance	226	227	1	0	1
Safe Water Supplies	152,287	152,287	0	0	0
Statutory Testing	348,694	348,694	0	0	0
Civic Centre Heating	1,146,646	0	(1,146,646)	(1,146,646)	0
Council House Rewiring	165,741	22,881	(142,860)	0	(142,860)
Council House Smoke & Heat Detection	326,920	0	(326,920)	(326,920)	0
Council House General Heating	2,173,560	0	(2,173,560)	(2,173,560)	0
Operation Repair & Maintenance Of Council Premises	336,077	21,133	(314,944)	(314,944)	0
Fire Risk Assessment	381,230	381,230	(0)	(0)	0
Schools Project	98,967	56,425	(42,542)	(42,542)	0
Walsall Council House Modern Secure Reception	26,228	0	(26,228)	(26,228)	0
Council House Internal Decoration	44,442	14,224	(30,218)	(30,218)	0

COUNCIL FUNDED SCHEMES	2021/22 Budget £	2021/22 Outturn £	Variance £	Carry forward to 2022/23 £	(Underspend) / Overspend £
Willenhall Lane Travellers Site Pumping Station	44,400	19,714	(24,686)	(24,686)	0
Security Arrangements For Corporate Buildings	125,000	5,950	(119,050)	(119,050)	0
Civic Centre Plumbing	66,600	0	(66,600)	(66,600)	0
Council House Windows	1,307,025	0	(1,307,025)	(1,307,025)	0
Council House Roof Repairs	750,000	0	(750,000)	(750,000)	0
Computer Aided Facilities Management System	250,000	0	(250,000)	(250,000)	0
Rushall Olympic Football Club	5,833	0	(5,833)	(5,833)	0
Saddlers Centre Shopping Centre	385,194	0	(385,194)	(385,194)	0
Challenge Block	33,214	0	(33,214)	(33,214)	0
Town Centre Strategic Acquisition For Town Centre Properties	2,682,716	133,377	(2,549,339)	(77,639)	(2,471,700)
Council Chamber Refurbishment	211,892	0	(211,892)	(211,892)	0
MYCMIS Committee Management System	27,000	11,204	(15,796)	(15,796)	0
Webcasting And Hybrid Council Meetings	20,000	0	(20,000)	(20,000)	0
Data Backup System Replacement	50,000	50,000	(0)	(0)	0
Essential Microsoft Upgrades & Foundation	58,421	16,800	(41,621)	(41,621)	0
ICT - Safe And Secure Environment	2,456,145	79,182	(2,376,963)	(2,376,963)	0
Single Mobile Devices for use within the new In-Tune Platform	34,820	34,820	(0)	(0)	0
Resource & Consultancy To Upgrade Win20	7,708	7,178	(530)	(530)	0
Proud - ICT	112,974	9,982	(102,992)	(102,992)	0
Enabling Technology	11,300,076	2,924,592	(8,375,484)	(8,375,484)	0
Maintaining A Safe And Secure Environment	100,000	79,436	(20,564)	(20,564)	0
Telephony Cloud Based System	199,178	7,711	(191,467)	(191,467)	0
Proud Card Payments Digital Website	550,000	57,164	(492,836)	(492,836)	0
Smartphones	200,000	75,658	(124,342)	(124,342)	0
RESOURCES AND TRANSFORMATION COUNCIL FUNDED	27,685,210	5,659,345	(22,025,865)	(19,411,305)	(2,614,560)

COUNCIL FUNDED SCHEMES	2021/22 Budget £	2021/22 Outturn £	Variance £	Carry forward to 2022/23 £	(Underspend) / Overspend £
CENTRALLY HELD					
Pipeline Equity Investment	26,049,579	0	(26,049,579)	(26,049,579)	0
Capital Investment Earmarked Reserve (including Flexible Use of Capital Receipts, Health & Safety schemes)	4,468,160	0	(4,468,160)	(4,468,160)	0
CENTRALLY HELD COUNCIL FUNDED	30,517,739	0	(30,517,739)	(30,517,739)	0
TOTAL COUNCIL FUNDED SCHEMES	98,316,953	20,502,335	(77,814,618)	(73,667,206)	(4,147,412)

Appendix 7 – Pre-audit Capital Outturn by Scheme 2021/22 – externally funded schemes

EXTERNAL FUNDED SCHEMES	2021/22 Budget £	2021/22 Outturn £	Variance £	Carry forward to 2022/23 £	(Underspend) / Overspend £
ADULT SOCIAL CARE, PUBLIC HEALTH AND HUB					
Integrated Community Equipment	888,000	888,000	0	0	0
ADULT SOCIAL CARE, PUBLIC HEALTH AND HUB EXTERNALLY FUNDED TOTAL	888,000	888,000	0	0	0
CHILDREN'S, EDUCATION AND CUSTOMER ENGAGEMENT					
Academies	346,130	0	(346,130)	(346,130)	0
Basic Need	29,510,340	7,320,122	(22,190,218)	(22,190,218)	0
Capital Maintenance	5,904,601	3,385,743	(2,518,858)	(2,518,858)	0
Devolved Formula Capital	2,007,312	679,361	(1,327,951)	(1,327,951)	0
Section 106	287,448	287,448	(0)	(0)	0
Universal Infant Free School Meals	9,610	9,610	(0)	(0)	0
School Nursery Capital Funding	991,550	793,240	(198,310)	(198,310)	0
High Needs Provision Capital Allocation	1,419,382	98,187	(1,321,195)	(1,321,195)	0
Purchase Of Dispersed Temporary Accommodation	1,538,915	0	(1,538,915)	(1,538,915)	0
Warm Homes	219,113	219,113	0	0	0
Disabled Facilities Grant	3,314,771	3,314,771	0	0	0
Off Gas Scheme	272,053	138,028	(134,025)	(134,025)	0
Contributions Health Through Warmth	17,306	17,306	(0)	(0)	0
Home upgrade grant and Local authority delivery grant	2,057,663	126,908	(1,930,755)	(1,930,755)	0
Midland Energy Hub - home upgrade and Local authority delivery	1,486,240	70,716	(1,415,524)	(1,415,524)	0
CHILDREN'S, EDUCATION AND CUSTOMER ENGAGEMENT EXTERNALLY FUNDED TOTAL	49,382,434	16,460,552	(32,921,882)	(32,921,882)	0
ECONOMY, ENVIRONMENT AND COMMUNITIES					
Regenerating Walsall - Private Contribution	8,746	0	(8,746)	(8,746)	0
Future High Street Fund	3,800,992	3,267,663	(533,329)	(533,329)	0
Phoenix 10 Homes England	587,556	587,556	(0)	(0)	0

EXTERNAL FUNDED SCHEMES	2021/22 Budget £	2021/22 Outturn £	Variance £	Carry forward to 2022/23 £	(Underspend) / Overspend £
Waste Infrastructure Capital Grant	185,092	185,091	(1)	(1)	0
Pelsall Memorial Garden	5,600	5,600	0	0	0
Fibbersley Local Nature Reserve	828	0	(828)	(828)	0
Rethinking Parks	57,227	53,169	(4,058)	0	(4,058)
Black Country Blue Network – European Regional Development Fund	53,990	0	(53,990)	(53,990)	0
Black Country Blue Network - S106	27,522	6,802	(20,720)	(20,720)	0
Darlaston Pool Energy Efficiency	150,000	0	(150,000)	(150,000)	0
Additional Highway Maintenance Pothole	1,340,173	1,340,173	0	0	0
Local Transport Plan Including Bridge Strengthening 2010	200,105	46,262	(153,843)	(153,843)	0
Capital Block Dept for Transport (DFT) Fund	1,452,417	1,452,417	0	0	0
Emergency Active Travel - Tranche 1	1,039	0	(1,039)	0	(1,039)
Challenge Fund	0	(467)	(467)	0	(467)
Replacement Footbridge Coalpool Lane	12	0	(12)	(12)	0
M6 Junction 10 Highway Improvements	4,586,923	2,354,400	(2,232,523)	(2,232,523)	0
Zebra Crossing	4,774	0	(4,774)	(4,774)	0
M6 J10 Designated Funds Non Motorised User Route	11,208	10,241	(967)	0	(967)
West Midlands Strategic Transport Plan	2,492,841	1,159,873	(1,332,968)	(1,332,968)	0
A41 Moxley Major Road Network Prep Fund	50,000	49,226	(774)	0	(774)
A41 Moxley Transforming Cities Fund	73,000	73,000	0	0	0
Active Travel (Tranche 2)	977,268	971,743	(5,525)	(5,525)	0
Tower Street Culvert	312,000	312,000	0	0	0
Flood Alleviation Bloxwich Road	90,000	205	(89,795)	(89,795)	0
National cycle network route - Veolia Trust	57,319	54,621	(2,698)	(2,698)	0
Better Streets	250,000	241,115	(8,885)	(8,885)	0
Wolverhampton Street S106	73,875	0	(73,875)	(73,875)	0
Electric Vehicle Charging Point Installation	25,000	0	(25,000)	(25,000)	0

EXTERNAL FUNDED SCHEMES	2021/22 Budget £	2021/22 Outturn £	Variance £	Carry forward to 2022/23 £	(Underspend) / Overspend £
National cycle network route - Canal And River Trust	63,000	56,166	(6,834)	(6,834)	0
Barr Beacon Security & Infrastructure Works	61,000	0	(61,000)	(61,000)	0
ECONOMY, ENVIRONMENT & COMMUNITIES EXTERNALLY FUNDED	16,999,507	12,226,857	(4,772,650)	(4,765,345)	(7,305)
RESOURCES AND TRANSFORMATION					
Towns Fund Accelerated Funding	395,283	395,283	0	0	0
Bloxwich Town Deal	1,065,000	89,212	(975,788)	(975,788)	0
Walsall Town Deal	1,065,000	306,237	(758,763)	(758,763)	0
Growth Deal	7,065,402	7,065,360	(42)	(42)	0
Land and Property Investment Fund	38,065,251	2,165,726	(35,899,525)	(35,899,525)	0
Getting Building Fund	17,451,221	15,824,886	(1,626,335)	(1,626,335)	0
Black Country Local Enterprise Partnership Reinvestment Digital Fund	1,245,318	1,244,373	(945)	(945)	0
Growing Places Fund	3,914,841	1,216,774	(2,698,067)	(2,698,067)	0
RESOURCES AND TRANSFORMATION EXTERNALLY FUNDED TOTAL	70,267,316	28,307,851	(41,959,465)	(41,959,465)	0
TOTAL EXTERNALLY FUNDED SCHEMES	137,537,257	57,883,260	(79,653,997)	(79,646,693)	(7,304)

Appendix 8 - Financial Health Indicators 2021/22

Treasury Management	2020/21 Actual	2021/22 Target	2021/22 Actual
Average Interest Rate (Borrowing)			
- Excluding OLA	3.46%	3.30%	3.59%
- Including OLA	3.54%	3.46%	3.65%
Gearing Effect on Capital Financing Estimates	3.58%	5.00%	3.69%
Net Borrowing Costs / Council Tax Requirement and NNDR contribution	4.44%	12.50%	4.60%
Capital Financing Requirement (£m)	380.886	417.360	417.360
Authorised limit for external Debt (£m)	472.173	498.300	498.300
Investment Rate Average (excl Property fund)	0.59%	0.27%	0.38%

Balance Sheet Ratios	2017/18	2018/19	2019/20	2020/21	2021/22 Draft Pre-audit
Current Assets : Current Liabilities	1.03	1.68	2.39	2.01	1.91
Useable Reserves : General Revenue Expenditure	0.65	0.72	0.73	1.02	1.07
Long Term Borrowing : Tax Revenue (Using both council tax and NNDR for tax revenue)	1.20	1.36	1.43	1.83	1.39
Long Term Assets : Long Term Borrowing	2.34	2.05	1.86	1.83	2.14
Total School Reserves : Dedicated School Grant	0.05	0.06	0.05	0.08	0.08

Revenues Performance % collected for financial year	2019/20 Actual Collected in total @ 31.03.19	2020/21 Actual Collected in total @ 31.03.21	2021/22	
			Profiled 2021/22*	Actual 2021/22
Council tax %	96.8%	95.8%	94.4%	92.4%
Total Council Tax collected (£m)	£134,865,941	£134,941,859	£144,700,000	£141,710,350
National Non Domestic Rate %	98.2%	94.7%	97.5%	95.0%
Total NNDR collected (£m)	£71,623,723	£45,312,649	£64,550,000	£62,914,115

* Profiled amounts are at Pre Covid19 levels

Debtors and Creditors Performance	2020/21 Actual	2021/22	
		Target	Actual
Sundry Debtors Collection – Average number of days to collect debt	24 days	30 days	24 days
Average number of days to process creditor payments*	7 days	14 days	8 days

Management of Resources	2021/22		
Service Analysis	Target	Actual	Variance
Adult Social Care, Public Health and Hub	58,901,217	63,395,662	4,494,445
Children's Services	0	0	0
- Children's and Education	84,628,552	84,624,168	(4,384)
- Customer Engagement	6,536,609	4,964,171	(1,572,438)
Economy and Environment	53,387,831	52,440,726	(947,105)
Resources and Transformation	31,749,808	30,703,885	(1,045,923)
Capital Financing	(5,250,831)	(6,450,832)	(1,200,001)
Central budgets	(97,407,405)	(98,626,583)	(1,219,178)
Total Net Revenue Expenditure	132,545,781	131,051,197	(1,494,584)
General Reserves	Minimum £6.6m Maximum £16.5m	N/A	N/A
Council Funded Capital Expenditure	98,316,953	20,502,335	(77,814,618)
External Funded Capital Expenditure	137,537,257	57,883,260	(79,653,997)
Total Capital Expenditure	235,854,210	78,385,595	(157,468,615)
Capital Receipts	4,231,584	3,978,763	(252,821)

Management of Resources	2020/21		
Service Analysis	Target	Actual	Variance
Children's Services			
- Children's and Education	78,111,424	78,073,649	(37,775)
- Customer Engagement	6,485,189	5,006,868	(1,478,321)
Economy and Environment	55,284,700	54,859,268	(425,432)
Adult Social Care	68,043,629	67,014,429	(1,029,200)
Resources and Transformation	34,157,780	33,526,225	(631,555)
Council Wide	(22,348,507)	(19,198,830)	3,149,677
NNDR/Top Up	(92,168,077)	(92,168,077)	0
Total Net Revenue Expenditure	127,566,138	127,113,532	(452,606)
General Reserves	Minimum £6.2m Maximum £15.5m	N/A	N/A
Council Funded Capital Expenditure	64,051,292	25,184,486	(38,866,806)
External Funded Capital Expenditure	153,126,757	77,789,577	(75,337,180)
Total Capital Expenditure	217,178,049	102,974,063	(114,203,986)
Capital Receipts	3,262,622	531,038	(2,731,584)

Notes to Management of Resources

The figures for 2020/21 represent the actual budget and spend for each area within the authority. This will include all internal recharges such as office accommodation, central support services, and accounting adjustments for pension liability in line with FRS17 and capital charges. Capital charges and pension liability year end transactions can change substantially at year end as this is when revaluations of assets and figures from the actuary are received and budgets updated to reflect any changes.

What this tells us

Treasury Management	
Average Interest Rate (Borrowing)	The average interest rate we are paying on the money we have borrowed compared to our target.
Gearing Effect on Capital Financing Estimates	Shows how a 1% increase in interest rates would affect the total interest cost to the council.
Net Borrowing Costs / Tax Requirement	Borrowing not financed by a grant from government, as a proportion of our Net Revenue Expenditure
Capital Financing Requirement (£m)	How much money we currently borrow to finance our capital programme.
Authorised limit for external Debt (£m)	The maximum amount of debt we should have at any one time
Investment Rate Average	The average interest rate we are receiving on the money we have invested.

Balance Sheet Ratios	
Current Assets : Current Liabilities	Our ability to meet our liabilities
Useable Reserves : General Revenue Expenditure	If our reserves are adequate to meet potential future variations.
Long Term Borrowing : Tax Revenue Using only council tax for tax revenue Using both council tax and NNDR for tax revenue	The effect of long term borrowing on our budget.
Long Term Borrowing : Long Term Assets	This allows us to understand the relationship between the money we borrow and the assets we have as they both change over time.
Total School Reserves : Dedicated School Grant	If schools reserves are at an appropriate level.

Revenues Performance	
% Collected for Financial Year	As a percentage the amount of council tax we collected during the financial year that runs from 1 April – 31 March. We collect council tax after the year that its related to, but this won't be included in this figure
Council Tax (%)	
National Non Domestic Rate (%)	As a percentage the amount of Business rates we collected during the financial year that runs from 1 April – 31 March. We collect council tax after the year that it related to.
Total Council Tax Collected (£m)	This tells us the amount of council tax we collected during the financial year that runs from 1 April – 31 March. We collect council tax after the year that it relates to, but this won't be included in this figure.
Total NNDR Collected (£m)	This tells us the amount of Business Rates we collected during the financial year that runs from 1 April – 31 March. We collect council tax after the year that it relates to, but this won't be included in this figure.
Sundry Debtors Collection Average number of days to collect debt	How long on average it takes us to collect money owed to us.
Average number of days to process creditors payments	How long on average it takes to pay our bills.

Management of Resources	
Service Analysis	
Children's Services Economy and Environment Adult Social Care Resources and Transformation Council Wide	Shows our forecast for how much we will spend on these services compared to what we planned and compared to how much we spent in the previous year.
General Reserves	Our forecast year end position on reserves against our opening balance.
Contingency	How much we have set aside and for unplanned expenditure, and how much we have left to spend.
Capital Expenditure	Forecast of our spend on capital programmes against our target
Capital Receipts	Forecast of how much money we expect to receive from selling some of our assets, against our target.

Appendix 9 – Pre-audit Prudential and Treasury Indicators 2021/22

National Indicators – as per CIPFA Prudential Code

Ref	Prudential Indicator Description	2020/21 Actual £m	2021/22 Target £m	2021/22 Actual £m	Variance to Target	
Prl 1	Capital Expenditure	102.837	235.854	78.385	-157.469	-67%
Prl 2	Ratio of financing costs to net revenue stream	5.17%	8.71%	7.23%	-1.49%	-17%
Prl 3	Estimates of the incremental impact of new capital investment decisions on Council Tax	£28.49	£52.43	£52.43	0.000	0%
Prl 4	Capital Financing Requirement	380.886	417.36	417.36	0.000	0%
Prl 5	Authorised Limit for external debt	472.173	498.300	498.300	0.000	0%
Prl 6	Operational Limit for external debt	429.248	453.000	453.000	0.000	0%

Ref	Prudential Indicator Description	2020/21	2021/22
Prl 7	Gross Borrowing exceeds capital financing requirement	No	No
Prl 8	Authority has adopted CIPFA Code of Practice for Treasury Management	Yes	Yes

Ref	Prudential Indicator Description	2020/21 Actual £m	2021/22 Target £m	2021/22 Actual £m
Prl 9	Total principle sums invested for longer than 365 days must not exceed	15.0	25.0	5.0

Ref	Prudential Indicator Description	Upper Limit	Lower Limit	Actual 2020/21	Actual 2021/22
Prl 10	Fixed Interest Rate Exposure	95.00%	40.00%	94.31%	89.47%
Prl 11	Variable Interest Rate Exposure	45.00%	0.00%	5.69%	10.53%
Prl 12	Maturity Structure of Borrowing:				
	Under 12 months	25.00%	0.00%	10.48%	22.94%
	12 months and within 24 months	25.00%	0.00%	21.72%	10.53%
	24 months and within 5 years	40.00%	0.00%	19.84%	14.32%
	5 years and within 10 years	50.00%	5.00%	0.54%	2.07%
	10 years and above	85.00%	30.00%	47.42%	50.14%

Local Indicators – As recommended by Treasury Management Panel

Ref	Prudential Indicator Description	2020/21 Actual	2021/22 Target	2021/22 Actual	Numerical Variance to Target	% Variance to Target	Met
L1	Full compliance with Prudential Code.	Yes	Yes	Yes	N/A	N/A	Y
L2	Average length of debt (years)	16.23	25.00	16.44	8.56%	34.24%	Y
L3a	Net borrowing costs as % of net council tax requirement.	7.02%	20.00%	7.15%	12.85%	64.27%	Y
L3b	Net borrowing costs as % of Tax Revenue.	4.44%	12.50%	4.60%	7.90%	63.23%	Y
L4	Actual debt vs. operational debt.	80.92%	85.00%	72.62%	12.38%	14.56%	Y
L5	Average interest rate of external debt outstanding excluding former WMCC debt	3.46%	3.30%	3.59%	-0.29%	-8.67%	N
L6	Average interest rate of external debt outstanding including former WMCC debt	3.54%	3.46%	3.65%	-0.19%	-5.57%	N
L7	Gearing effect of 1% increase in interest rate (expressed as the potential increase to the rate shown in L6 i.e. shows what the rate included in L6 would change to).	3.58%	5.00%	3.69%	-1.31%	-26.20%	Y
L8	Average interest rate received on STI vs. At Call rate.	580.00%	374.00%	280.00%	-94.00%	-25.13%	Y
L9							
L9a	AT call investments.	0.10%	0.05%	0.10%	0.05%	100.00%	Y
L9b	Short Term Investments.	0.68%	0.25%	0.38%	0.13%	52.00%	Y
L9c	Long Term Investments.	1.57%	0.80%	1.11%	0.31%	38.75%	Y
L9d	Property Fund Investments	4.10%	3.82%	3.45%	-0.37%	-9.69%	N
L10	Average interest rate on all ST investments (ST and AT call)	0.46%	0.24%	0.29%	0.05%	22.41%	Y
L11	Average rate on all investments (excluding property fund)	0.59%	0.27%	0.38%	0.11%	39.43%	Y
L11a	Average rate on all investments (including property fund)	1.01%	0.68%	0.74%	0.06%	8.87%	Y
L12	% daily bank balances within target range.	100%	99%	100%	1.00%	1.01%	Y

Cabinet – 22 June 2022

Cabinet Report – Corporate Plan: Markers of Success Q4 and Annual Summary for 2021/22

Portfolio:	Councillor Mike Bird
Related portfolios:	All
Service:	Policy & Strategy Unit
Wards:	All
Key decision:	Yes
Forward plan:	Yes

1. Aim

- 1.1 To report on Quarter 4 on the 2021/22 Corporate Plan Markers of Success, which have highlighted achievements, identified interdependencies and any support required to realise the agreed EPICC Outcomes for the period January -to- March 2022, with a summary of the 2021/22 year's performance.
- 1.2 To present an annual summary on the overall performance of the 2021/22 Corporate Plan Markers of Successes.

2. Summary

- 2.1. The 2021/22 Corporate Plan was published on 01 April 2021 as a one-year refresher to the 2018/21 publication due to the impact of COVID-19 on resources and capacity.
- 2.2. The refreshed version presented Walsall's intention to continue to focus on the five (5) EPICC priorities, which were first introduced in the 2018/21 publication.
- 2.3. These priorities are underpinned by 10 outcomes (two outcomes per priority) and in 2021/22 each outcome was aligned with two Markers of Success.
- 2.4. These 20 Markers of Success have been the tools to measure performance throughout 2021/22, which has informed the Council, Walsall residents and businesses as well as provide data and/or information to review and monitor throughout the year.

- 2.5. The performance for each Marker of Success has been reported to Cabinet on a quarterly basis:

Quarter 1	15 September 2021
Quarter 2	15 December 2021
Quarter 3	20 April 2022
Quarter 4	22 June 2022
2021/22 Summary	

- 2.6. This Paper is the report on the Markers of Success, covering the period January – March 2022 (i.e. Quarter 4) and a summary on the year's performance.

3. Recommendations

- 3.1. That Cabinet note the overall performance in Q4 relating to the period January – March 2022.
- 3.2. That Cabinet note the key achievements and identified interdependencies as highlighted in the appendices.
- 3.3. That Cabinet note the overall improved performance in 2021/22 (Q1 – Q4).

4. Report detail - know

Context

- 4.1. The 2021/22 Corporate Plan was a refreshed version of the 2018/21 edition, which was published to cover one-year due to the disruption that the COVID-19 pandemic created for all services locally, nationally and globally.
- 4.2. The governance agreed to assess the performance and progress in the delivery of the 2021/22 Corporate Plan throughout the year:
- Five (5) areas of focus (EPICC),
 - 10 outcomes and
 - 20 Markers of Success
- 4.3. Quarterly reports have demonstrated the Council directorates' performance in relation to the agreed areas of focus (*see priorities and aimed outcomes below*)
- 4.4. A three-year Council Plan for 2022-25 has been signed off by Council.

Council Corporate Plan priorities

4.5. The five 2021/22 Corporate Plan priorities and ten outcomes:

Priorities:	Outcomes:
1. E conomic Growth for all people, communities and businesses	1. Creating an environment where businesses invest and everyone who wants a job can access one
	2. Education, training and skills enable people to fulfil their personal development
2. P eople have increased independence, improved health and can positively contribute to their communities	3. People live a good quality of life and feel that they belong
	4. People know what makes them healthy and they are encouraged to get support when they need it
3. I nternal focus. All council services are efficient and effective	5. Internal services deliver quality and adapt to meet the needs of customer facing services
	6. Services are efficient and deliver value for money
4. C hildren have the best possible start and are safe from harm, happy, healthy and learning well	7. Children thrive emotionally, physically, mentally and feel they are achieving their potential
	8. Children grow up in connected communities and feel safe everywhere
5. C ommunities are prospering and resilient with all housing needs met in safe and healthy places.	9. Housing meeting all people's needs - is affordable, safe and warm
	10. People are proud of their vibrant town, districts and communities

4.6. Each Marker of Success has an agreed baseline (see *Dashboard, column D - Appendix 1*), which was presented to CMT and reviewed by Audit [08 July 2021]. These baselines are the 'point zero' from which these Outcomes will be measured.

4.7. Each quarter, a template questionnaire is completed and signed off by a director, which then populates the Dashboard.

- 4.8. In accordance with the information provided, we can confirm that submissions have been received from all directorates in Q4:

Performance	Qtr 4		Qtr 1	Qtr 2	Qtr 3
Green	62%	MoS met / exceeded target	39%	50%	59%
Amber	17%	MoS close to achieving target	45%	42%	29%
Red	9%	MoS did not achieve target	12%	8%	9%
White	12%	Data/information not available	3%	0%	3%

- 4.9. Overall performance has improved significantly from Q1 to Q4.

- 4.10. The changes in performance for the year (between Q1 and Q4):

Green	Number (%) of Markers that remained Green ↔	10	29%
	Number (%) of Markers that changed from Green to Amber ↓	3	9%
	Number (%) of Markers that changed from Green to Red ↓	0	-
	Number (%) of Markers that changed from Green to White	0	-

Amber	Number (%) of Markers that changed from Amber to Green ↑	10	29%
	Number (%) of Markers that remained Amber ↔	2	6%
	Number (%) of Markers that changed from Amber to Red ↓	1	3%
	Number (%) of Markers changed from Amber to White	3	9%

Red	Number (%) of Markers that changed from Red to Green ↑	1	3%
	Number (%) of Markers that changed Red to Amber ↑	1	3%
	Number (%) of Markers that remained Red ↔	2	6%
	Number (%) of Markers with no info/indicator	1	3%

- 4.11. The noted changes in performance for the year:

Changes	Priority	MoS	Comment / Explanation
Green to Amber ↓	People	5. Increase in people accessing reablement opportunities. <i>Less number of vulnerable residents who are in statutory services or having out of area placements</i>	Did not meet the baseline: The number of NEW clients who received reablement during 20-21 = 1674 (averaging 419/qtr)
	Children	15. Children, young people and families are involved in service design and development and the needs of children and families are well understood in each locality. Services and support is responsive to needs of different communities, partners are proactive in responding to these needs and children and families have easier and timelier access to services.	There has been a slight dip in performance but this remains within expected parameters
	Children	16. Children and families are better connected with community resources to enable them to build resilience, are involved in developing their plans and can provide regular feedback. More children and young people are supported in their	There has been a slight increase in the number of children entering care compared with 2020-21. However, we saw a decrease in children entering care in 2020 due to the pandemic. When we look at 2019-20 as a more comparable

		<i>family home, the response in meeting the needs of vulnerable adolescents is local and proactive with risks around exploitation reduced and fewer young people enter the Criminal Justice system.</i>	year 34.0 per 10,000 0-17 (237) children entered care which provides assurance, alongside in depth-analysis that in general the number of children entering care is reducing
Amber to Red ↓	Children	14. <i>Children with special educational needs and disabilities are identified and supported effectively. Children in care and care leavers are supported physically and emotionally through access to health checks and health histories and are able to achieve their potential through high quality education, employment and training opportunities.</i>	We are continuing to work to clear a backlog of cases which are impacting on timeliness.
Remained Red ↔	Economics	3. <i>Partnership working with businesses to offer apprenticeships, graduate programmes and training programmes for those wishing to re-enter the workforce</i>	Apprenticeships on programme - a comparison on our performance against previous years shows there is a reduction in the number of starts and participations, which reflects the reduction nationally.
	Children	16. <i>Children and families are better connected with community resources to enable them to build resilience, are involved in developing their plans and can provide regular feedback. More children and young people are supported in their family home, the response in meeting the needs of vulnerable adolescents is local and proactive with risks around exploitation reduced and fewer young people enter the Criminal Justice system.</i>	Did not meet the baseline: Number of first time entrants into the criminal justice system - between 01/04/2020 and 31/03/2021, benchmarking data published in July (180 per 100,000 10-17 (53) compared to statistical neighbours, among Regional neighbours and nationally) - target direction of travel – to decrease
No info/indicator	Amber to White	15. <i>Children, young people and families are involved in service design and development and the needs of children and families are well understood in each locality. Services and support is responsive to needs of different communities, partners are proactive in responding to these needs and children and families have easier and timelier access to services.</i>	Due to the merging of the front door these indicators are no longer measured in the same way and are therefore under review.
		15. <i>Children, young people and families are involved in service design and development and the needs of children and families are well understood in each locality. Services and support is responsive to needs of different communities, partners are proactive in responding to these needs and children and families have easier and timelier access to services.</i>	Due to the merging of the front door these indicators are no longer measured in the same way and are therefore under review.
		20. <i>High quality, well maintained public realm and safe community spaces</i>	No further updates regarding MoS 20 as Q3 submission was sent in late with some data that should have been held back for Q4
	Red to White	16. <i>Children and families are better connected with community resources to</i>	Number of children that go missing – indicator under review

		<i>enable them to build resilience, are involved in developing their plans and can provide regular feedback. More children and young people are supported in their family home, the response in meeting the needs of vulnerable adolescents is local and proactive with risks around exploitation reduced and fewer young people enter the Criminal Justice system.</i>	
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4.12. The Key Achievements highlighted in Appendix 2 demonstrates the directorates' consistent determination to provide quality services, by identifying and remedying gaps, and working towards the Council's Aim "to reduce inequalities and support residents and staff in maximising their potential".

4.13. The Identified Interdependencies (see Appendix 3) highlight the directorates' focus on building and developing partnerships, internally and externally, to optimise service delivery.

Risk management

4.14. Risks identified with regards to submitting quarterly and updating data for the agreed quarterly returns did not occur:

- i. Incomplete / current data unavailable,
- ii. Resource constraints e.g. staffing,
- iii. Unexpected demands from COVID e.g. having to redirect capacity to support the impact of the virus

4.15. Directors identified what actions they had to take and what additional support was required to achieve the 2021/22 Markers.

Financial implications

4.16. There were no specific financial implications of this report.

Legal implications

4.17. There were no direct legal implications from this report.

Procurement Implications/Social Value

4.18. There were no direct procurement implications from this report.

Property implications

4.19. There were no direct property implications from this report.

Health and wellbeing implications

4.20. The agreed implication:

“Achieving the Outcomes published will contribute significantly to having a positive impact on the health and wellbeing of our residents and staff.”

- 4.21. The importance of continuing to closely monitor these Measures of Success was acknowledged by all stakeholders.

Staffing implications

- 4.22. There were no direct staffing implications from this report.

Reducing Inequalities

- 4.23. The implications for and ability to reducing inequalities were considered when agreeing the Measures of Success for the 2021/22 Corporate Plan.
- 4.24. Every successful Outcome will have contributed to reducing inequalities in the Borough and supporting residents and staff desires to maximise their potential.

Climate Change

- 4.25. There were no direct implications to climate change from this report.

Consultation

- 4.26. Council directors discussed the Markers of Success at Directors' Group meetings and submitted the data for the quarterly returns, which informed and populated the Dashboard and appendices.

5. Decide

Cabinet agreed to the continuation of reviewing and reporting on the Markers of Success in this format on a quarterly basis in order for the Council to monitor the Outcomes outlined in the 2021/22 Corporate Plan.

6. Respond

Progress on the 2021/22 Markers of Success was monitored through the Corporate Management Team on a quarterly basis prior to submission to Cabinet and occasionally presented to Audit Committee.

7. Review

- 7.1 All Quarterly updates for 2021/22 Corporate Plan Markers of Success have been collated and presented to Cabinet
- 7.2 The balanced scorecard for the approved Our Council Plan (2022-25) will include integrated reporting covering financial and performance management and include appropriate benchmarking against other local authorities (where information is available) as raised by Audit. This will be brought to Cabinet on a quarterly basis.

Background papers - none

Annexes:

Appendix 1	Q4 Markers of Success Dashboard
Appendix 2	Q4 Key Achievements
Appendix 3	Q4 Identified Interdependencies

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Kerrie Allward

Executive Director

Adult Social Care, Public Health & Hub

9 June 2022



Councillor Bird

Leader of the Council

9 June 2022

2021/22 CORPORATE MARKERS OF SUCCESS DASHBOARD

PRIORITIES	OUTCOMES	MARKERS OF SUCCESS	BASELINE	BASELINE AMENDED NOV 2021	Lead	Qtr 1: Apr - Jun 2021	Comment / Progress achieved to date	Qtr 2 : Jul - Sept 2021	Comment / Progress achieved to date	Qtr 3 : Oct - Dec 2021	Comment / Progress achieved to date	Qtr 4 : Jan - Mar 2022	Comment / Progress achieved to date
Overall Aim: Inequalities are reduced and all potential maximised													
ECONOMIC - Growth for all people, communities and business	1. Creating an environment where businesses invest and everyone who wants a job can access one	1. Businesses accessible to staff, suppliers and customers. Transport networks free from defects and congestion.	Free from defects Highway condition – as per 2019/20:		Deborah Hindson		% of safety inspections completed on time – 100% % of Cat 1 emergencies completed on time (via Tarmac) – 100%		Highway safety inspections completed on time = 100% Emergency defects attended to within 1 hour = 96.2% Number of Urgent traffic signal faults repaired within time by contractor (%) = 100% Number of Non-Urgent traffic signal faults repaired within time by contractor (%) = 99% Traffic signal inspections completed on time = 100%		1. Highway safety inspections completed on time = 100% 2. Emergency defects attended to within 1 hour = 100% 3. Number of Urgent traffic signal faults repaired within time by contractor (%) = 100% 4. Number of Non-Urgent traffic signal faults repaired within time by contractor (%) = 98% 5. Traffic signal inspections completed on time = 100%		1. Highway safety inspections completed on time = 100% 2. Emergency defects attended to within 1 hour = 97% 3. Number of Urgent traffic signal faults repaired within time by contractor (%) = 100% 4. Number of Non-Urgent traffic signal faults repaired within time by contractor (%) = 99% 5. Traffic signal inspections completed on time = 100%
		2. A combination of low unemployment figures and high vacancy figures	Walsall Universal Credit Claimant Data (source: NOMIS March 2021) shows 15,380 claimants		Philippa Venables		During the Quarter 1 period a total of 355 local people enrolled to our Walsall Works programme with a majority of these being Universal Benefit Claimants who have been displaced due to Covid ie on furlough, made redundant or have left education without an offer of employment.		Walsall Universal Credit Claimant Data (source: NOMIS October 2021) shows a reduction in claimants since the last quarter. The current UC claimant count has dropped to 12,640 claimants from 15,310 claimants in late March 2021.		Walsall Universal Credit Claimants (source: NOMIS January 2022) shows a reduction in claimants since the last month, quarter and year. The current UC claimant count has dropped to 11,365 claimants from 14,665 at the start of the previous calendar year in January 2021.		The current UC claimant count has dropped in March 2022 to 10,910 claimants from 14,310 in March 2021 in the previous calendar year
			EMSI Walsall Unique Job Posting Analytics (source: EMSI April 2021) shows 5,512 unique vacancy postings		Philippa Venables		We support these clients by enrolling them to our Walsall Works programme which resulted in a total of 133 local people being supported to access employment, training, apprenticeships and paid work placements, as set out in the table in the attachment.		The volume of unique Walsall Job Postings identified at the start of this financial year, shows an increase in unique job postings to 5,512 vacancy postings		This quarter we have been able to obtain detailed data and information (source: Black Country Consortium) on unique job postings of vacancies in the Walsall borough and the wider Black Country sub region: -steady increase in the vacancy postings -increase in unique job postings in the last calendar year (by month) highlighting an increase in the unique postings to nearly 9k in the month of December 2021 (these vacancies are likely to include seasonable and short term vacancies, which may not sustainable job roles and therefore the volume of unique postings are likely to drop in January 2022 to a pre-Christmas figures)		Data shows decreases from heightened job postings at the end of December 2022 during a 30 day period in January to February 2022. But an overall heightened demand compared to the same period in 2021 and this is expected to continue for the foreseeable future.
	2. Education, training and skills enable people to fulfil their personal development	3. Partnership working with businesses to offer apprenticeships, graduate programmes and training programmes for those wishing to re-enter the workforce	Walsall Apprentices on programme (source: BC Data Cube April 2021) shows 2186 apprentices (averaging 547/qrt) The total number of apprenticeships from Walsall who have started or participating in an apprenticeship are set out below across levels in the period August 2020- April 2021 were • Apprenticeships Starts – 1350 (1800/yr = averaging @ 450/qrt) • Apprenticeship Participation – 3590 (4787/yr = averaging 1197/qrt) • Total Apprenticeships – 4940 (6587/yr = averaging 1647/qrt)		Philippa Venables		Apprenticeships on Programme: During the Quarter 1 period a total of 355 local people enrolled to our Walsall Works programme with a majority of these being Universal Benefit Claimants who have been displaced due to Covid ie on furlough, made redundant or have left education without an offer of employment. We found that a significant volume of these were young people who have left university and looking for their first employment, so they would not have been suitable to apply for apprenticeship vacancies. In the quarter of the 133 people supported into a positive outcome but only 5 of these were apprenticeships.		Apprenticeships on Programme - During the Quarter 2 period a total of 567 local people enrolled to our Walsall Works programme with a majority of these being Universal Benefit Claimants who have been displaced due to Covid ie on furlough, made redundant or have left education without an offer of employment. In the quarter of the 200 people supported into a positive outcome but only 2 of these were into apprenticeships that were known to us. At the next quarter, a position for the last full academic year will be presented		Apprenticeships on Programme - During the Quarter 3 period a total of 408 local people were enrolled to our Walsall Works programme with a majority of these being Universal Benefit Claimants who have been displaced due to Covid ie on furlough, made redundant or have left education without an offer of employment. We found that a large volume of these were young people who were referred to the BC Impact programme for support. In the quarter of the 165 people supported into a positive outcome and there was a slight increase of those who were placed in apprenticeships, at 7 young people known to us. These volumes people supported into apprenticeships are still stark compared to the known volumes of apprenticeship starts in the borough as outlined.		Apprenticeships on Programme: During the Quarter 4 period a total of 703 local people were enrolled to our Walsall Works programme with a majority of these being Universal Benefit Claimants through our Walsall Works Expo, Impact and Restart scheme. In the quarter of the 193 people supported into a positive outcome, only one young person accessed an apprenticeship. These volumes people supported into apprenticeships are still stark and we need to provide more support to help young people to apply for apprenticeships. The total volume of new apprenticeship starts were 1740 starts creating a total 4,450 enrolments. However, a comparison on our performance against previous years shows there is a reduction in the number of starts and participations, which reflects the reduction nationally.
			Walsall Council Kickstart Gateway Profile (source: DWP April 2021) shows a profile of 150 work placements				Kickstart Placements – Walsall Council Gateway As a Kickstart Gateway Organisation we have secured 150 work placement pledges from local private sector employers and in the first quarter we recruited approximately 40 placements into these roles. The current performance on our Gateway is set out in the attachment		In the second quarter we recruited young people into 40 placements into these roles.		Kickstart Placements – Walsall Council Gateway - As a Kickstart Gateway Organisation we have secured well over 150 work placement pledges from local private sector employers and we date have placed 118 young people into paid work placements. BC Impact - The Employment and Skills Team delivers on approx 70% of the performance targets for the BC Impact programme.		Kickstart Placements – Walsall Council Gateway: As a Kickstart Gateway Organisation we have placed 130 young people into paid work placements, with 39 currently on placement. BC Impact: The Employment and Skills Team currently has 242 clients being supported making up 76% of the current live caseloads for the BC Impact programme. Since the programme inception, 4436 enrolments which have resulted in a total of 2461 interventions and 1328 outcomes achieved (of which 55 young people have gone into apprenticeships).
			New business registrations and closures (Nomis) Business Engagements (Source Evolutive CRM & Walsall Works Records)				Business Engagements (Source Evolutive CRM & Walsall Works Records). Business and Employer Engagements led by the Walsall Works team resulted in 71 new vacancies being sourced and promoted in the quarter. Business Engagement Numbers: Walsall Council's Business Growth Team have recorded 84 business engagements on a range of issues for Q1 2021. The most common business engagement in Q1 2021 was general Business Support (40), followed by Access to Finance (31) and Sites & Premises inquiries (8).		Business Engagements (Source Evolutive CRM & Walsall Works Records) Business and Employer Engagements led by the Walsall Works team resulted in 78 new vacancies being sourced and promoted in the quarter. Walsall Council's Business Growth Team logged 111 enquiries with 82 businesses during Q2 2021. Mid-September also saw another of the team's engagement days in Walsall Wood. The team continue to deliver the AIM for Gold programme and currently have 28 enrolled on the programme at least at P13 (three hours of support) stage. The latest news for the programme sees a 50% intervention rate for businesses interested in capital investment.		Walsall Council's Business Growth Team logged 115 engagements with 91 businesses for Q3 2021. This was done through a variety of means, including events, webinars and 1-1 engagements, as well as working with partners such as the Black Country Chamber, Black Country Growth Hub and Best of Walsall. 38% of these engagements were for General Business Support, with 36% inquiring about access to finance and 11% around sites and premises enquiries, which is quite standard for the work of the team. Unexpectedly, 65% of inquiries came from manufacturing businesses with Wholesale and Retail Trade and Administrative Support Services making up 7% each, respectively. Walsall Council is currently account managing 8 foreign owned firms in the Borough who were active during Q3 2021 and continue to engage with us - ASSA ABLOY, JE Sedgwick, Delkin Europe, Midland Chilled Foods, Lichtgitter, RB Forgings UK, Enerpac (who have now moved out of the area but wish to keep a footprint in the Borough) and Bernstein. As well as relationship management of Poundland, Walsall Pressings and Handelsbanken.		The Business Growth Team has logged engagements with 145 businesses for Q4. This includes a mixture of events, 1-1 support, attending networking events and an engagement day that saw 50+ businesses visited in Willenhall. This also gives us an annual, 21/22 reporting figure of 464 inquiries with 311 companies in the Borough. The team currently has around 20 businesses actively engaged with the AIM for Gold business support programme at various stages, from Expression of Interest to awaiting defrayal of grant monies.
		4. Increase in local supported employment and educational opportunities for residents who have additional needs. Numbers of folk from hard to reach groups helped into training	Number of residents supported with employability who present with additional needs i.e. poor health. (Source: Walsall Works, Black Country Impact or Kickstart programmes)		Philippa Venables		The BC Impact Programme continues to identify and support 16-29 years olds who present with complex backgrounds and barriers ie health. The programme continues to provide dedicated support to young care leavers, young offenders, those with SEND, poor physical and mental health. A lifetime review of the data shows the average breakdown of participants as: • 2.1% care leavers • 3.0% ex offenders • 10.3% lone parents • 31.3% health barriers, of which one third were those with mental health issues		The Employment and Skills Team delivers on approx 70% of the performance targets for the BC Impact programme. Since the programme inception, 4436 enrolments which have resulted in a total of 2461 interventions and 1328 outcomes achieved (of which 55 young people have gone into apprenticeships. 16-25 year olds (total) Outcomes: Education = 414 Employment = 540 Apprenticeship = 55 Traineeship = 92 We have already achieved our targets for support key groups such as leavers but continue to service the needs by providing a dedicated Employment Advisor lead for the Probation Service, Youth Justice Team, Transitional Leaving Care, Adult Social Care, Teenage Pregnancy Unit, Sure Start Centres, Refugee Migrant Centre and many other community organisations.		The BC Impact Programme continues to identify and support 16–29-year-olds who present with complex backgrounds and barriers ie health. The programme continues to provide dedicated support to young care leavers, young offenders, those with SEND, poor physical and mental health. A lifetime review the data shows the average breakdown of the total 4436 participants and the sub groups they are identified within: •1.9% homeless •2.1% care leavers •3.0% ex offenders •10.3% lone parents •31.3% health barriers, of which one third were those with mental health issues. We have secured funding from the Careers Enterprise Company to target young people pre16 who are at risk of becoming NEET and this has resulted in referral of young people who are home-school elected, those who are at risk of dropping out of education and those with SEND. The aim of the project is to support these young people to find alternative provision in order to return back to education.		Black Country Impact has supported over 1660 participants aged 16-29 years old into positive outcomes, of these 496 participants have declared a disability, learning difficulty and/or health problem. Of these with a disability, 3 moved into apprenticeships, 273 into further education, 5 into traineeships and 192 into work
PEOPLE have	3. People live a good quality of life and feel that they belong	5. Increase in people accessing reablement opportunities. Less number of vulnerable residents who are in statutory services or having out of area placements	The number of NEW clients who received reablement during 20-21 = 1674 (averaging 419/qrt) (Note: we will include the previous year's outcome of 1165 as a further bench mark and caveat as 2020/21 may be an outlying year for this measure so use this figure as last year was unprecedented) Number of people in a long term residential or nursing placement during the year = 1240 (averaging 310/qrt)		Paul Gordon / Karen Jackson		441 people accessed reablement during quarter 1 The reablement review is taking place – and we are at the midpoint of the review		350 people accessed reablement during quarter 2		371 people accessed reablement during quarter 3		397 people accessed reablement during quarter 4
		6. Increase numbers of residents not requiring ongoing services and living independently in the community. Information and advice is accessible and signposting at the front door of community services	The number of contacts "signposted" during the year = 2497 (averaging 624/qrt)				703 contacts signposted during quarter 1		659 contacts signposted during quarter 2 Strength Based Practice using the three connections has now been rolled out across all the locality teams, LD and MH Connection 1 has had a significant impact in reducing the number of people moving onto support plans		872 contacts signposted during quarter 3		1385 contacts signposted during quarter 4


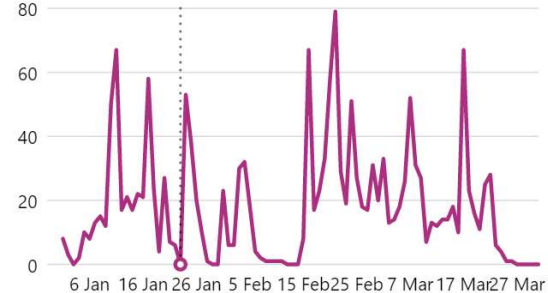
increased independences, improved health and can positively contribute to their communities	4. People know what makes them healthy and they are encouraged to get support when they need it	7. Reduced numbers of residents having formal ASC assessments who are empowered to take control and informed choices with the correct information	The number of assessments completed that did not lead to a Care and Support Plan/provision of long term services = 2089 (averaging 522/qtr)				547 assessments/connections undertaken during quarter 1 that did not progress to Care plan.		569 assessments/connections undertaken during quarter 2 that did not progress to Care plan,		551 assessments/connections undertaken during quarter 3 that did not progress to Care plan		581 assessments/connections undertaken during quarter 4 that did not progress to Care plan
		8. More people using active travel modes. Safe and convenient cycleways and footways	TfWM's most recent Covid-19 travel survey: • 65% of respondents from the West Midlands stated that they would like to become more physically active; • 28.3 of West Midlands' residents don't walk at least once a month; • 22.4% of children in the West Midlands are either overweight or obese; • 48.9% of disabled people are inactive in the West Midlands. Annual Travel survey figures for Walsall (academic year 2020/2021 at primary level): • Active Travel: Walsall 62% vs National 47%; • Walking figures: 60% vs 46% National; • Cycling 1% higher than National; • Car use 12% lower in Walsall than National; • Over 22,000 primary school students participating in Walk to school week; • 35 schools have a 5 minute walk zone set up; • 5 Primary schools have a walking bus		Deborah Hindson		- 240 children have received Bikeability level 1 & 2 training - 12 secondary school students have received Bikeability level 3 training - The number of residents engaging in Active Travel in Walsall has significantly increased during the last 12 months, as a result of the COVID-19 lockdown - According to CRT, the average daily count of pedestrians and cyclists on Walsall's canals pre-lockdown was 89 compared to 226 post-lockdown – this an increase of 154%.J15		Better street projects have been delivered at Haws Rd and Harden Rd/Station Rd A new shared cycleway on Lichfield Rd is 50% complete. The Walsall cycle hire scheme was promoted in the run up to the Women's Tour cycle event. The Council website contains up to date information on active travel projects: https://walsallwalking-and-cycling.commonplace.is/		1. Completed the evaluation of 5 experimental school street zones and determined the benefit of implementing as a permanent solution. 2. Delivery of 335M of shared cycle way (on Lichfield Rd). 3. Design and delivery of 600M of new segregated cycle and pedestrian routes (on Wolverhampton Rd West). 4. Improved 725M of existing cycle path (on the NCNS path between Mill Ln and Ryecroft Cemetery)		Bikeability: 35 children have attended Learn to Ride sessions 24 children have participated in Level 1 & 2 cycle training 53 students have participated in Level 3 cycle training 210 children have participated in Fix (cycle maintenance) sessions 208 reception children and their parents carers have received pedestrian training 475 year 3 children have received pedestrian training Continued implementation of School Streets at 5 locations, using Active Travel Tranche 2 Funding (ATF T2). Delivery of a 600M new segregated cycle and pedestrian route (on Wolverhampton Rd West), as part of the Connecting Bentley Phase II Active Travel Fund Tranche 2 (ATF T2) scheme Resurfaced 725M of the existing the NCNS cycle path between Mill Ln and Ryecroft Cemetery, using funding from the Veolia Environmental Trust.
INTERNAL Focus – All Council services are efficient and effective	5. Internal services deliver quality and adapt to meet the needs of customer facing services	9. Smarter commissioning of service resulting in required outputs being delivered to realise quality outcomes	- Keeping within budget (OH / Physio / EAP contracts) - Agency completion rates - Evidence of adding Social Value (Agency contract)		Tony Meadows		We have been able to utilise spare capacity within an existing Children's Services contract for Motivational Interviewing training for the benefit of the Adult Social Care workforce thus saving time and ensuring both workforces are adopting the same methodology.		The Third Party Spend Board has started to strategically focus on how the council can develop opportunities for a greater level of local spend. Working across the council it has evolved to embrace a commissioning approach that takes a view of future need in order to better inform both existing and future businesses of the opportunities to keep the Walsall E in Walsall. ASC, as part of their refreshed transformation plan, are working with both internal and external partners in order to embed a strength and asset approach whereby people are able to access support and guidance within their own community to enhance their independence without the need for statutory services.		A 2-year plan has been shaped to enable Adult Social Care to continue on its transformation journey which incorporates a whole council approach to wellbeing.		As at the end of 2021/22, £9.73m (50%) of the £19.41m benefit target for TPS has been counted in the Council budget. £553k of these are red benefits which have been delayed and are now expected to be delivered in 2022/23. The full value of benefits identified over the Council's medium term financial position is £19.02m, 98% of the workstream benefit target. It is expected that the processes put in place by the workstream to date will help to deliver further budgeted benefits in future financial years as well as ensuring cost avoidance and value for money are maximised thus supporting the Council's medium term financial position. The workstream has also supported the Council's financial position through support to delivery of non-cashable financial benefits of £972k
		10. Internal Services are regularly reviewed and delivered within budget.	Proposed – Keeping within budget (HR)				Supporting the recruitment of apprentice social workers in Children's Services and Adults to ensure a pipeline of talent for the future. - As at June 2021 HR Budget was £25K underspent		R&T within budget for Qtr 2 monitoring – underspend £260k (R&T underspend of £180k in Qtr 1, which includes HR £25k underspend)		R&T within budget for Qtr 3 monitoring – underspend £320k		R&T within budget for Draft Outturn – underspend £970k (underspend of £320k in Qtr 3)
	6. Services are efficient and deliver value for money	11. Internal Services have staff and processes able to adapt to meet the emerging needs of customers	<i>Quantities Data is not currently available. It is being prepared as part of the OneSource Closure Report and Implantation Lessons learnt process</i>		Michele Leith / Shaun Darcy		The migration of Payroll function from Itrent System onto the integrated Enterprise Resource Platform (ERP) OneSource. This was completed as scheduled on 5 th July 2021. The standing up of the Admin and Business Support Function, with the transfer of core administrative and Business Support activities to the new teams. Successful Recruitment to two key Director roles - Director of HR,OO & Administration and Director of Transformation & Digital. Successful completion of ILM accreditation in Mediation by a number of HR officers		Implementation of Payroll in OneSource and training to staff to improve digital inclusion and utilise the system for payslip and overtime purposes and ironing out of bugs post Go Live. This is enabling the integration of staff/payslip data with budget/actuals/commitment data to improve the forecasting ability across the council for budget holders to view in real time once posted. This will also support the Business Insights work moving forward to be able to blend financial and non-financial data to better plan service delivery and likely need in the future.		Workforce survey completed showing areas that have improved and areas requiring more focus to take onboard and make the required improvements. This is feeding into our E&SS and ECC workstreams to ensure this is captured and deliverables are including relevant areas to deliver the greatest impact of improvement to staff and customer experience through both the Workforce Strategy and the OO Strategy. Workforce Development Strategy is progressing. Strategic Asset Plan and appendices approved and implementation underway. Closed ATAR clocking in system and went live with WALTER gaining significant admin efficiencies across the Council Initial Org Dev Strategy developed and socialised. Digital Strategy approved and underway. Customer Experience Strategy approved and underway		Workforce survey completed (last qtr) showing areas that have improved and areas requiring more focus to take onboard and make the required improvements. This is feeding into our E&SS and ECC workstreams to ensure this is captured and deliverables are including relevant areas to deliver the greatest impact of improvement to staff and customer experience through both the Workforce Strategy and the OO Strategy. Workforce Development Strategy is progressing. Strategic Asset Plan and appendices approved and implementation underway. Closed ATAR clocking in system and went live with WALTER gaining significant admin efficiencies across the Council Initial Org Dev Strategy developed and socialised. Digital Strategy approved and underway. Customer Experience Strategy approved and underway
		12. Online portals that allow self-service, payments and order tracking are in place for ease of use for all.	As part of the deployment of on-line portals/self service through the CRM are developed data from the relevant services will form the baseline. Services will monitor, measure and track data as part of an end to end process.		Elise Hopkins / Michelle Dudson		<i>CRM phase 1 does not go live until September 2021</i> Discovery sessions have been held with wave 1 services in preparation for build out		A strategic partner was appointed to help undertake CRM development. So far 80 processes have been reviewed, and approximately 50% are now in digital development. The first set of processes for clean and green and complaints are expected to go live for customer use before the end of 2021.		Various new self-serve processes for Clean and Green and Community Protection were built. Go live was due to happen at the end of quarter 3 but was unfortunately delayed. (All the targeted processes for Q3 have since gone live but this was behind schedule and occurred in Q4).		Various new self-serve processes for Clean and Green and Community Protection were launched. Key Stats: 9,848 MyAccount Created (Total customers registered to self-serve on the new platform) We have received 5,795 requests through Dynamics of which 50% have been processed via MyAccount self-service. Channel shift highlights - % of customer requesting services online rather than telephone: •81% Abandoned Vehicles report its come through MyAccount self-service •71% Bigger Bin Applications come through MyAccount self-service •62% Bulky Waste Requests come through MyAccount self-service Please note this has been achieved organically with minimal comms/marketing of the MyAccount portal which is very encouraging
	7. Children thrive emotionally, physically, mentally and feel they are achieving their potential	13. Children have access to high quality education and training opportunities and schools are more inclusive. Children and young people engage with education, fewer children are excluded and educational outcomes improve.	• % of children who attend good and outstanding schools – as at 31st March 2021 (74%, compared with 82% regionally and 84% nationally) – target direction of travel – to increase;		Andrea Potts, Sharon Kelly, Sally Rowe, Colleen Male		• % of children who attend good and outstanding schools – as at 30 th June 2021 - 74%, – <i>direction of travel - stayed the same</i>		• % of children who attend good and outstanding schools – as at 30/09/2021 - 74%, – <i>direction of travel - stayed the same</i>		% of children who attend good and outstanding schools – as at 31/12/2021 - 79% – <i>direction of travel – increasing from baseline</i>		% of children who attend good and outstanding schools – as at 31/03/2022- 79.5% – <i>direction of travel – increasing from baseline</i>
			• % of 16, 17 and 18 year olds who are not in Education, Employment and Training - as at 31st March 2021 (1.4% of young people are NEET and 1.5% of young people are 'unknown', giving a total of 2.9%, compared with 3.9% in the Black Country, 5.7% in the West Midlands and 5.5% nationally) – target direction of travel – to decrease;				• % of 16, 17 and 18 year olds who are not in Education, Employment and Training - as at July 2021 - 1.4% of young people are NEET and 1.3% of young people are 'unknown', giving a total official figure of 2.6% (The overall percentage is lower that the two figures combined due to the rounding up of the individual NEET & 'unknown' figures) – <i>direction of travel - decreasing</i>		• % of 16, 17 and 18 year olds who are not in Education, Employment and Training - as at July 2021 - 1.4% of young people are NEET and 1.3% of young people are 'unknown', giving a total official figure of 2.7% (The overall percentage is lower that the two figures combined due to the rounding up of the individual NEET & 'unknown' figures) – <i>direction of travel – stable</i>		% of 16, 17 and 18 year olds who are not in Education, Employment and Training - as at December 2021 - 1.3% of young people are NEET and 1.8% of young people are 'unknown', giving a total official figure of 3.1% – <i>direction of travel – stable from baseline</i>		% of 16, 17 and 18 year olds who are not in Education, Employment and Training - as at March 2022 - 1.3% of young people are NEET and 1.4% of young people are 'unknown', giving a total official figure of 2.7% – <i>direction of travel – improving from baseline</i>
			• % of children excluded from school (fixed term and permanent) – Data is based on academic year with the baseline for the 2019-20 year and the 2020-21 academic year measured as part of the markers of success. (Primary – Fixed Term – 0.53% (142), Permanent – 0.04% (10), Secondary – Fixed Term – 2.63% (468), Permanent – 0.20% (36)) – target direction of travel – to decrease				% of children excluded from school (fixed period and permanent) – 2020-21 academic year up to 30 th June 2021 (Primary – Fixed Period – 0.28% (74), Permanent – 0.03% (8), Secondary – Fixed Period – 3.02% (551), Permanent – 0.19% (34)) – <i>direction of travel – fixed period and permanent for Primary and permanent for secondary have reduced, however, fixed period for secondary has increased compared with 2019-20</i>		% of children excluded from school (fixed period and permanent) – 2020-21 academic year - (Primary – Fixed Period – 0.32% (84), Permanent – 0.03% (8), Secondary – Fixed Period – 3.18% (581), Permanent – 0.20% (36)) – <i>direction of travel – fixed period and permanent for Primary and have reduced, permanent for secondary has remained the same, however, fixed period for secondary has increased compared with 2019-20</i>		% of children excluded from school (fixed period and permanent) – 2021-22 autumn term - (Primary – Suspensions – 0.14% (38), Permanent – 0.02% (4), Secondary – Suspensions – 1.01% (185), Permanent – 0.05% (9)) – <i>direction of travel – there has been a very small increase in the number of primary suspensions and permanent exclusions compared with the 2020-21 autumn term (38 suspensions and 4 permanent exclusions compared with 31 and 2 last year), however, there has been a significant decrease in the number of suspensions and permanent exclusions at secondary (185 suspensions and 9 permanent exclusions compared with 245 and 18 last year) giving an overall reduction in the number of children suspended and excluded.</i>		% of children excluded from school (suspensions and permanent) – 2021-22 to date - (Primary – Suspensions – 0.52% (140), Permanent – 0.12% (23)) – <i>direction of travel – suspensions and exclusions are generally decreasing, particularly at secondary school level. Currently all measures except for primary suspension rate remain below the 2020-21 out-turn and all measures are below the 2019-20 out-turn giving an overall reduction in the number of children suspended and excluded. It is possible that by the end of the summer term some of the indicators may be slightly higher than 2019-20 and 2020-21, however, when weighed against the fact that schools were closed for significant periods of time during the previous two academic years, performance in this area continues to demonstrate significant improvement.</i>
		14. Children with special educational needs and disabilities are identified and supported effectively. Children in care and care leavers are supported physically and emotionally through access to health checks and health histories and are able to achieve their potential through high quality education, employment and training opportunities.	• % of Care Leavers who are in Education, Employment and Training – as at 31 st March, benchmarking data published in October (57.8%, compared to 48% among statistical neighbours, 42% among Regional neighbours and 39% nationally) - <i>target direction of travel – to increase</i>	AMENDED 2020-21 baseline - % of Care Leavers who are in Education, Employment and Training – (Walsall – 50.0%, Statistical Neighbours – 46.4%, West Midlands – 50.0%, National – 52.0%)			% of Care Leavers who are in Education, Employment and Training – as at 30 th June – 54.6%, - <i>direction of travel – fallen slightly</i>		% of Care Leavers who are in Education, Employment and Training – as at 30/09/2021 – 56.3%, - <i>direction of travel – fallen slightly from baseline but still within expected parameters</i>		% of Care Leavers who are in Education, Employment and Training – as at 31/12/2021 – 52.9%, - <i>direction of travel – improving from amended baseline.</i>		% of Care Leavers who are in Education, Employment and Training – as at 31/03/2022 - 54% - <i>direction of travel – improving from amended baseline</i>
			• % of EHC assessments completed within 20 weeks – measured from January 2020 to December 2020 – benchmarking data published in May 2021 (19.7% of plans issued within 20 weeks, compared to 60.1% among statistical neighbours, 50.0% among Regional neighbours and 58.0% nationally) - <i>target direction of travel – to increase to 60% or more;</i>		Andrea Potts, Sharon Kelly, Sally Rowe, Colleen Male		% of EHC assessments completed within 20 weeks – between 01st July 2020 and 31st June 2021- 37.4% of plans issued within 20 weeks - <i>direction of travel – improving</i>		• % of EHC assessments completed within 20 weeks – between 01/10/2020 and 30/09/2021- 40.7% of plans issued within 20 weeks - <i>direction of travel – improving</i>		% of EHC assessments completed within 20 weeks – between 01/01/2021 and 31/12/2021- 39.0% of plans issued within 20 weeks - <i>direction of travel – slight fall and unlikely to hit the 60% target for this year.</i>		% of EHC assessments completed within 20 weeks – between 01/01/2021 and 31/12/2021- 39.0% of plans issued within 20 weeks. However, we are continuing to work to clear a backlog of cases which are impacting on timeliness. When these are removed from the indicator, performance so far in 2022 is closer to target at 52.7% - <i>direction of travel – slight fall and unlikely to hit the 60% target for this year.</i>


CHILDREN have the best possible start, are safe from harm, happy, healthy and learning well			<ul style="list-style-type: none"> • % of children in care with up to date health assessments – as at 31st March, benchmarking data published in October (93.2%, compared among statistical neighbours, among Regional neighbours and nationally) - target direction of travel – to increase; 	AMENDED 2020-21 baseline - % of children in care with up to date health assessments - (Walsall – 85.0%, Statistical Neighbours – 91.7%, West Midlands – 89.0%, National – 91.0%)		<ul style="list-style-type: none"> • % of children in care with up to date health assessments – as at 30th June - 90.0%, - direction of travel – fallen slightly but still within expected parameters 		<ul style="list-style-type: none"> • % of children in care with up to date health assessments – as at 30/09/2021 – 91.3%, - direction of travel – fallen slightly from baseline but still within expected parameters 		% of children in care with up to date health assessments – as at 31/12/2021 – 90.6%, - direction of travel – improving from amended baseline.		% of children in care with up to date health assessments – as at 31/03/2022 – 95.1%, - direction of travel – improving from amended baseline.
	8. Children grow up in connected communities and feel safe everywhere	15. Children, young people and families are involved in service design and development and the needs of children and families are well understood in each locality. Services and support is responsive to needs of different communities, partners are proactive in responding to these needs and children and families have easier and timelier access to services.	<ul style="list-style-type: none"> • % of Early Help contacts completed within timescales - between 01/04/2020 and 31/03/2021, no benchmarking data available (89.0%) - target direction of travel – to increase; 		Andrea Potts, Sharon Kelly, Sally Rowe, Colleen Male	<ul style="list-style-type: none"> • % of Early Help contacts completed within timescales - between 01/07/2020 and 30/06/2021 87.6% - direction of travel – slight dip but within expected parameters 		<ul style="list-style-type: none"> • % of Early Help contacts completed within timescales - between 01/09/2020 and 31/08/2021 87.6% - direction of travel – slight dip but within expected parameters – data only available until 31st August due to a change in reporting processes 		<ul style="list-style-type: none"> • % of Early Help contacts completed within timescales - between 01/09/2020 and 31/08/2021 87.6% - direction of travel – data only available until 31st August due to a change in reporting processes. Updated information will be available by end of February (Q4) 		Due to the merging of the front door these indicators are no longer measured in the same way and are therefore under review.
			<ul style="list-style-type: none"> • % of social care contacts completed within 48 hours - between 01/04/2020 and 31/03/2021, no benchmarking data available (83.5%) - target direction of travel – to increase; 			<ul style="list-style-type: none"> • % of social care contacts completed within 48 hours - between 01/07/2020 and 30/06/2021 82.9% - direction of travel – slight dip in performance due to increasing numbers of contacts at the front door. 		<ul style="list-style-type: none"> • % of social care contacts completed within 48 hours - between 01/09/2020 and 31/08/2021 82.8% - direction of travel – slight dip in performance due to increasing numbers of contacts at the front door – data only available until 31st August due to a change in reporting processes. 		<ul style="list-style-type: none"> • % of social care contacts completed within 48 hours - between 01/09/2020 and 31/08/2021 82.8% - direction of travel – data only available until 31st August due to a change in reporting processes. Updated information will be available by end of February (Q4) 		Due to the merging of the front door these indicators are no longer measured in the same way and are therefore under review
			<ul style="list-style-type: none"> • % of social care contacts which lead to a referral - between 01/04/2020 and 31/03/2021, no benchmarking data available (30.0%) - target direction of travel – to increase; 			<ul style="list-style-type: none"> • % of social care contacts which lead to a referral - between 01/07/2020 and 30/06/2021 27.0% - direction of travel – there has been a slight dip in the percentage of contacts leading to a referral. 		<ul style="list-style-type: none"> • % of social care contacts which lead to a referral - between 01/09/2020 and 31/08/2021 25.8% - direction of travel – there has been a slight dip in the percentage of contacts leading to a referral but this remains within expected parameters - data only available until 31st August due to a change in reporting processes. 		<ul style="list-style-type: none"> • % of social care contacts which lead to a referral - between 01/09/2020 and 31/08/2021 25.8% - direction of travel – data only available until 31st August due to a change in reporting processes. Updated information will be available by end of February (Q4) 		% of social care contacts which lead to a referral - between 01/12/2021 – 31/03/2022 - 28.4%- Please note that due to the changes at the front door, the way this indicator is calculated has changed. It is therefore not directly comparable to the baseline, however, generally performance remains broadly stable in this area
			<ul style="list-style-type: none"> • % of social care assessments completed within 45 days – between 01/04/2020 and 31/03/2021, benchmarking data published in October (90.2%, compared to statistical neighbours, among Regional neighbours and nationally) - target direction of travel – to increase 			<ul style="list-style-type: none"> • % of social care assessments completed within 45 days – between 01/07/2020 and 30/06/2021 91.5% - direction of travel – increasing. 		<ul style="list-style-type: none"> • % of social care assessments completed within 45 days – between 01/09/2020 and 31/08/2021 89.1% - direction of travel – there has been a slight dip in performance but this remains within expected parameters. 		<ul style="list-style-type: none"> • % of social care assessments completed within 45 days – between 01/09/2020 and 31/08/2021 88.2% - direction of travel – there has been a slight dip in performance but this remains within expected parameters. 		% of social care assessments completed within 45 days – between 01/04/2021 – 31/03/2022 87.9% - direction of travel – there has been a slight dip in performance but this remains within expected parameters
		16. Children and families are better connected with community resources to enable them to build resilience, are involved in developing their plans and can provide regular feedback. More children and young people are supported in their family home, the response in meeting the needs of vulnerable adolescents is local and proactive with risks around exploitation reduced and fewer young people enter the Criminal Justice system.	<ul style="list-style-type: none"> • % of children and young people who contribute to their CP conferences - between 01/04/2020 and 31/03/2021, no benchmarking data available (94.0%) - target direction of travel – to maintain or increase; 		Andrea Potts, Sharon Kelly, Sally Rowe, Colleen Male	<ul style="list-style-type: none"> • % of children and young people who contribute to their CP conferences - between 01/07/2020 and 30/06/2021 – 95.5% - direction of travel – increasing 		<ul style="list-style-type: none"> • % of children and young people who contribute to their CP conferences - between 01/09/2020 and 30/09/2021 – 96.2% - direction of travel – increasing 		<ul style="list-style-type: none"> • % of children and young people who contribute to their CP conferences - between 01/09/2020 and 31/12/2021 – 95.4% - direction of travel – increasing from baseline 		% of children and young people who contribute to their CP conferences - between 01/04/2021 and 31/03/2022 – 95.6% - direction of travel – increasing from baseline
			<ul style="list-style-type: none"> • % of children and young people who contribute to their LAC review - between 01/04/2020 and 31/03/2021, no benchmarking data available (97.0%) - target direction of travel – to maintain or increase; 			<ul style="list-style-type: none"> • % of children and young people who contribute to their LAC review - between 01/07/2020 and 30/06/2021 – 96.2% - direction of travel – decreasing 		<ul style="list-style-type: none"> • % of children and young people who contribute to their LAC review - between 01/09/2020 and 30/09/2021 – 97.3% - direction of travel – increasing 		<ul style="list-style-type: none"> • % of children and young people who contribute to their LAC review - between 01/09/2020 and 31/12/2021 – 98.8% - direction of travel – increasing from baseline 		% of children and young people who contribute to their LAC review - between 01/04/2021 and 31/03/2022 – 98.4% - direction of travel – increasing from baseline
			<ul style="list-style-type: none"> • Number / Rate per 10,000 of children entering care – between 01/04/2020 and 31/03/2021, benchmarking data published in October (24.2 per 10,000 0-17 (167) compared to statistical neighbours, among Regional neighbours and nationally) - target direction of travel – to decrease; 			<ul style="list-style-type: none"> • Number / Rate per 10,000 of children entering care – between 01/07/2020 and 30/06/2021 – 21.6 per 10,000 0-17 (149) - direction of travel – decreasing 		<ul style="list-style-type: none"> • Number / Rate per 10,000 of children entering care – between 01/09/2020 and 30/09/2021 – 23.3 per 10,000 0-17 (162) - direction of travel – decreasing 		<ul style="list-style-type: none"> • Number / Rate per 10,000 of children entering care – between 01/09/2020 and 31/12/2021 – 23.9 per 10,000 0-17 (166) - direction of travel – decreasing from baseline 		Number / Rate per 10,000 of children entering care – between 01/04/2021 and 31/03/2022– 26.2 per 10,000 0-17 (182) - direction of travel – decreasing from baseline. There has been a slight increase in the number of children entering care compared with 2020-21. However, we saw a decrease in children entering care in 2020 due to the pandemic. When we look at 2019-20 as a more comparable year 34.0 per 10,000 0-17 (237) children entered care which provides assurance, alongside in depth-analysis that in general the number of children entering care is reducing
			<ul style="list-style-type: none"> • Number of children that go missing - between 01/04/2020 and 31/03/2021, no benchmarking data available (233) - target direction of travel – to decrease; 			<ul style="list-style-type: none"> • Number of children that go missing - between 01/07/2020 and 30/06/2021 - 305 - direction of travel – increasing 		<ul style="list-style-type: none"> • Number of children that go missing - between 01/09/2020 and 30/09/2021 - 305 - direction of travel – increasing 		<ul style="list-style-type: none"> • Number of children that go missing - between 01/09/2020 and 31/12/2021 - 305 - direction of travel – increasing 		Number of children that go missing – indicator under review
			<ul style="list-style-type: none"> • Number of first time entrants into the criminal justice system - between 01/04/2020 and 31/03/2021, benchmarking data published in July (180 per 100,000 10-17 (53) compared to statistical neighbours, among Regional neighbours and nationally) - target direction of travel – to decrease 			<ul style="list-style-type: none"> • Number of first time entrants into the criminal justice system - between 01/07/2020 and 30/06/2021 - 207 per 100,000 10-17 (61) - direction of travel – increasing 		<ul style="list-style-type: none"> • Number of first time entrants into the criminal justice system - between 01/09/2020 and 30/09/2021 - 179.9 per 100,000 10-17 (54) - direction of travel – within target range. 		<ul style="list-style-type: none"> • Number of first time entrants into the criminal justice system - between 01/09/2020 and 31/12/2021 - 194.1 per 100,000 10-17 (56) - direction of travel 		Number of first time entrants into the criminal justice system - between 01/04/2021 and 31/03/2022– 183.3 per 100,000 10-17 (55) - direction of travel – stable – please note that while the correct number of first time entrants was reported in q3 there was an error in the calculation of the number per 100,000 this should have been 186.6 (56)

COMMUNITIES are prospering and resilient with all housing needs met in safe and healthy places that build a strong sense of belonging and cohesion	9. Housing meeting all people's needs - is affordable, safe and warm	17. Less residents in statutory building based services	As at the end of May we had 850 clients in Long stay/Permanent placements		Karen Jackson	848 R & N Clients as at end of June 2021		835 R & N Clients as at end of September 2021		812 Residential & Nursing Clients as at end of December 2021		792 R & N Clients as at end of March 2022
		18. Increase in residents who are accessing community voluntary sector opportunities	The number of contacts "signposted" during the year = 2497 of which a sub set relates to housing, but detail not held on systems.			703 contacts signposted at quarter 1		659 contacts signposted during quarter 2		672 contacts signposted during quarter 3		1385 contacts signposted during quarter 4
	10. People are proud of their vibrant town, districts and communities – Paul Gordon	19. Council and partners maintain open communication with all communities and engage in cultural awareness resulting in wide range and high quality cultural offers	Number of active volunteers that support cultural offers. Strength of VCS organisations involved in cultural work. Number of cultural events organised by VCS		Philippa Venables / Paul Gordon	COVID-19 Community Champions: <ul style="list-style-type: none"> • We have recruited 14 community organisations to deliver the COVID-19 Community Champions programme. These organisations broadly represent a wide spectrum of diverse communities and protected characteristics groups within the borough. Over 100 champions are working in a variety of different roles, from supporting the vaccination programme to ensuring communities have access to up-to-date COVID information and ensuring mental health and wellbeing is prioritised. • Up to 27th July 2021, community champions groups have supported the mobile vaccination programme. They have successfully helped to vaccinate 1,276 people. The mobile vaccination programme consists of 3 buses (including one static bus at the Manor Hospital). There have been 77 deployments (includes 18 days at the hospital) across 38 locations. ESOL Intelligence Unit: 12 provisions were delivered in the last quarter, of which: <ul style="list-style-type: none"> • 5 provisions have completed their delivery; • 7 provisions are continuing after this quarter; • Over 130 learners have engaged in learning in this quarter Walsall for All programme: 32 projects have been commissioned or awarded funding under the Walsall for All programme, of which: <ul style="list-style-type: none"> • 15 projects are complete; • 16 projects are either ongoing or suspended (due to COVID); • 1 project is yet to commence (Cultures of Walsall) 		Despite the continuing impact of COVID-19 there have been many cultural activities that have happened on-line and a small number of physical activities. Whilst the Walsall for all team has been focused on supporting the Community Champions and vaccination bus initiative we have continued to organise COVID-19 safe events. The COVID vaccination buses took part in over 150 deployments in community locations. Each deployment was supported by a community champions group. There were 9 sessions were community champions from across the borough came together to share best practice and common operational issues. Our target housing Provider, WHG has enthusiastically adopted a resilient communities approach (open engagement). Feedback from their work will be included in the next quarter update.		Learning and Engagement Team has offered work experience opportunities, placements and volunteering opportunities for engaged with 11 people during this period. We offered work experience opportunities for 6 FE students, placements for 2 HE students and volunteering opportunities for one young person who is NEET, one recent graduate who is in part time employment, and another individual who is a part time art teacher.		Communication with all diverse communities is maintained through partnerships, such as Walsall for All, Safer Borough Partnership. It is also maintained through regular information updates to Walsall Community Network and through One Walsall provider management. In addition to achievements under MoS 18, Walsall for All Programme achieved targets in the following areas: 7891 residents took part in social mixing and school linking activities, 800 residents engaged in the community dialogue, 2832 residents participated in ESOL and women empowerment programme and 4400 people benefited from the information/awareness promoted by the Covid-19 Community.
		20. High quality, well maintained public realm and safe community spaces	Existing performance data is limited to outputs (e.g. cleaning frequency, number of volunteer litter picks, number of fly tips, etc). Figures to be confirmed. Outcome performance data for public realm quality is being developed: X (to be confirmed) community litter picks carried out. X% scheduled street cleans carried out. X fly tips cleared		Deborah Hindson	Walsall Community Litter Watch was the winner of the Keep Britain Tidy Community Engagement award. Development of Alloy system.		A street scene strategy is being drafted and will be presented to Cabinet in December. Work is underway to set up the APSE land audit management system for performance reporting on environmental quality.		Streets are well maintained, services are responsive and operations are undertaken in a consistent and timely manner. Also refer to MoS19 – Community volunteers / litter picking.		No further updates regarding MoS 20 as Q3 submission was sent in late with some data that should have been held back for Q4

	Outcomes:	Markers of Success:	Key Achievements:																																								
E	1. Creating an environment where businesses invest and everyone who wants a job can access one	1. Businesses accessible to staff, suppliers and customers. Transport networks free from defects and congestion	Highway Maintenance: Both resurfacing and preventative maintenance programmes have commenced on time and are on track. M6J10: North and South bridge decks are complete; traffic is now running over the southern bridge and extensive resurfacing is running to programme.																																								
		2. A combination of low unemployment figures and high vacancy figures	<p>The key achievement is the increase in the volume of unique job postings vs the volume of unemployed Universal Credit benefit claimants, suggesting that people have been able to obtain employment. However, given the high volume of job postings which are remaining unfilled and the duration these are remaining vacant, there appears to be a mismatch between the types of skills required for job roles available vs the aspiration and skills of those who are unemployed but actively seeking employment.</p> <p>Data and intelligence gathered from qualitative and quantitative sources by the Black Country Intelligence Unit on unemployment (Nomis) and unique job postings (EMSI data source), has highlighted the need to better understand the skills mismatch issue. Better research and intelligence has established the key issues as:</p> <ul style="list-style-type: none">• The volumes of unemployed claimants in the Black Country are reducing slower than other areas across the West Midlands & UK with young people, over 50's and female returners particularly impacted and higher than average in other key groupings• There are labour market demands across nearly all sectors and these are in skilled, semi-skilled and low skilled occupations. Each area may have specific skills needs based on their prevalent sectors in their areas.• There are hard to fill jobs and a shortage in the access to skilled talent in technical and professional occupations across all sectors but particularly advanced manufacturing, digital, green economy• Brexit related labour movement of EU Nationals is impacting some key sectors• There is a labour market movement from low paid to higher jobs, creating a risk of inflation due to higher wages demands• Invasion of Ukraine by Russia has significant impact on the movement of goods (import and export)• Pandemic has stimulated more flexibility in the workplace including hybrid working arrangements <p>Despite the challenges, during the Quarter 4 period we were able to attract even more participants to enrol onto our programmes to support with their job search journey. We secured a total of 703 new enrolments with a majority of these being Universal Benefit Claimants who have been referred to attend our Walsall Works Expo held on 24th March 2022. These people include those who may have been referred to the welfare to work programme Restart and who have just commenced their employability support. The enrolments also include those who have recently enrolled for support through our BC Impact programme, Kickstart scheme and those who have been engaged within our community settings. During the quarter, we supported 114 people into employment, 43 into training and 34 to access Kickstart paid work placements. Further details of outcomes by quarter and year are set out below.</p> <table><tr><th>WW Outcomes Outcome Type</th><th>Q1</th><th>Q2</th><th>Q3</th><th>Q4</th><th>Actual</th><th>Profile</th></tr><tr><td>People into Apprenticeships (funded)</td><td>1</td><td>0</td><td>1</td><td>0</td><td>2</td><td>5</td></tr><tr><td>Walsall Works Apprenticeships (funded)</td><td>1</td><td>0</td><td>1</td><td>0</td><td>2</td><td>-</td></tr><tr><td>Walsall Works Apprenticeships (LACs)</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>-</td></tr><tr><td>People into Apprenticeships (non-funded)</td><td>5</td><td>2</td><td>7</td><td>1</td><td>15</td><td>20</td></tr><tr><td>People into employment</td><td>56</td><td>73</td><td>105</td><td>114</td><td>348</td><td>325</td></tr></table>	WW Outcomes Outcome Type	Q1	Q2	Q3	Q4	Actual	Profile	People into Apprenticeships (funded)	1	0	1	0	2	5	Walsall Works Apprenticeships (funded)	1	0	1	0	2	-	Walsall Works Apprenticeships (LACs)	0	0	0	0	0	-	People into Apprenticeships (non-funded)	5	2	7	1	15	20	People into employment	56	73	105	114
WW Outcomes Outcome Type	Q1	Q2	Q3	Q4	Actual	Profile																																					
People into Apprenticeships (funded)	1	0	1	0	2	5																																					
Walsall Works Apprenticeships (funded)	1	0	1	0	2	-																																					
Walsall Works Apprenticeships (LACs)	0	0	0	0	0	-																																					
People into Apprenticeships (non-funded)	5	2	7	1	15	20																																					
People into employment	56	73	105	114	348	325																																					

			People supported with employability skills	133	200	165	193	691	530	
			People into accredited training	22	79	22	43	166	100	
			<i>Full-Time Study</i>	<i>14</i>	<i>51</i>	<i>21</i>	<i>11</i>	<i>97</i>	-	
			<i>Part-Time Study</i>	<i>8</i>	<i>28</i>	<i>1</i>	<i>32</i>	<i>69</i>	-	
			People in traineeships	3	4	4	0	11	10	
			<i>Traineeship / Pre-App - Walsall Works</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	-	
			<i>Traineeship / Pre-App - Non WW</i>	<i>3</i>	<i>4</i>	<i>4</i>	<i>0</i>	<i>11</i>	-	
			People into work placements	1	1	0	0	2	10	
			People into self-employment	1	1	2	1	5	10	
			Kickstart Placements	44	40	24	34	142	150	
			<i>Kickstart - Walsall Works Gateway</i>	<i>36</i>	<i>37</i>	<i>16</i>	<i>32</i>	<i>121</i>	-	
			<i>Kickstart - Other Gateway</i>	<i>8</i>	<i>3</i>	<i>8</i>	<i>2</i>	<i>21</i>	-	
			No of Customer Contacts	355	563	408	703	2029	1000	
			No of Recruitment / Information Sessions						40	
			No of new employers engaged						100	
			No of job vacancies advertised	62	78	108	102	350	200	
	2. Education, training and skills enable people to fulfil their personal development	3. Partnership working with businesses to offer apprenticeships, graduate programmes and training programmes for those wishing to re-enter the workforce	<p>We are cascade all the apprenticeship vacancies for the Walsall borough from the apprenticeship service, which are cascaded weekly to the employment and IAG advisors in the team in order to support young people to apply for these. We have met with the College apprenticeship team to understand live apprenticeship vacancies and hard to fill vacancies in order improve our visibility of apprenticeships. The College have engaged with Kickstart employers and Kickstarters in order to convert placements to apprenticeships in order to sustain employment and support employers to access enhanced apprenticeship incentives, which resulted in 7 of our Kickstart placements been taken on as apprenticeships. Apprenticeship providers have been invited to a number of our events, virtual and face to face events in order to promote these to clients on our programmes, including the Walsall Works Expo the largest jobs fair event in the Black Country region. We continue to promote the Councils internal Endless Possibilities programme to our clients and especially our most vulnerable ones. We continue to promote apprenticeships on our website and have created a dedicated Apprenticeship webpage to host information on how to apply for these vacancies – https://go.walsall.gov.uk/walsallcom/Walsall-Works/Apprenticeships and we communicate a weekly list of current apprenticeship vacancies receiving from the national apprenticeship service and these are vacancies with all providers including Walsall College.</p> <p>Walsall Works has been active on social media channels, creating promotions advertising the service, promoting latest vacancies and training provisions and putting out employability tips and support. Using social media to promote opportunities not only from Walsall Works, but to also promote opportunities in the wider region and from our partner organisations.</p> <p>In Quarter 4 the Walsall Works Twitter account had over 24,000 impressions and 7000 profile views an increase of 20% over Quarter 3. The Walsall Works Facebook posts reached over 49,000 people during Quarter 4 and increase of over 73% over Quarter 3.</p>							

			<div><div>Reach</div><div><div>Facebook Page reach ⓘ</div><div>42,935 ↑ 73.7%</div><div></div></div><div><div>Instagram reach ⓘ</div><div>817 ↑ 35.3%</div><div></div></div><div><div>Events & Roadshows</div><div><p>The Walsall Works team have been involved in a number of events in quarter 4, the Works+ delivery team supported a number of local roadshows in partnership with Walsall College, promoting the 50+ and Works+ schemes.</p><p>The Walsall Works Expo took place on the 24 March at the Walsall College Hub, giving local residents the chance to meet and find out about job, training and apprenticeship opportunities from over 70 employers, providers and service providers. The event was attended by over 500 residents.</p></div></div></div>
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			<div data-bbox="1448 268 1941 974">  <p>Walsall works EXPO 2022 Celebrating 10 Years of Walsall Works</p> <p>Thursday 24 March 2022 9am - 4pm The Hub @ Walsall College Littleton Street West, WS2 8ES</p> <ul style="list-style-type: none"> Meet with over 40 employers offering full and part-time roles Get advice and support with accessing and securing a new long-term career <p>Book your place at walsallworksevent.eventbrite.co.uk Find out more at www.walsallworks.com Or call 01922 654353</p> </div> <div data-bbox="1982 247 2338 764">  <p>Walsall works Jobs & Skills Fair Wednesday 19 January 2022 9.00am to 3.00pm Willenhall CHART, Gomer Street, Willenhall, WV13 2NS</p> <ul style="list-style-type: none"> Meet with over 25 employers and training providers offering full and part-time opportunities Get advice and support with accessing and securing a new long-term career <p>Book your place at walsallworksevent.eventbrite.co.uk Find out more at www.walsallworks.com Or call 01922 654353</p> </div> <div data-bbox="2350 260 2724 772">  <p>New Year New Job 9th Feb 4pm - 6pm</p> <p>Learn about apprenticeships Join us to celebrate National Apprenticeship Week 2022 at an event aiming to provide young people, parents and carers with information about apprenticeship opportunities in the Black Country, Birmingham and Solihull. Featuring live vacancies, impact stories, support and guidance.</p> <p>No registration needed, just follow the link! cutt.ly/newyearnewjob</p> </div>
	<p>4. Increase in local supported employment and educational opportunities for residents who have additional needs. Numbers of folk from hard to reach groups helped into training</p>	<p>We have secured Community Renewal Funding for two projects; Works+ and 50 Plus Partnership which will focus on these key vulnerable groups who may need to additional support ie those residing in our 7 most deprived wards, social housing tenants, those aged over 50 and those at risk or made redundant. We are being able to commence delivery in community venues across all 7 ward areas and with 7 delivery partners who will deliver innovative approaches to engage the 50+ cohort into training and job search activities.</p> <p>On our Impact programme we have maintained our referral links with key partners and services i.e. Youth Justice, Probation Service, Transitional Leaving Care Team, Jobcentreplus and direct referrals from marketing in community settings.</p> <p>We therefore have already achieved our targets for support key groups such are care leavers but continue to service the needs by providing a dedicated Employment Advisor lead for the Probation Service, Youth Justice Team, Transitional Leaving Care, Adult Social Care, Teenage Pregnancy Unit, Sure Start Centres, and many other community organisations.</p>	<p>Number of people on Medically Fit For Discharge list remains on target at under 50.</p> <p>80% of people at home 3 months after engagement with reablement services, compared to 77% in the previous year</p> <p>Commissioning review of ICS has taken place with an emphasis on effectiveness of reablement – outcomes of review to inform future commissioning approaches</p> <p>Where available residents are signposted to community and voluntary sector activities, levels of signposting is recorded. An increased front door demand proportionately reflects the number signposted.</p> <p>Adult social care are now actively engaged with the CAM work stream and will continue into the new financial year, there is a real opportunity to develop a whole borough approach alongside resilient</p>
P	3. People live a good quality of life and feel that they belong	<p>5. Increase in people accessing reablement opportunities. Less number of vulnerable residents who are in statutory services or having out of area placements</p> <p>6. Increase numbers of residents not requiring ongoing services and living independently in the community. Information and advice is accessible and signposting at the front door of community services</p>	

			communities in order to maximise the extent citizens can directly access support and services within their local areas, underpinned by a stronger digital offer to aid awareness.
	4. People know what makes them healthy and they are encouraged to get support when they need it	7. Reduced numbers of residents having formal ASC assessments who are empowered to take control and informed choices with the correct information	Embedding of Strength based approach across all teams valuing the skills, knowledge, connections and potential in individuals and communities, helping people to do things for themselves by deploying personal strengths to aid recovery and empowerment.
		8. More people using active travel modes. Safe and convenient cycleways and footways	<p>Support to schools on the A*STARS programme with the promotion of initiatives that promote active modes of travel, such as 5 Minute Walk Zones, Walking Buses and Park & Stride schemes</p> <p>Delivery of the Connecting Bentley Phase II ATF T2 scheme. This scheme involves introducing a segregated two-way cycle and pedestrian route along a section of Wolverhampton Road West, as well as improving pedestrian crossings and street lighting.</p> <p>Participated in a Black Country application for funding from the City Regional Sustainable Transport Settlements (CRSTS) for the A41/A4038 and A454 Sustainable Transport Corridors. The application focused on improvements for bus users, cyclists and pedestrians.</p> <p>Produced a business case to bid for Towns Funding, in order to fund Sustainable Transport Projects in Walsall and Bloxwich Town Centres. These projects again focus on bus, rail, cycling and walking.</p>
I	5. Internal services deliver quality and adapt to meet the needs of customer facing services	9. Smarter commissioning of service resulting in required outputs being delivered to realise quality outcomes	A refreshed approach to commissioning care has been scoped in order to reinvigorate the Walsall care economy and provide opportunities for transformation and innovation. The approach aims to take a whole of life approach and incorporate wider health partners.
		10. Internal Services are regularly reviewed and delivered within budget.	<p>Sign off of Enabling & Support Services (E&SS) phase 2 including 2 project groups to deliver the opportunities and benefits, end to end process redesign of 7 opportunities and service offers and benefits realisation agreed and approval to commence to Phase 3 delivery of the opportunities and ESS Portal in 2022/23.</p> <p>Strategic Asset Plan and appendices approved and implementation underway</p> <p>Closed ATAR clocking in system and went live with WALTER gaining significant admin efficiencies across the council</p> <p>Initial Org Dev Strategy developed and socialised</p> <p>Digital Strategy approved and underway</p> <p>Customer Experience Strategy approved and underway</p> <p>Further robustness built in regarding 2022/23 delivery plans</p>
	6. Services are efficient and deliver value for money	11. Internal Services have staff and processes able to adapt to meet the emerging needs of customers	Sign off of Enabling & Support Services (E&SS) phase 2 including 2 project groups to deliver the opportunities and benefits, end to end process redesign of 7 opportunities and service offers and benefits realisation agreed and approval to commence to Phase 3 delivery of the opportunities and ESS Portal in 2022/23.
		12. Online portals that allow self-service, payments and order tracking are in place for ease of use for all.	<p>All recommendations from the Socitim Independent Review were implemented.</p> <p>A re-profiled CAM Implementation Plan and Financial projection has been developed.</p> <p>Recruitment was undertaken to establish a larger CAM Programme Team (as recommended by Socitim).</p>
C	7. Children thrive emotionally, physically, mentally and feel they are achieving their potential	13. Children have access to high quality education and training opportunities and schools are more inclusive. Children and young people engage with education, fewer children are excluded and educational outcomes improve.	Since Ofsted inspections re-started, of the 16 inspections carried out in Walsall schools and published by 31 st March, three have improved from Inadequate to Requires Improvement, six have become Good – five from RI and one from Inadequate, one has remained Outstanding and three have remained Good. One school has moved from Outstanding to Good, and two have moved from Good to RI. The overall percentage of schools that are now rated as good or outstanding is 82.7%.

			<p>The proportion of 16-, 17- and 18-year-olds who are NEET remains low. Walsall has the highest number of 16-, 17- and 18-year-olds in education among our statistical neighbour authorities.</p> <p>Suspensions and exclusions continue to reduce overall as we continue to work with schools to embed our Inclusion strategy.</p> <p>As part of the extended powers of the Virtual Head to support all children with a social worker we have launched our Vulnerable Pupils Hub and have prevented the exclusions of a number of children. We are also working to challenge schools more robustly in relation to exclusions where appropriate. Exclusions will also be a key focus for the Walsall Strategic Alliance.</p>
		<p>14. Children with special educational needs and disabilities are identified and supported effectively. Children in care and care leavers are supported physically and emotionally through access to health checks and health histories and are able to achieve their potential through high quality education, employment and training opportunities.</p>	<p>Work continues to be undertaken with health colleagues to identify blockages in the processes of sharing information including assurances that we are informing health colleagues in timely manner when children enter care and working with health colleagues to raise concerns about the timeliness in which the LA receives health assessments which can impact on timeliness. As a result, timeliness of initial health assessments and overall health assessments continues to improve.</p> <p>The % of care leavers in education, employment or training is improving from the baseline of 50%. The NEET Action Group continues to meet to monitor closely any care leavers who are NEET and to support them in accessing education, employment and training and since October the IMPACT service have established a drop-in service. We are maximising opportunities through kick start and the Council's apprenticeship.</p> <p>Although the timeliness of EHC plans is improving, close monitoring of performance data identified an emerging backlog of EHC assessments that were over 20 weeks old and impacting on timeliness performance as plans are issued. An action plan to address this was implemented is being closely monitored by the LAIB.</p>
	<p>8. Children grow up in connected communities and feel safe everywhere</p>	<p>15. Children, young people and families are involved in service design and development and the needs of children and families are well understood in each locality. Services and support is responsive to needs of different communities, partners are proactive in responding to these needs and children and families have easier and timelier access to services.</p>	<p>In August, Early Help was brought back into the MASH to create a unified front door. Analysis and quality assurance work had demonstrated that repeat contacts were being over reported as families moved between the Early Help front door and the MASH. We are already starting to see the impact of the joined-up processes with reduced repeat contacts and referrals. Work is continuing with partners to ensure that referrals into social care are appropriate.</p> <p>Police continue to be the agency that makes the highest number of contacts. Presently the number of police contacts that result in no further action include the information shared through DA triage. A recent NFA joint audit has been completed and identifies areas of good practice as well as those that need further development. The police have now completed a number of training sessions with officers in regard to MASH operating principles and Right Help Right Time Guidance. There is also an agreement that this will now be an ongoing training area for new Police cadet leaders on a rolling basis to ensure that information shared with us remains appropriate and proportionate. Since the inspection, changes have been made to the processes within the MASH and in particular DA triage which ensures that any child who has had three or more contacts in the previous six months receives enhanced screening.</p> <p>The new Early Help strategy developed with partners was launched alongside the neglect strategy and domestic abuse strategy at a series of locality partnership events in November. These strategies were informed by our recent Big Conversation activity where we engaged over the Summer with 323 CYP aged 5-19. This has helped us to understand experiences of growing up in Walsall and the impact of the pandemic, which in turn informed the Neglect Strategy and the WR4C Strategic Alliance work.</p> <p>We have developed and are implementing the action plan for the Early Help strategy, neglect strategy and domestic abuse strategy and continue to work with partners to ensure that referrals are proportionate and appropriate.</p>

		<p>16. Children and families are better connected with community resources to enable them to build resilience, are involved in developing their plans and can provide regular feedback. More children and young people are supported in their family home, the response in meeting the needs of vulnerable adolescents is local and proactive with risks around exploitation reduced and fewer young people enter the Criminal Justice system.</p>	<p>There is an increasing number of children who participate within their looked after review/child protection conference. Participation is one of our five practice priorities with focussed working groups exploring how we can engage children and young people in a more creative way that takes into account the different digital means in which young people communicate.</p> <p>The number of children entering care has seen a slight increase over the quarter but remains below the number that entered care the year before last (although slightly higher than 2020, the number of children entering care was impacted by the pandemic). Outcomes monitoring for Family Safeguarding is demonstrating that fewer children supported under the model enter care as the model continues to embed.</p> <p>Each child that is reported as missing living in Walsall who the council has responsibility for is offered a return home interview. The 2020-21 out-turn based line figure included lockdown where fewer children went missing due to the unique circumstances of the pandemic meaning that we did anticipate seeing some increases as restrictions were lifted. Therefore, the appropriateness of reporting on this measure in this format is under review. Every missing incidence is considered at a multi-agency Daily Exploitation Triage meeting and follow up action taken as appropriate.</p> <p>We recognised the vital opportunity The Holiday Activity and Food programme (HAF) afforded us, through the involvement of individuals, communities and an innovative public / private partnership, to improve outcomes to children's lives including those relating to poverty and education, exacerbated by the impact of the pandemic and specifically the impact of social distancing on children's development and mental and emotional health and wellbeing.</p> <p>Affording children, the opportunity to build a relationship with 50 local HAF providers over Easter, summer and Christmas, has ensured the majority of the 3,000 children engaged with the programme experienced immediate and longer term positive outcomes including a successful transition back into education in September and continued connection to local support, which will make a significant contribution to improving the lived experiences of Walsall children.</p>
C	9. Housing meeting all people's needs - is affordable, safe and warm	17. Less residents in statutory building based services	Fully embedded strength-based approach across all teams, utilising individual and community assets, enabling people to remain independent for longer. Working with ADASS and Partners to deliver a Walsall wide Pilot that develops a suite of tools to assist staff who work in supported living environments to spot early signs of ill health in their tenants with a learning disability and create opportunities across the partners to ensure people with a LD also have access to good health interventions, thus living more safely in community settings/housing.
		18. Increase in residents who are accessing community voluntary sector opportunities	Work with internal and external stakeholders to progress some of the outcomes following recent Walsall wide consultation linked to meaningful day opportunities
	10. People are proud of their vibrant town, districts and communities	19. Council and partners maintain open communication with all communities and engage in cultural awareness resulting in wide range and high quality cultural offers	The progress for this quarter includes completion of evaluation of Walsall for All – Integrated Area Programme activity 2019-2022 and identifying priorities for Phase 2 of WfA Programme. The Board recommended continued focus on two areas – 1. Social mixing & reduction of segregation (bringing people together), 2. Supporting those who experience barriers (ESOL, access to jobs, volunteering).
		20. High quality, well maintained public realm and safe community spaces	<i>No info provided</i>

Q.4 Identified Interdependencies:

	Outcomes:	Markers of Success:	Interdependencies:
ECONOMIC - Growth for all people, communities and business	1. Creating an environment where businesses invest and everyone who wants a job can access one	1. Businesses accessible to staff, suppliers and customers. Transport networks free from defects and congestion	SPRINT Phase 1: interdependency with Council's planned carriageway resurfacing programme Q1 2022/23; also, with SPRINT Phase 2 design development works and P&R proposals.
		2. A combination of low unemployment figures and high vacancy figures	Our team of advisors are working in blended working arrangement ie face to face and virtual support. We have secured a number of new community outreach venues, but in some cases, these rely on the good will of the community organisations to offer the space at little or no charge. Despite the high unemployment numbers, we had noted a reduction in the number of referrals from Jobcentre work coaches, and especially from young people which may be due to the pressure DWP are under to match young claimants to vacant Kickstart placements first. However, the referrals volumes of young people into Restart and Impact are expected to increase given the Kickstart scheme comes to end on 31 March 2022. Mobilising our delivery on the Restart scheme has been slower than intended due to problems with sourcing and recruiting qualified and experience employability advisors and staff. The reliance on DWP work coaches to refer the right type of claimants to our Restart delivery model is an ongoing issue as more and more participants fall within the discretionary longer term unemployed group. There is a continuous need to build positive relationships with JC+ work coaches to ensure that UC claimants who are shorter term unemployed are referred to our Restart scheme. We have established partnership links with all organisations but do rely on new and existing funded training providers, support services led by partner organisations and employers to bring forward local vacancies and support our clients enrolled onto Walsall Works to apply for these vacant positions.
	2. Education, training and skills enable people to fulfil their personal development	3. Partnership working with businesses to offer apprenticeships, graduate programmes and training programmes for those wishing to re-enter the workforce	<u>Apprenticeships</u> Our service depends on and relies on a healthy working relationship and collaborative working with all Apprenticeship providers, employers and our internal service areas to create and growth new Apprenticeship vacancies. There is a level of dependency on the availability of grants and incentives for employers to encourage them to create apprenticeships, and we have now been informed that Apprenticeship incentives have been extended until May 2022.
		4. Increase in local supported employment and educational opportunities for residents who have additional needs. Numbers of folk from hard to reach groups helped into training	We are reliant on partner organisations to continue to refer clients from vulnerable target groups, as set out above.
PEOPLE have increased independences, improved health and can positively contribute to their communities	3. People live a good quality of life and feel that they belong	5. Increase in people accessing reablement opportunities. Less number of vulnerable residents who are in statutory services or having out of area placements	Walsall Together, provider market, developing an outcomes-based commissioning
		6. Increase numbers of residents not requiring ongoing services and living independently in the community. Information and advice is accessible and signposting at the front door of community services	Strengthening ASC collaboration with wider council work stream; alongside strength-based approaches underpinning all we do
	4. People know what makes them healthy and they are encouraged to	7. Reduced numbers of residents having formal ASC assessments who are empowered to take control and informed choices with the correct information	No info provided

Q.4 Identified Interdependencies:

	get support when they need it	8. More people using active travel modes. Safe and convenient cycleways and footways	Availability and retention of casual road safety tutors to fulfil the Bikeability and pedestrian training. Interdependency with Council's planned programme of highway schemes and traffic regulation orders for 2021/2022.
INTERNAL Focus – All Council services are efficient and effective	5. Internal services deliver quality and adapt to meet the needs of customer facing services	9. Smarter commissioning of service resulting in required outputs being delivered to realise quality outcomes	Interdependencies need to explore the links between this and any council economic regeneration activity, and also the council's future strategy for supporting the community sector.
		10. Internal Services are regularly reviewed and delivered within budget.	Ensuring the workforce has the right skills, knowledge and behaviours to deliver our transformation ambitions. A lot of the same staff are involved in multiple workstreams due to their expertise and skills and this is being mapped to ensure timescales are not impacted by the reliance on certain individuals, especially considering their business as usual tasks as well and ensuring smooth service delivery throughout the period.
	6. Services are efficient and deliver value for money	11. Internal Services have staff and processes able to adapt to meet the emerging needs of customers	Overlap of process improvements across workstreams being managed to ensure an overall timetable for delivery can be achieved in the most optimum way for impact to enable staff effectively. A lot of the same staff are involved in multiple workstreams due to their expertise and skills and this is being mapped to ensure timescales are not impacted by the reliance on certain individuals. Also making sure service delivery from internal services is not detrimentally impacted due to the input required into the process improvement.
		12. Online portals that allow self-service, payments and order tracking are in place for ease of use for all.	Clear interdependencies with the future enabling technology roadmap (in particular development of a new payments system and replacement of various business-line systems). Dependencies with Culture and Behaviour Workstreams. Dependency on Organisational Development Plan for PMO and the recruitment of key roles within Centre of Excellence and Connected Working. Dependency on creation of the Hub and future approach to voluntary sector commissioning. Dependency on Resilient Communities, to help facilitate first-line advice and digital support. Dependency on Asset Management Review and availability and suitability of buildings to undertake first-line advice and digital support. Dependency on contents in other Service Development Plans and partnership arrangements.
CHILDREN have the best possible start, are safe from harm, happy, healthy and learning well	7. Children thrive emotionally, physically, mentally and feel they are achieving their potential	13. Children have access to high quality education and training opportunities and schools are more inclusive. Children and young people engage with education, fewer children are excluded and educational outcomes improve.	Schools are largely responsible for improvements required to achieve this marker of success. We continued to work closely with them to improve the quality of education for children and young people in Walsall. Data from last year and this year is somewhat of an anomaly due to Covid-19 and the amount of time schools have been closed or children have been out of school due to self-isolation. As we move out of Covid, both schools and children and young people will need additional support to deal with the fallout and long term impacts of Covid-19.
		14. Children with special educational needs and disabilities are identified and supported effectively. Children in care and care leavers are supported physically and emotionally through access to health checks and health histories and are able to achieve their potential through high quality education, employment and training opportunities.	The percentage of children in care with up-to-date health assessments is reliant on Health Colleagues being available to complete the assessments and submitting the paperwork back to the LA so that the child's record can be updated. There have been some issues with the timely submission of paperwork in particular, however, we continue to work with health colleagues to address this and are assured that performance is likely better than reported as the assessments have actually taken place. Health provides assurance of their capacity to deliver health assessments via the Corporate Parenting Board.

Q.4 Identified Interdependencies:

			The ability for Care Leavers to access Education, Employment and Training is linked to the overall jobs market and availability of opportunities. There is a risk that any disruption to employment could impact on this indicator, although support will be provided to care leavers to mitigate this as much as possible.
	8. Children grow up in connected communities and feel safe everywhere	15. Children, young people and families are involved in service design and development and the needs of children and families are well understood in each locality. Services and support is responsive to needs of different communities, partners are proactive in responding to these needs and children and families have easier and timelier access to services.	<p>The number and timeliness of contacts and the proportion leading to a referral remains highly dependent on partners making contact. Police conversion rates are suppressed by the DA triage process and reporting is being refined to account for this.</p> <p>NFA rates remain high and work is being undertaken to look at the quality of MARFs with partners. Consent remains an issue - where there are no CP concerns, we are pushing back to referrers in some cases to get consent before progressing. In other cases, where consent has not been gained by the referrer, the contact is NFA due to parents refusing consent on contact. We are introducing the E-MARF to support with this issue.</p> <p>The upcoming changes in health in relation to the implementation of the ICS will need to be carefully considered and we will work closely with health colleagues to ensure that any disruption has a minimal impact on safeguarding processes.</p>
		16. Children and families are better connected with community resources to enable them to build resilience, are involved in developing their plans and can provide regular feedback. More children and young people are supported in their family home, the response in meeting the needs of vulnerable adolescents is local and proactive with risks around exploitation reduced and fewer young people enter the Criminal Justice system.	<p>We will continue to work with partners in order that a more rounded data analysis can be provided that supports the family safeguarding model and its impact on children being maintained in school, call outs from the police and presentation at A and E in order to support the development of a sustainable model.</p> <p>The exploitation pathway is dependent upon partnership commitment to resource and continued support to ensure the exploitation panel functions as a mechanism to identify and respond to risk, threat and harm.</p> <p>Continued collaboration with the violence reduction unit and support to enable the inclusion of children/young people in education where criminal exploitation is a known vulnerability.</p> <p>We are working with the Councils resilient communities' team and with Walsall Together resilient communities partnership to continue the development of our Holiday Activity and food programme to maximise opportunities to connect families to resources and enable them to be resilient.</p>
COMMUNITIES are prospering and resilient with all housing needs met in safe and healthy places that build a strong sense of belonging and cohesion	9. Housing meeting all people's needs - is affordable, safe and warm	17. Less residents in statutory building based services	<i>No info provided</i>
		18. Increase in residents who are accessing community voluntary sector opportunities	We await the further development of community resilience corporately linked to our developing strength-based approach utilising individual and community assets
	10. People are proud of their vibrant town, districts and communities	19. Council and partners maintain open communication with all communities and engage in cultural awareness resulting in wide range and high quality cultural offers	There are potential interdependencies with Our Walsall Story consultations, review of the Corporate Plan, contribution to Physical Activity Framework, Mental Health and Wellbeing Strategies, ASC Continuous Improvement Plan and many others. There is established exchange of activity with Safer Borough Partnership and Walsall Together.
		20. High quality, well maintained public realm and safe community spaces	<i>No info provided</i>

Cabinet – 22 June 2022

Performance Management Framework – Recommendations from Audit Committee

Portfolio: Councillor Bird

Related portfolios: All

Service: All

Wards: All

Key decision: No

Forward plan: No

1. Aim

- 1.1 To provide Cabinet with a refreshed Performance management Framework following consideration and recommendations incorporated from Audit Committee which aims to provide assurance that the council's performance management arrangements are fit for purpose and support delivery of the Council Plan.

2. Summary

- 2.1 The report sets out the latest version of the Walsall Performance Management Framework at Appendix One. The Performance Management Framework sets out how the council ensures the delivery of the council's aim and priorities. It sets out the broad expectations relating to how performance management is embedded within work and underlines the performance management responsibilities for everyone working for the council.
- 2.2 The framework has been considered by the Audit Committee and the resolution of Audit Committee have been included for consideration by Cabinet.

3. Recommendations

- 3.1 That Cabinet consider the resolution made by Audit Committee, namely *"That the Audit Committee reviewed and noted the Performance Management Framework 2022-2025 as presented"*.
- 3.2 That Cabinet approve the use of the Performance Management Framework for all services.

4. Report detail - know

Context

- 4.1 A Performance Management Framework (PMF) provides the structure for the council, directorates and services to effectively manage their performance. It outlines the expectations placed on services in relation to collating and monitoring performance information as part of the management of the service and provides the framework for services and all staff to recognise how their contribution connects back to the priorities of the organisation.
- 4.2 The PMF provides the structure against which services and directorates select the data and information used to manage performance. It provides clarity regarding responsibilities at every level of the organisation and the 'plan – do – check – act' cycle that is a foundation of the planning cycle. Effective performance management is also integral to the identification and management of risks and a key process within the council's internal controls and assurance arrangements.
- 4.3 The council has had a PMF in place since 2002. It is regularly reviewed to consider changes to local priorities and management arrangements along with recognised good practice. Initially the framework was one that focussed on centralised monitoring of compliance. In more recent years the framework has focused on supporting self-governance within services and directorates. The performance management framework being presented has taken into consideration the Council Plan 2022-2025 that was approved at Council in February 2022.
- 4.4 The Framework is attached as Appendix 1 to this report.

Council Corporate Plan priorities

- 4.5 The PMF supports the tracking of performance against priorities and includes details of the markers of success supporting delivery of the priorities of the Council Plan 2022-2025.

Risk management

- 4.6 A thorough understanding of how the council is performing is essential to identifying and effectively managing risks and this framework supports the reporting and management of performance to inform the identification and management of risks at every level.

Financial implications

- 4.7 Effective performance management is key to efficient service delivery and effective allocation of resources. The framework should inform the medium term financial strategy and budget setting, enabling services to develop measures to track activity and identify potential savings.

Legal implications

- 4.8 There is no legal requirement, but the framework supports good governance and helps to evidence that the council meets its statutory and regulatory responsibilities.

Procurement Implications/Social Value

- 4.9 N/A.

Property implications

- 4.10 N/A.

Health and wellbeing implications

- 4.11 The Framework helps ensure delivery of all the council priorities and consequently supports health and wellbeing.

Staffing implications

- 4.12 The Framework embeds the 'golden thread' for all employees and underlines the importance of a well-motivated workforce which is achieved through:
- Having a clear and constant vision and purpose that everyone can work towards.
 - Empowering staff to give their customers the help they need in the way they need it.
 - Acting on blockages that are stopping them from doing their work
 - Listening to their views and involving them in change
 - Being open and transparent about performance in a way that promotes learning rather than apportioning blame.

Reducing Inequalities

- 4.13 The Framework helps ensure the delivery of the council's equalities duties through promoting a thorough understanding of the needs of our diverse communities and supports the delivery of our aim that "Inequalities are reduced and all potential is maximised. Together we are committed to developing a healthier, cleaner and safer Walsall and creating an environment that provides opportunities for all residents, communities and businesses to fulfil their potential and thrive." and our purpose by focussing on delivery of the priorities.

Climate change

- 4.14 The framework includes planning and performance monitoring processes that help ensure the delivery of services and actions including those in the Councils Climate Change Action Plan.

Consultation

- 4.15 During the drafting of the refreshed PMF input was sought from Corporate Management Team (CMT), the Directors Group, Senior Management Group, performance leads from all directorates and key governance services. The framework was then presented to Audit Committee on 28 April 2022.

5. Decide

- 5.1 Recommendations for Cabinet have been included in section 3 of this report.

6. Respond

- 6.1 The PMF provides portfolio holders with the structure by which they discuss with Executive Directors performance across all areas of their responsibility and enables them to monitor service delivery.

7. Review

- 7.1 The PMF will be annually reviewed as part of assurance mapping activity. In addition, a fuller review will be conducted in line with the review of the Council Plan 2022-2025. Any revisions to the framework will be considered by Audit Committee prior to Cabinet's approval being sought.

Background papers

[Audit Committee Report 28.04.2022](#)

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22 June 2022



Councillor M Bird
Leader of the Council

22 June 2022

Performance Management Framework 2022/2025

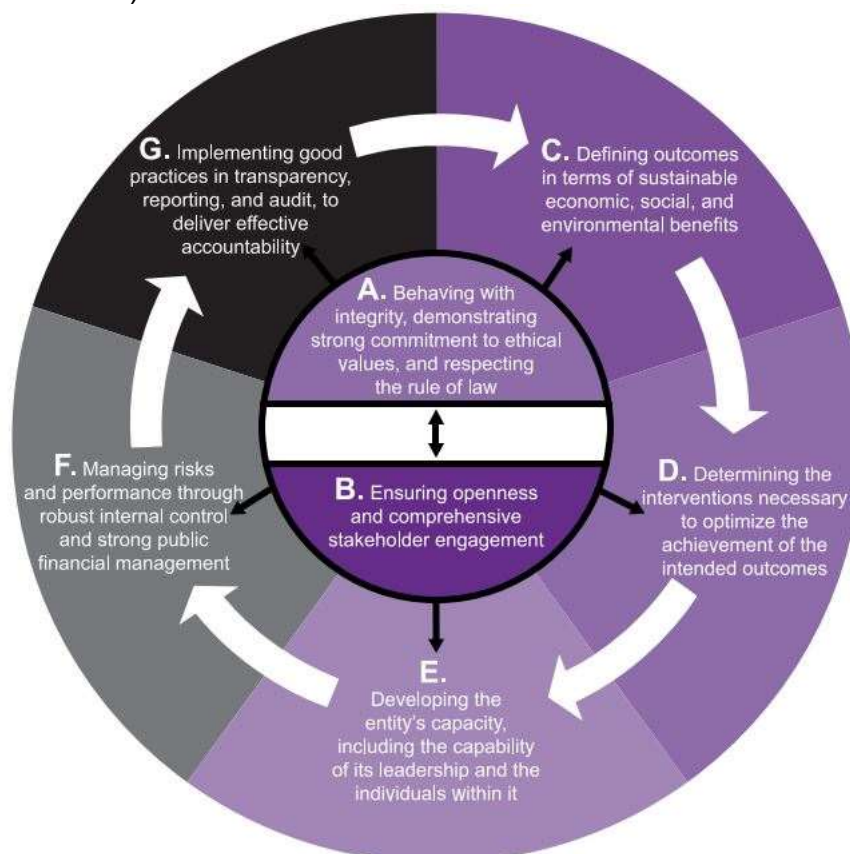
Review Date: January 2025

1. Introduction

The council operates to serve the people of Walsall, against the context of the council's Aim: *Inequalities are reduced and all potential is maximised. Together we are committed to developing a healthier, cleaner and safer Walsall and creating an environment that provides opportunities for all residents, communities and businesses to fulfil their potential and thrive.*

Governance supports the council to deliver outcomes by ensuring there are high standards of conduct and leadership that make sure the council does the right things, in the right way, for the right people in a timely, inclusive, open, honest and accountable manner. As a public body the council is responsible for ensuring that its business is conducted with the highest ethical and legal standards and that public money is safeguarded and used economically, efficiently and effectively.

Figure: Achieving the Intended Outcomes While Acting in the Public Interest at All Times (CIPFA/IFAC 2014).



Performance Management is an integral part of the council's wider corporate governance and assurance arrangements which comprise the systems and processes, culture and values the council operates within as a public sector organisation (see section 'F' in diagram above).

The council's Performance Management Framework (PMF) is an essential element of the council's governance, control and assurance mechanisms to deliver services efficiently and effectively, ensuring the council meets its statutory and legislative responsibilities.

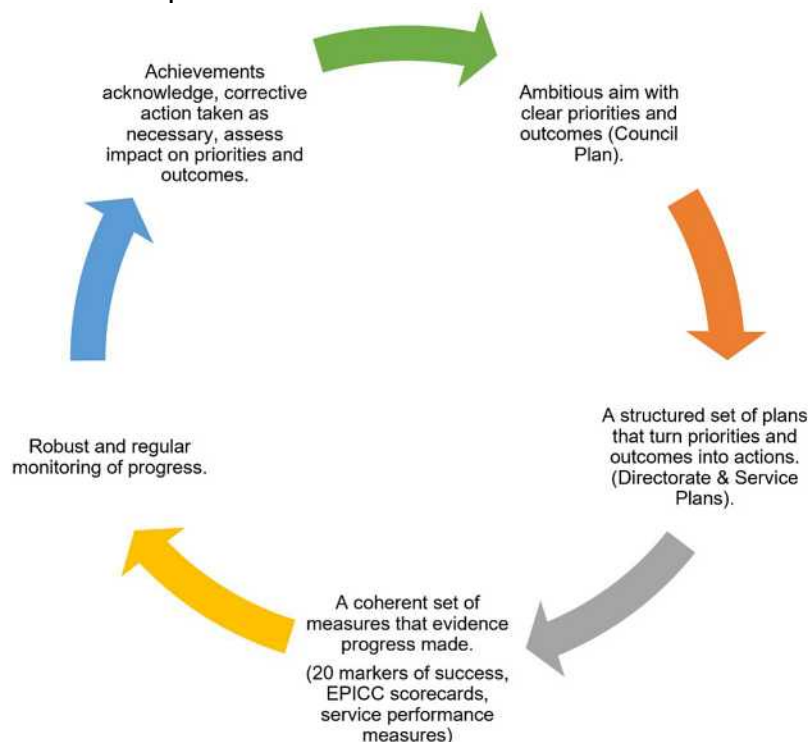
In order to successfully deliver as an organisation, performance and how it is managed must be of upmost relevance to our strategies, objectives and goals. Delivering effective performance management arrangements assists any organisation in making informed decisions, delivering outcomes that support the overarching aim and play an integral role in service improvement and transformation. Performance management is key to the identification and management of risks and an essential process within our internal controls and assurance arrangements and in the monitoring of the delivery of outcomes and value for money.

In addition to having robust performance management arrangements, as outlined in this framework, it is important that there are checks in place to assure that performance is being managed at every level of the organisation and that monitoring and reporting arrangements are in place. These checks serve to demonstrate that arrangements are effective and identifies if services should strengthen their management and monitoring of performance. The Annual Review of Effectiveness of the System of Internal Controls and assurance mapping processes are the mechanisms by which the effectiveness of the Performance Management Framework is reviewed and informs when refreshes are required.

1.1 Definition

Within the council, performance management comprises the systems, processes, structures and supporting arrangements established by management to ensure the delivery of our aim, priorities and outcomes. Performance management tools and techniques are needed to be able to identify, assess, monitor, and respond to performance issues, and to allow actions to be taken which will contribute significantly to the achievement of agreed priorities and outcomes.

PMF Core Components



Simply, if we do not know how we are performing, then we do not know where improvements are needed or could be made. In addition, we do not know how well something is being achieved and may not consider the impact that has on our communities. Monitoring and managing performance supports our strategic budgeting approach that aligns our financial resources to the delivery of our key areas of focus and outcomes.

Given the council operates to serve the people of Walsall our customers are at the centre of the services we deliver. Performance Management arrangements:

- Create clarity and constancy of purpose for all services that can be translated to individual activity / contribution, providing individuals with a clear sense of purpose and understanding of their role and their contribution to the delivery of the council's aim, priorities and outcomes.
- Build an intelligence led / informed approach to strategic and operational decision making so there is no change without profound knowledge and understanding of what needs to change and why.
- Help to embed a cultural shift to learning and improvement through trust and transparency that provides development opportunities and supports effective service succession planning.
- Champion and create learning loops for continuous improvement (based on check, plan, review, do) – the opportunity for individuals to feedback from a customer perspective to improve service delivery (recognising the distributed leadership model).
- Provide clearly defined responsibilities of all those engaged in the delivery of council services and change and improvement activity.
- Enable the monitoring of service delivery to ensure the allocation of resources is having the intended impact, allowing successes to be celebrated and corrective action to be taken if needed.
- Help to identify and manage risks for the council.
- Monitor delivery of our Proud Promises: Improve outcomes and customer experience; Improve employee satisfaction and engagement: and Improve service efficiency and performance.
- Supports the use of data and intelligence to forecast future needs and demands to assist planning and resource allocation.

Managing performance includes consideration of numerous sources of quantitative and qualitative information, a detailed understanding of work flows and processes and, as importantly, the perspectives of both customers and staff regarding their experience and satisfaction with services.

1.2 Scope

This PMF sets out the arrangements for the council, directorates and services to effectively manage performance. It outlines the expectations placed on services in relation to collating and monitoring performance information as part of the management of the service and provides the approach for services and all staff to recognise how their contribution connects back to the priorities and outcomes of the organisation.

In setting out the overarching approach, these corporate arrangements recognise the great diversity amongst council services and the differing levels of demand from statutory and regulatory requirements and external performance frameworks. Examples of the external demands that can be placed on services to varying degrees include:

- Submission of data in statutory returns to government bodies which is then collated and published to allow direct comparison with other local authorities (benchmarking).
- Reporting on statutory performance measures aligned to national outcomes frameworks.
- Inspections of services and settings by external bodies, for example Ofsted and the Care Quality Commission (CQC).
- Peer challenges and sector led improvement activity (e.g. Food Standards Agency inspection of our enforcement services).
- Investigations by external organisations in response to complaints to them, for example Information Commissioners Office (ICO) and Local Government and Social Care Ombudsman (LGSCO).

The need to comply with external performance requirements means that there must be some flexibility in how different areas implement their own performance management arrangements. This framework applies to all directly managed services and change activity of the council. For those that commission services it is important that they ensure that service providers meet any information requirements to enable services to track the performance measures developed in local frameworks and that contractual arrangements cover the performance of providers.

2. Performance Management Framework

2.1 Why manage performance?

Any business must have a clear aim so to be clear on what it needs to do. Once there is a clear aim plans can be made regarding how that aim is delivered, what needs to be changed and what services are needed to create those changes. In general terms performance management serves as a support or guide for the delivery and improvement of services and to ensure the appropriate level of governance is maintained at all times. Actively managing performance ensures all individuals, teams and the whole organisation know the 'what' and the 'how' they should be doing and enables them to recognise achievements and also where improvements can be made. This applies equally to all services and activities.

Embedding effective performance management arrangements:

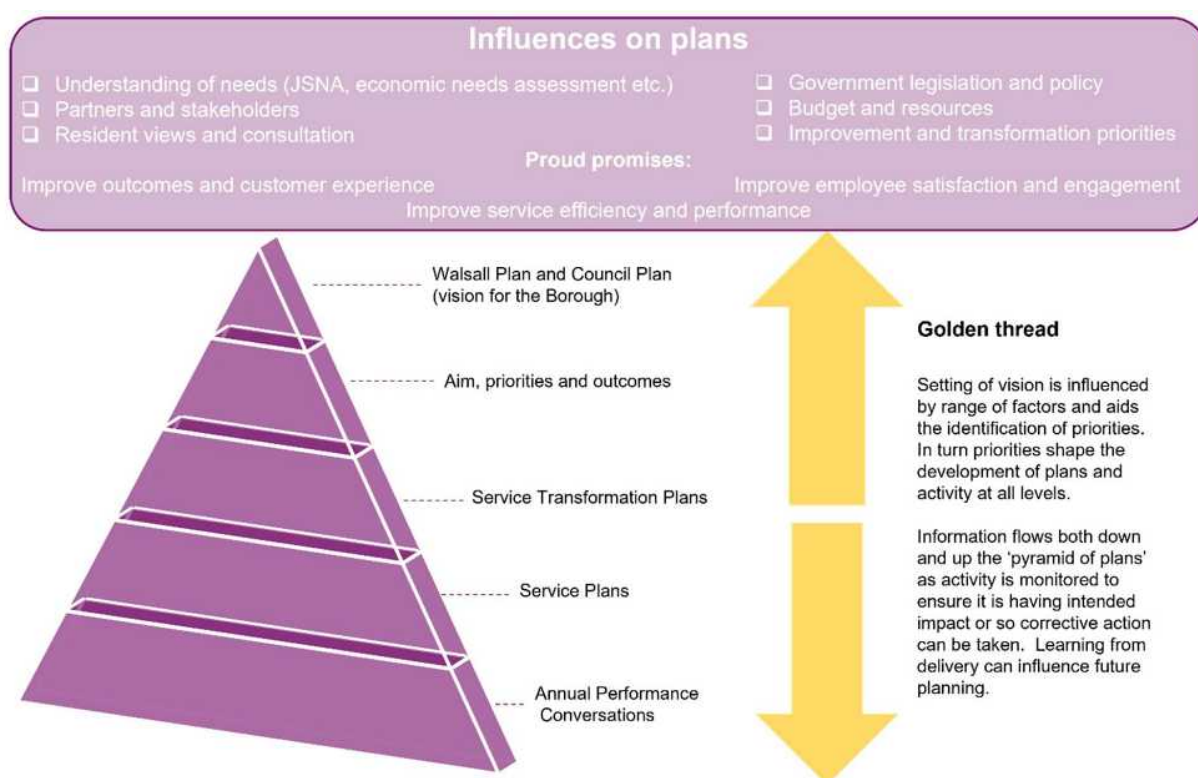
- Ensure goals are prioritised and resources are allocated effectively.
- Help improve services and outcomes for local people.
- Provide an environment that helps motivate staff as they are aware of what is expected from them and understand how they contribute to the delivery of council priorities.
- Ensure significant risks to the delivery of priorities are identified and managed.
- Assure officers and political leaders that service delivery is at expected levels and there are mechanisms to take corrective action where performance is poor.
- Ensure the council and partners achieve what they set out to do and that we focus on what matters most.
- Provide opportunities to recognise and celebrate successes and improvements.

- Provides data and intelligence to enable services to predict trends in demand, identify opportunities for improvements in processes and verify the quality of the data the service holds.
- Provides a strong evidence base for improved decision making, assurance that governance arrangements are robust, and the council is effective in its use of resources, demonstrating value for money and robust arrangements for continuous improvement in value for money.

2.2 Planning Framework

Effective performance management is delivered via a planning framework. Planning occurs at various levels in the organisation, with plans including more detail the closer they are to operational activity (e.g., service and team plans). Planning provides an important link between the strategic corporate plan (the Council Plan) and directorate/service/team plans through to individual employee annual performance conversations, supporting all employees to understand their role in the delivery of corporate priorities.

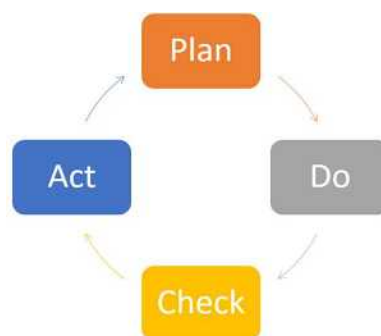
Planning frameworks are often seen as providing the 'golden thread' where strategic priorities are transformed into deliverable actions that can be monitored and reviewed so the impact they have can be understood. The council's planning framework is illustrated in the following diagram.



2.3 Planning Cycle

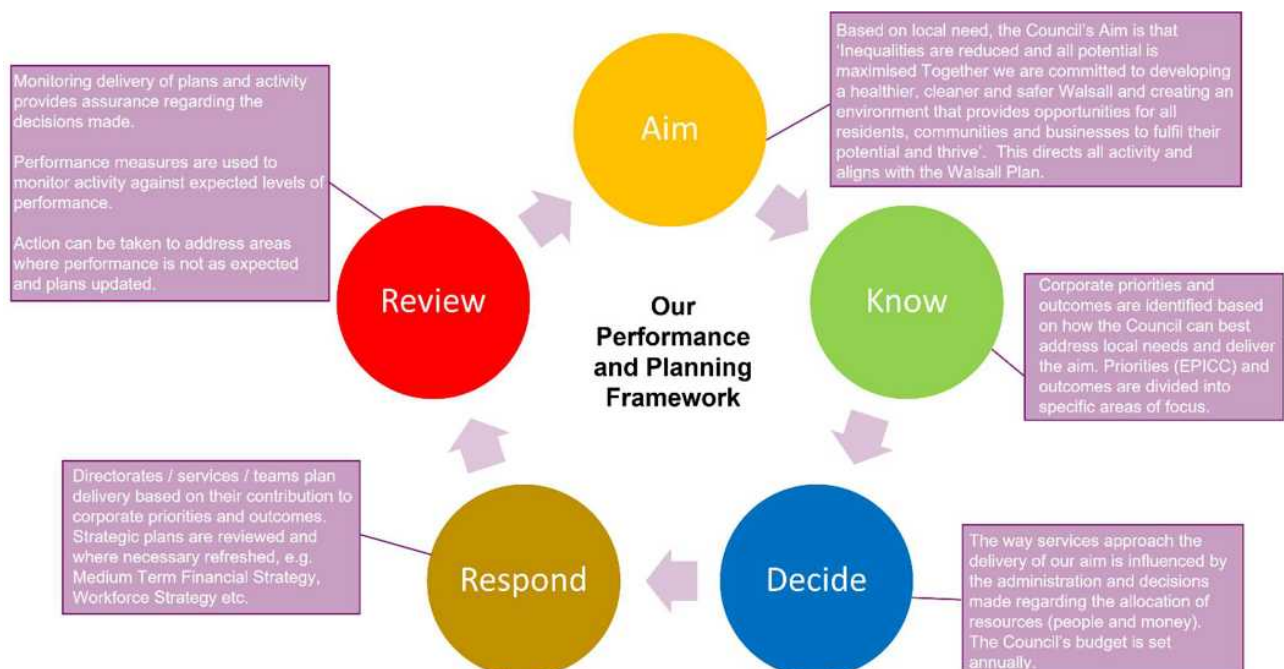
All planning is based on a cycle. Basic cycles are often described as 'plan, do, study (or review) and act'. You **plan** what you need to do, you deliver as planned (**do**) and then you **check** how you delivered and whether it had the intended impact. Once you have

reviewed delivery you **act** based on learning from the review. This could be to continue or increase activity as it is having the desired impact or changing the plan as the impact currently achieved doesn't meet expectations. This is illustrated in the diagram below:



When conducting the check phase it is important to consider all factors that may have influenced the planned delivery in any way. Where areas of concern or underperformance are noted, there is an expectation and requirement that this will be escalated up to, for example, the Corporate Management Team (CMT) and Cabinet who will also receive quarterly performance reports on progress against the priorities in the Council Plan. Services are responsible for reporting performance within their directorates, ensuring issues are escalated so that appropriate action can be taken.

The council's 'Ways of Thinking' framework sets out the approach taken to decision making across the council. It centres on being clear about our aims, what we are working towards and what we know. This 'Ways of Thinking' framework can also be applied to performance management arrangements when considering the planning framework.



As planning is a continuous process, delivery is monitored, and plans are checked and refreshed. This is holistic from strategic to operational plans with progress being reported on a minimum of a quarterly basis. The quarterly review of performance and

plans informs future iterations of plans at every level from the Council Plan to the objectives in an annual performance conversation (APC) or review. This creates a perpetual calendar as outlined below. The dates for each activity are indicative and reflect the two-way nature of the 'Golden Thread'. For example, the drafting of a directorate or service plan that goes live from April will inform and be informed by the completion of APC's in March.

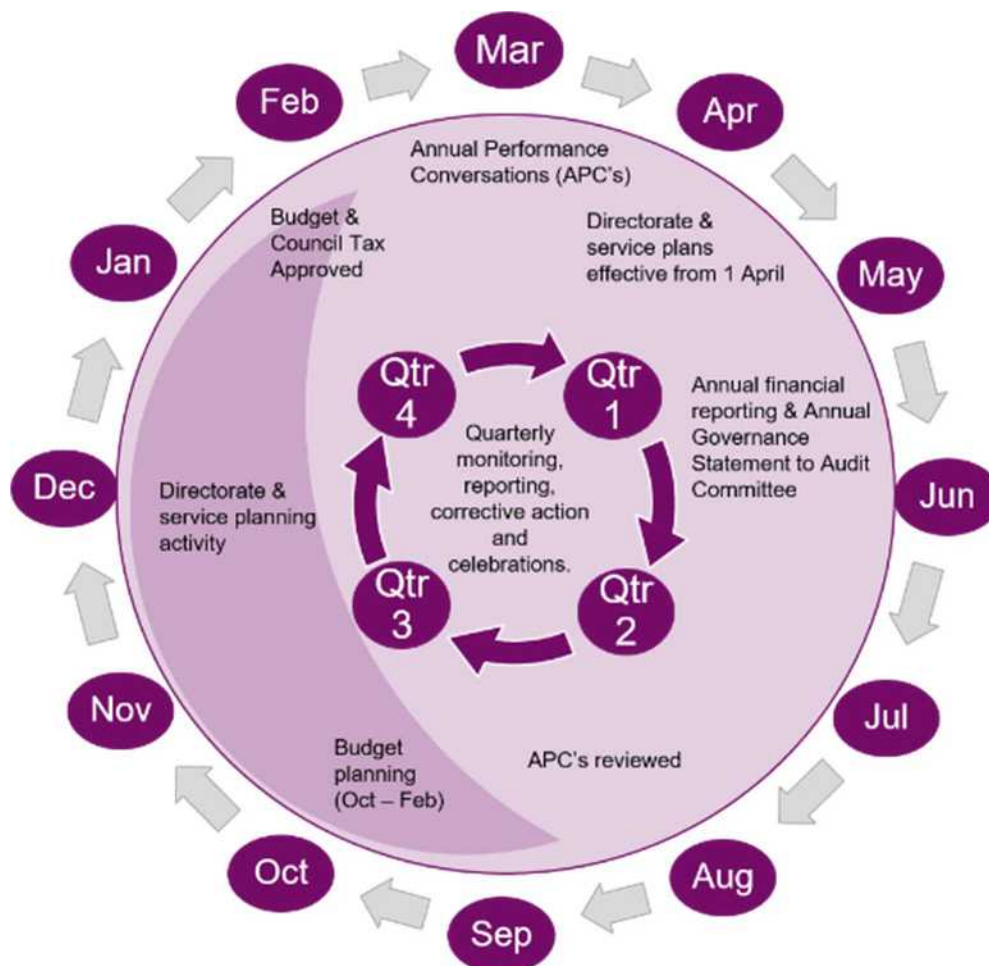


Figure: Planning Calendar

2.4 Planning

Planning at every level in the organisation describes how services and directorates work towards the delivery of the council's aim, priorities, and outcomes. They will also connect to other key strategies such as the Medium Term Financial Framework (MTFF), Workforce Strategy, Customer Experience Strategy and Digital Strategy.

The service transformation planning process enables Directors and senior leaders to routinely monitor the delivery of benefits linked to transformation activity in a holistic way. Our proud promises are key to the delivery of our aim, priorities and outcomes and the service transformation planning process, along with financial management as illustrated below:



As referenced in section 1.2 there is great diversity across the council in the services that are provided and the need to comply with external performance requirements. It is important that the approach to service planning is flexible to enable services to develop plans that align with external performance requirements as well as linking operational activity to the council's aim and priorities. As such there is no set planning template for services to complete. When developing plans, it is important that links and interdependencies with organisational strategies (e.g. Customer Experience Strategy) and activity in other services and directorates are identified and clarified. There some key components all plans will contain:

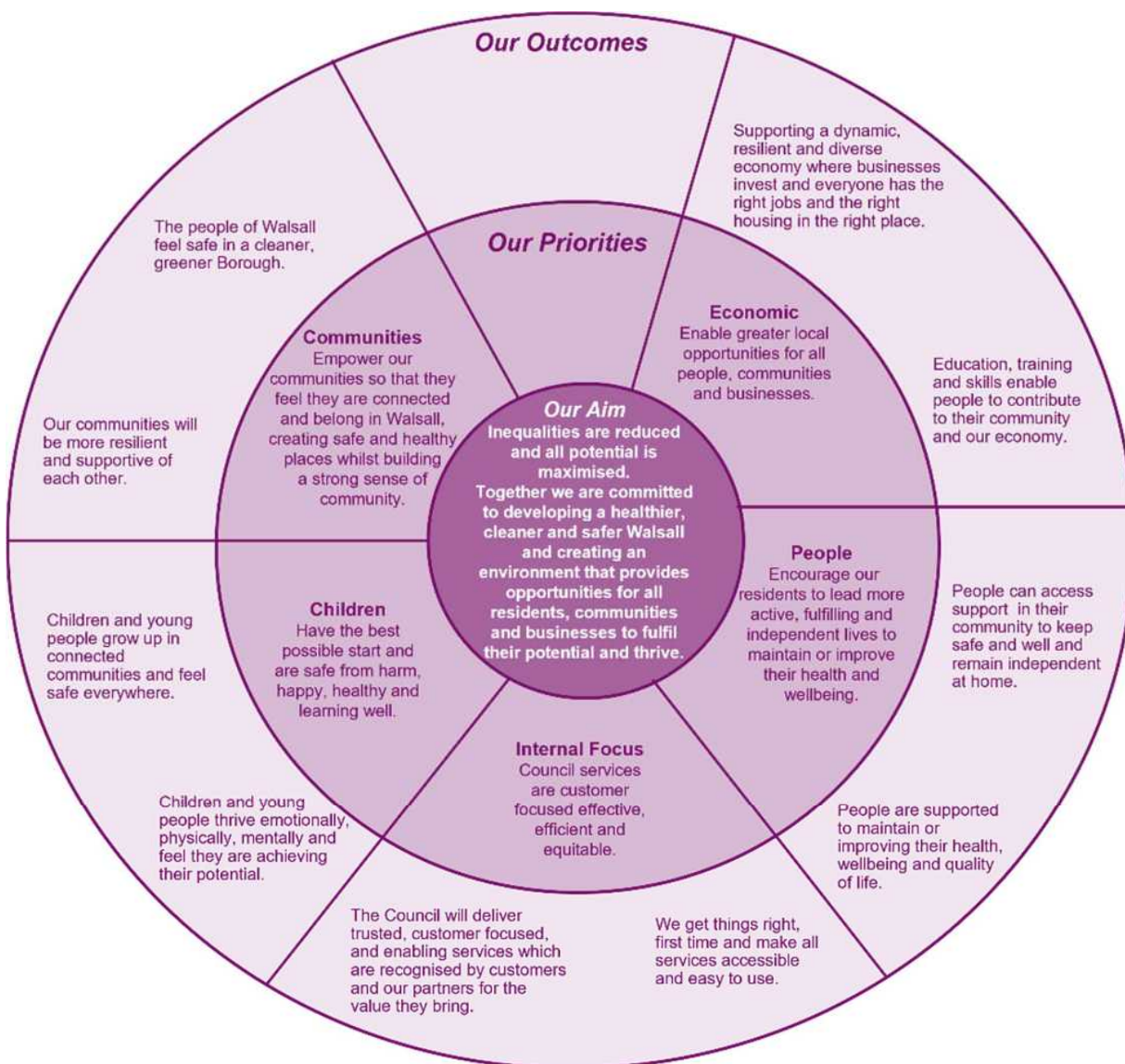
- Objectives that will link the 'golden thread' from the council's aim, priorities and outcomes to individual employee APC objectives. Objectives should be developed using SMART criteria (Specific, Measurable, Achievable, Realistic and Time Based).
- Clarity regarding resources and links to resource strategies and plans (MTFS and workforce strategy).
- Consideration of customer demographics and any specific equalities needs that must be met to ensure accessibility to services for all that need them.
- Measures or indicators that provide opportunity to monitor delivery of our outcomes, our proud promises and that enable services to consider potential future demand to inform future plans.

Planning should not be a laborious process completed annually but rather a continuous 'live' activity that provides clarity regarding objectives and how services and directorates support the organisation's aim and priorities. The regular monitoring of objectives and measures contributes to performance monitoring reports, the annual review and refresh of plans and future resource allocation.

3. Performance Management

3.1. Delivering our aim, priorities and outcomes.

As highlighted in section 2.2, performance management is linked to the 'Golden Thread' of delivery. This 'golden thread' connects the overarching Walsall Plan for the borough to the Council Plan and Aim. The connection from our aim through to outcomes is illustrated in the diagram below.



As detailed above, our aim is translated into 5 (EPICC) priorities which is further broken down into 10 outcomes.

These 10 outcomes are further broken down into 20 'Markers of Success' which are developed based on the specific focus of activity for the year. The 20 markers will be supported by balanced scorecards that will enable the council to assess progress in an open and transparent way, allowing councillors, scrutiny committees and residents to monitor progress.

Outcomes	Markers of Success
1. Supporting a dynamic, resilient and diverse economy where businesses invest and everyone has the right jobs and the right housing in the right place.	1. Better connectivity, improved reliability and well maintained transport networks creating an environment where businesses are supported to thrive and grow.
	2. Regenerating the borough to support places where people are proud to live and work, delivering affordable homes and attracting inward investment.
2. Education, training and skills enable people to contribute to their community and our economy.	3. Provide access to education, apprenticeships and training to improve productivity and skills.
	4. Reducing unemployment through collaborative working with employers and partners.
3. People can access support in their community to keep safe and well and remain independent at home.	5. People are supported to build on their strengths and those in their communities to maintain and/or maximise their independence.
	6. People feel safe in their home and community.
4. People are supported to maintain or improve their health, wellbeing and quality of life.	7. People know how to maintain or improve their health and wellbeing and get timely support for this, where required.
	8. People can access timely social care support and reablement to prevent a hospital admission or facilitate a timely discharge.
5. We get things right, first time and make all services accessible and easy to use.	9. Services will be accessible and easy to use with improved customer satisfaction.
	10. Customers and partners report that they would recommend working with us in the future.
6. The Council will deliver trusted, customer focused, and enabling services, which are recognised by customers and our partners for the value they bring.	11. Services will provide value for money measured through delivery of outcomes within agreed resources.
	12. Services are trusted and customer focused measured through staff satisfaction/ engagement scores.
7. Children and young people thrive emotionally, physically, mentally and feel they are achieving their potential.	13. Children and young people have access to high quality education and training opportunities and schools are more inclusive.
	14. Children and young people with additional needs or in specific circumstances are identified and supported to have their health and education needs met.
8. Children and young people grow up in connected communities and feel safe everywhere.	15. Services and support is responsive to needs of different communities, partners are proactive in responding to these needs and children and families have easier and timelier access to services.
	16. Children and families are better connected with community resources to enable them to

	build resilience, are involved in developing their plans and can provide regular feedback.
9. Our communities will be more resilient and supportive of each other.	17. There will be a vibrant and diverse community and voluntary sector providing help and support where people need it with a range of volunteering opportunities.
	18. Trust will be built within and between communities across the Borough.
10. The people of Walsall feel safe in a cleaner, greener Borough.	19. The Borough's streets are clean, green and welcoming, with more waste recycled and less going to landfill.
	20. People feel safe in their local area and anti-social behaviour and crime – particularly environmental crime is reduced.

3.2 Performance Management Responsibilities

Performance is everyone's responsibility. It is an essential part of all activity from daily operations and strategic planning.

Our Council Values are key to the delivery of our priorities as they underpin the way we operate as an organisation. They influence our choices and behaviour.

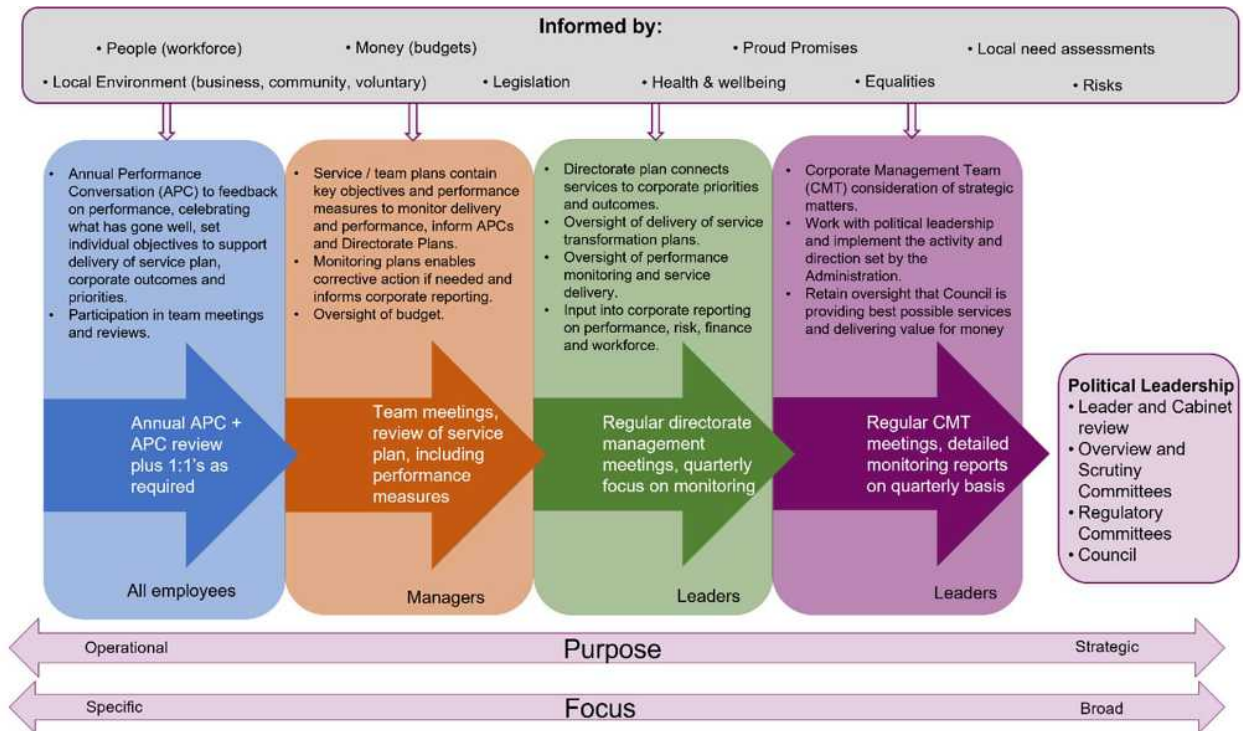
Professionalism	We understand the importance of our roles, show respect for all, act appropriately and deal with issues in a moderate and straightforward manner whenever possible.
Leadership	We motivate and inspire people to engage with our aim, recognise and encourage individual talents, providing opportunities to allow those talents to be utilised for the betterment of our organisation.
Accountability	We adhere to a standard of professionalism and hold ourselves responsible for upholding the purpose of our organisation.
Transparency	We ensure the availability of information which can be made public.
Ethical	We work with integrity, honesty and are mindful of the rule of law to successfully practice and promote transparency of government.

All employees are responsible for how they operate and perform. They are jointly responsible for the delivery of services, the delivery of outcomes and how well services perform in terms of meeting the needs of our customers, the delivery of our priorities and improvements to services. We know from our employee survey in 2021 that managing performance matters to our staff and, like so many things, there is always opportunity to improve. Just as important as what we do, our priorities and outcomes, is the way we deliver. Whilst our values underpin how we operate, support is available to ensure the delivery of performance management arrangements:

- The Behaviour Framework Guidance has recently been refreshed and there is additional information for Leaders and Managers regarding expected behaviours.
- Annual Performance Conversations provide an opportunity to have brave conversations, employee to manager and manager to employee, to drive performance

improvement. Additional information is available from the Learning and Development team.

The following diagram illustrates the relationship between various levels of activity and roles and how the Golden Thread and delivery of corporate priorities and outcomes is embedded at every level.



All Employees

- Deliver quality services to ensure customer needs are met, taking into consideration the variety of internal and external customers they have, and the various ways customers may contact and engage their service.
- Recognise and understand how their role and service aligns to the Council Plan, priorities and outcomes, working within the resources available to the service and seeking at all times to remove waste from processes, be customer focussed, efficient and effective.
- Actively participate in the annual performance conversation process and service / team planning and monitoring activity. Utilising this opportunity to review past achievements and performance whilst planning future objectives. The APC process provides the opportunity to identify successes and opportunities for training and development.
- Ensure the data and information captured and used by services is accurate, where necessary cleansed and anonymised appropriately so can be used to inform reporting on performance, inform trend analysis and decision making at every level.
- Abide by the Employee Code of Conduct at all times.

Services and teams

- Use data and intelligence to challenge and improve performance and to identify, manage and mitigate risks. Data and intelligence can also inform needs and demands, informing service improvement and so it is important that the quality of data is sufficient.
- Use planning and key performance indicators, both quantitative and qualitative to provide intelligence that supports informed decision making and forecasting future demand. Where required and necessary, based on the data available, services should consider development of measures that include customer experience and satisfaction.
- Ensure delivery of any national frameworks applicable to the service. This includes inspection frameworks, and the reporting of key performance data and surveys.
- Escalate areas of concern and key achievements to directorate level and participate in the review and monitoring of plans to inform future direction.

Directorates

- Maintain oversight of use of resources across all services in the directorate via regular monitoring of financial, workforce and risk management in addition the key performance indicators from services. This includes monitoring delivery of Strategic Transformation Plans.
- Provide a strategic overview (plan on a page) of the key deliverables for services linking these to corporate priorities and outcomes. As a minimum the plan connects corporate priorities, outcomes and markers to directorate deliverables, including activity and performance measures.
- Constructively challenge data quality, hold service and team managers to account for performance and assist in identifying how improvements can be achieved.
- Ensure learning and opportunities are shared across operational and change activity to keep staff informed and also identify good practice that can be shared and implemented in other areas.

Corporate Management Team (CMT)

- Provide visible officer leadership to ensure the council's aim, priorities and outcomes are delivered.
- Ensure excellence in respect of customer service, people management, corporate governance, performance management, financial management and control, risk management and change management.
- Monitor delivery of transformation activity, Proud promises and set the strategic direction.
- Receive quarterly reports to monitor the delivery of corporate priorities and outcomes, support Cabinet with any realignment of resources based on the delivery of outcomes.

Political Leadership

- **Full Council** is ultimately accountable to the public for how the council performs, sets the policy framework and overall budget envelope for the delivery of priorities and outcomes as agreed by the council and expressed in the Council Plan.
- **Cabinet** are the administration and lead the setting of policy and priorities in relation to service delivery, agreeing performance objectives for the services within their portfolios. They work closely with CMT and Executive Directors to monitor service performance and to review intelligence that informs decision making. They know and are accountable for what services are doing to maximise, improve or turn around poor

performance. They receive quarterly reports on the delivery of Council Plan priorities and outcomes.

- **Audit Committee** is a regulatory committee and has delegated powers to ensure an effective internal control environment is maintained as this is key to the council's governance arrangements. This includes delegated powers to consider the effectiveness of performance management arrangements and how they are embedded.
- **Overview and Scrutiny Committees** are responsible for holding Cabinet to account for the delivery of corporate priorities and outcomes as expressed in the Council Plan. As such they may request and review performance data and make recommendations to Cabinet.
- **Ward Councillors** as community leaders and representatives of specific areas and communities understand the needs of those they represent and champion the concerns and priorities of residents, communities and businesses. Understanding of local need, in partnership with detailed needs analysis from the Business Insight Hub, influences and informs corporate decision making.

All employees have a responsibility to be aware of and deliver the requirements of this framework to support the council's governance arrangements. Regular monitoring that informs action is a key part of the framework and responsibilities across all levels of the organisation.

3.3 Quality Matters

As highlighted in the roles and responsibilities section quality is a key factor in terms of performance management. Quality matters in a number of ways:

- The quality and accuracy of data and information captured and used to monitor performance and service delivery informs decision making. This can be anything from the time taken to complete a task to the customer satisfaction at the end of the engagement. Data and information that is of poor quality or inaccurately recorded may lead to poor prioritisation and resource allocation. Services must take sufficient action to improve data quality where possible and ensure it is maintained at the highest level possible.
- Having good quality data and information, both quantitative and qualitative is vital to the management of performance and to enable the council to monitor delivery, celebrate successes and take corrective action when needed. Good quality data and information informs the 'know' for our way of thinking which in turn ensures decision making is intelligence led and based on accurate information so that the council responds in the appropriate way.
- Under Data Protection Regulations and law every employee has a duty and responsibility for ensuring information that is collected, stored, processed and or shared is accurate, up to date, captured in a timely manner and shared on a need to know basis. Every employee that has responsibility for recording data in a council system has a responsibility for the quality of that data.
- Understanding local needs is based on the interpretation of a number of data sets about Walsall and its communities. This includes, for example, demographic,

economic and health profile data. How these data sets are analysed and collated is vital intelligence regarding local needs which informs decision making. The accuracy of analysis and data is key due to the influence it has on decision making.

- Increasingly, qualitative information is crucial to the development of services. It is as important to understand what customer's value, want and see as priorities. As previously identified, the council operates to serve Walsall residents. Capturing and utilising quality customer data and consulting customers regarding services provides vital data and information to inform decision making at every level.

All activity should connect to the delivery of the aim, priorities, outcomes and the Proud promise. Knowing how an activity or service is contributing to these strategic aims is key to ensuring resources are not wasted and that the council is focussing on what matters most. It is important that where possible council services efficiently capture and analyse information that can be used to evidence that services are having the impact intended in terms of delivering outcomes and to inform future priorities.

Cabinet – June 2022

Black Country Plan: Additional Sites 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 Council and its partner authorities in the Black Country (Wolverhampton City Council, Dudley Council and Sandwell Council) are currently moving through the consultation stages of the Black Country Plan (BCP), which is in preparation and 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. Plans require careful preparation, are subjected to public scrutiny and examined by independent Planning Inspectors in public before adoption can be achieved.
- 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 current BCCS and SAD run to 2026. The BCP will aim to provide sufficient land for homes and jobs to promote sustainable growth in the Black Country, 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 addressed the Issues and Options Report in 2017; the outcome of that consultation informed the production of the regulation 18 version, known as the Draft Plan. As well as providing more detail about the number of additional homes and amount of employment land that the plan aimed to provide, the Draft Plan identified specific sites that we proposed to be allocated for development.
- 1.4 Regulation 18 required the Local Planning Authority to consult on the content of the draft local plan, including site allocations. As a result of the consultation, submissions have been received and reviewed for the introduction of new allocations of suitable sites lying within the Walsall area and the internal review

of a previously excluded call for site submission. This report seeks authorisation to consult on those additional suitable housing sites for the Draft Plan version of the Black Country Plan.

- 1.5 The next stage is the production of a regulation 19 plan. The regulation 19 publication will be informed by the previous consultation and this version for consultation would seek representations on the soundness of the plan which is the main criteria considered by the Planning Inspectorate at the future examination in public. However, for this reason it is not considered that new proposed site allocations can be added at regulation 19 stage and an additional regulation 18 consultation is therefore required for these new Walsall suitable sites.
- 1.6 By including the sites in the Reg 19 BC Plan we will be closer to meeting the housing need of the Black Country for the period up to 2039. This gives us a more robust and sound Plan.
- 1.7 Restrictions due to Covid meant that the decision was taken to make consultation for the regulation 18 plan predominantly on-line, although it was possible to hold several drop-in sessions as restrictions eased. The regulation 18 consultation generated a very large number of representations, however now that national Covid restrictions have been lifted Cabinet are asked to consider whether additional methods of public engagement should be used for the current consultation. These are set out in Appendix C below.
- 1.8 Another round of consultation gives residents, community groups and statutory bodies the chance to make their views about the additional sites known, and can help us to pick up any issues that we have not identified through the site assessment process.
- 1.9 Whilst the additional sites only lie in Walsall, similar reports are being taken to the respective cabinets of Dudley, Sandwell and City of Wolverhampton.

2. Summary

- 2.1 This report seeks authorisation to consult on additional housing sites for the regulation 18 Draft Plan version of the Black Country Plan. The Regulation 18 Draft Plan as originally published is provided in full in Appendix A, the list of additional sites is provided in Appendix B. Appendix C 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. Discussions are also being held with neighbouring authorities outside the Black Country under the Duty to Cooperate, to encourage authorities to allocate land in local plans to meet some of the need arising from the Black Country and Birmingham.

2.4 However, after thorough analysis of evidence, research and consultation, it is concluded that all these sources together would not provide sufficient land to meet our requirements. The regulation 18 Draft Plan therefore proposed 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. The additional sites that are now proposed would add a further 828 dwellings and involve 32.47ha.

3. Recommendations

3.1 That Cabinet approves additional regulation 18 consultation to include in the BCP the additional sites as set out in the draft consultation document Appendix B.

3.2 That the approach to the consultation as set out in Appendix C of this report be approved.

3.3 That delegated authority be made to the Executive Director of Economy, Environment and Communities in consultation with the Cabinet portfolio holder for Regeneration to make any necessary amendments to the Draft Plan and other consultation documents prior to the commencement of the additional regulation 18 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 reg 18 draft plan.
- 4.5 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.
- 4.6 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.
- 4.7 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.
- 4.8 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.

- 4.9 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.
- 4.10 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.
- 4.11 In Walsall the Draft Plan 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.
- 4.12 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.
- 4.13 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 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.
- 4.14 At the same cabinet as this report officers are seeking approval of the following timetable (the Local Development Scheme – LDS) for the future stages of the plan. Set out as follows:

Focussed consultation on additional sites	July - September 2022
Cabinet/ Council consider Publication Plan (Regulation 19)	October 2022
Regulation 19 Consultation	November – December 2022
Submission	March – May 2023
Examination	Summer – Autumn 2023
Adoption	Early 2024

- 4.15 The need to process the large volume of representations received in response to the 2021 consultation, and the additional consultation stage that is proposed in this report, has meant that it has not been possible to follow the previous timetable to date, although measures are being examined to bring the later stages of the timetable back on course.
- 4.16 Following a review of the representations from the previous regulation 18 consultation these additional sites have been considered potentially suitable for housing and require an additional regulation 18 consultation:

WSA257	Land West of Chester Road North of Little Hardwick Road, Streetly	655 Houses
WAH258	Land east of Skip Lane and North of Woodfield Close	135
WAH259	Pacific Nurseries (extension to area already proposed in Draft Plan)	30

- 4.17 Most of these sites will include land to be used as open space and to enhance biodiversity.
- 4.18 Because of Covid restrictions at the planning stage, consultation for the Draft Plan in 2021 was predominantly on-line, including through the council's social media platforms. There was also widespread coverage in local mainstream media and several well-attended drop-in sessions were held around the borough. A large number of representations were received and these related to nearly all the major site allocations proposed in the Plan, as well as most of the other policies. Whilst the consultation techniques were agreed by Cabinet, and complied with the legislation and the council's Statement of Community Involvement, concerns were raised that many existing residents were not aware of the proposals.
- 4.19 The BCP could potentially affect all residents and businesses across the Black Country and beyond. However, it would be costly and ineffective to directly contact all addresses in the borough. A high proportion of residents do not live close to the sites proposed for allocation in the BCP so would be unlikely to respond. It is therefore recommended in addition to contacting people who have already engaged with the plan, making printed copies available at key Council buildings, press releases that a focussed consultation takes place within Walsall wards that contain or lie adjacent to the proposed new Green Belt housing sites as set out in Appendix C, including letters and a face to face drop in session.

Council Corporate Plan priorities

- 4.20 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

- 4.21 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, which may compromise our ability to make decisions locally. Delays in the timetable means it is important to consider the implications of the commitments made to Government as part of the West Midlands Housing Deal. This requires Local Plans for both constituent and non-constituent local authorities ‘to be updated, as necessary, by the end of 2019 to deliver and accommodate 215,000 homes by 2030/31’. A delay to the timetable is a risk to these commitments.

Financial information

- 4.22 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 balance of a one- off revenue reserve of £26,643 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

- 4.23 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

- 4.24 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

- 4.25 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. The

inclusion of the new sites in the BC Plan gives us the opportunity to ensure that future housing is in the most sustainable locations and provides for the enhancement of environmental living conditions with modern housing built to a high standard

Staffing implications

- 4.26 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

- 4.27 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.

Climate impact

- 4.28 Part of the assessment of the new sites includes considering climate change impacts, and the BC Plan itself contains policy requirements to address climate change.

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 consultation on the inclusion of the additional sites in the Draft Plan as set out in appendix B. A revised Draft Plan will be finalised with supporting documents to be used in an 8 week 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 (reg 19), which is intended to be prepared in 2022 for approval by Cabinet and public consultation before being submitted for examination in 2023.

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://Black Country Plan (dudley.gov.uk))

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Appendices

APPENDIX A1 Draft Black Country Plan Written Statement

APPENDIX A2 Draft Black Country Plan Policies Map

APPENDIX B Draft Plan Consultation Additional housing Sites in Walsall.

APPENDIX C Public Consultation Engagement Techniques

APPENDIX D Draft Sustainability Appraisal

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 policies¹ 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;

¹ 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.

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 Strategy², 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

² [Industrial Strategy \(wmca.org.uk\)](https://www.wmca.org.uk/industrial-strategy)

- 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.

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	Create a prosperous, stronger, and sustainable Black Country	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

Objective	Strategic Priority	Policy
Climate Change	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
Housing that meets all our needs	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
Improving the Health and Wellbeing of residents and	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
promoting social inclusion	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
Enabling a strong, stable and inclusive economy	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
Enhancing the vitality of our centres	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;
Promoting sustainable transport & active travel	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
Enhancing our natural & built environment	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
Meeting our resource and infrastructure needs	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.

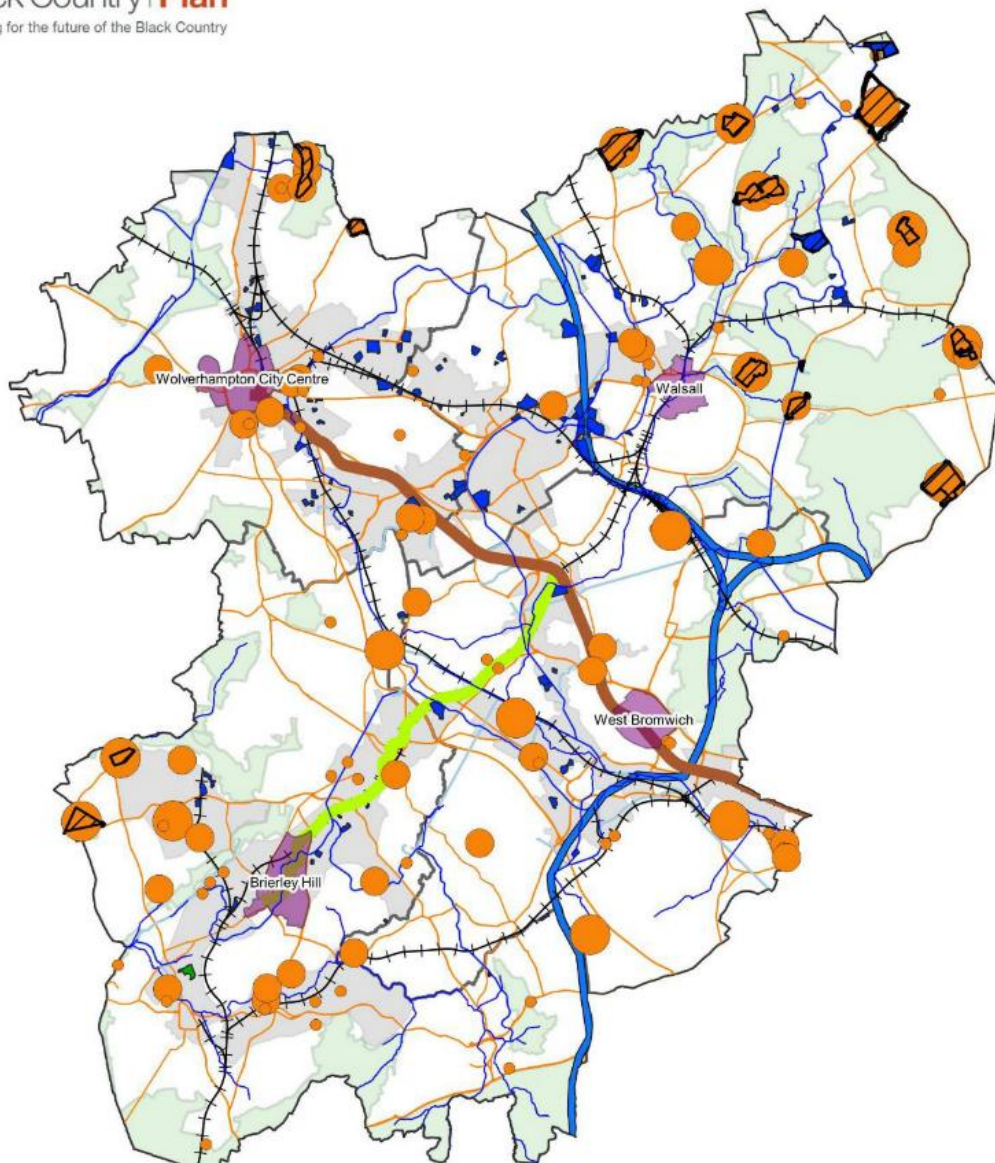
3 Spatial Strategy

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) | Tier One Strategic Centres (CEN2) |
| Employment Development Sites (EMP1) | Local Authority Boundaries |
| Existing West Midlands Metro (TRAN4) | Core Regeneration Areas (CSP2) |
| Wednesbury -Brierley Hill Metro Extension (TRAN4) | Strategic Allocations |
| Rail Network (TRAN4) | Local Green Space (DSA .4) |
| Motorways | River Network |
| Key Route Network (TRAN1) | Black Country Green Belt (GB1) |
| Canal (ENV7) | 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)
The Growth Network		
Strategic Centres	9,561	0
Core Regeneration Areas	11,208	192

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

*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.

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.

- 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 guidance³ 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

³ <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 sectors⁴ 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,**

⁴ 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 applied⁵. This will protect the amenities of incoming residents while at the same time it will preserve and protect the existing adjacent use / activity.

⁵ 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 services⁶;

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

⁶ 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) technology⁷ 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

⁷ 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.

Monitoring

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

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5 Health and Wellbeing

Introduction

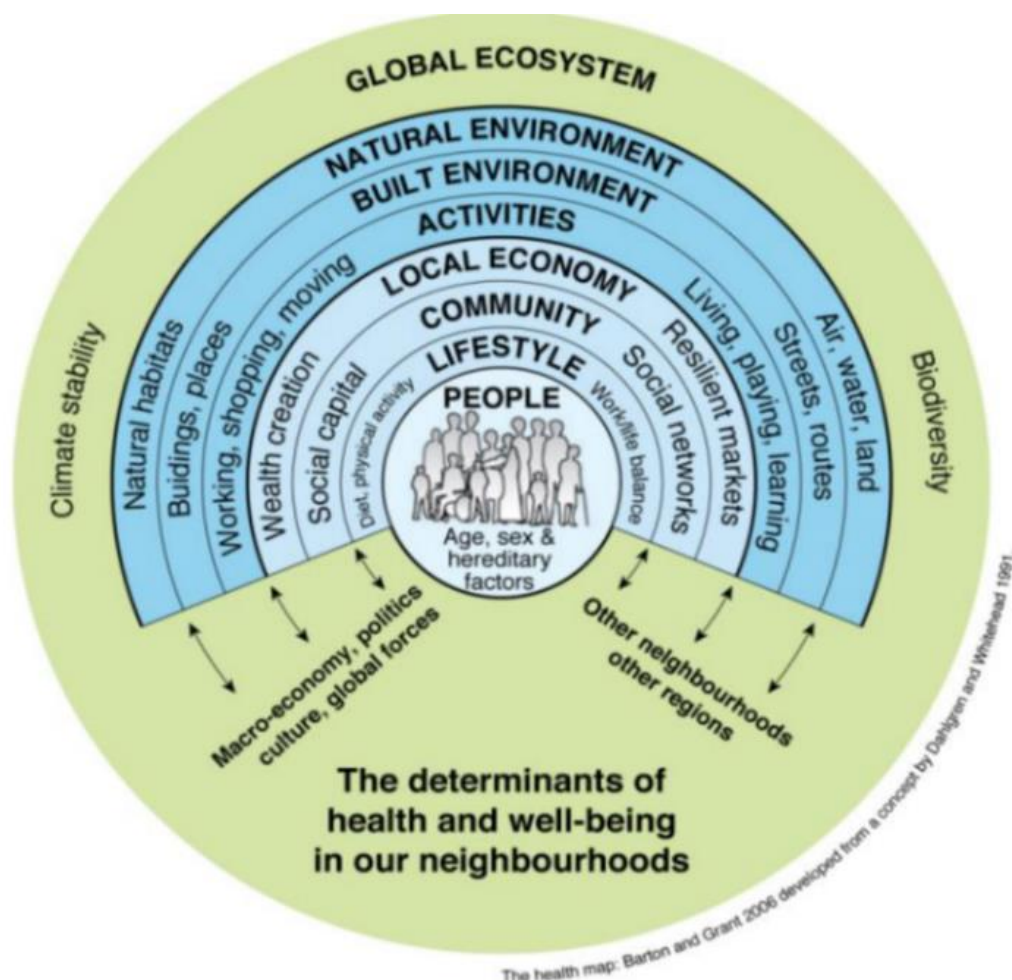
- 5.1 The purpose of the planning system in England is to contribute to the achievement of sustainable development. The built and natural environments are key determinants of health and wellbeing. The NPPF states that one of the three overarching objectives of the planning system is supporting strong, 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

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.

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.

- 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, expanded⁸. 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.

⁸ 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	<p>Compliance with supportive policies quoted</p> <p>Compliance with more detailed supportive Development Plan Documents and Supplementary Planning Documents produced by each Black Country Authority</p>	<p>All developments within scope of the policies</p> <p>All developments within scope of the policies</p>
HW2	<p>Location of infrastructure in compliance with the requirements outlined in the policy</p> <p>Receipt of developer contributions where required to support new residential developments</p>	<p>All developments for health infrastructure</p> <p>All developments for health infrastructure to meet demand generated by new housing developments where contributions are required (subject to viability)</p>
HW3	<p>Number of Health Impact Assessments produced</p> <p>Number of recommendations from Health Impact Assessments implemented</p>	<p>All developments where required by local development plan documents</p> <p>All developments where recommendations are made</p>

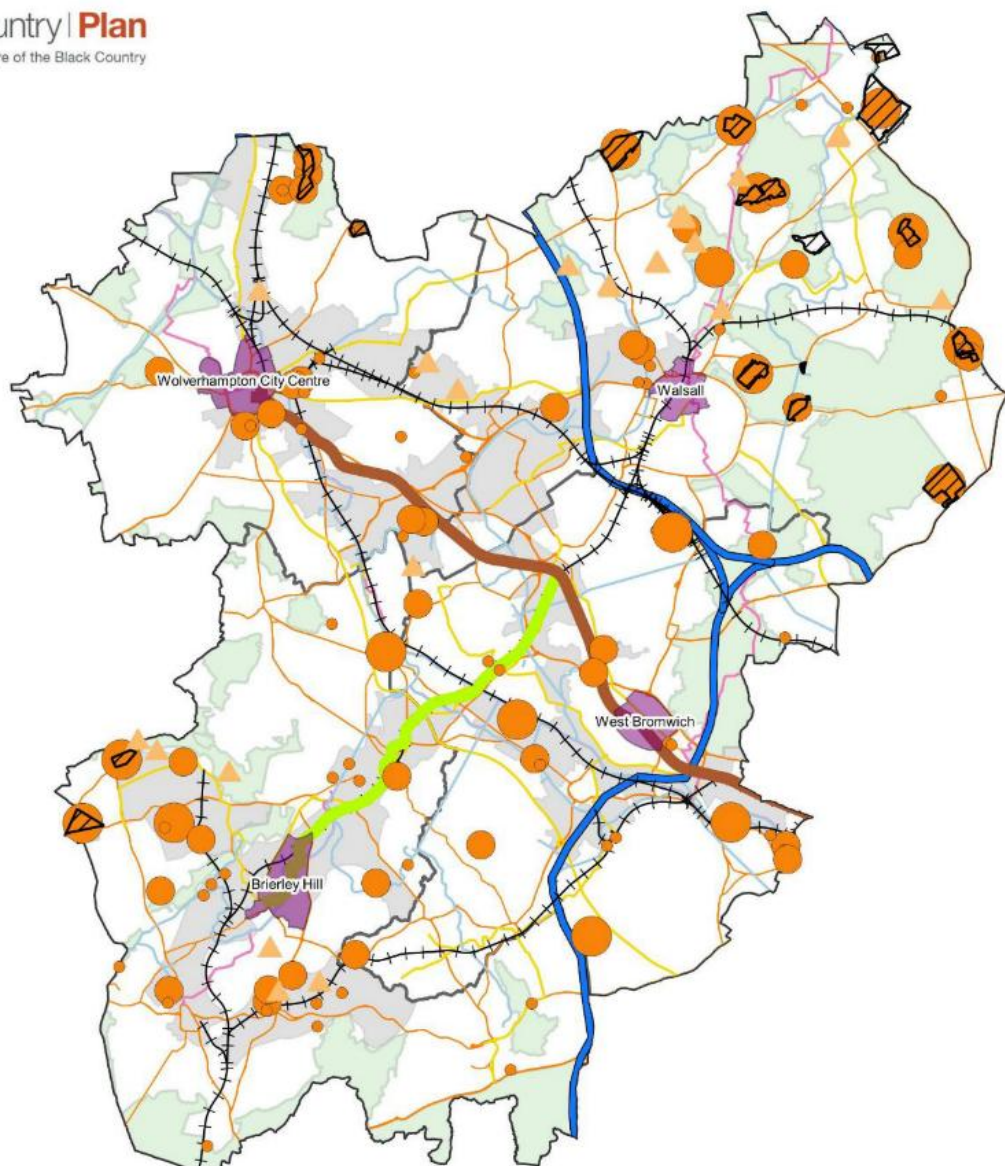
6 Housing

Introduction

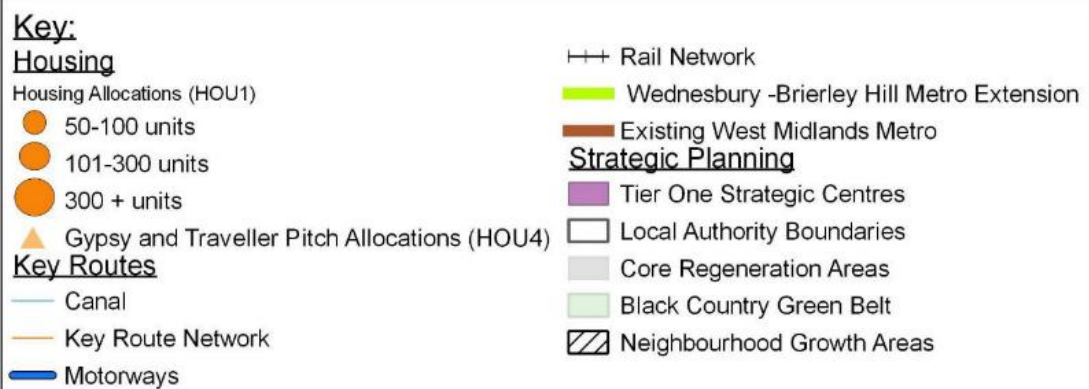
- 6.1 The policies in this chapter will help to create a network of cohesive, healthy and prosperous communities across the Black Country, which is a fundamental element of the vision and objectives and which will deliver the overarching strategic priority and Strategic Priorities 3 and 4. The provision 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



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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
CURRENT SUPPLY as of April 2020	Sites Under Construction	5,258	5,258	0	0
	Sites with Planning Permission or Prior Approval ▲	7,380	7,244	136	0
	Sites with Other Commitment (as set out in 2020 SHLAAs) ☼	3,802	2,002	986	814
	Existing Housing Allocations in Strategic Centres ☼ (not subject to review through the Black Country Plan)	4,973	1,708	1,795	1,470
HOUSING ALLOCATIONS IN BLACK COUNTRY PLAN⁹	Occupied Employment Land ♠	3,091	616	1,228	1,247
	Sites released from the Green Belt	7,720	2,398	3,173	2,149
	Other ☼	6,921	4,308	1,487	1,126
WINDFALL ALLOWANCES	Small sites (<10 homes / 0.25 ha)	7,651	2,661	2,495	2,495
	Wolverhampton City Centre upper floor conversions	812	232	290	290
ADDITIONAL SITE CAPACITY IN STRATEGIC CENTRES (to be allocated in Local Plans)	Wolverhampton City Centre	750	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

⁹ 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
TOTAL GROSS HOMES		48,908	26,427	12,115	10,366
TOTAL LOSS HOMES	Dudley Estimated Housing Renewal Demolitions	- 323	- 323	0	0
	Small-scale demolition windfalls	- 748	- 328	- 210	- 210
TOTAL NET HOMES		47,837	25,776	11,905	10,156

▲ 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
CURRENT SUPPLY 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 ¹⁰	102	2,691 ¹¹	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

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

¹¹ Including 833 homes on identified sites in Walsall Town Centre

Source of Supply (net new homes)		Dudley	Sandwell	Walsall	Wolverhampton
HOUSING ALLOCATIONS IN BLACK COUNTRY PLAN¹²	Sites released from the Green Belt	1,117	171	5,418 ¹³	1,014
	Other [⌘]	2,739	2,013	1,402	767
WINDFALL ALLOWANCES	Small sites (<10 homes / 0.25 ha)	2,816	1,728	1,455	1,652
	Wolverhampton City Centre upper floor conversions				812
ADDITIONAL SITE CAPACITY IN STRATEGIC CENTRES (to be allocated in Local Plans)	Brierley Hill Town Centre	350			
	West Bromwich Town Centre		200		
	Walsall Town Centre			0	
	Wolverhampton City Centre				750
TOTAL GROSS HOMES		13,938	9,498	13,344	12,128
TOTAL LOSS HOMES	Estimated Housing Demolitions 2020-39	- 703	- 340	0	- 28
TOTAL NET HOMES (per annum¹⁴)		13,235 (696)	9,158 (482)	13,344 (702)	12,100 (637)
PHASED HOUSING TARGETS (NET)	2020-2029	6,264	4,338	6,318	5730
	2029-2034	3,480	2,410	3,510	3185
	2034-2039	3,480	2,410	3,510	3185

▲ discounted by 5%

⌘ discounted by 10%

◆ discounted by 15%

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

¹³ Excludes 1,715 homes that it is estimated will be delivered after 2039

¹⁴ Rounded down

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
Accessibility (by either walking or public transport, unless stated)			
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.

- 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:

	One bedroom	Two bedrooms	Three bedrooms	Four + bedrooms
Owner occupied	19.1%	27.9%	30.5%	22.6%
Private rented	22.2%	22.3%	20.3%	35.2%
First Homes	20.6%	26.9%	33.6%	18.9%
Shared ownership	25.0%	32.0%	27.5%	15.5%
Social Rent / Affordable Rent	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 Dwellings¹⁵.**
 - b. On greenfield sites* in medium or higher value zones: 15% of homes to meet the optional Building Regulations Requirement M4(3): Wheelchair User Dwellings¹⁶ and all remaining homes to meet the optional Building Regulations Requirement M4(2): Accessible and Adaptable Dwellings¹⁷.**
- 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**

¹⁵ Or any subsequent national equivalent standard

¹⁶ Or any subsequent national equivalent standard

¹⁷ 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

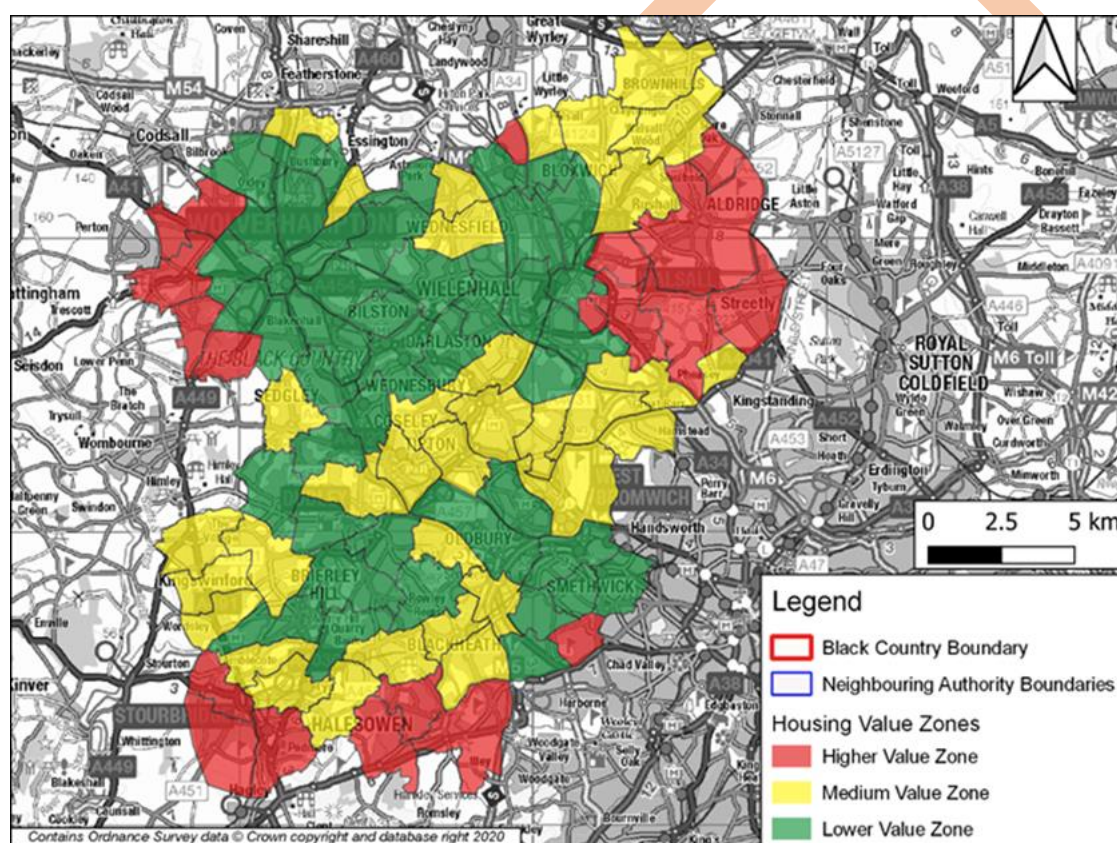
Justification

- 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

from 10% to 30%, has been set out in Policy HOU3 which reflects this variation. This approach should ensure that viability appraisals are not required at planning application stage for the majority of sites. However, viability issues can vary significantly from site to site and are often caused by poor ground conditions, the extent of which cannot be accurately assessed until planning application stage. Therefore, to maximise delivery of affordable housing over the Plan period, it is important that affordable housing is sought on all eligible sites, that viability is assessed on a site by site basis where required, and that a flexible approach is employed wherever possible to allow for changing market conditions.

Figure 5 – Black Country Housing Value Zones

(Source: Black Country Viability and Delivery Study 2021)



- 6.28 The tenure of affordable housing required over the Plan period will vary according to local housing need and market conditions and will also be constrained by the requirements of national planning policy. In general, a mix of tenures will be sought on all sites of ten homes or more, to help create mixed communities across the Black Country. However, there may be circumstances where this goal is better achieved through the provision of a 100% affordable housing development to boost

- 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 Targets¹⁸

		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

¹⁸ 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
Plots for Travelling Showpeople	Target	6	4	4	2	21	14	0	0	51
	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:**
- the development would not result in the loss of family-sized dwellings in areas where there is a proven demand for such accommodation;**
 - 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;**
 - The development would not have a significant adverse impact on the character and appearance of the area, including the historic and natural environment;**
 - 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.

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)¹⁹, and the Black Country Employment Area Review (BEAR)²⁰. 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;

¹⁹ Prepared by Warwick Economics & Development Limited (WECD)

²⁰ 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

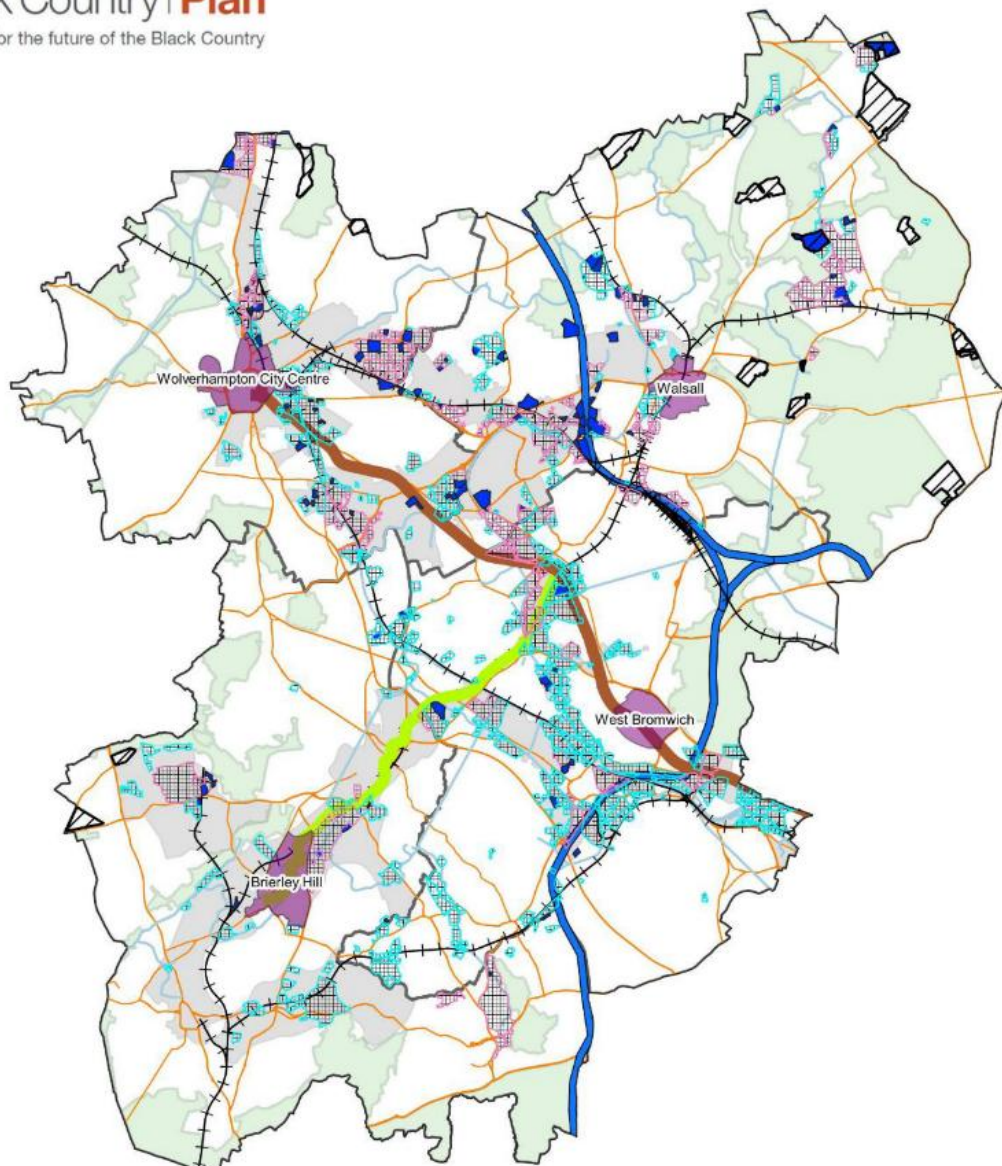
considerably less than was envisaged by the Black Country Core Strategy adopted in 2011;





- 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.

Figure 6 - Black Country Employment Key Diagram

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

**Employment Key Diagram**

Key:	
Employment	
 Employment Development Sites (EMP1)	 Rail Network
 Strategic Employment Areas (EMP2)	 Motorways
 Local Employment Areas (EMP3)	 Canal
Key Routes	
 Key Route Network	Strategic Planning
 Existing West Midlands Metro	
 Wednesbury -Brierley Hill Metro Extension	
	 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.

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;**

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

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]

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

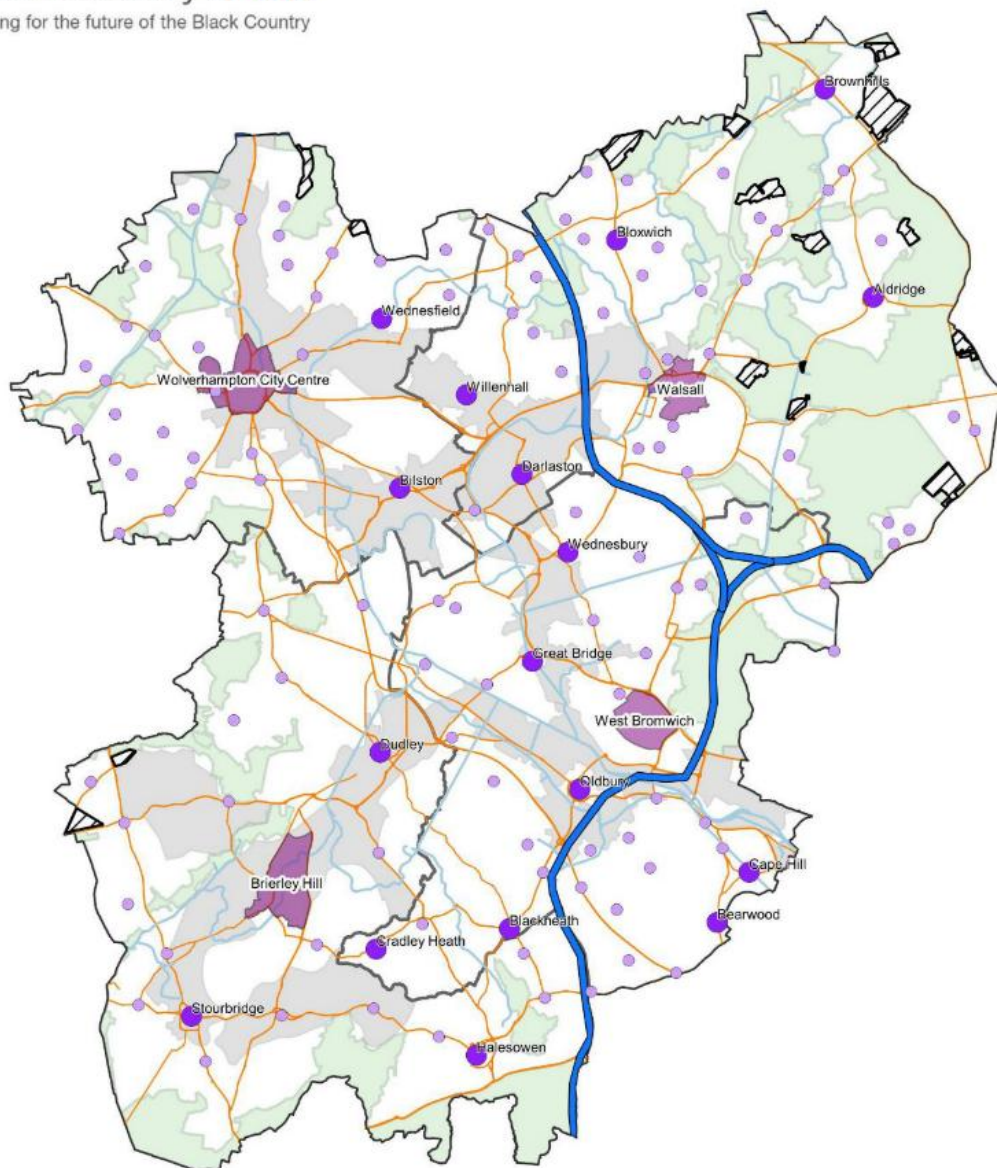
the floorspace thresholds for undertaking the impact assessments set out in national guidance; and Local Development Plan policies (such as frontage policies), defined as currently including:

- ‘*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

Key:

Centres

■ Tier One Strategic Centres (CEN2)

● BCP Tier Two Centres (CEN3)

● BCP Tier Three Centres (CEN4)

Key Routes

— Canal

— Motorways

— Key Route Network

Strategic Planning

■ 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).

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**

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

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
One	Strategic Centres	Brierley Hill	West Bromwich	Walsall Town Centre	Wolverhampton City Centre	Policy CEN1 Policy CEN2	Policy CEN1 Policy CEN2 Policy CEN5 (if floorspace uplift/ unit size <280sqm see paragraph 8.48 - 9) Policy CEN6 Sequential Test Impact Tests	Policy CEN1 Policy CEN5 (if floorspace uplift/ unit size <280sqm see paragraph 8.48 - 9) Policy CEN6 Sequential Test Impact Tests

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	Policy CEN1 Policy CEN3	Policy CEN1 Policy CEN3 Policy CEN5 (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
						Policy CEN6 Sequential Test Impact Tests (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	Policy CEN1 Policy CEN4 Policy CEN5 (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) Policy CEN6 Sequential Test Impact Tests (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
				Shelfield South Mossley Dudley Fields Streets Corner Buxton Road, Bloxwich Coppice Farm Turnberry Road, Bloxwich Blackwood	Chapel Ash			

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.

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.

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 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.**

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

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).

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).**

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;
- a) proposals related to petrol filling stations and drive-through facilities;
 - b) proposals for ancillary retail and leisure uses under Policies EMP2 and EMP3;
 - c) 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

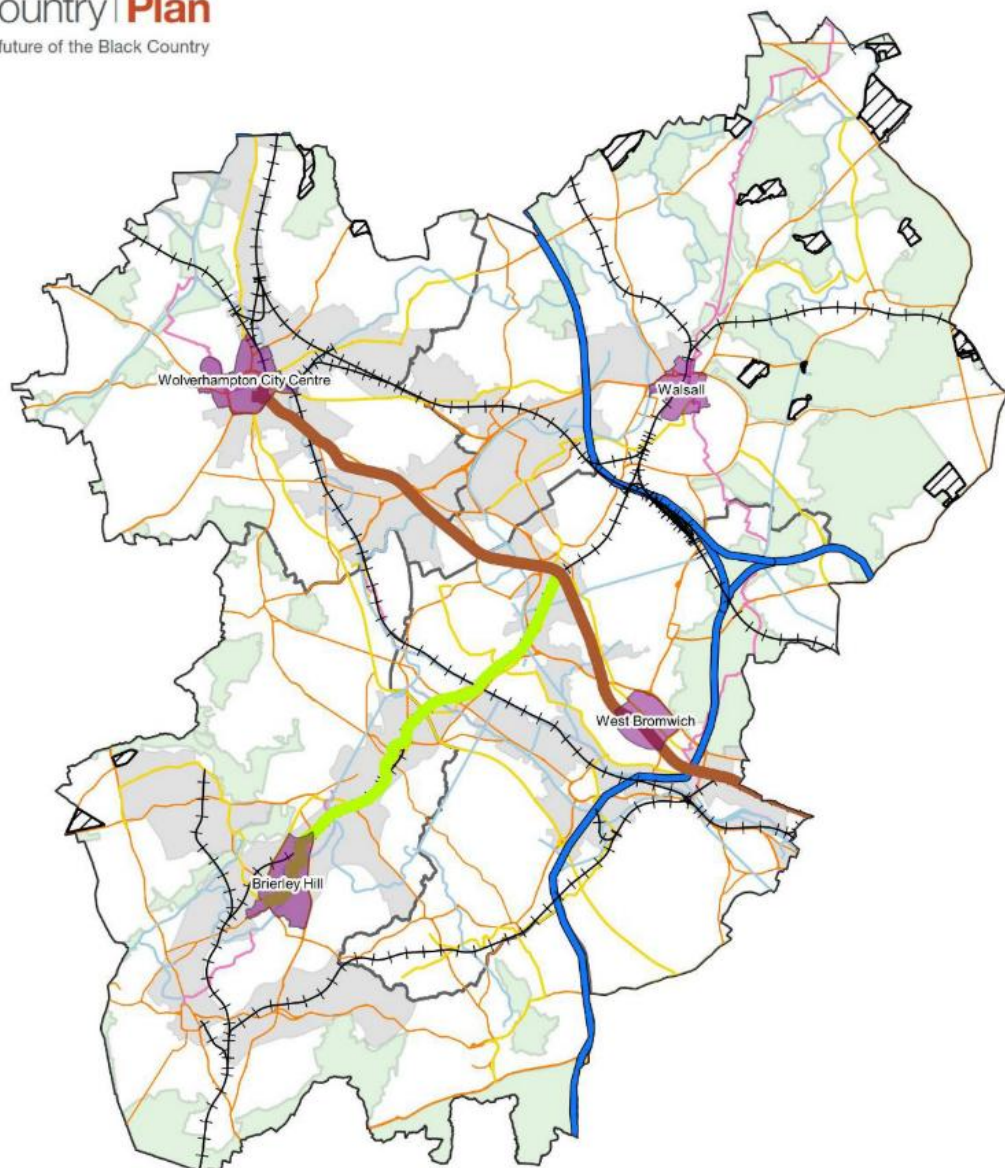
9 Transport

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:	
Transport	
Key Route Network (TRAN1)	Wednesbury - Brierley Hill Metro Extension (TRAN4)
Motorways	Canal
Local Cycle Networks (TRAN5)	Strategic Planning
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 following²¹:**
 - 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**

²¹ 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 Corridors²²:**
 - 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.

²² 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 UTMCC 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 lines²³ 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

²³ 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.

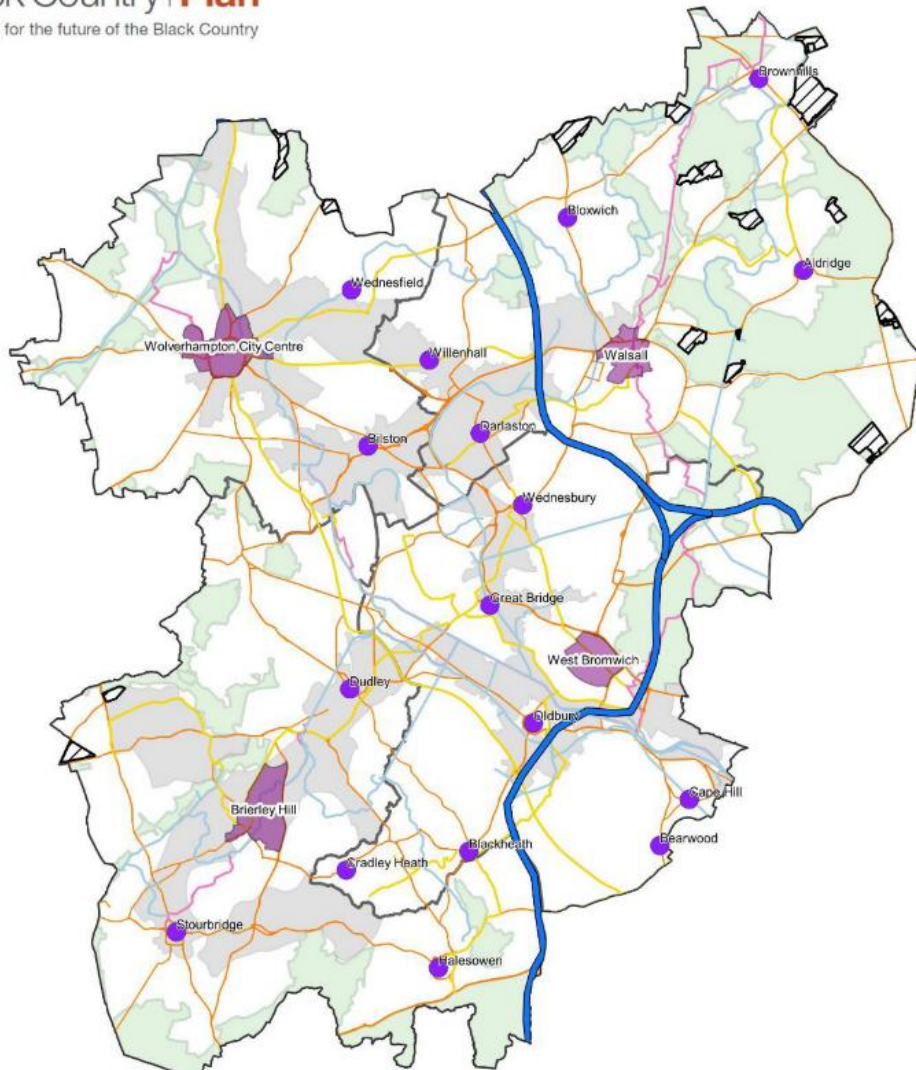
Issues & Options Consultation

- 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:	
Cycle Network (TRAN5) Strategic Planning	
— National Cycle Network	Core Regeneration Areas
— Local Cycle Network	Local Authority Boundaries
Key Routes	
— Motorways	BCP Tier Two Centres
— Key Route Network	Tier One Strategic Centres
— Canal	Black Country Green Belt
	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 an addition 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

Policy	Indicator	Target
TRAN8	TBC	TBC

DRAFT

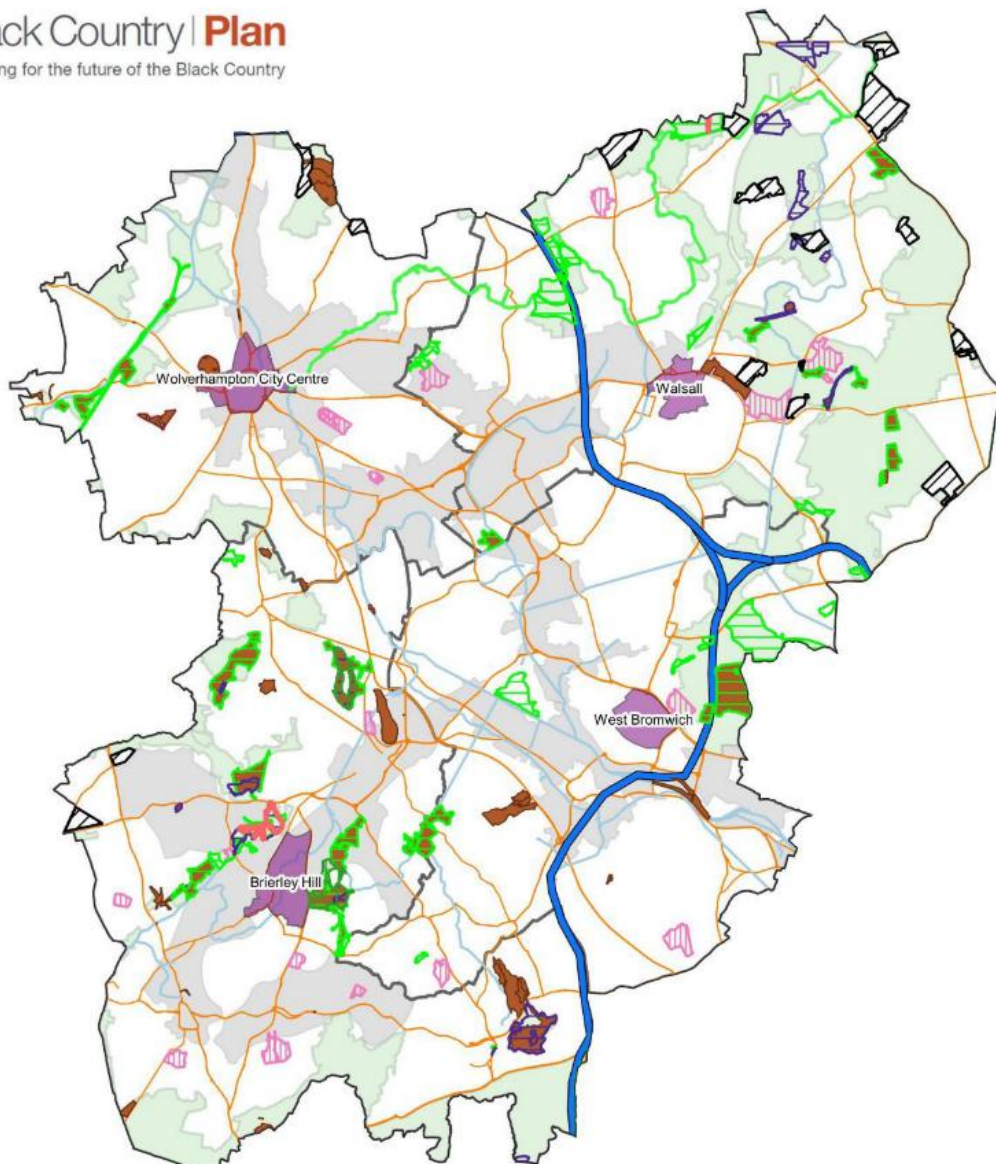
10 Environmental Transformation and Climate Change

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

<u>Key:</u>	
<u>Environment</u>	
	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)
<u>Key Routes</u>	
	Motorways
	Key Route Network
<u>Strategic Planning</u>	
	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.

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*”²⁴, 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 Earth²⁵. 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

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

²⁵ 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.

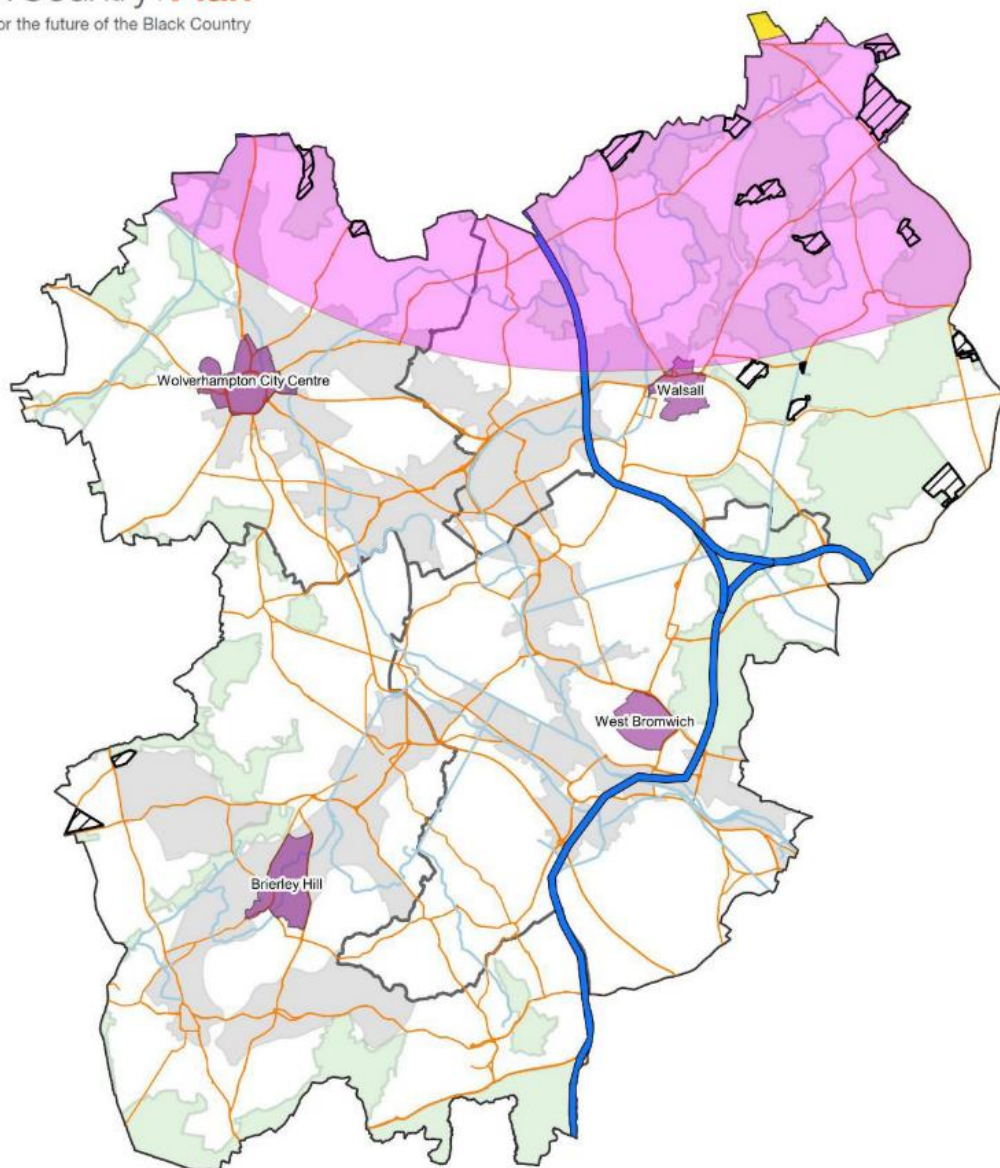
Policy ENV2 - Development Affecting Special Areas of Conservation (SACs)

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

Key:	
Zones of Influence (ENV2)	
	Cannock Chase SAC Zone of Influence – 15km
	Cannock Chase SAC Zone of Influence – 8km
Key Routes	
	Motorways
	Key Route Network
Strategic Planning	
	Tier One Strategic Centres
	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.

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 LNRs, creating an incentive for a wide range of organisations to engage with the creation of LNRs 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 LNRs through an uplift in the calculation of biodiversity units created at sites identified by the strategy. LNRs 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 period²⁶, based on data establishing its current levels of provision²⁷ and identifying opportunities for doing so derived from the Nature Recovery Network and biodiversity net gain targets.

²⁶ 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/>

²⁷ 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 removal²⁸. 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

²⁸ 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 habitat²⁹ 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.**

²⁹ E.g. from the local ecological records centre

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

- 11) Existing mature trees³⁰, 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 amenity³¹ 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 proposals³², 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 cover³³.**
- 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 site³⁴.**
- 14) New houses and other buildings must be carefully designed and located to prevent an incompatible degree of shade³⁵ 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**

³⁰ Health and status as assessed in a report produced by an accredited arboriculturist

³¹ 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.

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

³³ The area of ground covered by trees when seen from above.

³⁴ Emergency Tree Plan for the UK – The Woodland Trust 2020

³⁵ 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 group³⁶.**
- 19) Trees on development sites must be physically protected during development. Care must be taken to ensure that site engineering /**

³⁶ 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 works³⁷, 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 pits³⁸, 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 works³⁹ 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.

³⁷ 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.

³⁸ 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

³⁹ 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 level⁴⁰, 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.

⁴⁰ [GB Wards Canopy Cover Map](#)

- 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 iTree⁴¹ 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.

⁴¹ VALUING LONDON'S URBAN FOREST Results of the London i-Tree Eco Project 2015
<https://www.treeeconomics.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 trees⁴². 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 services⁴³, such as in:
- a) helping to improve residents' physical health⁴⁴
 - 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 stroke⁴⁵)
 - 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

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

⁴³ 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.

⁴⁴ 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)

⁴⁵ 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 trees⁴⁶

- 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

⁴⁶ <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

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 assets⁴⁷, attention should be paid to the following non-designated heritage assets⁴⁸ 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):**

⁴⁷ 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

⁴⁸ 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 significance⁴⁹.**
- 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**

⁴⁹ 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

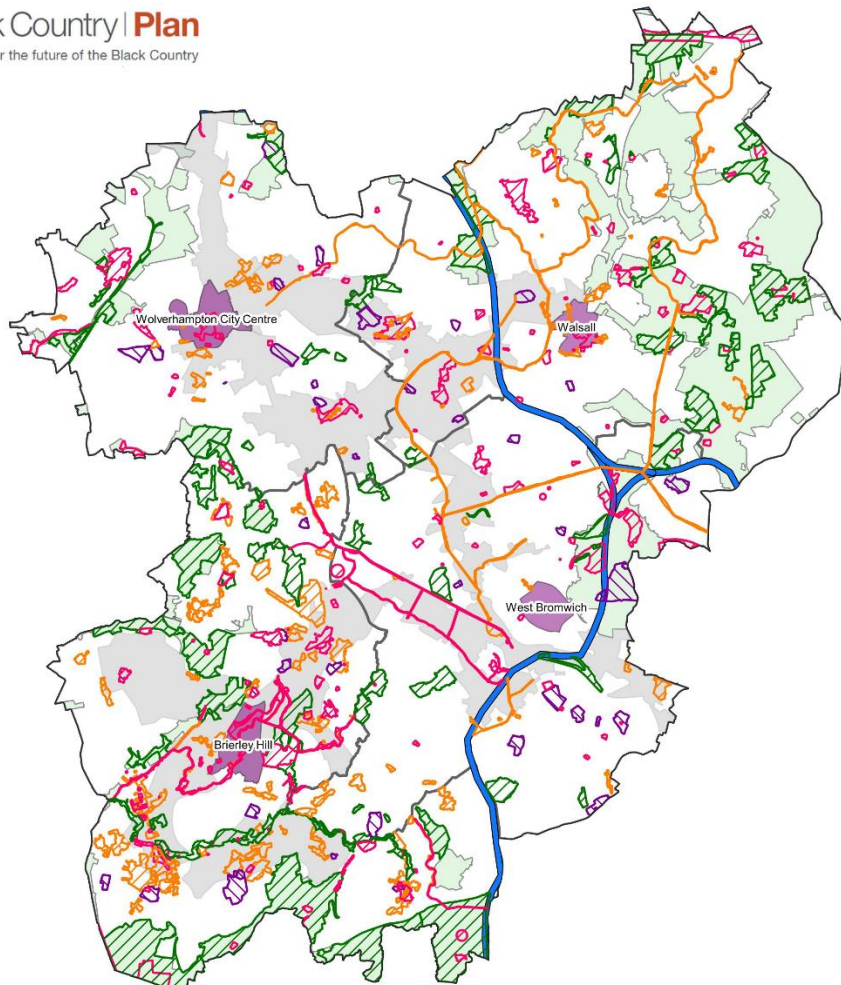
provided, either in Design and Access Statements, Statements of Heritage Significance, or other appropriate reports.

- 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 Map⁵⁰

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

**Historic Landscape Characterisation Policies Map (ENV5)****Key:****Historic Landscape Characterisation (ENV5)**

- Areas of High Historic Landscape Value
- Areas of High Historic Townscape Value
- Archaeological Priority Areas
- Designed Landscapes of Historic Value

Key Routes

- Motorways

Strategic Planning

- Tier One Strategic Centres
- Local Authority Boundaries
- Core Regeneration Areas
- Black Country Green Belt

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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

⁵⁰ 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 Network⁵¹. 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.

⁵¹ 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 sites⁵² 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 Energy⁵³ 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.

⁵² 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.

⁵³ 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 Geopark⁵⁴ 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

⁵⁴ <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.

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

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 Guide⁵⁵ to ensure the provision of a high-quality network of streets, buildings and spaces;
 - b) implementation of the principles of “Manual for Streets⁵⁶” 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 Life⁵⁷ 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 change⁵⁸ 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;

⁵⁵ <https://www.gov.uk/government/publications/national-design-guide>

⁵⁶ To be supplemented by Manual for Streets 2 in 2022 - <https://www.ciht.org.uk/knowledge-resource-centre/resources/revising-manual-for-streets/>

⁵⁷ <https://www.udg.org.uk/publications/othermanuals/building-healthy-life>

⁵⁸ 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 standards⁵⁹ 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)⁶⁰, 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;

⁵⁹ <https://www.gov.uk/government/publications/sanitation-hot-water-safety-and-water-efficiency-approved-document-gov>

⁶⁰ <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 H1⁶¹ 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.

⁶¹ 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 characteristics⁶² 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 Charter⁶³. 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.

⁶² Context; Identity; Built form; Movement; Nature; Public spaces; Uses; Homes and buildings; Resources; Lifespan.

⁶³ <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 placemaking⁶⁴.

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 LEP⁶⁵. 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

⁶⁴ 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.

⁶⁵ Black Country LEP Garden City Principles: <https://www.blackcountrylep.co.uk/our-strategy/place/black-country-garden-city/garden-city-principles/>

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 policy⁶⁶. 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.

⁶⁶ 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

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 Office⁶⁷ 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 winter⁶⁸ 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

⁶⁷ <https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18-infographic-headline-findings-land.pdf>

⁶⁸ All results are for the 10th-90th percentile range for the 2060-2079 period relative to 1981-2000

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 time⁶⁹ 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

⁶⁹ 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 change⁷⁰ 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;

⁷⁰ Paragraph: 003 reference ID: 6-003-20140612

- d) promoting adaption 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 Budget⁷¹
- 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.

⁷¹ <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 energy⁷² provision within the site, unless it can be demonstrated that the development is not suitable, feasible or viable for district heat⁷³ 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 connection⁷⁴ 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

⁷² 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](#)

⁷³ <https://www.gov.uk/guidance/heat-networks-overview>

⁷⁴ 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 NOx emissions related to energy generation will be equivalent to or lower than those of an ultra-low NOx⁷⁵ 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.

⁷⁵ Ultra-low NOx boiler Standard specified in the Black Country Air Quality Supplementary Planning Document.

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 NOx gas boiler;
- e) use low-emission combined heat and power (CHP);
- f) use ultra-low NOx gas boilers only if more sustainable alternatives are unavailable;
- g) CHP and ultra-low NOx 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.

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 proposals⁷⁶ should minimise both internal heat gain and the impacts of urban heat islands⁷⁷ 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, albedo⁷⁸, 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 mass⁷⁹ and high ceilings;**
 - d) **provide passive ventilation;**
 - e) **provide mechanical ventilation;**

⁷⁶ Excluding domestic extensions.

⁷⁷ Caused by extensive built-up areas absorbing and retaining heat.

⁷⁸ 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.

⁷⁹ 'Thermal mass' is a material's capacity to absorb, store and release heat.

Policy CC3 – Managing Heat Risk

f) provide active cooling systems⁸⁰.

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 document⁸¹ 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 effect⁸² 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 inequity⁸³ 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.

⁸⁰ Systems using energy to provide cooling. They circulate a coolant (gas, fluid) to transfer heat from one place to another.

⁸¹ UK Climate Projections: Headline Findings (September 2019) Version 2

⁸² www.metlink.org/fieldwork-resource/urban-heat-island-introduction/

⁸³ [Jason Byrne et al 2016 Environ. Res. Lett. 11 095014](#)

- 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-soleil⁸⁴,
 - 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.

⁸⁴ Architectural feature that reduces heat gain within a building by deflecting sunlight

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 objectives⁸⁵. 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 pollution⁸⁶.

10.177 According to the 2019 Clean Air Strategy published by DEFRA⁸⁷,

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

⁸⁵ https://uk-air.defra.gov.uk/assets/documents/reports/cat09/2006240802_Impacts_of_Net_Zero_pathways_on_future_air_quality_in_the_UK.pdf

⁸⁶ http://www.euro.who.int/data/assets/pdf_file/0005/397787/Air-Pollution-and-NCDs.pdf?ua=1

⁸⁷ <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 mitigation⁸⁸.
- 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 street⁸⁹);
 - c) using ventilation systems to draw cleaner air into buildings;
 - d) improving public transport access to all development;

⁸⁸ NPPG, Paragraph: 007 Reference ID: 32-007-20140306

⁸⁹ <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 test⁹⁰ 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 250m²); or**

⁹⁰ NPPF (2019), paragraph 158

Policy CC5 – Flood Risk

- 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;
 - 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 in Flood Zone 1 (Low Probability), the information in the 2020 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

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

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 demand⁹¹ 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:**

⁹¹ 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

* 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 uk-air.defra.gov.uk/data/data-catalogue).	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%

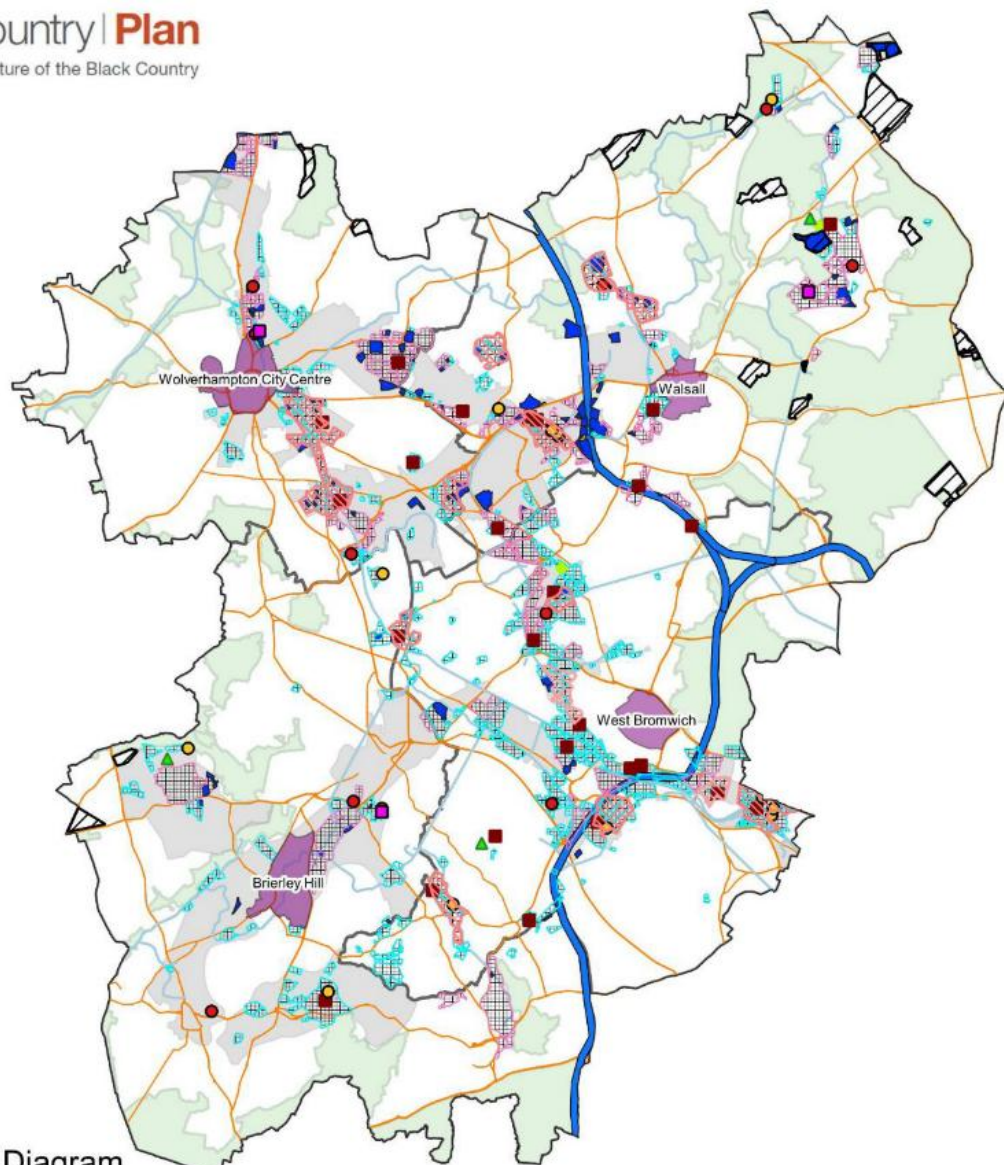
11 Waste

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>	
Employment Development Sites (EMP1)	Core Regeneration Areas
Strategic Employment Areas (EMP2)	Local Authority Boundaries
	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 ⁹²

⁹² 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 tpa⁹³
- 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,

⁹³ 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) ⁹⁴	
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).

⁹⁴ 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.

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.

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.

Policy W3 – Preferred Areas for New Waste Facilities

- 1) **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.**

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 Positive Locational Objectives (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 Spatial Exclusionary Objectives (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 Spatial Discretionary Objectives (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

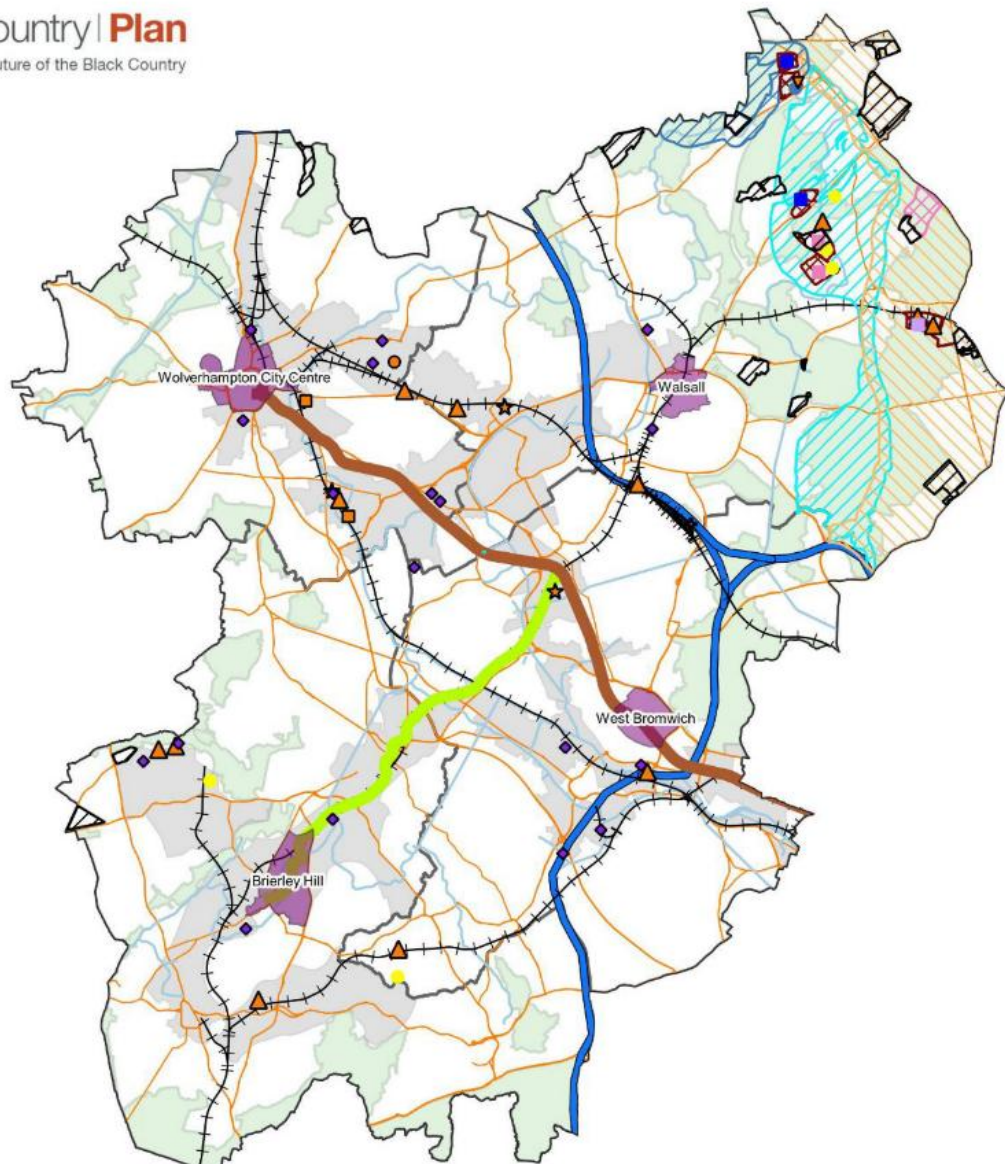
12 Minerals

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**Mineral Safeguarding Areas (MIN2)**

- Fireclay Mineral Safeguarding Area
- Sand and Gravel Mineral Safeguarding Area
- Brick Clay Minerals Safeguarding Area

Existing Mineral and Mineral Infrastructure Sites (MIN2)

- Mineral Extraction Sites
- Rail Linked Aggregates Depot
- Aggregates Recycling Facilities
- Coating Plant
- Manufacture of Concrete Products
- Concrete Batching Plant

- Dry Silo Mortar Plant
- Fireclay Stockpile
- Brickworks
- Pot Clay Factory
- Dormant Quarry
- Active Quarry
- Pre-operational Quarry

Preferred Areas for Mineral Development (MIN3)

- Preferred Area for Sand Gravel

Key Routes

- Existing West Midlands Metro

- Wednesbury -Brierley Hill Metro Extension

- Rail Network

- Key Route Network

- Motorways

- Canal

Strategic Planning

- Regeneration Growth Corridors

- Local Authority Boundaries

- Tier One Strategic Centres

- Black Country Green Belt

- Neighbourhood Growth Areas

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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)⁹⁵ 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 annum⁹⁶. 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 sites⁹⁷. As a minimum, the Black Country will aim to maintain this level of production throughout the plan period. In support of this, permitted

⁹⁵ The West Midlands Metropolitan Area (WMMA) comprises the seven unitary authorities of Birmingham, Coventry, Dudley, Sandwell, Solihull, Walsall, and Wolverhampton.

⁹⁶ 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.

⁹⁷ 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).

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 Authorities⁹⁸ 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.

⁹⁸ 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
Annual Sales	0.500	0.375	0.451	0.401	0.461	0.491	0.498	0.529	0.577	0.480
Rolling ten-year average sales	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 ⁹⁹ (ten-year average sales x 20 Years)	9.60
Requirement for Landbank	3.36

⁹⁹ 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)	
Total Landbank Requirement (20 years + 7 Years)	12.96

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 tonnes¹⁰⁰.
- 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 rock¹⁰¹.
- 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.

¹⁰⁰ 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.

¹⁰¹ 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.

- 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 production¹⁰², 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 quantified¹⁰³. 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.

¹⁰² Actual annual production figures for aggregate minerals are not available, therefore annual sales figures, which are available, are used as a 'proxy.'

¹⁰³ 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 11th 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 economy¹⁰⁴.
- 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 groups¹⁰⁵. At 72%, the borough's employment rate is higher than the average of 68.3% across the Black Country.

¹⁰⁴ Economic Impact of Tourism in Dudley Borough, Research Solutions, 2017

¹⁰⁵ 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

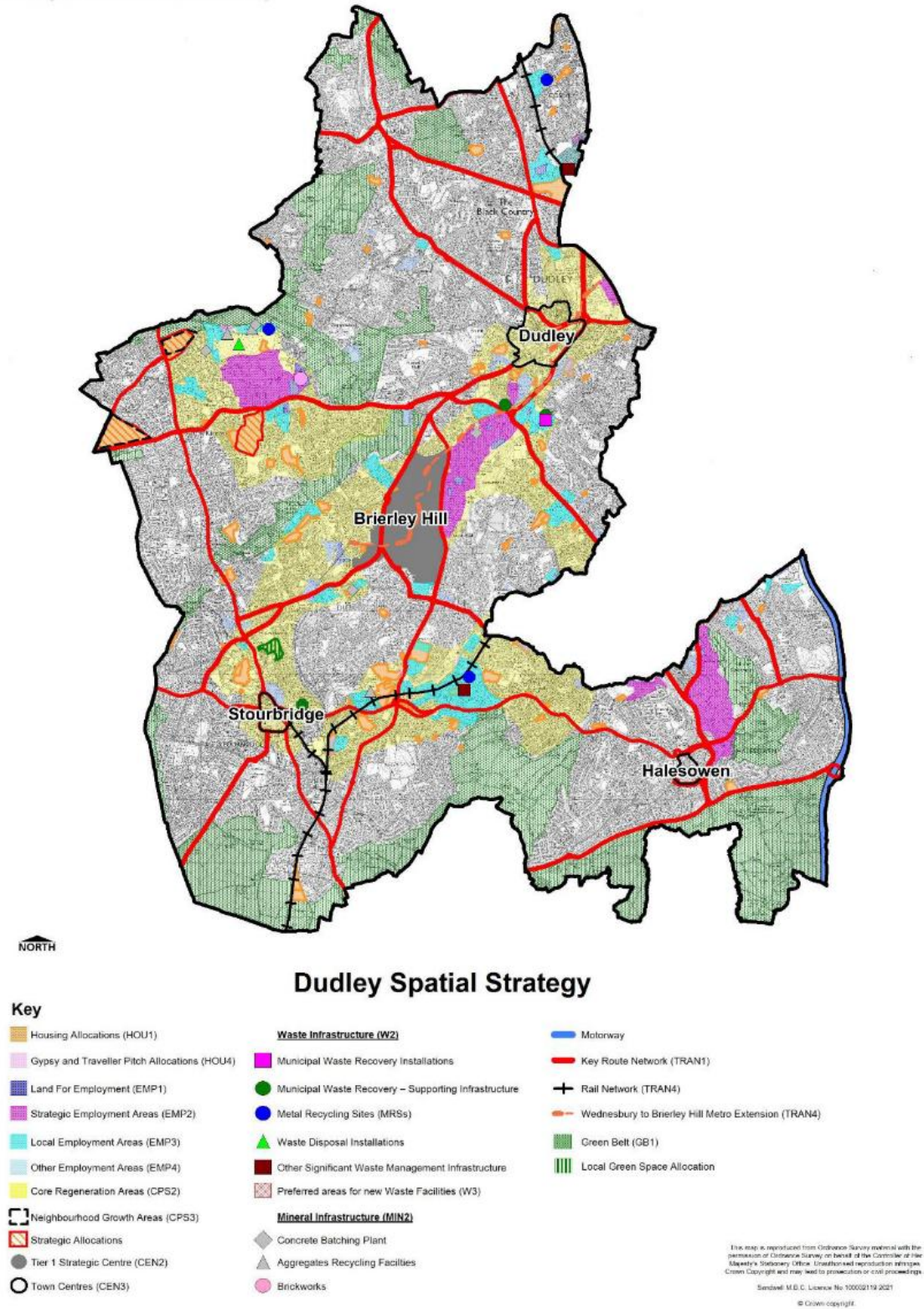
- A8 '*Forging a future for all*' is a shared vision for Dudley borough, developed in 2018, following extensive consultation with key partners and stakeholders. It is built around seven aspirations and goals to be reached by 2030:
- Towns – Dudley will have thriving, regenerated town centres where people 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)
Strategic Centre		
Brierley Hill (Strategic Centre)	3,154 (inc 350 uplift)	0
Core Regeneration Areas		
Central Core Regeneration Area	1,712	7.51
North West Core Regeneration Area	1,145	1.4
Jewellery Line Core Regeneration Area	886	0
Total Growth Network	6,897	8.91
Towns and Neighbourhoods Area		
Dudley Towns and Neighbourhood Areas	2,662	13.09
Kingswinford Neighbourhood Growth Area	860	0
Total Towns and Neighbourhoods Area	3,522	13.09
Allowance for windfall housing sites (outside of the strategic centre)	2,816	0
Total	13,235	22

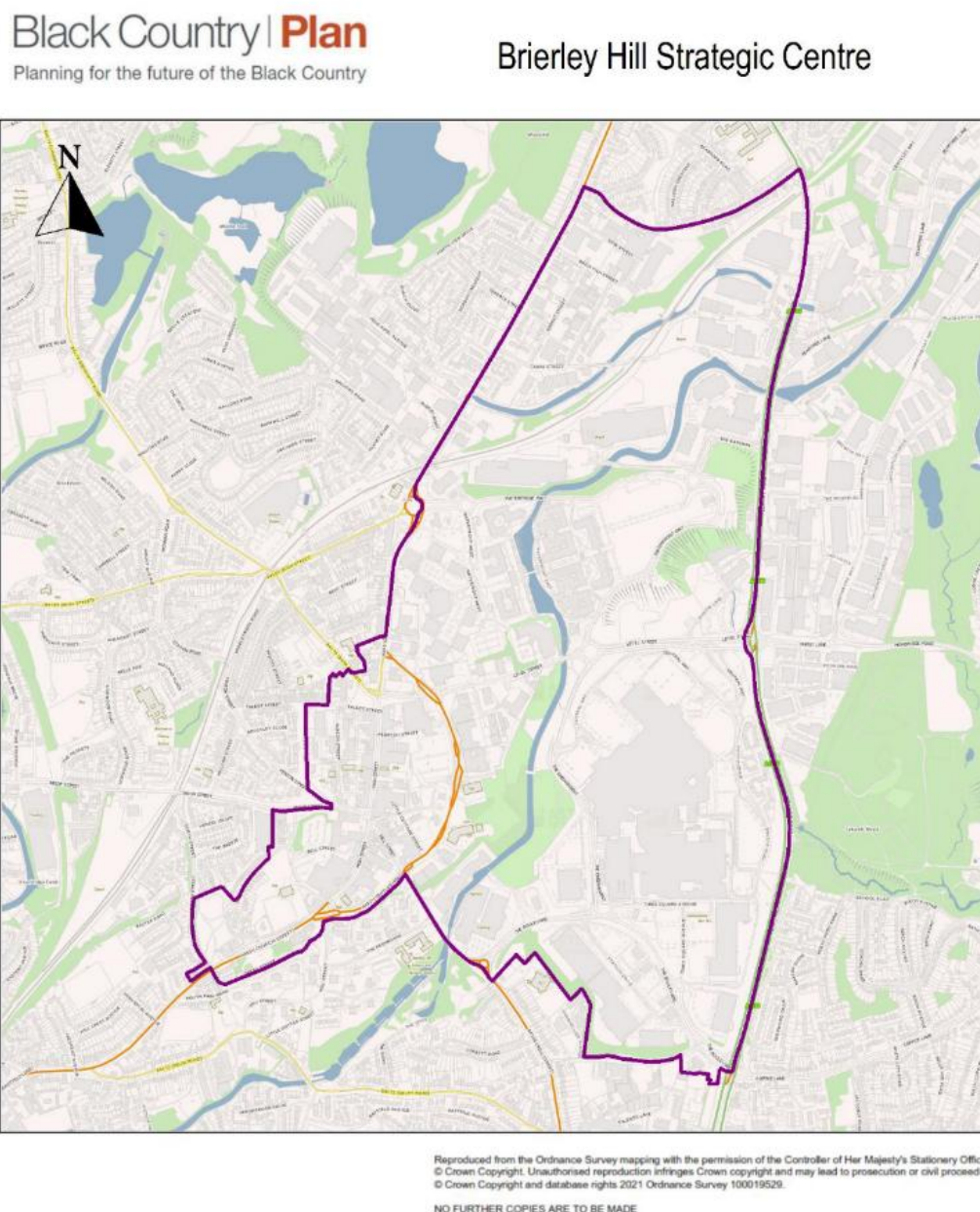
Brierley Hill Strategic Centre

- 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



- 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 Strategy¹⁰⁶. 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.

¹⁰⁶ <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 locations¹⁰⁷ 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

¹⁰⁷ 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, Hayseach 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.

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
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

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
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)

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
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:

Table 17 - Strategic Waste Management Sites in Dudley (BCP Policy W2)			
BCP Site Ref/location	Previous Local Plan Ref (2011 Black Country Core Strategy, BCCS)	Site Name and Address	Operational capacity (tonnes per annum, tpa)
			Total Landfill Capacity (tonnes) (end of 2018)
Municipal Waste Recovery Installations			
WS01	WSD6	Dudley Energy from Waste (EfW) facility, Lister Road Depot, Lister Road, Dudley	95,000
Municipal Waste Recovery – supporting infrastructure			
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

Table 17 - Strategic Waste Management Sites in Dudley (BCP Policy W2)			
BCP Site Ref/location	Previous Local Plan Ref (2011 Black Country Core Strategy, BCCS)	Site Name and Address	Operational capacity (tonnes per annum, tpa)
			Total Landfill Capacity (tonnes) (end of 2018)
WS06	WSD10	Stourbridge Household Waste Recycling Centre (HWRC) off Birmingham Street (A458), Stourbridge	20,000
Waste Disposal Installations			
WS16	WSD5	Himley Quarry Landfill, Oak Lane, Kingswinford	150,000 / 432,000
Significant Metal Recycling Sites (MRS)			
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
Other Significant Waste Management Infrastructure			
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

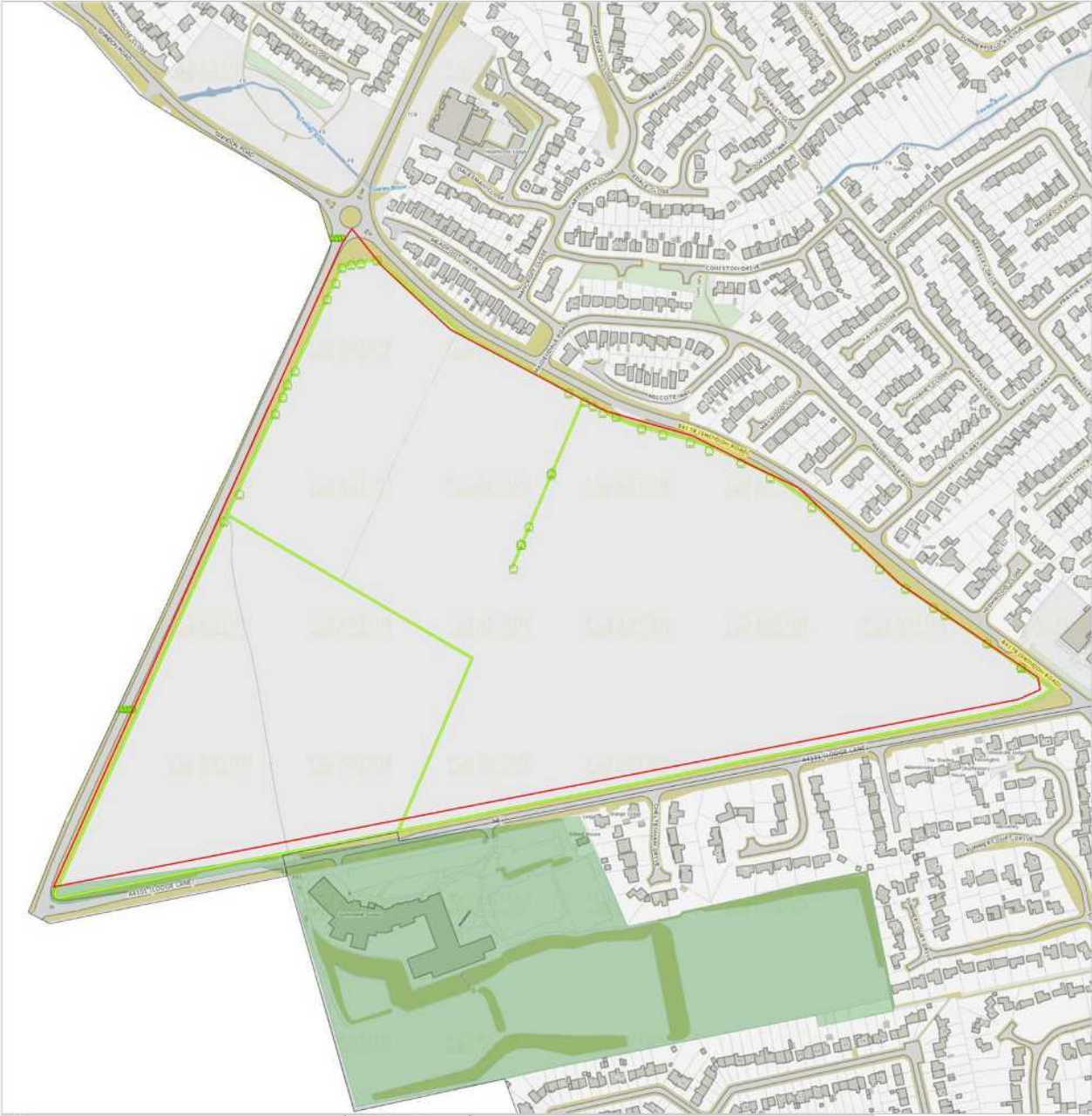
gaps. The hedgerow adjacent to the Wolverhampton Road (A491) has several large, mature trees within it, including Norway maple and aspen. These will need to be retained as part of the development.

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Policy DSA2– Land at Swindon Road, Wall Heath, Kingswinford (The Triangle site) Strategic Allocation



STRATEGIC ALLOCATION



Key: <div><div></div> Strategic Allocation</div> <div><div></div> Conservation Area</div> <div><div></div> Listed Buildings</div> <div><div></div> Individual Tree Preservation Order (TPO)</div> <div><div></div> Grouped TPO</div> <div><div></div> Sites of Importance for Nature Conservation (SINC)</div> <div><div></div> Sites of Local Importance for Nature Conservation (SLINCs)</div> <div><div></div> Greenway</div> <div><div></div> Green Belt</div>	Strategic Allocation:	DSA.2
	Site Assessment Reference:	SA-0025-DUD
	Site Names:	The Triangle
	Local Authority:	Dudley
	Ward:	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 be 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: <div><div></div> Strategic Allocation</div> <div><div></div> Conservation Area</div> <div><div></div> Listed Buildings</div> <div><div></div> Individual Tree Preservation Order (TPO)</div> <div><div></div> Grouped TPO</div> <div><div></div> Sites of Importance for Nature Conservation (SINC)</div> <div><div></div> Sites of Local Importance for Nature Conservation (SLINC)</div> <div><div></div> Greenway</div> <div><div></div> Green Belt</div>	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 be 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)¹⁰⁸.

- 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

¹⁰⁸ 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

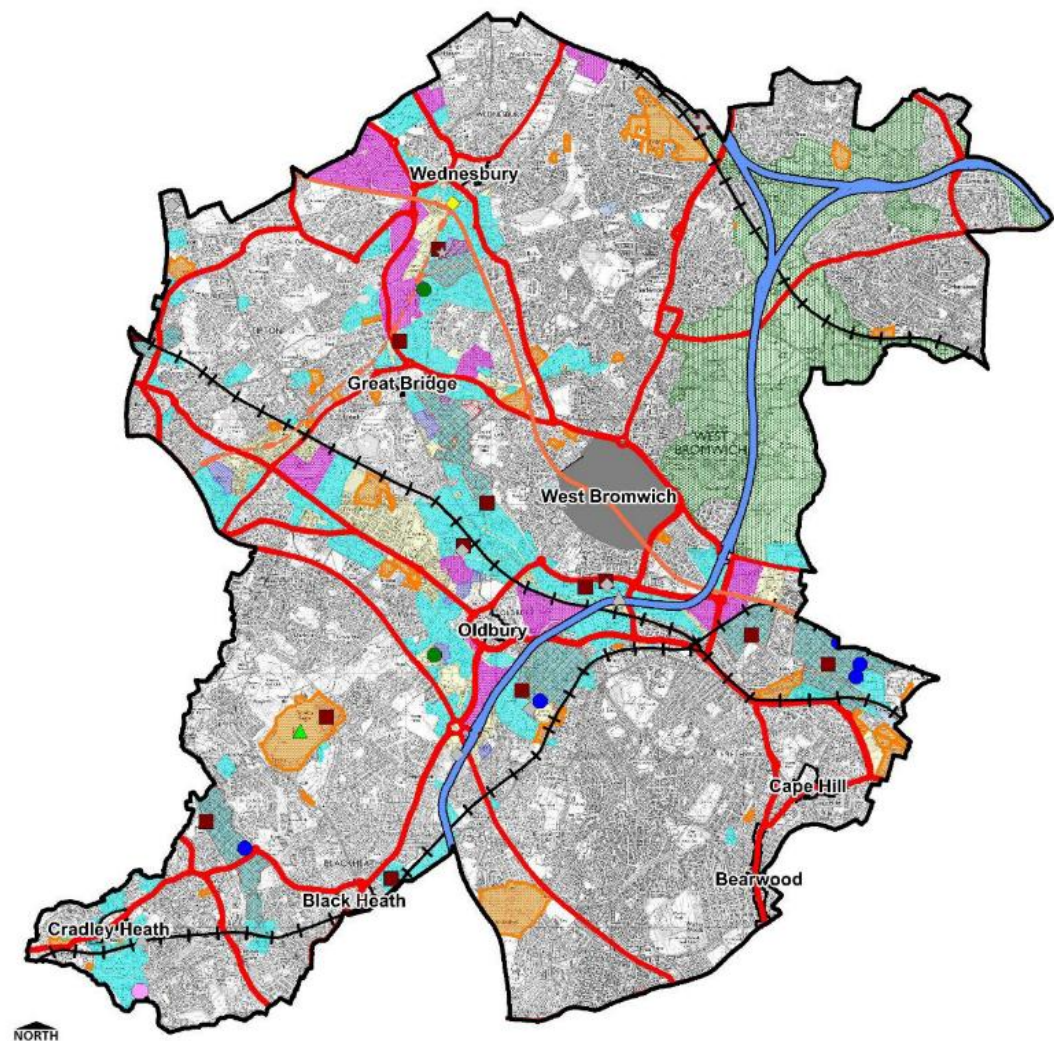
- B.6 The 2030 Vision for Sandwell is:

'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)
- Gypsy and Traveller Pitch Allocations (HOU4)
- Employment Development Site (EMP1)
- Strategic Employment Areas (EMP2)
- Local Employment Areas (EMP3)
- Other Employment Areas (EMP4)
- Core Regeneration Areas (CSP2)
- Tier 1 Strategic Centres (CEN2)
- Town Centres (CEN2)
- Waste Infrastructure (W2)**
- 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)**
- Rail Linked Aggregates Depot
- Aggregates Recycling Facilities
- Concrete Batching Plant
- Coating Plant
- Concrete Products
- Brickworks

- Motorway
- Key Route Network (TRAN1)
- Rail Network (TRAN4)
- Birmingham to Wolverhampton Metro Line (TRAN4)
- Wednesbury to Brierley Hill Metro Extension (TRAN4)
- Green Belt (G1)

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Table 21 - Sandwell Growth targets (net) 2020 - 2039

Location	Housing	Employment Land allocations (ha)
The Growth Network		
Strategic Centre	201 200 (Uplift to be tested) = 401	0
Sandwell Central Core Regeneration Area	2,032	28
Towns and Neighbourhood Areas		
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
Total	9,158	28

West Bromwich Strategic Centre

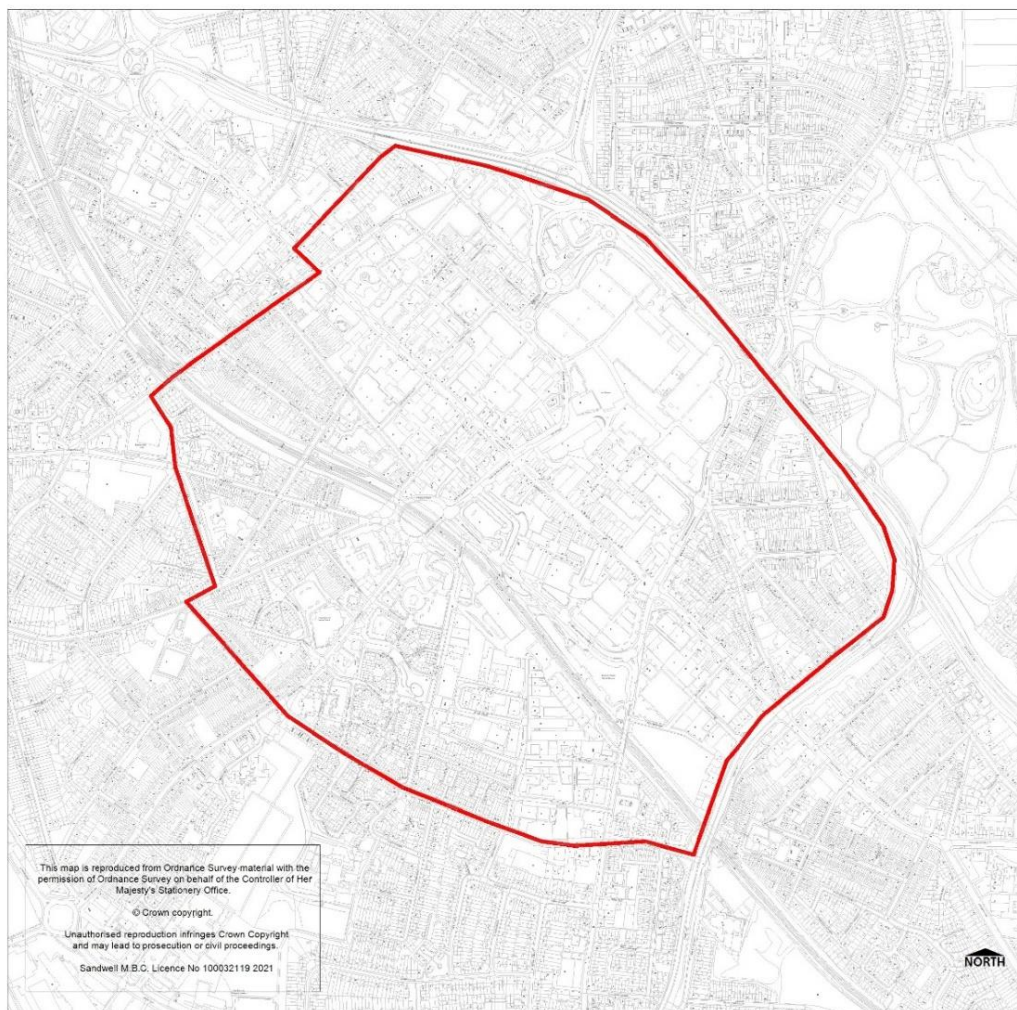
B.10 West Bromwich Strategic Centre, as designated on the Policies Map and shown on Figure 17 is the third largest centre in the Black Country and It is the focus for a wide range of civic, retail, cultural and leisure functions. The centre is organised around a strong linear high street form. The High 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		Site removed from the GB. Green Belt mitigation will be required
									Majority of site is a SLINC (SA006 Land at Yew Tree) mitigation measures will be required
									See below for more detailed information

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
<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		Site removed from the GB. GB mitigation will be required.
									Submitted as a CfS – 40
									Majority of the site is a SLINC (SA045 – Tanhouse Avenue)

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									so mitigation measures will be required.
									Small part of the site is a SINC (0.21ha).
									Part of site is Community Open Space – replacement in wider site which will need to be mitigated
									See below for more detailed information

Table 22 - Sandwell Residential Site Allocations (BCP Policy HOU1)

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<p>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.</p> <p>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.</p> <p>A railway track bounds the site to the south, which separates the site from Sandwell Valley.</p> <p>There is an access road that serves a social club that bounds the site on the southwest boundary.</p> <p>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.</p> <p>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.</p> <p>The front of the site has a strong treeline, which should be retained.</p> <p>Consideration would need to be given in terms of capacity and safety to the junctions of;</p> <p>Tanhouse Avenue and Hamstead Road; Bowstoke Road and Newton Road; Newton Road and Hamstead Road</p>									

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
<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

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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.

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									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

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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

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)
Municipal Waste Recovery – Supporting Infrastructure			
WS07	Eagle Recovery and Transfer Hub	Sandwell	140,000
WS08	Sandwell HWRC (Shidas Lane)	Sandwell	20,000
Waste Disposal Installations (1)			
WS17	Edwin Richards Landfill	Sandwell	250,000
			9,171,000 ¹⁰⁹
Significant Hazardous Waste Treatment Infrastructure			
WS19	Wednesbury Treatment Centre	Sandwell	40,000
Significant Metal Recycling Sites (MRSs)			
WS23	Alutrade	Sandwell	24,000
WS24	Cradley Metal Recycling Centre	Sandwell	165,000
WS25	ELG CSR Depot (Rowley Regis) ^[1]	Sandwell	20,000

¹⁰⁹ 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
Other Significant Waste Management Infrastructure			
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
[1] Operational in 2018 but currently (April 2020) 'mothballed.'			

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 ^[1]	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

¹ 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

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	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

Table 29 - Sandwell changes to existing housing allocations

Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Est. Capacity	proposed use
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 / 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
(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

Table 29 - Sandwell changes to existing housing allocations

Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Est. Capacity	proposed use
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

Table 29 - Sandwell changes to existing housing allocations

Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Est. Capacity	proposed use
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 people¹¹⁰, 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.¹¹¹
- 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,

¹¹⁰

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland> - ONS Mid-year estimate 2019

¹¹¹ [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 20th 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."*¹¹²
- 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:

¹¹² 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

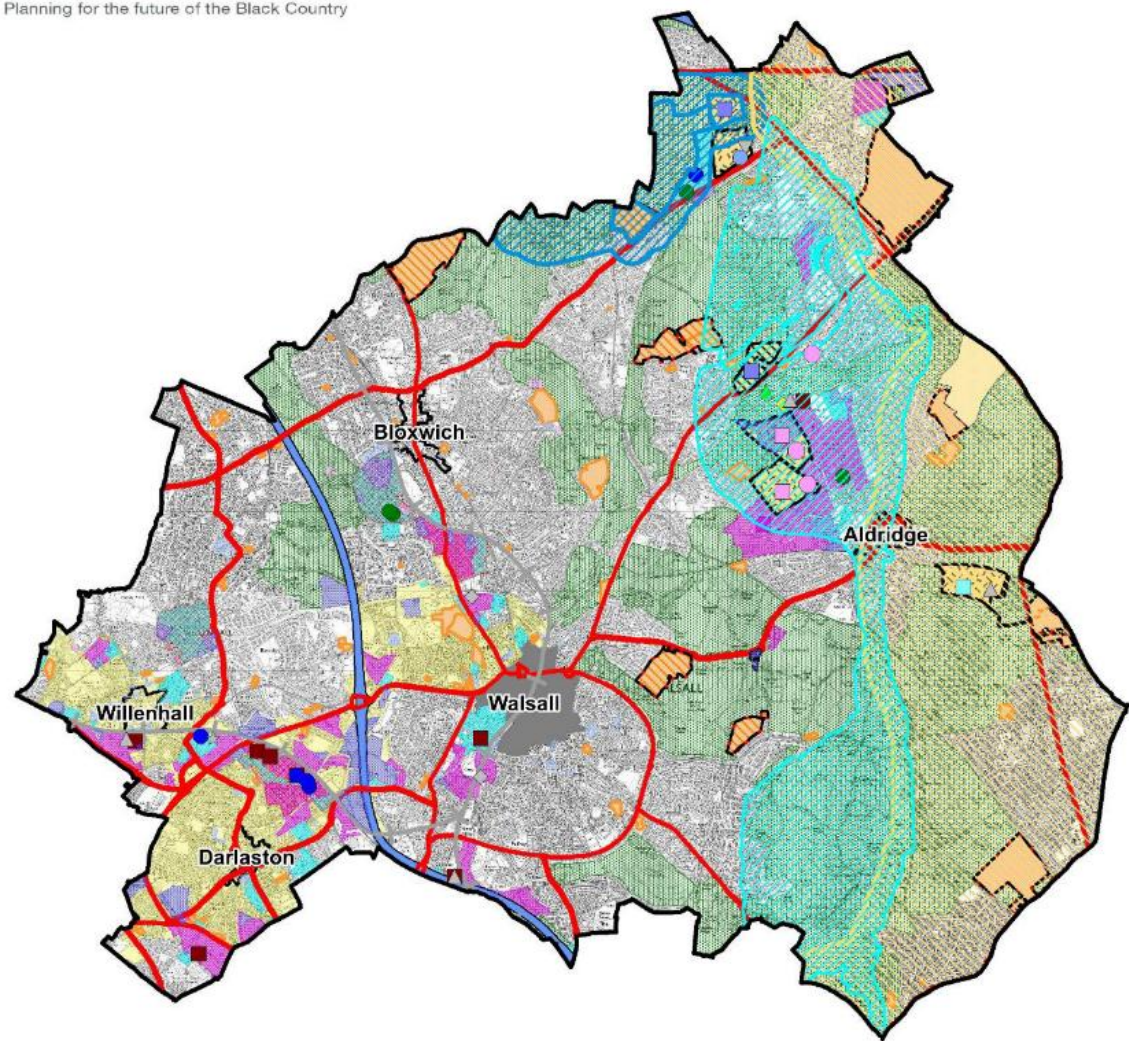
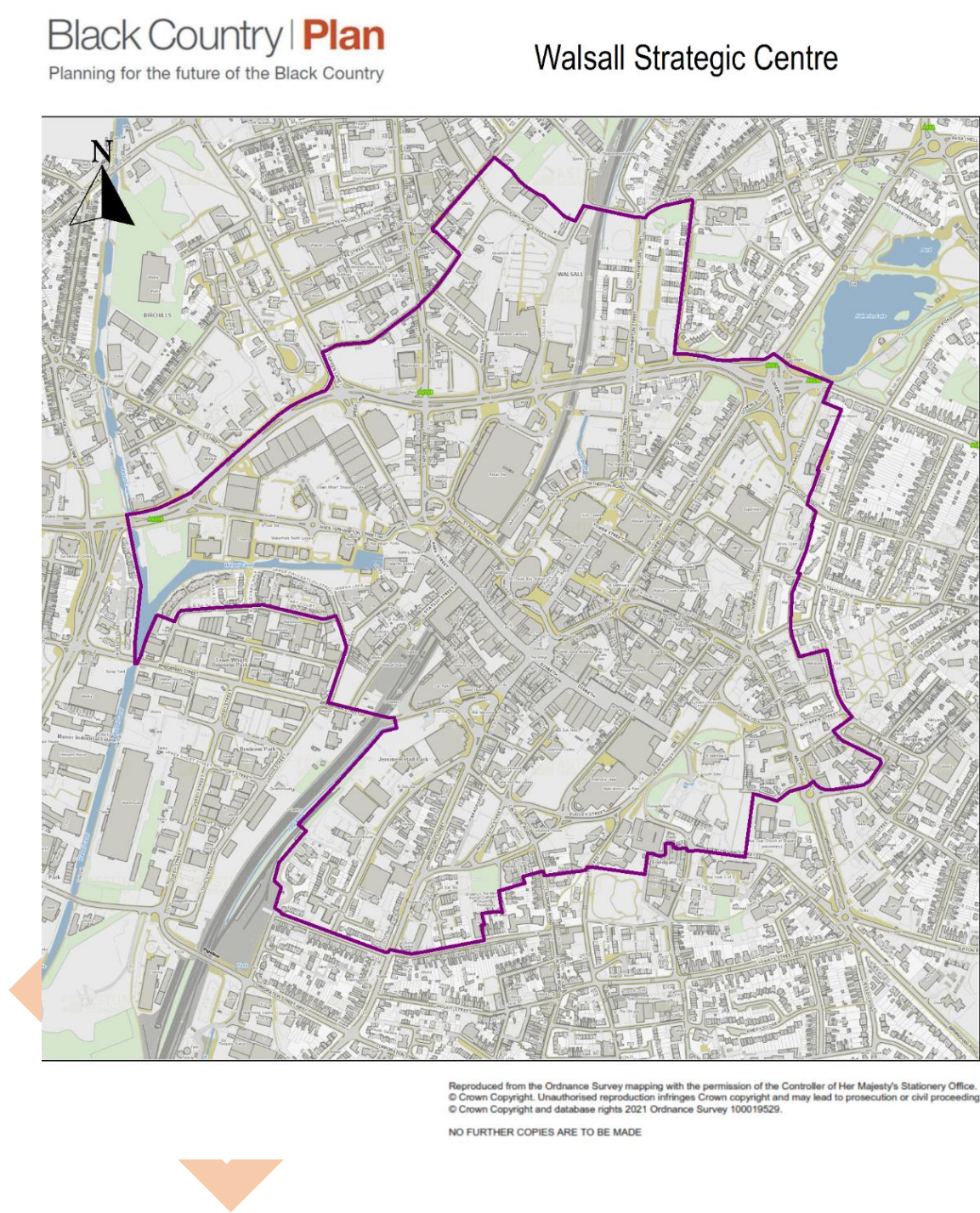


Figure 20 - Walsall strategic centre and AAP boundary



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-to-day 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
Total	13,344	164ha

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

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									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

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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

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
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	

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
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	

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
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.

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
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

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
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

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
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.

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
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

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
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

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
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

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	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 / Bullocks 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	Axcess 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		

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



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.

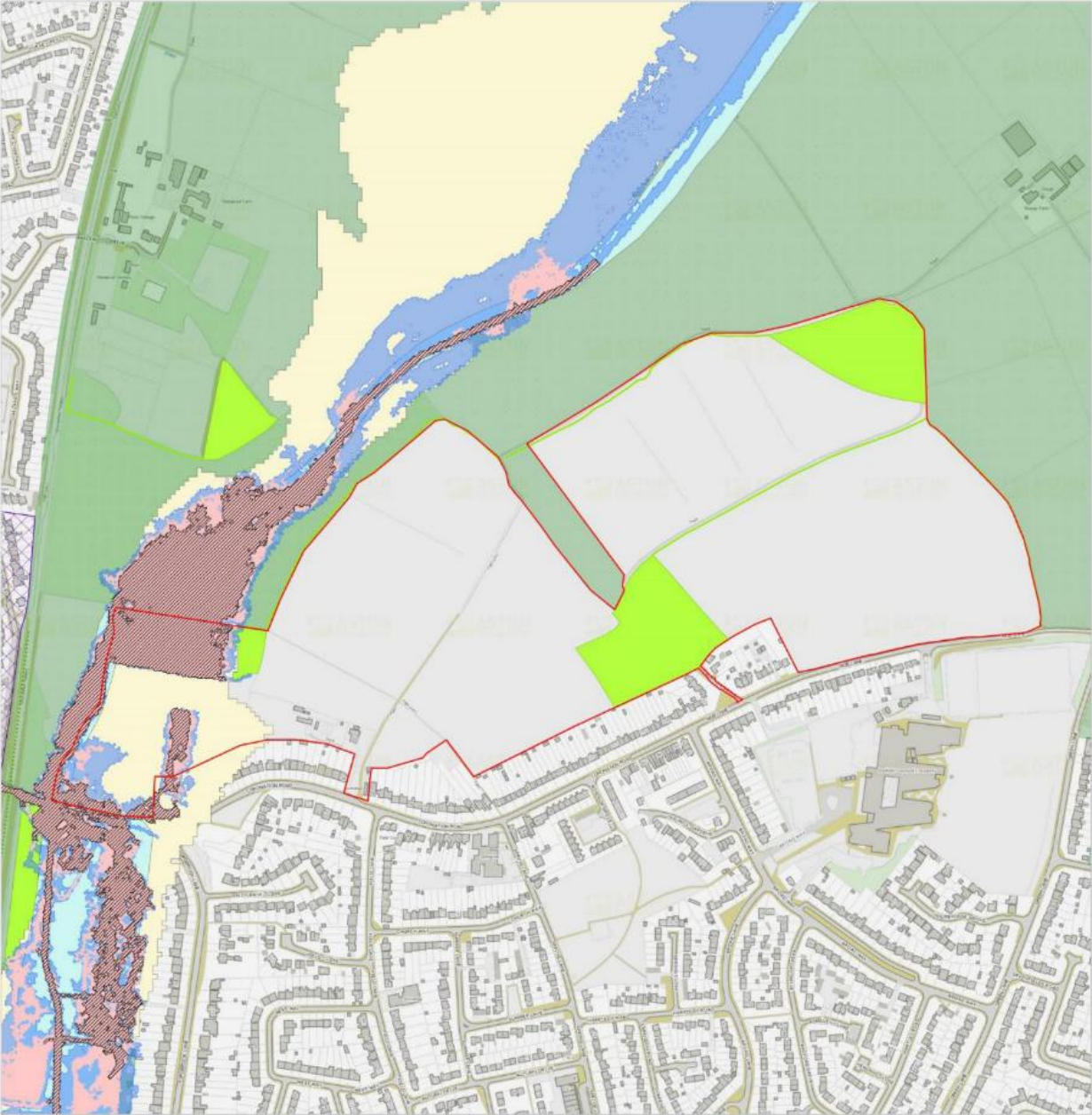
- A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character or on protected animal species
- The site is in a MSA and requires prior extraction where 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



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		

Strategic Allocation:	WSA.2
Site Assessment Reference:	SA-0056-WAL & SA-0048-WAL
Site Names:	Land at Mob Lane, Pelsall, Walsall, West Midlands
Local Authority:	Walsall
Ward:	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



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



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



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



General introduction

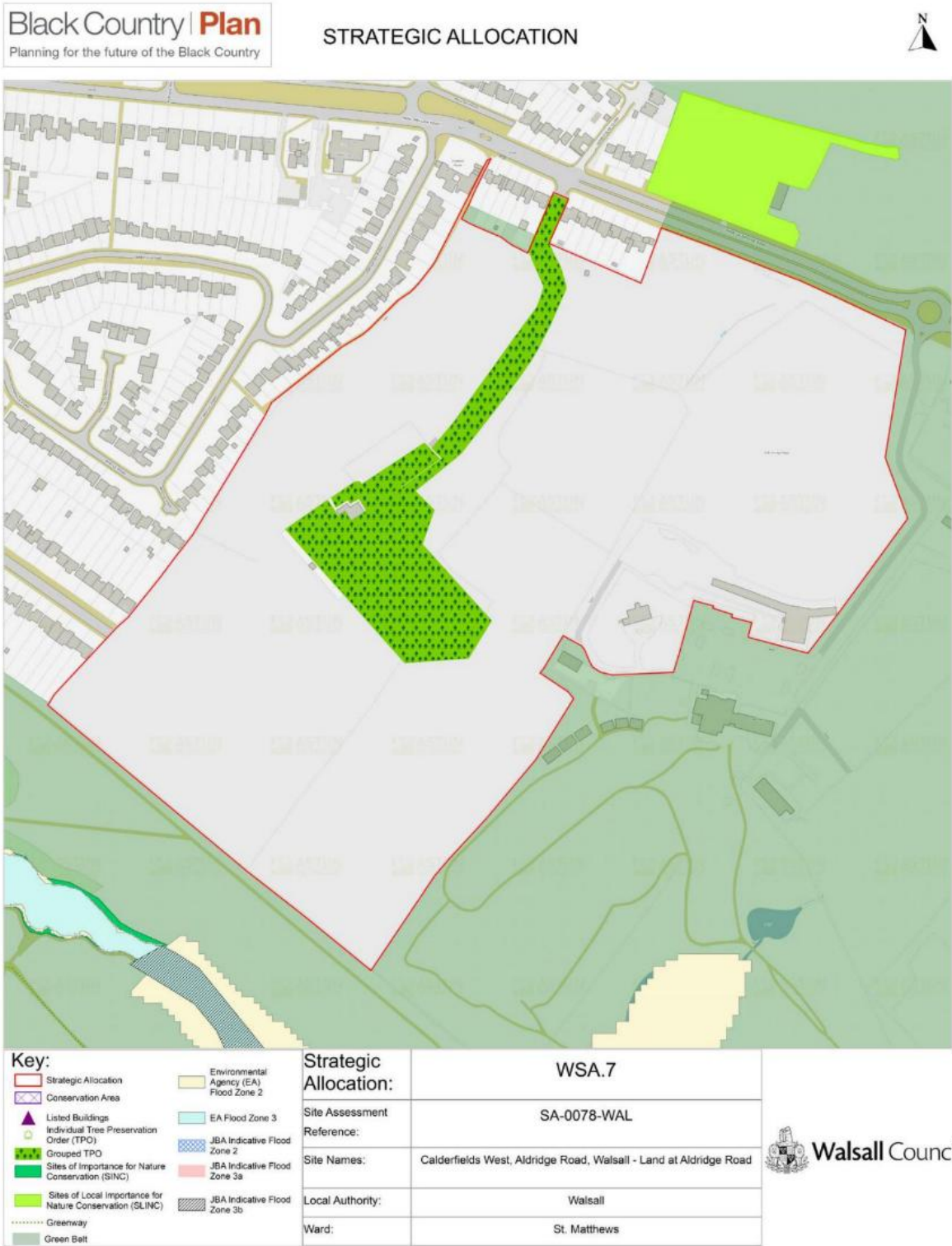
- C.53 Land off Sutton Road, Longwood Lane is located along the very northern part of Pheasey Park Farm. To the north are fields, to the east and south are houses and to the west is the canal with Arboretum Park beyond it. The character of the immediate area is defined by predominantly traditionally-styled 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



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



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



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

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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:

Table 38 - Strategic Waste Management Sites in Walsall			
BCP Site Ref	Walsall SAD Site Ref	Site Name and Address	Operational Capacity (tpa)
			Total Landfill Capacity (tonnes) ¹¹³
Municipal Waste Recovery Installations			
WS02	WS9	Aldridge MRF (Biffa) ¹¹⁴ , Westgate Aldridge	150,000
Municipal Waste Recovery – Supporting Infrastructure			
WS09	WS8	Fryers Road WTS, Bloxwich	100,000
WS10	WS8	Fryers Road HWRC, Bloxwich	12,000

¹¹³ 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.

¹¹⁴ Formerly operated by Greenstar MRF

Table 38 - Strategic Waste Management Sites in Walsall			
BCP Site Ref	Walsall SAD Site Ref	Site Name and Address	Operational Capacity (tpa)
			Total Landfill Capacity (tonnes) ¹¹³
WS11	WS14	Merchants Way HWRC, Aldridge	10,000
WS12	WS19	Walsall Council Environmental Depot, Brownhills	2,700
Waste Disposal Installations			
WS18	WS10	Highfields South Landfill, Walsall Wood	130,000
			928,000
Significant Hazardous Waste Treatment Infrastructure			
WS20	WS6	Empire Treatment Works, Aldridge	100,000
Significant Metal Recycling Sites (MRSs)			
WS29	W17	Chas B Pugh, Heath Road, Darlaston	18,000
WS30	W21	ELG Haniel Metals, Heath Road, Darlaston	30,000
WS31	WS05	EMR Darlaston, Bentley Road South	260,000
WS32	W62	Scanmetals (UK) Ltd, Bilston Lane, Willenhall	56,000
WS33	W77	Tandom Metallurgical, Apex Road, Brownhills	25,000
Other Significant Waste Management Infrastructure			

Table 38 - Strategic Waste Management Sites in Walsall

BCP Site Ref	Walsall SAD Site Ref	Site Name and Address	Operational Capacity (tpa)
			Total Landfill Capacity (tonnes)¹¹³
WS49	WS17	Bescot Triangle South, Bescot Road	50,000
WS50	WS03	Credential Environmental, Parkway North, Western Way	40,000
WS51	W76	D S Smith Birmingham Depot, Rose Hill Industrial Estate, Willenhall	20,000
WS52	WS01	D E O'Reilly Waste Management ¹¹⁵ , Coppice Lane, Aldridge	40,000
WS53	WS05	EMR Darlaston (Fridge Recycling Plant), Bentley Mill Lane, Darlaston	40,000
WS54	WS04	Ecobat Logistics ¹¹⁶ , Crescent Works Industrial Estate, Willenhall Road	25,000
WS55	WS11	Veolia Darlaston, Holland Industrial Park, Bentley Road South	30,000
WS56	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.

¹¹⁵ Formerly Interserve MRF.

¹¹⁶ 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

BCP Site Ref	Walsall SAD Site Ref	Site Name and Address	Type
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

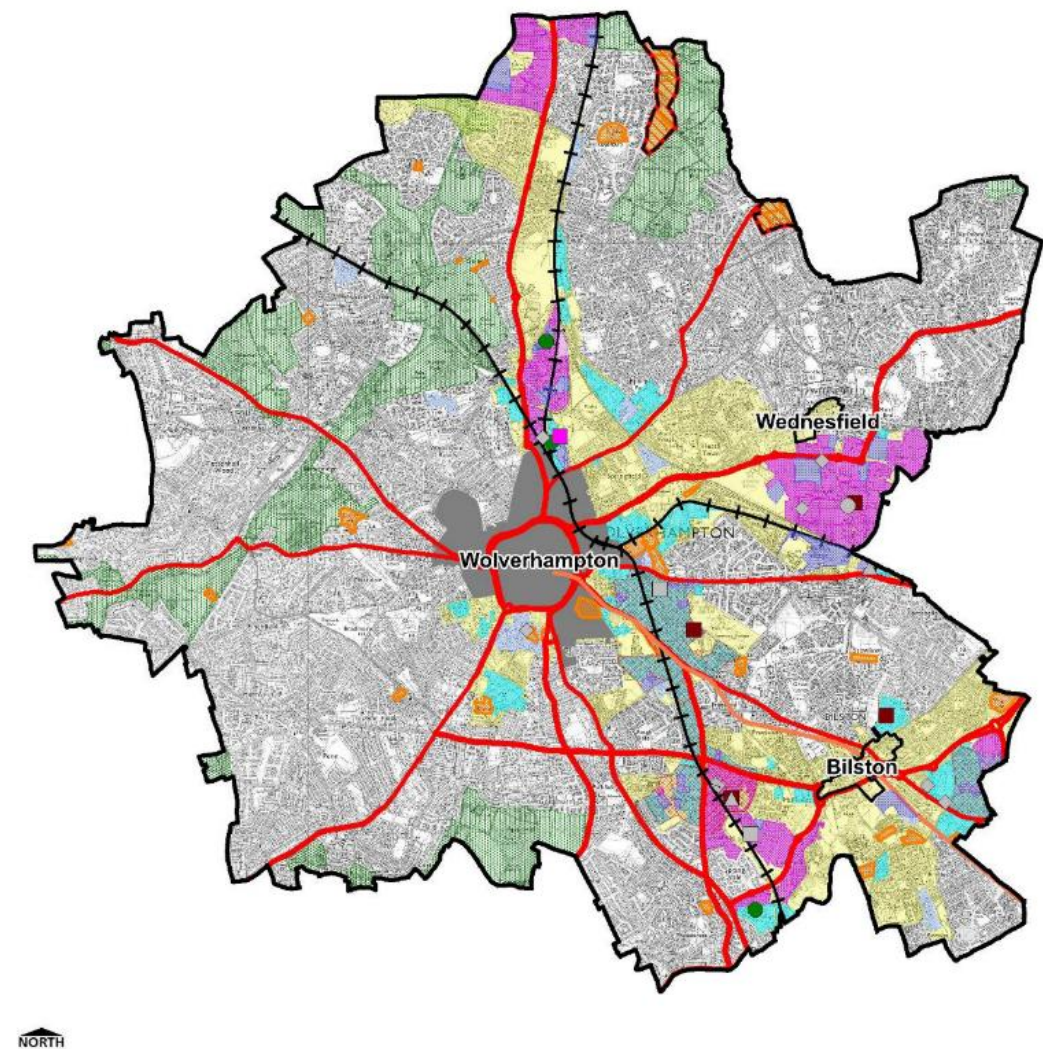
- D.6 In the context of the issues and opportunities outlined above, the 2030 Vision for Wolverhampton is for:

‘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



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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.

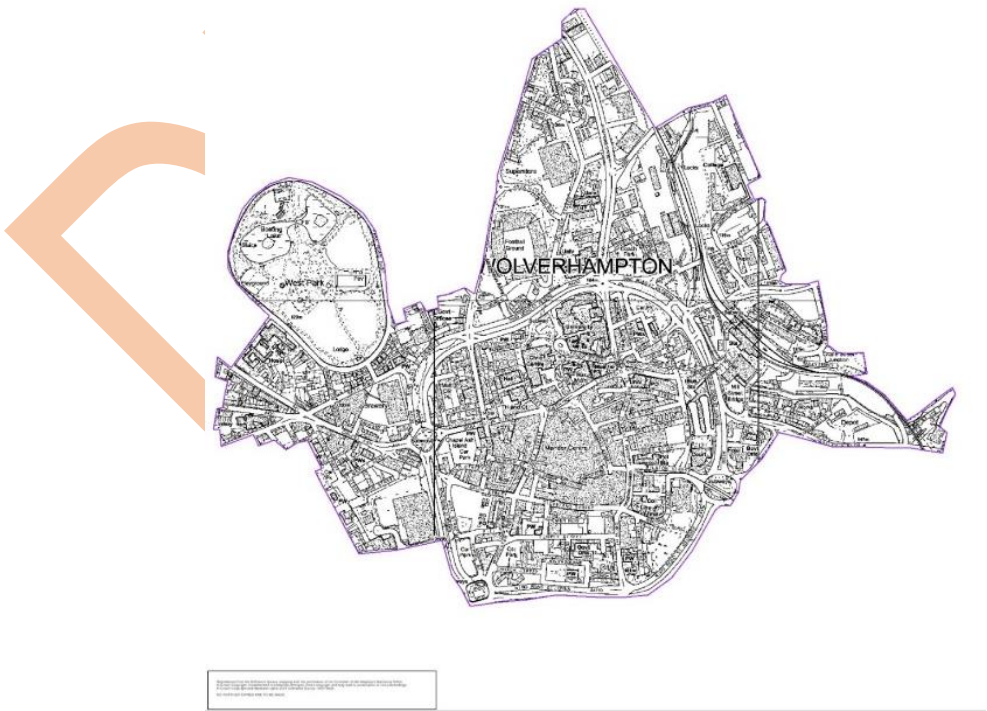
Table 42 - Wolverhampton Housing and Employment Growth Network

Location	Housing (net homes)	Employment Land allocations (ha)
Growth Network		
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
Total Growth Network	8,145	66.0
Towns and Neighbourhoods Area		
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
Total Towns and Neighbourhoods Area	2,303	0.0
Small Windfall Housing Sites (outside Wolverhampton City Centre)	1652	0.0
Wolverhampton Total	12,100	65.0

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 Graiseley¹¹⁷ and All Saints¹¹⁸ (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

¹¹⁷ Policy CA10

¹¹⁸ 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.

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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	2.4 0 (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									
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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.

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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									
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									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

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									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

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									<p>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</p>

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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

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		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

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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	

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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.

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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.

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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.

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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

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									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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		Road, Wolverhampton							<p>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</p>

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.

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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
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. .

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

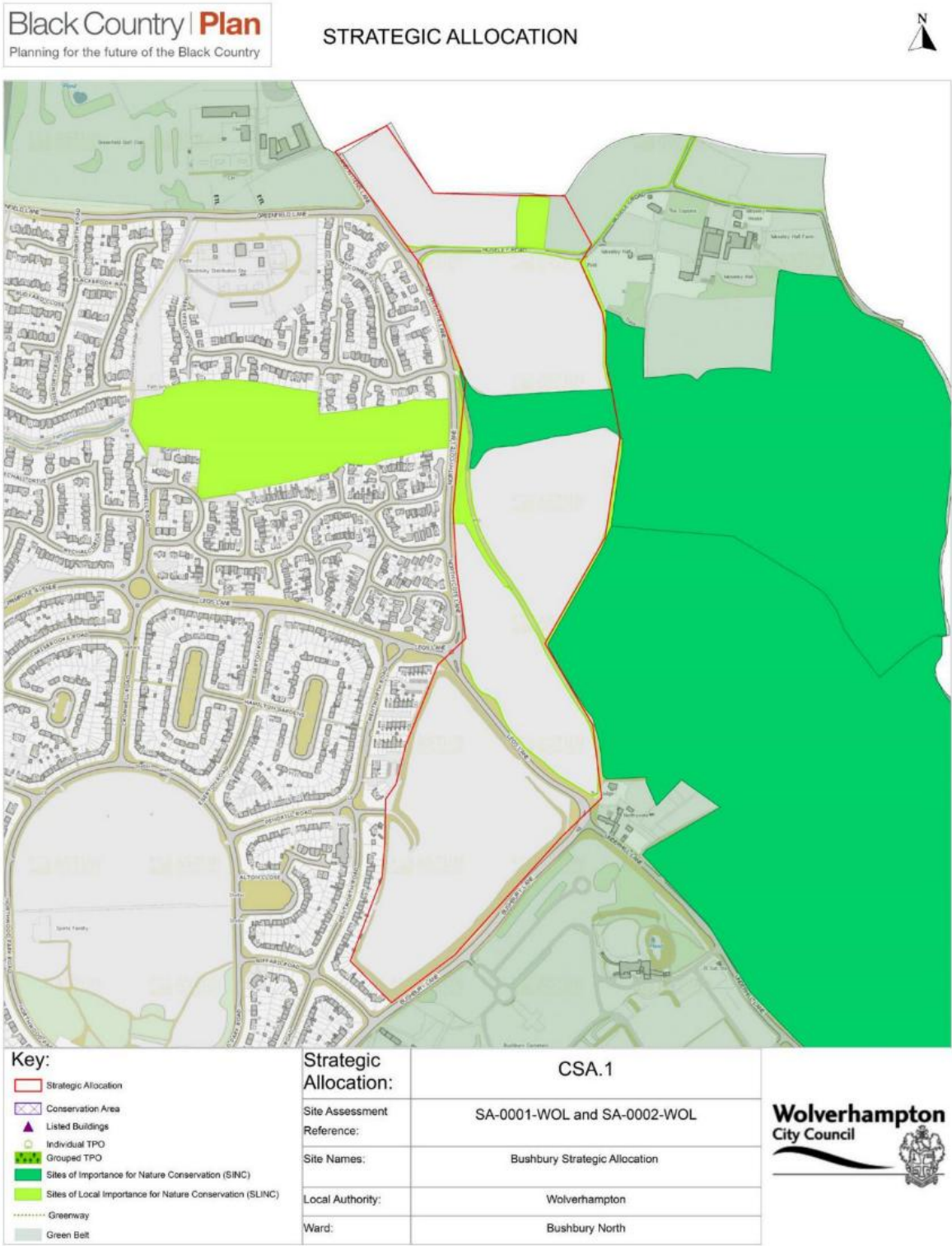
BCP Site Ref / Location	Previous Local Plan Allocation (replaced unless stated)	Site Name and Address	Appropriate Uses	Indicative Development Capacity (ha employment land)	Gross Site area (ha)	Anticipated Delivery Timescale	Further Information
WOE726 SRCRA	SRCAAP EDO 11	Stratosphere Site, Wolverhampton 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

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 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.

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 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. 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 Northcote 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



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)
Municipal Waste Recovery - installations			
WS03 SRCRA	SRCAAP – SW1	Wolverhampton Energy from Waste (EfW), Crown Street	115,000
Municipal Waste Recovery - Supporting Infrastructure			
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
Other Significant Waste Management Infrastructure			
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 ¹¹⁹	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

¹¹⁹ 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 ¹¹⁹	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>	<p>Energy from Waste</p> <p>Treatment</p> <p>In-vessel composting</p> <p>Anaerobic digestion</p> <p>Transfer</p> <p>Recycling</p>	74.5
WPWo3 BCRA	Dale Street, Loxdale, Bilston	<p>Treatment</p> <p>In-vessel composting</p> <p>Anaerobic digestion</p> <p>Transfer</p> <p>Recycling</p>	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)

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 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

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 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

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 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

Appendix A1 - Dudley Local Plan Policies to be superseded by the Black Country Plan		
Local Plan document	Superseded Policy	Replacement Policy / wording
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 - <i>as reference within Policy 49 to the BCCS and the Affordable Housing SPD</i>
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	<p>Replace: Housing policies within the Black Country Core Strategy (including policy HOU3 'Affordable Housing)</p> <p>With: <i>Housing policies within the Black country Plan (Including Policy HOU3 'Delivering Affordable, Wheelchair accessible and self-build / custom build housing)</i></p>
DAAP	Para.11.9 under Dudley Urban Historic Landscape Characterisation Study section refers to Policy ENV2 'Historic Character and Local Distinctiveness'	<p>Replace: Core strategy Policy ENV2 'Historic Character and Local Distinctiveness</p> <p>With: <i>Black Country Plan Policy ENV5 'Historic Character and Local Distinctiveness of the Black Country'</i></p>
DAAP	Para. 13.30 in Nature Conservation supporting text refers to Policy ENV1 'Nature Conservation	<p>Amend HAAP Para 7.13 from: '<i>...are protected through Core Strategy Policy ENV1...</i>'</p> <p>to '<i>...are protected through Black Country Plan Policy ENV1...</i></p> <p>Re Policy ENV1 - <u>No change required</u> – remains as (BCP) Policy ENV1 'Nature Conservation'</p>

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'

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	Corbyns 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

Appendix A2 – Changes to existing local plan designations				
Local Plan Document	Designation / Site Reference	Site Name	Description of Change	Reason for Change
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

Appendix A2 – Changes to existing local plan designations				
Local Plan Document	Designation / Site Reference	Site Name	Description of Change	Reason for Change
(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

Appendix A2 – Changes to existing local plan designations				
Local Plan Document	Designation / Site Reference	Site Name	Description of Change	Reason for Change
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

Appendix A2 – Changes to existing local plan designations				
Local Plan Document	Designation / Site Reference	Site Name	Description of Change	Reason for Change
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

Appendix A2 – Changes to existing local plan designations				
Local Plan Document	Designation / Site Reference	Site Name	Description of Change	Reason for Change
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

Appendix A3 – Dudley AAP policies with a housing allocation			
Tier Two Plan	Reference	Site	Residential Yield (dwellings)
Dudley AAP	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
Halesowen AAP	OS1	Pool Road	C3 Residential and B1

Appendix A3 – Dudley AAP policies with a housing allocation			
Tier Two Plan	Reference	Site	Residential Yield (dwellings)
	OS2	Trinity Point	B1 offices
	OS3	Link House	C3 – 20
	OS4	Little Cornbow	C3- 43
	OS5	Fountain House	C3 – 30
Stourbridge AAP	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"> • Watery Lane SLINC and SINC (Wordsley); • Coopers Wood and Lyeclose meadow SINC (Land South of Manor Way) 	No Change
<ul style="list-style-type: none"> • Roundhill, Holbeache Land SLINC (Kingswinford); • Ashwood Haye Fields SLINC (Kingswinford); 	Designation as new SLINCs

Appendix A4 – Alteration to nature conservation designations in Dudley	
Site Name	Status
<ul style="list-style-type: none"> • Racecourse Lane SLINC (Norton); • Manor Abbey Farm SLINC; formed from the Brickyard and Manor Abbey Hedgerows (Land south of Manor Way (Halesowen)); • Raddens Pastures SLINC; covering Raddens Pastures (Land South of Manor Way (Halesowen)); • Lyeclose Farm SLINC; covering Lyeclose Farm (Land South of Manor Way (Halesowen)); and; • Illey Hall Farm SLINC; covering Illey Hall Farm (Land South of Manor Way (Halesowen)) 	
<ul style="list-style-type: none"> • St Mary's Abbey Remains SINC; covering St Mary's Abbey Remains and Manor Way Tip. 	Designation of a new SINC

Appendix A4 – Alteration to nature conservation designations in Dudley	
Site Name	Status
<ul style="list-style-type: none"> Amalgamate the Tributary of Illey Brook SINC, Lyeclose Lane Wood SINC, Illey Hall Farm SLINC and Illey Brook SLINC into a single designated site; Kitwell Brook Valley SINC (Land South of Manor Way (Halesowen). Extension to the SINC Boundary around the existing Tributary of Illey Brook SINC. <p>Extend the boundaries of existing Sites of Local Importance for Nature Conservation (SLINC) designations</p> <ul style="list-style-type: none"> Ketley Quarry (Kingswinford) Coopers Bank north of Coopers Bank Road (Gornal) Coopers Bank south of Coopers Bank Road (Gornal) <p>Extend the existing Sites of Importance for Nature Conservation (SINC) designation:</p>	Amalgamation and /or extension of boundaries

Appendix A4 – Alteration to nature conservation designations in Dudley	
Site Name	Status
<ul style="list-style-type: none"> Hurst Hill Wood (Sedgley) <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, Huntsmill 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"> Brick Kiln Lane SINC (Gornal); Conference Wood and Gornal Sewage Works SLINC (Gornal) 	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"> Revised Sites of Local Importance for Nature Conservation (SLINC) boundary designation at: Turls Hill (Sedgley) Swanbrook Valley (Sedgley) – including reduction of boundary 	
<ul style="list-style-type: none"> Caslon Wood SLINC (Cradley and Wollescote) 	Boundary adjustment to an existing SLINC and the inclusion of several hedgerows within the SLINC Designations
<ul style="list-style-type: none"> Minor reduction to the existing boundaries of the following designated Sites of Local Importance for Nature Conservation (SLINC); Moden Hill East (Viewfield Crescent) (Gornal) 	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

Appendix B2 - Changes to Existing Local Plan Designations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Estimated capacity	proposed use
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

Appendix B2 - Changes to Existing Local Plan Designations						
Allocation Ref	Site Ref	Old SAD Ref	Address	Site Area (ha)	Estimated capacity	proposed use
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		Summerton 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

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

Walsall Unitary Development Plan 2005	
Superseded Policy	Replacement Policy
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	

Walsall Town Centre Area Action Plan 2019
All policies to be carried forward

Appendix C2 - Walsall Site Allocation Document 2019		
Policy	Site Reference	Reference in BCP
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

Appendix C2 - Walsall Site Allocation Document 2019

Policy	Site Reference	Reference in BCP
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.

Appendix C3 – Changes to Walsall's existing Travelling Showpeople allocations				
Local Plan Document	Designation / Site Reference	Site Name	Description of Change	Reason for Change
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.

Appendix D1: Wolverhampton Policies Map amendments that will result from the adoption of the BCP				
Local Plan Document	Designation / Site Reference	Site Name	Description of Change	Reason for Change
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.

Appendix D1: Wolverhampton Policies Map amendments that will result from the adoption of the BCP				
Local Plan Document	Designation / Site Reference	Site Name	Description of Change	Reason for Change
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

Appendix D1: Wolverhampton Policies Map amendments that will result from the adoption of the BCP				
Local Plan Document	Designation / Site Reference	Site Name	Description of Change	Reason for Change
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

Appendix D1: Wolverhampton Policies Map amendments that will result from the adoption of the BCP				
Local Plan Document	Designation / Site Reference	Site Name	Description of Change	Reason for Change
	(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

Local Plan Document	Policy / paragraph	Replacement BCP Policy
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.

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	Within UDP			
	Office				or not adjoining APP boundary, or within AAP but outwith PSA and poorly related to it	inset area but not related to PSA or transport, or not adjoining, related to or 100m within UDP Inset			

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

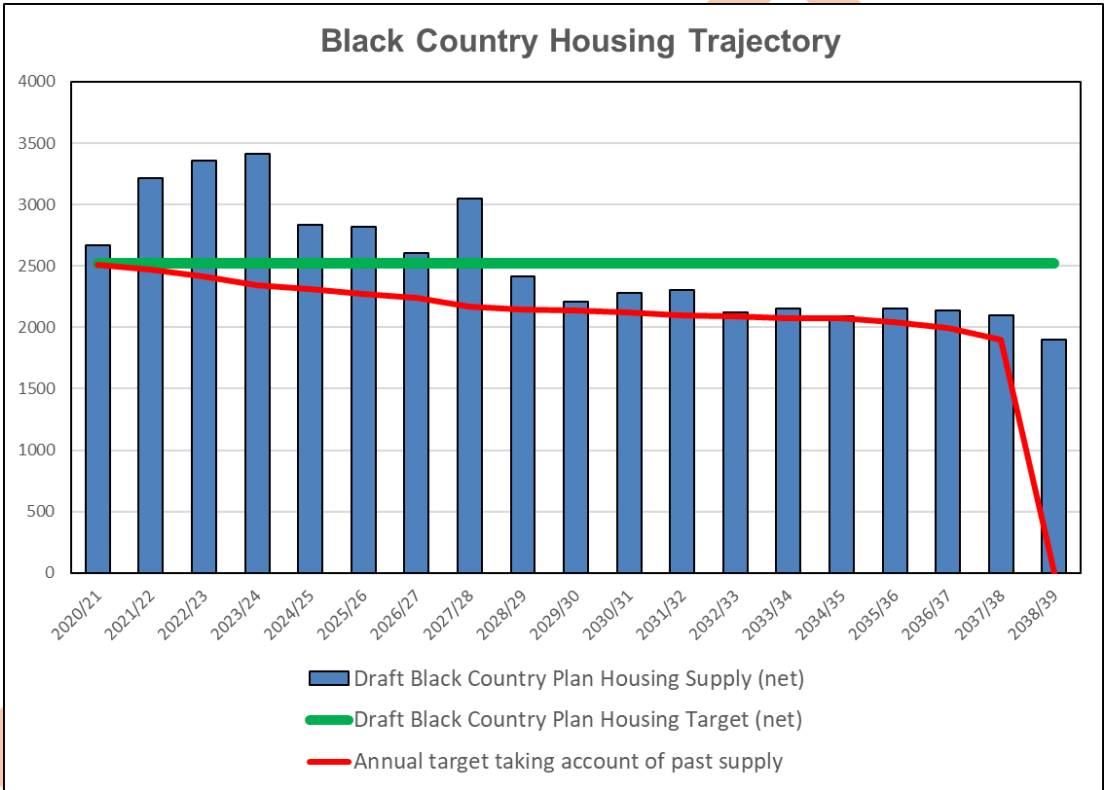
1) Draft Black Country Plan Housing Supply

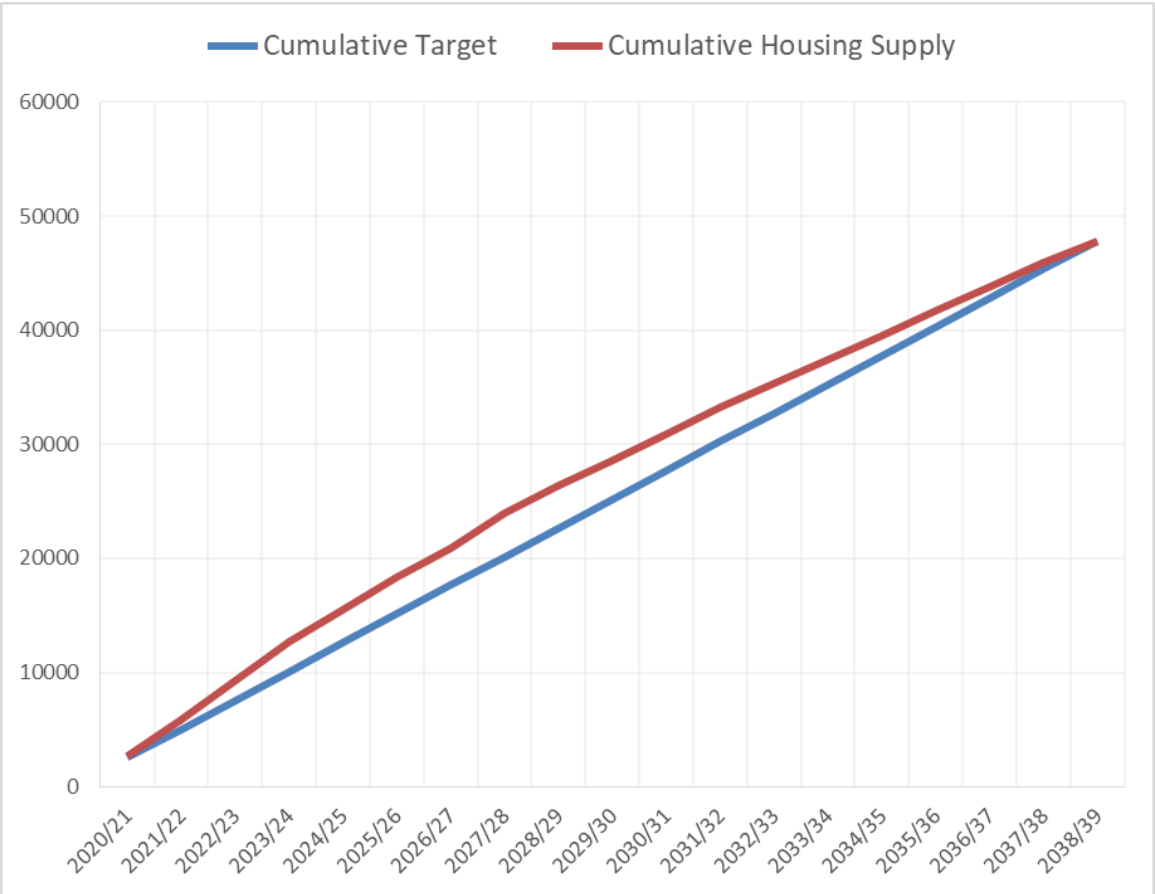
Projected Completions (net homes)	Dudley	Sandwell	Walsall	Wolverhampton	Black Country
2020/21	730	619	146	1177	2672
2021/22	730	346	996	1141	3213
2022/23	730	513	1094	1019	3356
2023/24	907	620	935	949	3411
2024/25	912	606	928	392	2838
2025/26	659	607	874	681	2821
2026/27	668	443	919	572	2602
2027/28	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
Total	13235	9158	13344	12100	47837

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



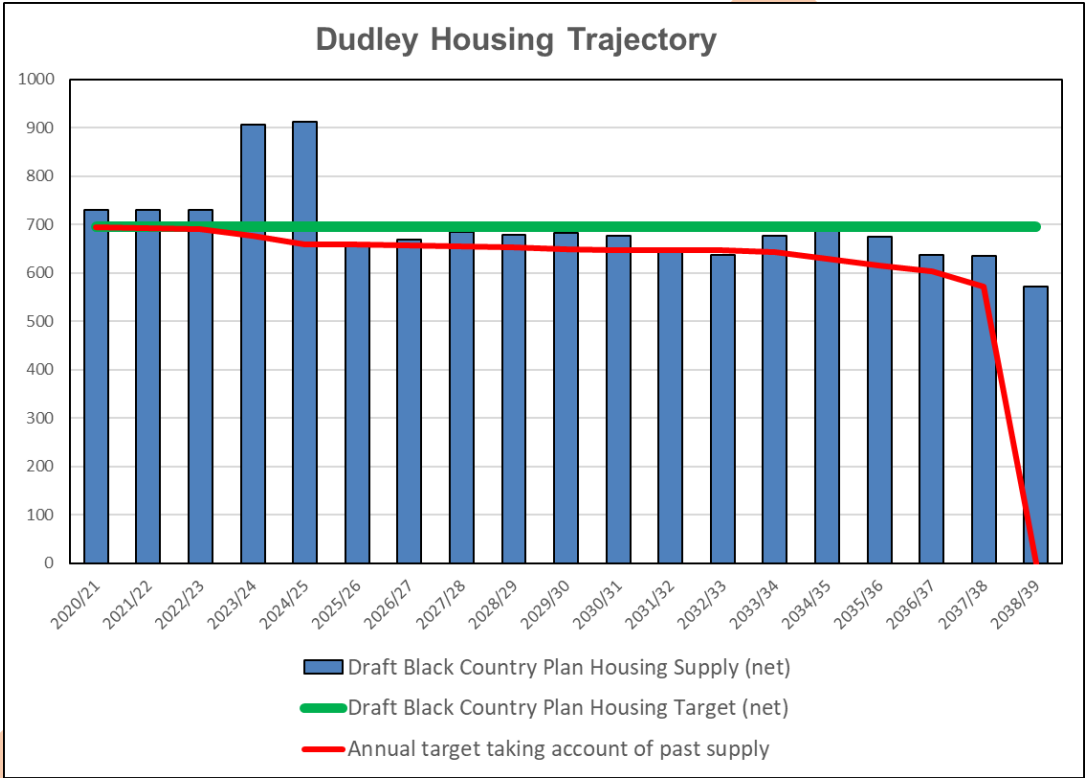


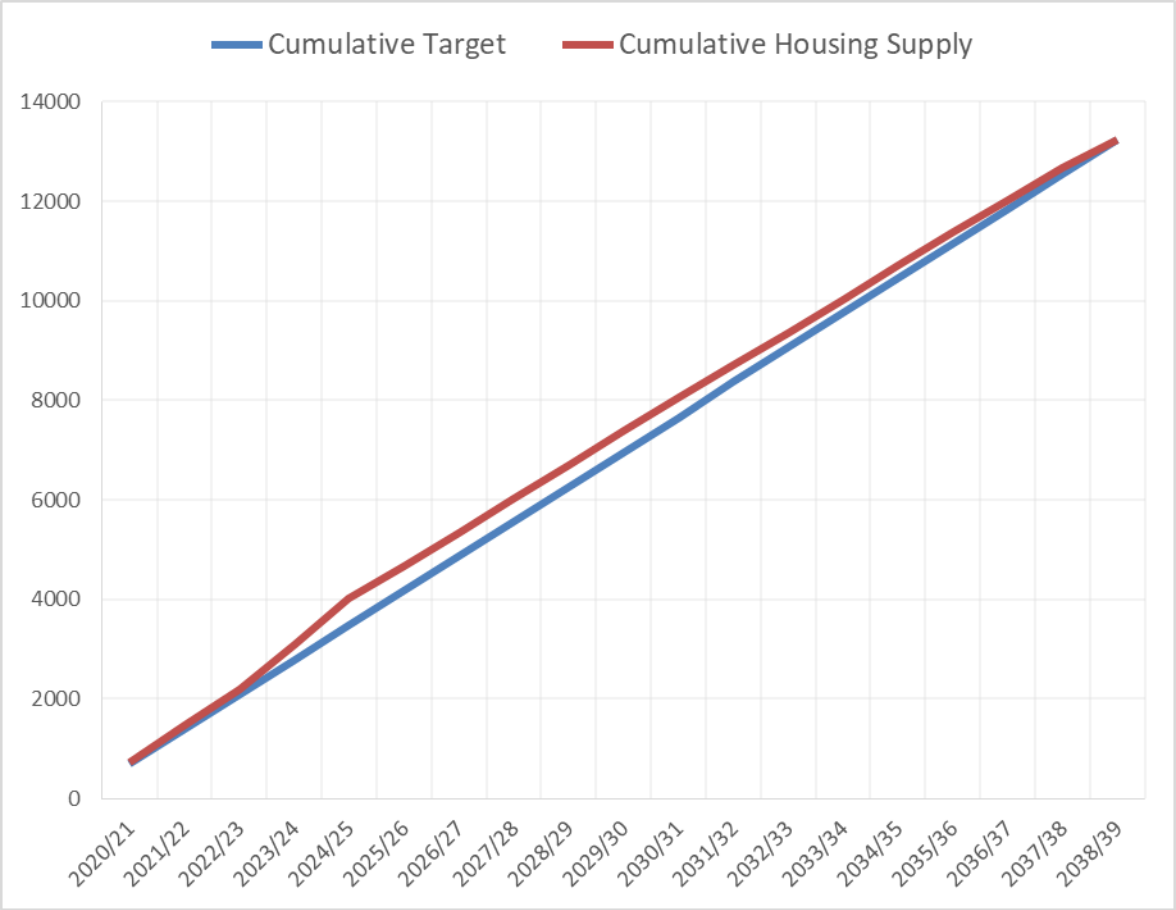
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3) Dudley Housing Trajectory

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



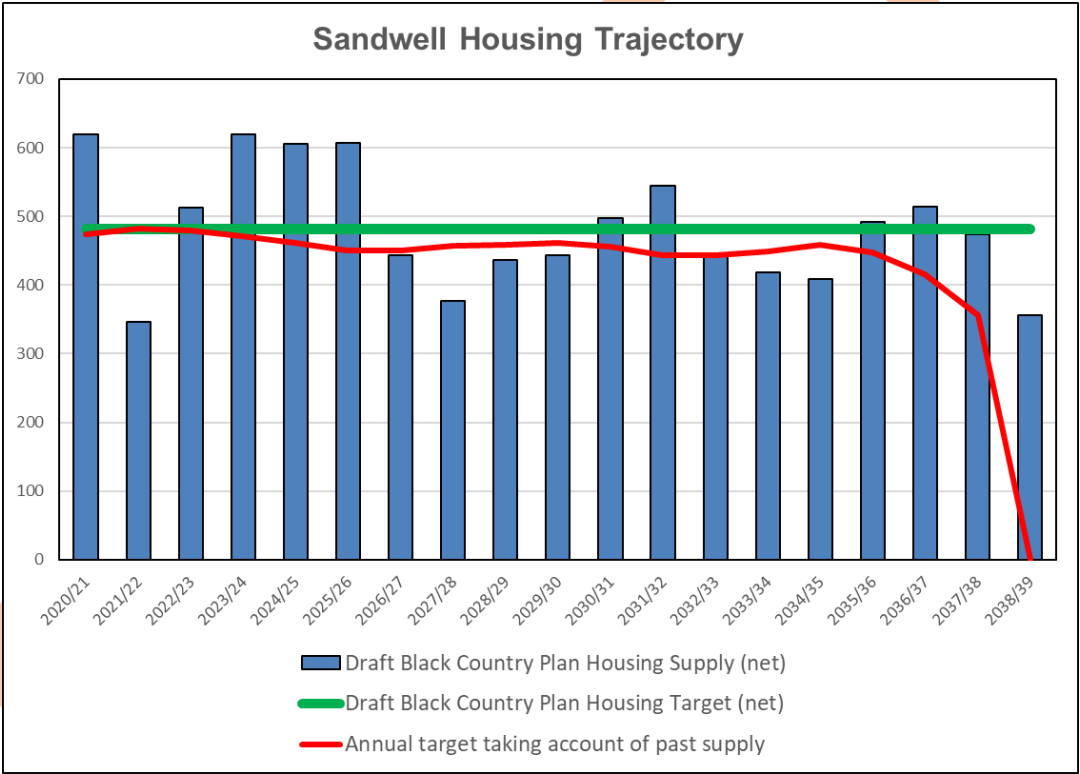


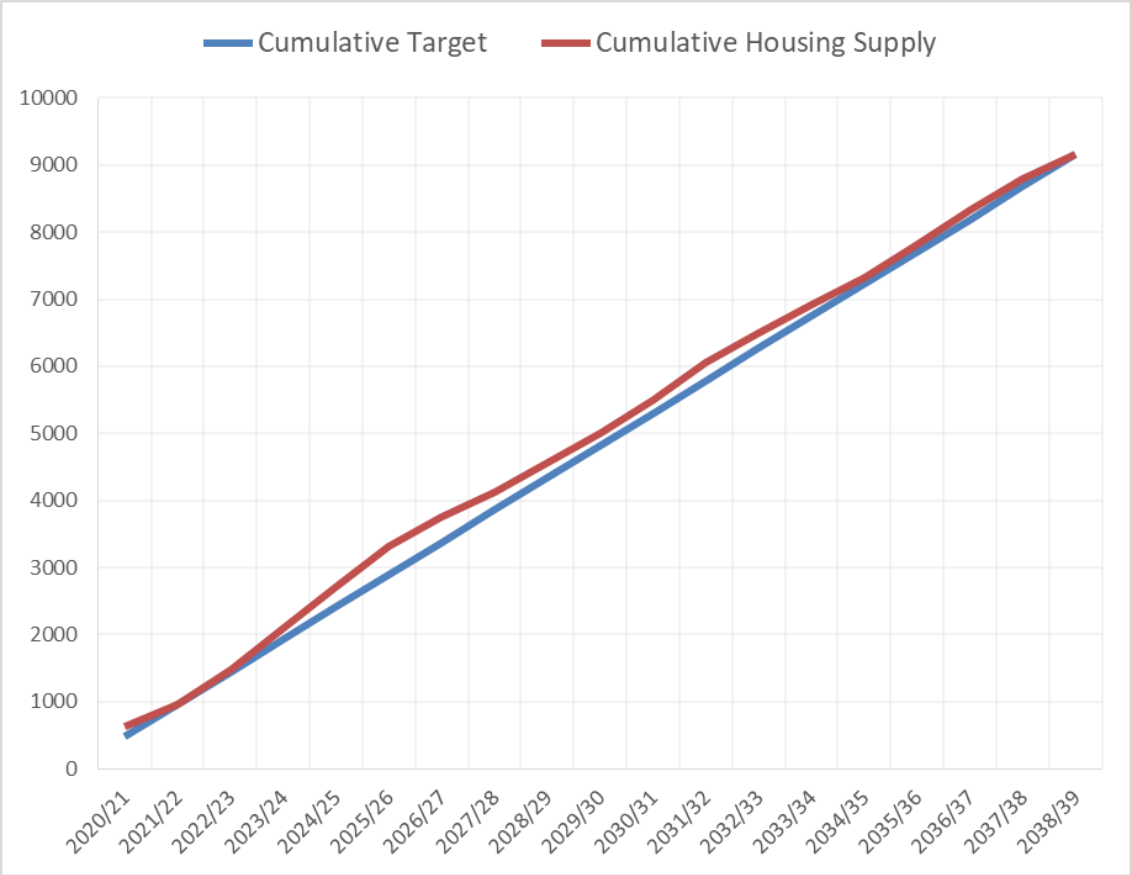
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4) Sandwell Housing Trajectory

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



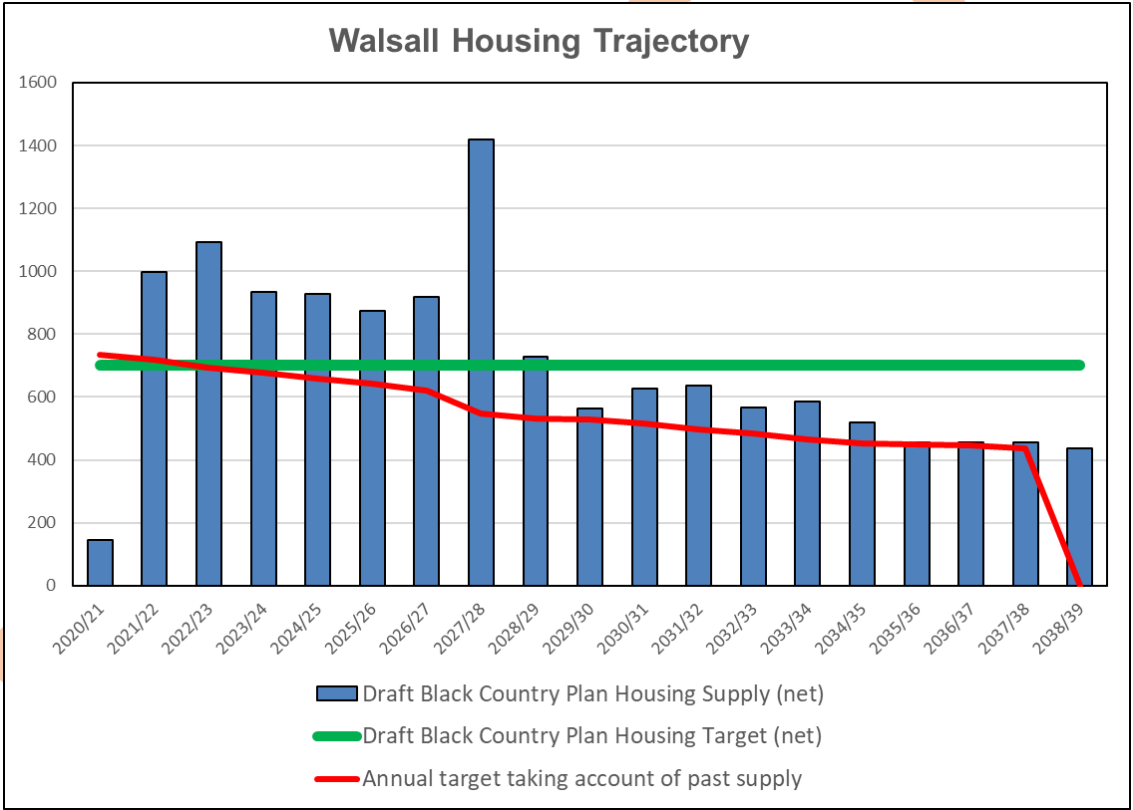


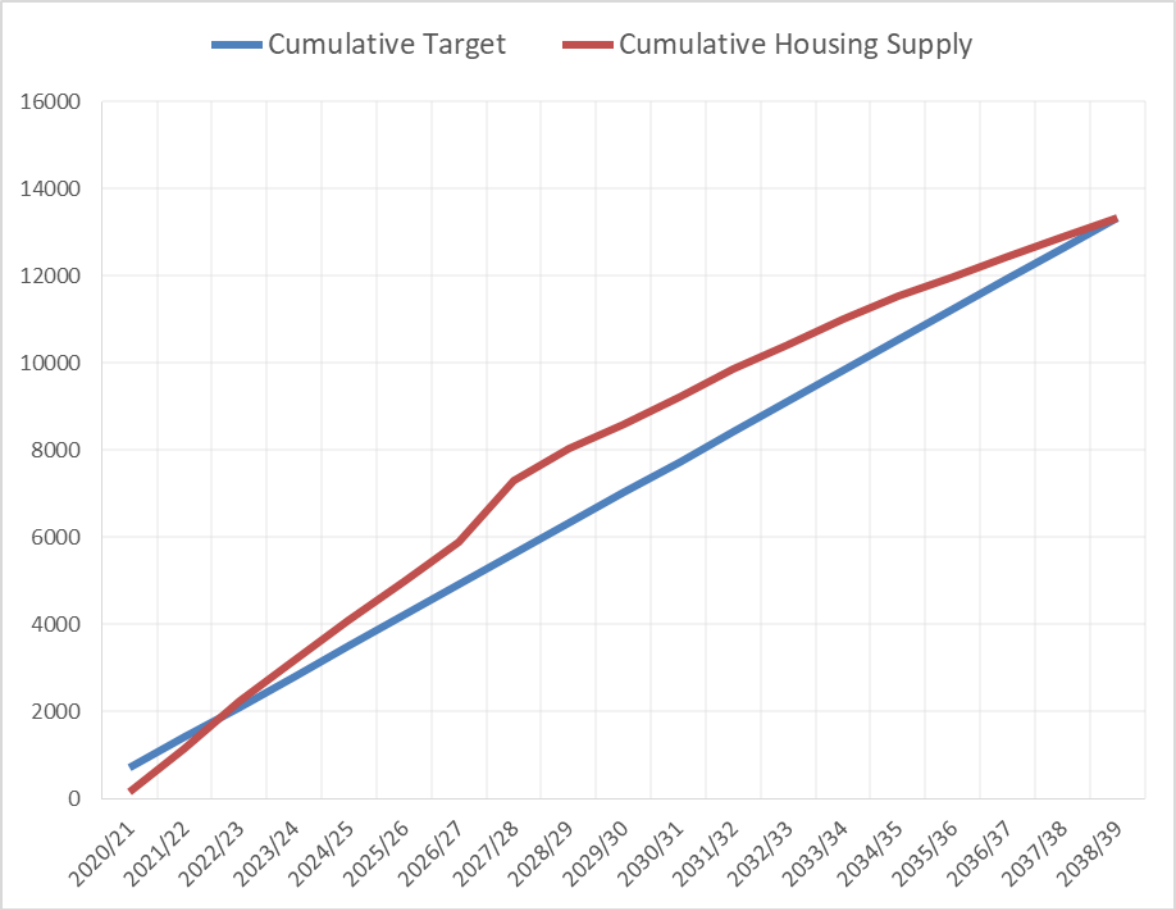
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5) Walsall Housing Trajectory

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

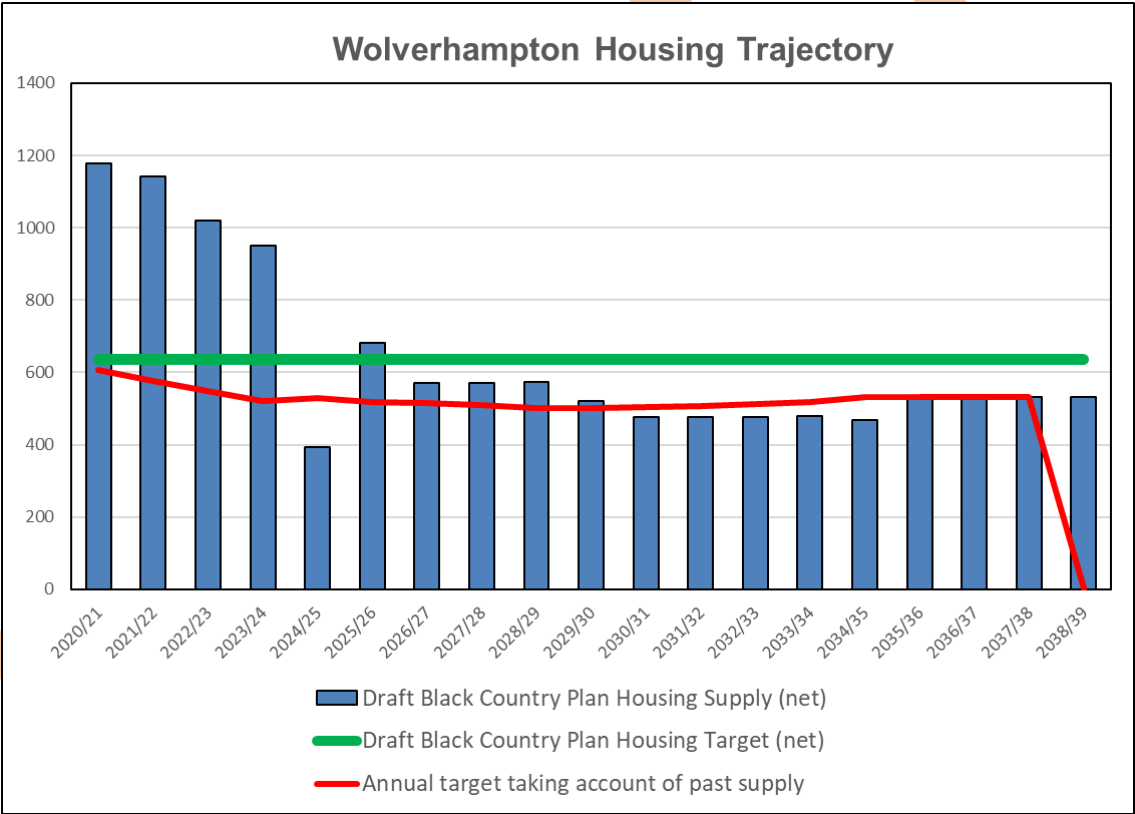


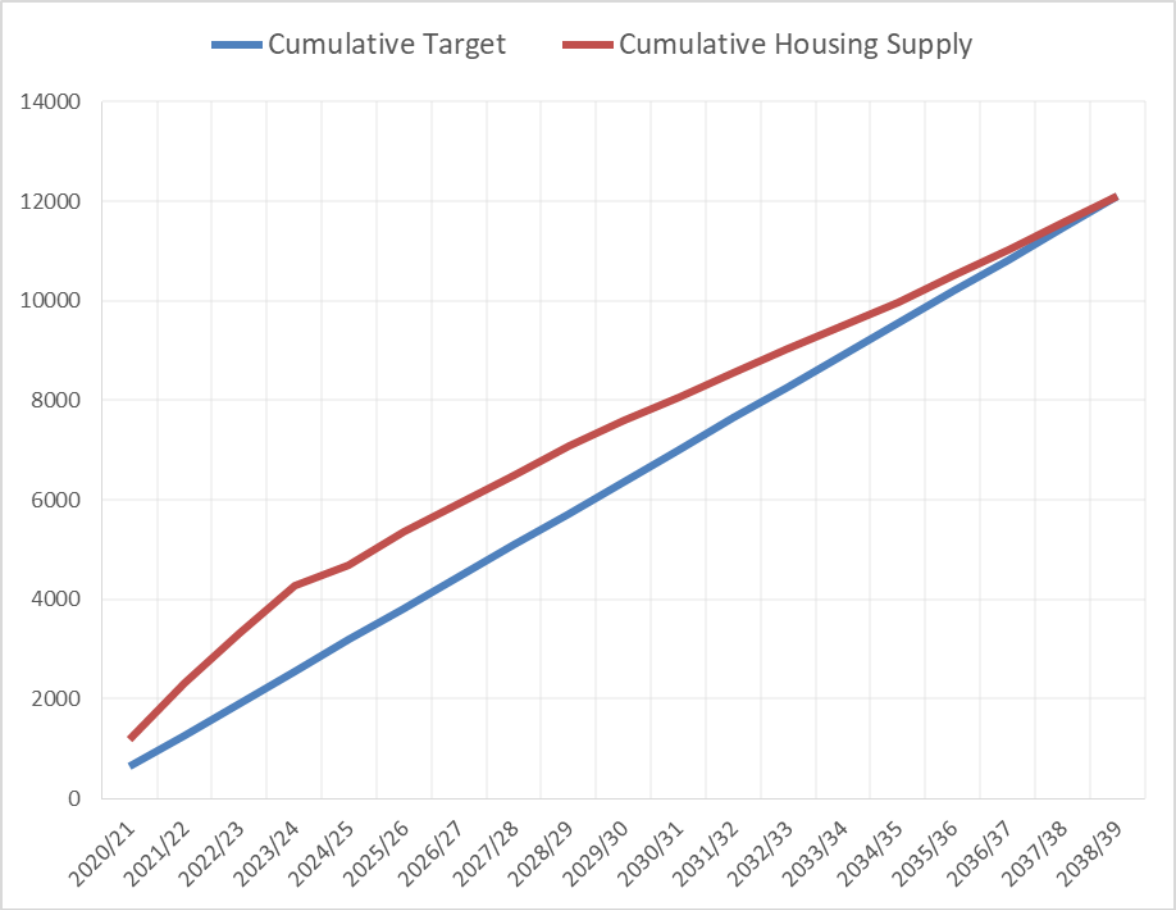


6) Wolverhampton Housing Trajectory

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





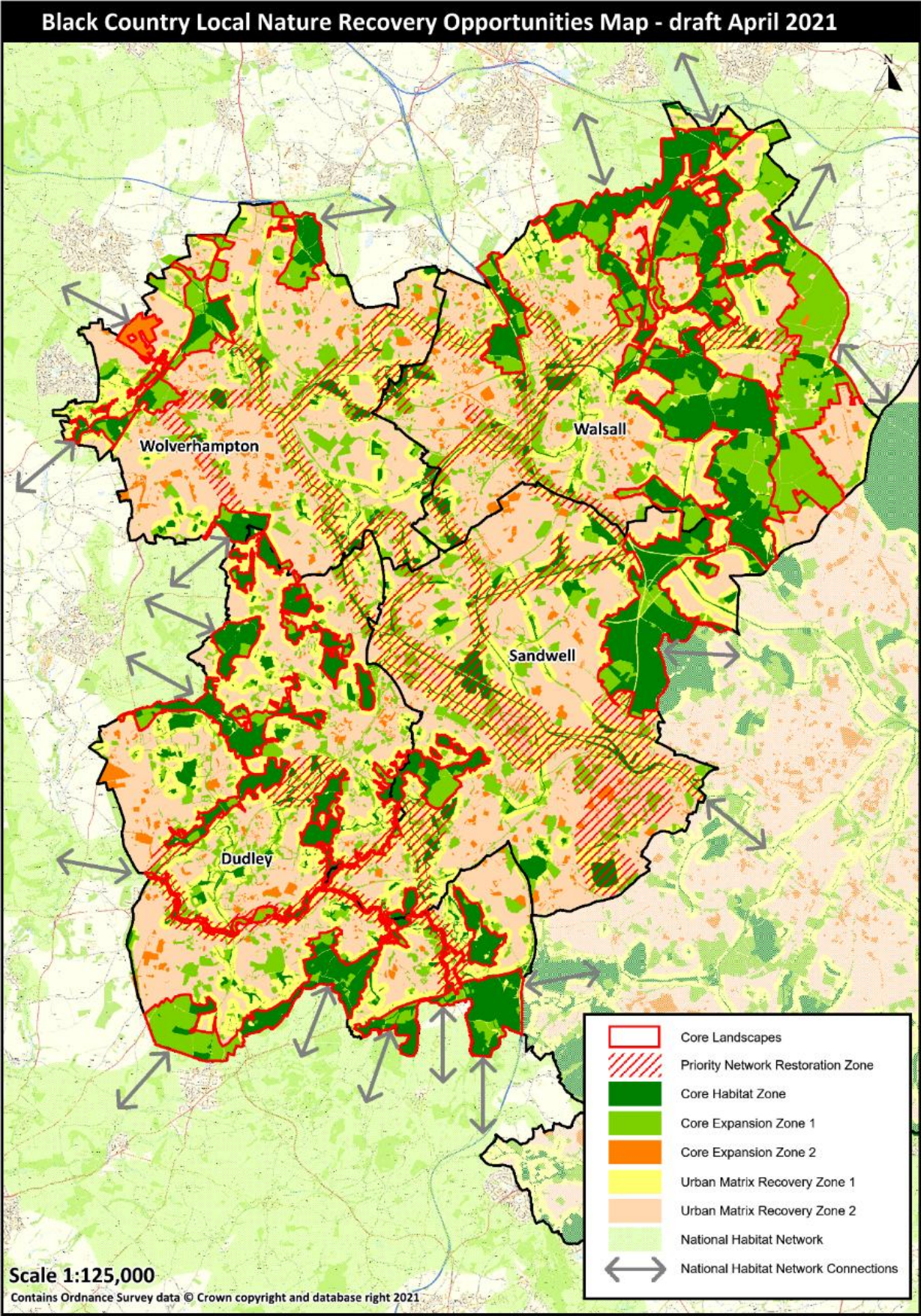
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18 Appendix – Nature Recovery Network

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.

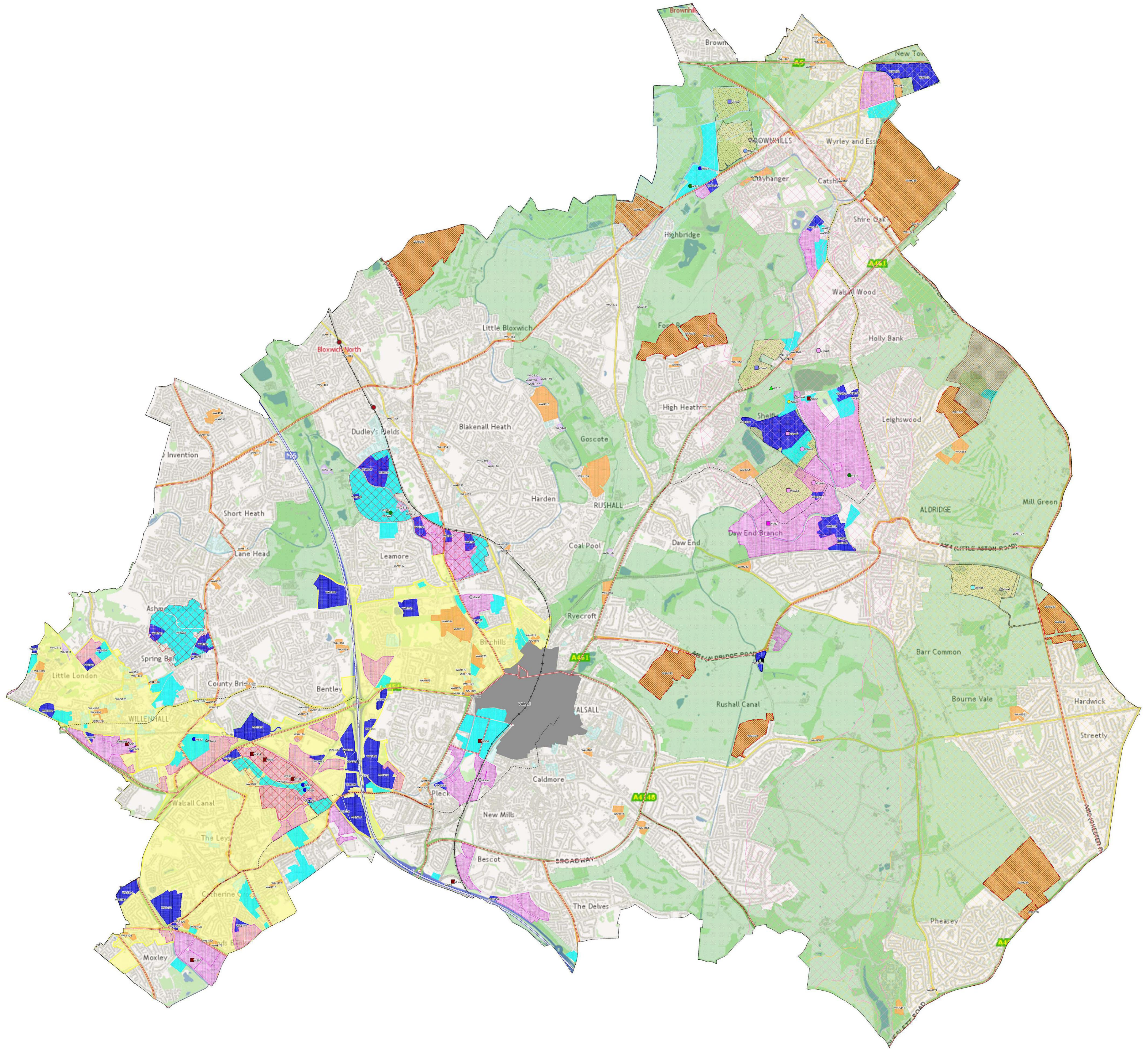
6. Core Expansion Zone 1 comprises land use parcels that are of lower ecological value than those in the Core Habitat Zone but, due to inherent value or location, have the most potential to contribute to a coherent ecologic network. These sites are a priority for investment in the restoration and creation 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		

Word / Phrase	Acronym	Meaning



Key

- | | | | |
|---|--|---|-----------------------------------|
|  | Housing Allocation (HOU1) |  | Strategic Centres (CEN2) |
|  | Gypsy and Traveller Pitch Allocations (HOU4) |  | Core Regeneration Areas (CSP2) |
|  | Employment Development Sites (EMP1) |  | Neighbourhood Growth Areas (CSP3) |
|  | Strategic Employment Areas (EMP2) |  | Green Belt (GB1) |
|  | Local Employment Areas (EMP3) | | |
|  | Other Employment Areas (EMP4) | | |
|  | Local Greenspace (DSA.6) | | |
|  | Strategic Allocations | | |

Existing Mineral Sites and Mineral Infrastructure Sites (MIN 2)

- Mineral Sites
 - Pre-operational Quarry
 - Active Quarry
 - Dormant Quarry
 - Brickworks
 - Pot Clay Factory
 - ▼ Fireclay Stockpile
- Mineral Infrastructure Sites
 - ✦ Rail Linked Aggregates Depot
 - ▲ Aggregates Recycling Facilities
 - ◆ Concrete Batching Plant
 - Concrete Products
 - Coating Plant
 - Dry Silo Mortar Plant

-  Brick Clay Minerals Safeguarding Area (MIN2)
-  Fireclay Minerals Safeguarding Area (MIN2)
-  Sand and Gravel Minerals Safeguarding Area (MIN2)
-  Preferred Area for Sand and Gravel (MIN3)
-  Preferred Area for New Waste Facilities (W3)
-  Mineral Extraction Sites (MIN2)

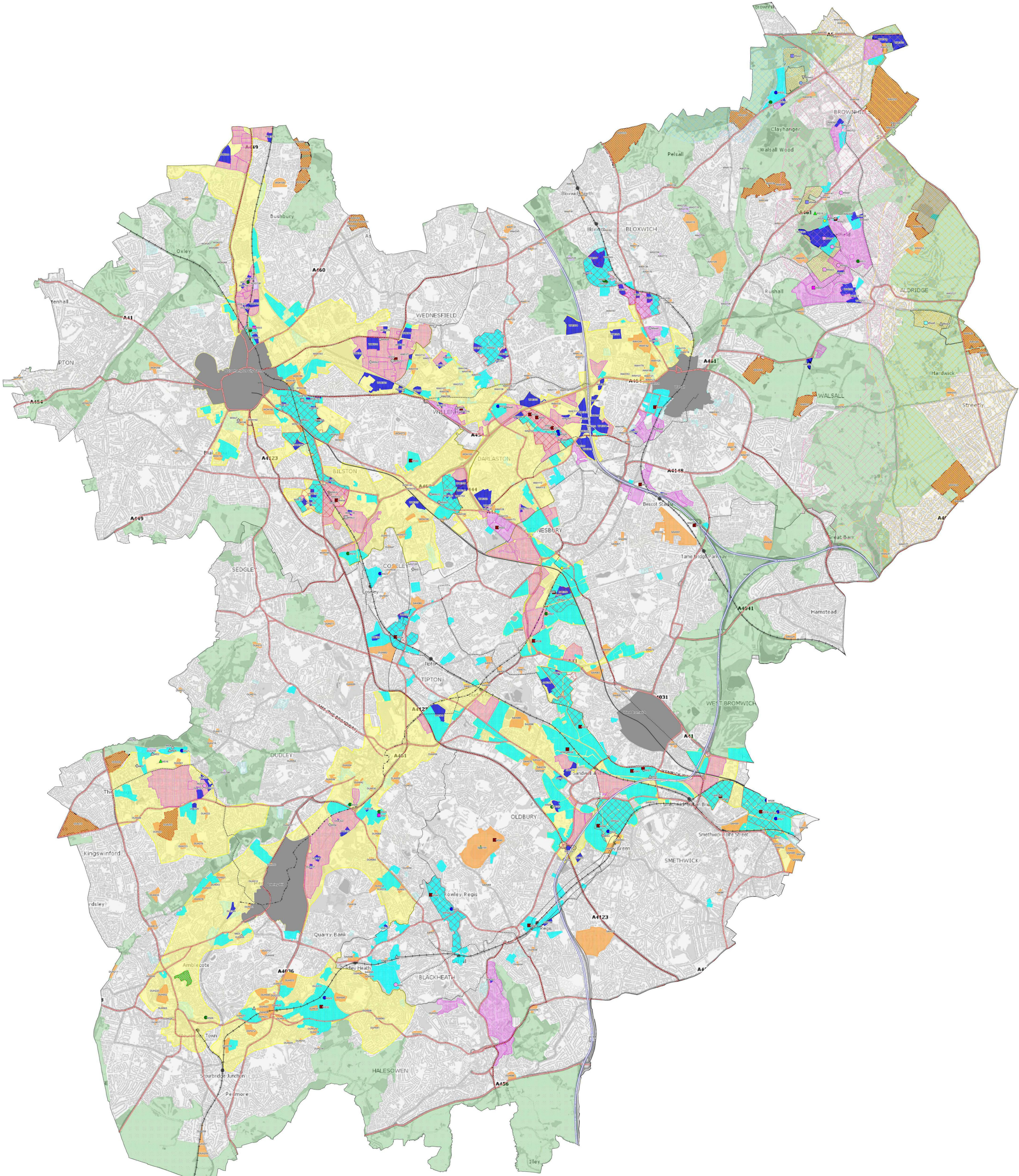
- Hazardous Waste Treatment Infrastructure (W2)
- Metal Recycling Sites (W2)
- ▲ Waste Disposal Installations (W2)
- Municipal Waste Recovery Installations (W2)
- Municipal Waste Recovery-Supporting Infrastructure (W2)
- Other Significant Waste Management Infrastructure (W2)

Transport

- Motorways
- Key Route Network (TRAN1)
- Rail Network (TRAN4)
- Existing West Midlands Metro (TRAN4)
- Wednesbury- Brierley Hill Metro Extension (TRAN4)
- Cycle Network (TRAN5)

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Key

- Housing Allocation (HOU1)
- Gypsy and Traveller Pitch Allocations (HOU4)
- Employment Development Sites (EMP1)
- Strategic Employment Areas (EMP2)
- Local Employment Areas (EMP3)
- Other Employment Areas (EMP4)
- Local Greenspace (DSA.6)
- Strategic Allocations
- Strategic Centres (CEN2)
- Core Regeneration Areas (CSP2)
- Neighbourhood Growth Areas (CSP3)
- Green Belt (GB1)

Existing Mineral Sites and Mineral Infrastructure Sites (MIN 2)

- Mineral Sites
 - Pre-operational Quarry
 - Active Quarry
 - Dormant Quarry
 - Brickworks
 - Pot Clay Factory
 - Fireclay Stockpile
- Mineral Infrastructure Sites
 - Rail Linked Aggregates Depot
 - Aggregates Recycling Facilities
 - Concrete Batching Plant
 - Concrete Products
 - Coating Plant
 - Dry Silo Mortar Plant

- Brick Clay Minerals Safeguarding Area (MIN2)
- Fireclay Minerals Safeguarding Area (MIN2)
- Sand and Gravel Minerals Safeguarding Area (MIN2)
- Preferred Area for Sand and Gravel (MIN3)
- Preferred Area for New Waste Facilities (W3)
- Mineral Extraction Sites (MIN2)

- Hazardous Waste Treatment Infrastructure (W2)
- Metal Recycling Sites (W2)
- Waste Disposal Installations (W2)
- Municipal Waste Recovery Installations (W2)
- Municipal Waste Recovery-Supporting Infrastructure (W2)
- Other Significant Waste Management Infrastructure (W2)

- Transport
 - Motorways
 - Key Route Network (TRAN1)
 - Rail Network (TRAN4)
 - Existing West Midlands Metro (TRAN4)
 - Wednesbury- Brierley Hill Metro Extension (TRAN4)
 - Cycle Network (TRAN5)

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Black Country | **Plan**

Planning for the future of the Black Country



HOUSING



ENVIRONMENT



EMPLOYMENT



TRANSPORT

Draft Plan Consultation: Additional Housing Sites in Walsall

July - September 2022

Introduction

In the summer of 2021 the Black Country Authorities of Dudley, Sandwell, Walsall and Wolverhampton consulted on a Draft Black Country Plan (the Regulation 18 Plan). This Plan identified where all new employment and housing development would be located and where investment for new infrastructure such as transport, schools and health facilities would be made.

Following a review of the consultation responses and completion of new evidence, three additional sites in Walsall are now considered potentially suitable for housing. These three sites are now subject to a formal public consultation (an additional Regulation 18 consultation) before the Black Country Plan can move to the next stage of consultation - Regulation 19. One of these sites was subject to site assessment and considered not suitable for development at Draft Black Country Plan stage – new evidence has changed the site assessment for this site. Two of the sites are new sites which were not subject to site assessment at Draft Black Country Plan stage.

5 new sites in Walsall which were submitted during the 2021 consultation have also been subject to site assessment and are considered not suitable for housing. Further information is available in an addendum to the Site Assessment report. A Sustainability Appraisal of all new sites (both potentially suitable and not suitable) has also been completed.

This document should be read in conjunction with the Draft Black Country Plan published for consultation in 2021. No decision has been taken at this stage about the sites or policies proposed in that document.

What is a Local Plan?

All Local Planning Authorities (including Dudley, Sandwell, Walsall and Wolverhampton) are required by Government to write a Local Plan that describes how the necessary development over the next 20 years or so will be handled and where it will be located.

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, new housing and where additional retail, office and leisure development is needed. In addition, the Local Plan considers whether any additional supporting infrastructure (e.g. schools, 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 being prepared by the four Black Country Authorities (Dudley, Sandwell, Walsall and Wolverhampton). The Plan will direct where new development will be located for the Black Country up to 2039.

It will guide key issues like:

- **New Housing** – where will it go? How many new homes are needed? What type of new homes will be required and how many affordable houses will be needed?
- **Provision for new employment** – how much employment land is needed and where should it go?
- **What supporting infrastructure and services** (e.g. transport, schools, health) will be needed and where will these be located?
- **In the face of new development** how will the natural environment be protected?

Why are we reviewing the Black Country Plan?

The Government requires Local Authorities to have Local Plans that 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 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 Walsall 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 preparing the Black Country Plan?

We started to prepare the Black Country Plan in 2017. We held a public consultation in July – September 2017 on the issues facing the Black Country and some possible solutions. Following the Issues and Options consultation we consulted on the Draft Black Country Plan (Regulation 18) for eight weeks in August – October 2021. The Draft Plan considered the responses we received to the Issues and Options consultation along with a range of other technical studies produced on planning issues.

The next stage is the production of a Regulation 19 Plan. The Regulation 19 Plan will be informed by the Regulation 18 consultation responses and any new evidence. The Regulation 19 consultation will seek representations only on the soundness and legality of the Plan preparation process, which is the main criteria considered by the Planning Inspectorate at the future examination in public, rather than the content of the Plan. For this reason, new proposed site allocations cannot be added at Regulation 19 stage and therefore an additional Regulation 18 consultation is required for the three additional sites in Walsall now considered potentially suitable for housing.

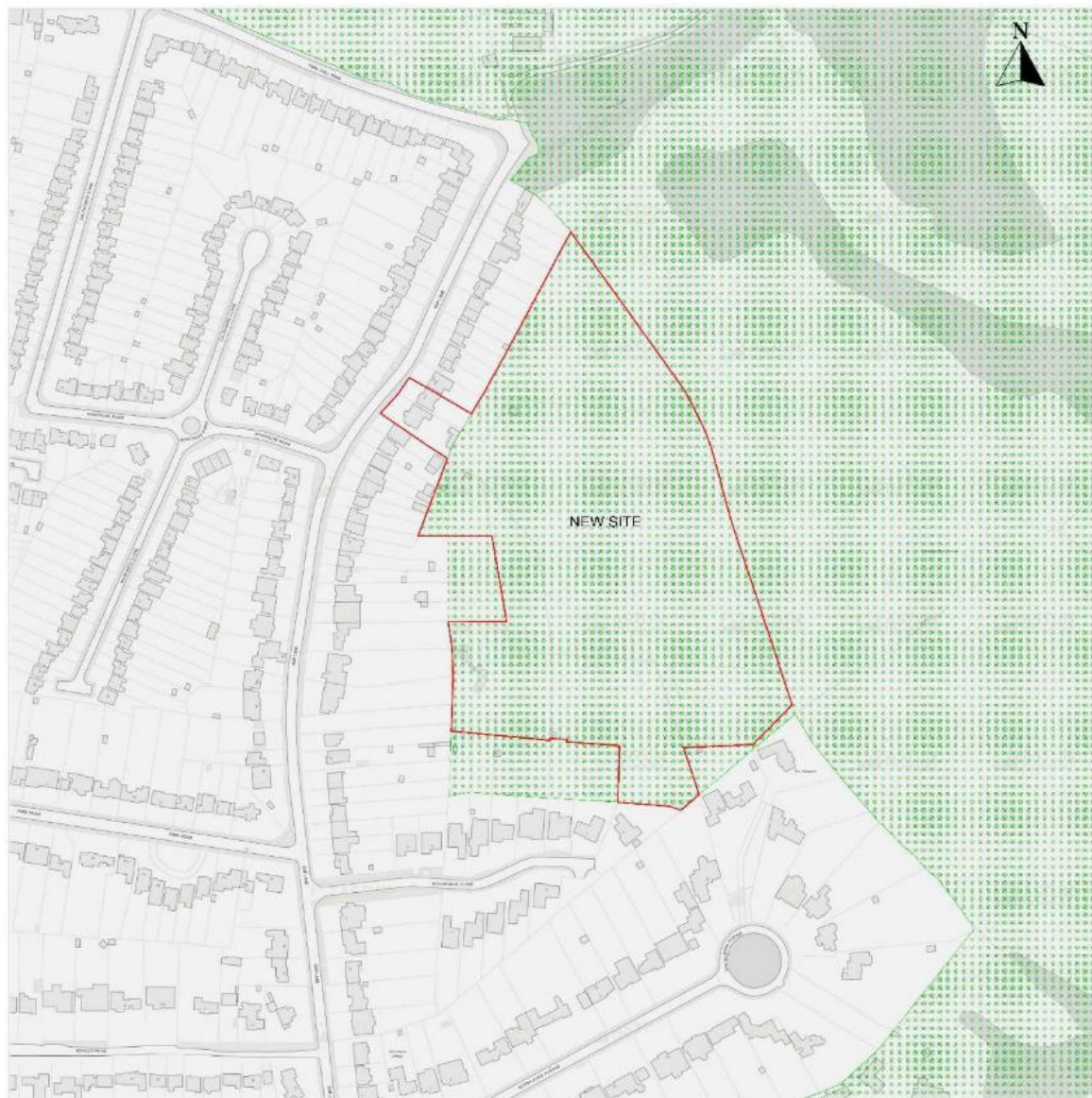
Location of the additional housing Draft Black Country Plan (Regulation 18) sites in Walsall.

Site Ref	Policy in Previous Local Plan (Site Allocation Document)	Site Name and Address	Indicative Housing Capacity	Gross Site area (ha)	Indicative Net Developable Area (ha)	Net Density (dwellings per hectare)
WAH257	GB1	Land West of Chester Road North of Little Hardwick Road, Streetly	655	25.98	18.73	35
WAH258	GB1, EN5 (part)	Land East of Skip Lane and North of Woodfield Close	135	5.16	3.87	35
WAH259	GB1	Pacific Nurseries, East of Chester Road	30	1.15	0.86	35



- Key**
- Current Proposed Allocation (HOU1)
 - New Proposed Allocation (HOU1)
 - Local Authority Boundary
 - Green Belt (GB1)

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Key

- Current Proposed Allocation (HOU1)
- New Proposed Allocation (HOU1)
- Local Authority Boundary
- Green Belt (GB1)

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WAH258 Land East of Skip Lane and North of Woodfield Close

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 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 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 identified in the Draft Plan document in 2021 made provision for 47,837 homes and 354ha of employment land, allowing most of our housing and employment land needs to be met in the Black Country. However, there was 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?

The 2021 Draft Plan (regulation 18) consultation for Walsall proposed land to provide an additional 13,344 new homes and 164ha of employment land over the period to 2039.

As part of the additional sites consultation to be held in July – September 2022, we are proposing an additional 820 new homes over the period to 2039.

What happens next?

We want your views

You can also view copies of the Draft Plan documents and a map of proposed land allocations at the following venues in Walsall:

Walsall First Stop Shop

Bloxwich Library

Darlaston Library

Willenhall Library

Lichfield Street Hub

Brownhills Library

Streetly Community Library

Mobile Library Services

Aldridge Library

In addition, copies of the documents will be available at key council buildings across the wider Black Country

Dudley	Sandwell	Wolverhampton
<ul style="list-style-type: none"> • Dudley Council House, 1 Priory Road, Dudley • Dudley Council Plus, 259 Castle Street, Dudley • Brierley Hill Library • Coseley Library • Dudley Library • Dudley Wood Neighbourhood Learning Centre and Library Link • Gornal Library • Halesowen Library • Kingswinford Library • Market • Long Lane Library Halesowen • Lye Library • Netherton Library 	<ul style="list-style-type: none"> • Sandwell Council House Freeth Street, Oldbury • Central Library West Bromwich • Blackheath Library • Cradley Heath Library • Great Barr Library • Great Bridge Library • Oldbury Library • Sandwell Council House, • Smethwick Library • Tipton Library • Wednesbury Library • Bleakhouse Library, Oldbury • Brandhall Library, Oldbury • Glebefields Library, Tipton • Hamstead Library, Great Barr 	<ul style="list-style-type: none"> • Wolverhampton Civic Centre St Peter's Square, Wolverhampton • Wolverhampton Central Library • Bilston Library • Wednesfield Library

- Quarry Bank Library
(subject to this library
being open)
- Sedgley Library
- Stourbridge Library
- Wordsley Library
- Hill Top Library West
Bromwich
- Langley Library
Oldbury
- Oakham Library
Tividale
- Rounds Green Library,
Oldbury
- Stone Cross Library
Beverley Road, West
Bromwich
- Thimblemill Library,
Smethwick

Have your say

Visit the website:

Complete our online response form at: <https://blackcountryplan.dudley.gov.uk/t2/p5/>

Email: 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.

If you need assistance to explain the documents or fill in your response form, please contact the Walsall Planning Policy Team at: planningpolicy@walsall.gov.uk or 01922 658020.

Please note that, at this stage, we are only seeking views on the three additional sites in Walsall now considered potentially suitable for housing. We have noted and analysed all consultation responses submitted in summer 2021 on the Draft Black Country Plan – these responses do not need to be submitted again.

The deadline for responses is: 5:00 pm on Monday 5th September 2022

Plan Timetable

Stage	Date
Consultation on the Publication Plan (Regulation 19)	November - December 2022
Submission of Plan to Secretary of State for Examination	March 2023 - May 2023
Examination in Public	Submission – early 2024
Adoption	March 2024

Appendix C Public Consultation Engagement Techniques

Consultation Stage	Target Audience	Consultation Methods to be used by all BC Authorities	Additional channels specific to Walsall
8 week Regulation 18 Draft Black Country Plan consultation on additional potentially suitable Walsall housing allocations.	All Stakeholders inc. Public Members MPs Statutory Consultees.	<ul style="list-style-type: none"> • Ebulletin and letters to stakeholders on the consultation database • Email to Members when consultation has gone live • Email to MPs • Webcontent and online consultation response forms • Printed copies of Plan documents and summary leaflets to be available in key council buildings (e.g. libraries, council offices and others tbc) • Online virtual FAQ sessions/presentations to be held • Launch press release, plus 2-3 reminder releases • Ebulletin 	<ul style="list-style-type: none"> • Hold drop in session at Streetly using libraries or other cultural/ community based facility. • To notify residents within wards containing new sites.

Sustainability Appraisal of the Black Country Plan

Regulation 18 (II) SA Report

June 2022



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Page 864 of 1125

Sustainability Appraisal of the Black Country Plan

Regulation 18 (II) SA Report

LC-816	Document Control Box
Client	Black Country Authorities
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Reviewed	LB
Approved	ND

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About this report & notes for readers

Lepus Consulting Ltd (Lepus) has prepared this report for the use of the Black Country Authorities (Dudley Metropolitan Council, Sandwell Metropolitan Council, Walsall Council and City of Wolverhampton Council). There are a number of limitations that should be borne in mind when considering the results and conclusions of this report. No party should alter or change this report whatsoever without written permission from Lepus.

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The conclusions below are based on the best available information, including information that is publicly available. No attempt to verify these secondary data sources has been made and they have been assumed to be accurate as published.

This report was prepared during May and June 2022 and is subject to and limited by the information available during this time. This report has been prepared with reasonable skill, care and diligence within the terms of the contract with

the client. Lepus Consulting accepts no responsibility to the client and third parties of any matters outside the scope of this report. Third parties to whom this report or any part thereof is made known rely upon the report at their own risk.

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Acronyms & Abbreviations

A&E	Accident and Emergency
AHHTV	Area of High Historic Townscape Value
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
AOS	Area of Search
APA	Archaeological Priority Area
AQMA	Air Quality Management Area
BCA	Black Country Authorities
BCP	Black Country Plan
BMV	Best and most versatile
CA	Conservation Area
CaBA	Catchment Based Approach
CF	Carried Forward
DBEIS	Department for Business, Energy and Industrial Strategy
DEFRA	Department for Environment, Food and Rural Affairs
DLHHV	Designed Landscape of High Historic Value
EU	European Union
GI	Green Infrastructure
GIS	Geographical Information System
GP	General Practitioner
ha	Hectare
HEAD	Historic Environment Area Designation
HGV	Heavy Goods Vehicle
HRA	Habitats Regulations Assessment
IMD	Index of Multiple Deprivation
IRZ	Impact Risk Zone
km	Kilometre
LA	Local Authority
LCT	Landscape Character Type
LGS	Local Geological Site
LNR	Local Nature Reserve
LSOA	Lower Super Output Area
LTP	Local Transport Plan
LVIA	Landscape and Visual Impact Assessment
LWS	Local Wildlife Site
m	Metre
MBC	Metropolitan Borough Council
MHCLG	Ministry of Housing, Communities and Local Government
MSA	Minerals Safeguarding Area
NCA	National Character Area
NERC	Natural Environment Research Council
NHS	National Health Service
NNR	National Nature Reserve
NO₂	Nitrogen Dioxide

NPPF	National Planning Policy Framework
ONS	Office of National Statistics
OS	Ordnance Survey
PM₁₀	Particulate Matter (10 micrometres)
PPG	Planning Practice Guidance
PPP	Policies Plans and Programmes
PRoW	Public Rights of Way
RA	Reasonable Alternative
RPG	Registered Park and Garden
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SINC	Site of Importance for Nature Conservation
SLINC	Site of Local Importance for Nature Conservation
SM	Scheduled Monument
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Sites of Special Scientific Interest
SuDS	Sustainable Drainage System
SWFR	Surface Water Flood Risk
ZOI	Zone of Influence

Executive Summary

Sustainability Appraisal process

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

Purpose of this report

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

Summary findings

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

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

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

Next steps

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

1 Introduction

1.1 This report

- 1.1.1 The Black Country Authorities (BCA), which include Dudley Metropolitan Council, Sandwell Metropolitan Council, Walsall Council and City of Wolverhampton Council, are in the process of writing the Black Country Plan (BCP), previously referred to as the Black Country Core Strategy Review.
- 1.1.2 As part of this process, a Sustainability Appraisal (SA) is being undertaken that incorporates the requirements of the Strategic Environmental Assessment (SEA) Regulations 2004 (SI 1633). The purpose of SA is to assess the likely social, environmental and economic consequences of a plan from the outset, and throughout its iterative development, to ensure that sustainability considerations are taken into account.
- 1.1.3 The BCA prepared an Issues and Options document in June 2017² as part of the plan-making process, which set out to review the adopted Black Country Core Strategy in light of these challenges and opportunities. In 2021 the BCA prepared the Draft BCP³, setting out draft planning policies and allocations to support the growth and regeneration of the Black Country over the plan period. This Regulation 18 (II) SA Report follows on from the SA Scoping Report⁴ and SA Issues and Options Report⁵ prepared by Lepus Consulting in 2017 alongside the BCA's Issues and Options document, and the Regulation 18 SA Report⁶ prepared by Lepus Consulting in 2021 alongside the draft BCP.
- 1.1.4 This Regulation 18 SA Report has been prepared as the third stage of the SA process in order to inform the environmental assessment of the BCP, following on from the SA outputs to date. This report will be published for consultation with the statutory consultation bodies as required by Regulation 13 of The Environmental Assessment of Plans and Programmes Regulations 2004⁷ (SEA Regulations).

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

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

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

⁵ 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 [Date Accessed: 09/05/22]

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

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

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

1.2 The Black Country

- 1.1.1 The Black Country is a predominantly urban sub-region of the West Midlands, located to the north west of Birmingham (see **Figure 1.1**). The sub-region includes the boroughs of Dudley, Sandwell, Walsall and the City of Wolverhampton. The Black Country covers an area of 35,728ha and has a combined population of approximately 1,202,500⁸. The sub-region is culturally diverse, and home to a greater proportion of people of people from Asian ethnic groups (14.64%) and Black ethnic groups (4.19%) in comparison to the national averages (7.5% and 3.3% respectively)^{9,10}.
- 1.2.1 The area has a rich industrial heritage, including its extensive canal network, which opened up the mineral wealth of the area for exploitation during the Industrial Revolution. The area owes its name to black smoke, particularly from iron and coal industries, during a time when the Black Country became one of the most heavily industrialised areas in Britain.
- 1.2.2 Mining ceased in the area in the late 1960s, but manufacturing continues today, although on a much smaller scale. There is a total of 435,000 employee jobs across the Plan area¹¹. In addition to manufacturing, which equates to approximately 13.8% of employee jobs in the Black Country, the biggest employment sectors include wholesale and retail trade (19.3%) and human health and social work activities (15.6%)¹².
- 1.2.3 Today, the Black Country contains four Strategic Centres (the towns of Brierley Hill, Walsall and West Bromwich and the City of Wolverhampton), as well as a network of smaller towns and local centres. The major centres provide a wide range of employment, leisure, retail and tourism opportunities to serve the Black Country and the wider area.

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

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

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

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

¹² Ibid

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

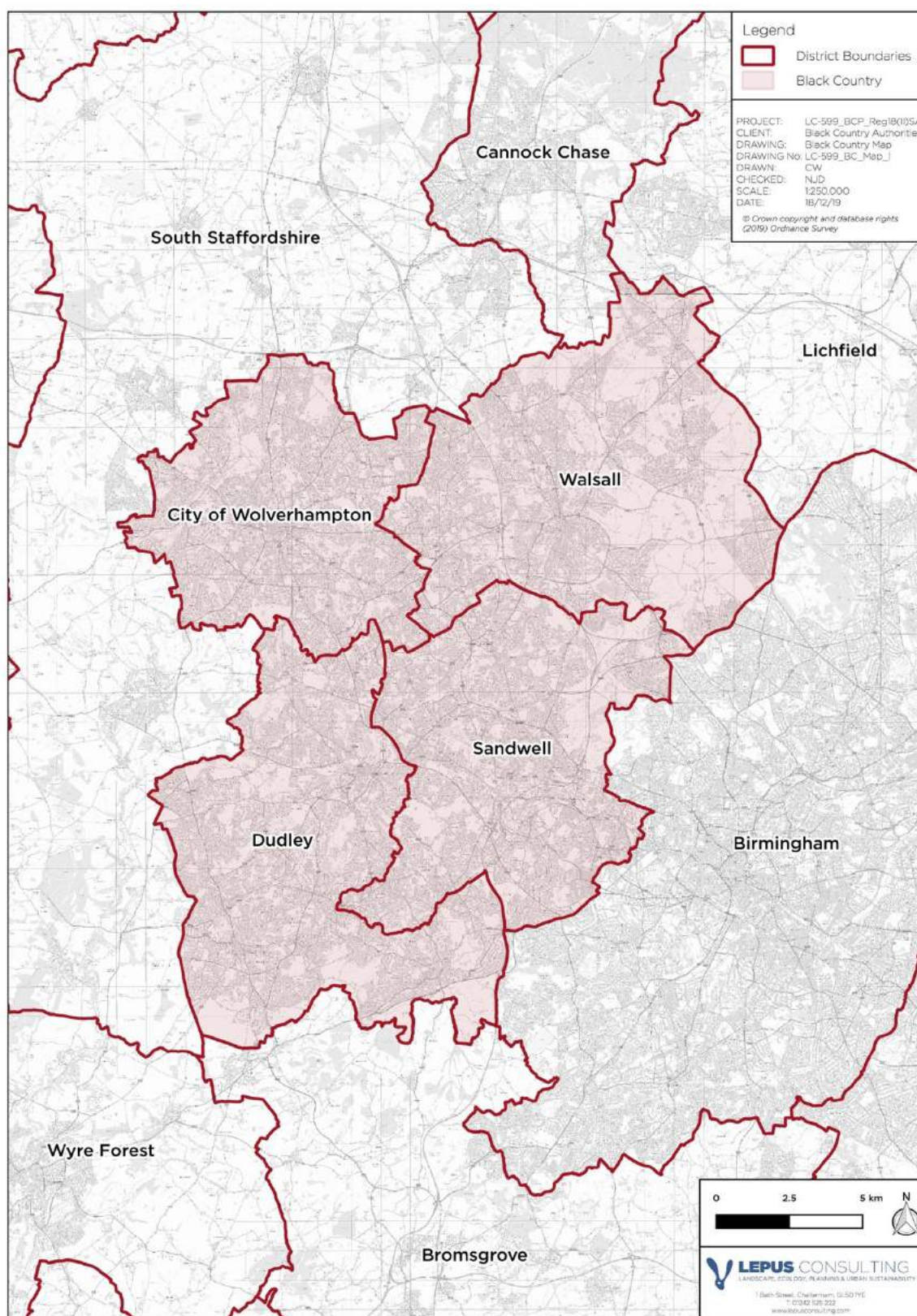


Figure 1.1: City of Wolverhampton, Dudley, Sandwell and Walsall authority boundaries

1.3 The BCP Review

- 1.3.1 The Black Country covers the areas of Dudley Metropolitan Borough Council (MBC), Sandwell MBC, Walsall Council and the City of Wolverhampton Council. The four authorities worked together to produce the Black Country Core Strategy¹³, which was adopted in 2011.
- 1.3.2 The Draft Black Country Plan (referred to as the BCP throughout this document) contains planning policies and land allocations to support the growth and regeneration of the Black Country over the next 20 years.
- 1.3.3 The BCP, which includes both strategic and local policies, will provide a policy framework to:
- Facilitate the delivery of the right development types to meet identified and emerging needs in the most sustainable places;
 - Prevent uncoordinated development;
 - Provide certainty over the types of development that is likely to be approved;
 - Meet housing needs between now and 2039;
 - Attract new businesses and jobs and offer existing businesses the space to grow by meeting employment land needs;
 - Increase employment opportunities to support the delivery of the Black Country and West Midlands Combined Authority Strategic Economic Plans (SEP), Local Industrial Strategy and Covid-19 recovery plans;
 - Address the issue of climate change;
 - Promote and enhance health and well-being in accordance with the four local authorities' health and well-being strategies;
 - Protect and enhance designated areas; and
 - Ensuring infrastructure, such as roads, public transport, new schools, new healthcare facilities, upgraded utilities and broadband, waste and sewage disposal, is provided at the right time to serve the new homes and employment provision it supports.
- 1.3.4 When adopted, the Black Country Plan will replace the Black Country Core Strategy (2011) and substantial elements of 'Tier 2' Plans in the form of Area Action Plans and Site Allocations Documents.

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

1.4 Sustainability Appraisal and Strategic Environmental Assessment

- 1.4.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.
- 1.4.2 The European Union Directive 2001/42/EC¹⁴ (SEA Directive) applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport etc. (see Article 3(2) of the Directive for other plan or programme types). The objective of the SEA procedure can be summarised as follows: *“the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”*.
- 1.4.3 The SEA Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004¹⁵ (SEA Regulations). Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the BCP to be subject to SEA throughout its preparation.
- 1.4.4 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is required by S19(5) of the Planning and Compulsory Purchase Act 2004¹⁶ and should be an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA resides in The Town and Country Planning (Local Planning) (England) Regulations 2012¹⁷. SEA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.
- 1.4.5 Public consultation is an important aspect of the integrated SA/SEA process.

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

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

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

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

1.5 Best Practice Guidance

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

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment¹⁸;
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive¹⁹;
- Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework (NPPF)²⁰;
- Ministry of Housing, Communities and Local Government (2021) Planning Practice Guidance (PPG)²¹; and
- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans²².

1.6 Sustainability Appraisal

1.6.1 This document is a component of the SA of the BCP. It provides an assessment of the likely effects of reasonable alternatives, as per Stage B of SA presented in **Figure 1.2**, according to the PPG on Sustainability Appraisal²³.

¹⁸ 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 [Date Accessed: 25/04/22]

¹⁹ 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 [Date Accessed: 25/04/22]

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

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

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

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

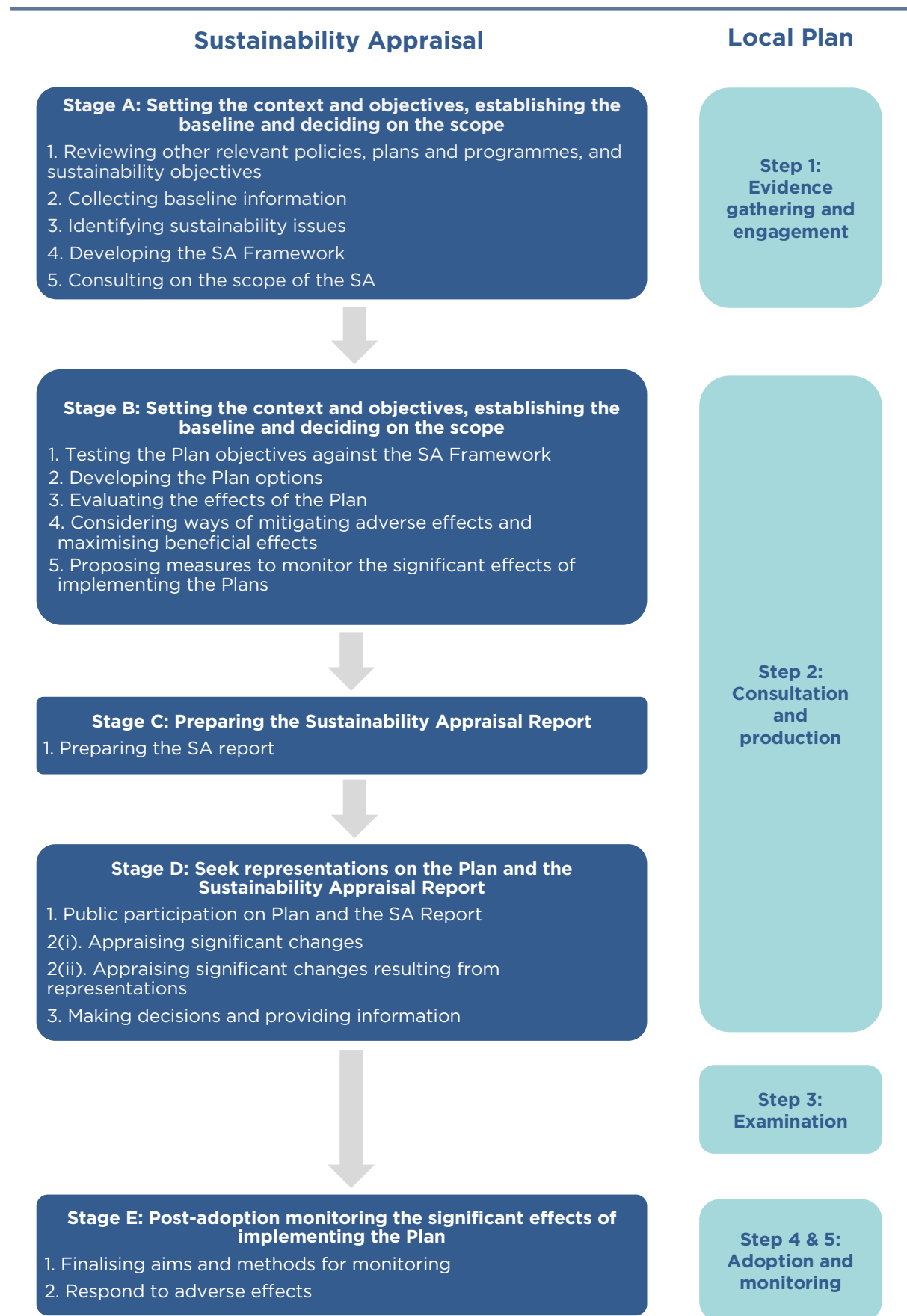


Figure 1.2: Sustainability Appraisal process

1.7 The SA process so far

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

Table 1.1: The BCP and SA process to date

Date	BCP Stage	Sustainability Appraisal
February 2017	N/A	SA Scoping Report²⁴ 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	Issues and Options Report²⁵ 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.	Issues and Options SA Report²⁶ The Issues and Options SA Report assessed eight strategic options, five strategic policies and eight policy areas.
July 2021	Draft Black Country Plan 2039 (Regulation 18: Preferred Options)²⁷ The Draft BCP contained planning policies and land allocations, as well as a vision, strategic objectives and priorities, to support the growth and regeneration of the Black Country over the plan period to 2039.	Regulation 18 SA Report²⁸ This SA report contains an assessment of 723 reasonable alternative sites, 77 draft policies, five housing options, five employment options and eleven spatial options.
June 2022	Regulation 18 (II) Additional Housing Sites in Walsall The BCA prepared a site assessment report for each of the additional sites, to be consulted on alongside the existing evidence base that accompanied the Draft BCP Consultation.	Regulation 18 (II) SA Report (this report) This SA report contains an assessment of eight additional reasonable alternative sites and updated selection / rejection information.

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

²⁵ 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 [Date Accessed: 25/05/22]

²⁶ 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 [Date Accessed: 25/05/22]

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

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

1.8 Scoping Report

1.8.1 In order to identify the scope and level of detail of the information to be included in the SA process, an SA Scoping Report was produced by Lepus²⁹. The SA Scoping Report represented Stage A of the SA process (see **Figure 1.2**), and presents information in relation to:

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

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

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

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

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

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

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

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

1.9 Issues and Options (June, 2017)

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

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

1.9.2 The Issues and Options SA Report³¹ assessed eight strategic options, five strategic policies and eight policy areas. The assessment of strategic options indicated that the likely strategy for growth within the Black Country has the potential to place pressure on existing infrastructure and resources. It was concluded that the overall approach which underpins the BCP policies is appropriate.

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

1.10 Regulation 18: Preferred Options (July, 2021)

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

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

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

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

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

1.12 Assessment of reasonable alternatives

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

³¹ 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 [Date Accessed: 25/05/22]

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

- 1.12.2 Regulation 12 of the SEA Regulations³³ states that the Environmental Report “*shall identify, describe and evaluate the likely significant effects of the environment of – (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and geographical scope of the plan or programme*”.
- 1.12.3 PPG Paragraph: 018 Reference ID: 11-018-20140306 states that “*Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings*”.
- 1.12.4 As outlined within **sections 1.9** and **1.10**, a number of different types of reasonable alternatives have been considered previously in the SA process, including housing and employment growth options, spatial options, reasonable alternative sites and policies. This Regulation 18 (II) SA Report focuses only on reasonable alternative sites, in addition to those considered within the previous Regulation 18 SA Report.
- 1.12.5 The key aspects both the BCP and Regulation 19 SA reporting outputs will need to consider in respect to RA are:
- What reasonable alternatives have been identified and on what basis?
 - How they have been assessed and compared (including consideration of sustainability issues)?
 - What are the preferred alternatives and why they are preferred over other alternatives?
- 1.12.6 This report also provides information in relation to the likely characteristics of effects, as per the SEA Regulations (see **Box 1.1**).

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

Box 1.1: Schedule 1 of the SEA Regulations³⁴

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

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

1.13 Structure of this SA Report

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

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

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

2 Assessment of Sites

2.1 Preface

2.1.1 The Black Country Call for Sites request first opened in July 2017 and re-opened from 9th July – 20th August 2020³⁵. Each of the four authorities have carried out a Strategic Housing Land Availability Assessment (SHLAA) of sites within which have the potential to accommodate new housing development and an Employment Development Land Review for sites with potential to accommodate employment development. Some sites have been assessed for both potential uses within the SA process to date.

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

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

Table 2.1: Reasonable alternative sites assessed within this SA Report

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

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

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

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

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

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

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

2.2 SA Assessment Methodology

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

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

Table 2.2: Presenting likely impacts

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

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

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

2.3 SA Objective 1: Cultural heritage

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

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

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

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

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

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

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

⁴⁰ Sandwell Metropolitan Borough Council (2022) Listed buildings and conservation areas. Available at: http://www.sandwell.gov.uk/info/200275/planning_and_buildings/444/listed_buildings_and_conservation_areas [Date Accessed: 23/05/22]

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

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

⁴³ 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 [Date Accessed: 23/05/22]

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

⁴⁴ 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 [Date Accessed:
23/05/22]

2.4 SA Objective 2: Landscape

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

Box 2.2: SA Objective 2: Landscape strategic assessment methodology

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

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

⁴⁶ 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]

⁴⁷ 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 [Date Accessed: 16/06/21]

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

Likely Impact		Notes
Views from the PRow Network		
-	Development proposals which may alter views of a predominantly rural or countryside landscape experienced by users of the PRow network.	PRow data provided by the BCA. Views have been identified through the use of aerial photography and Google Maps ⁴⁹ .
0	Development proposals are not considered to significantly alter views experienced by users of the PRow network.	
+	Development proposals which could potentially improve the views experienced from the nearby PRow network.	
Green Belt		
--	Development proposals located within areas of 'moderate-high', 'high' or 'very high' Green Belt harm.	Appraisal of sites informed by the Black Country Green Belt Study ⁵⁰ . 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.	

⁴⁹ Ibid

⁵⁰ 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 [Date Accessed: 23/05/22]

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

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

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

Likely Impact		Notes
European site e.g. SAC, SPA or Ramsar site		
--	Development proposal coincides with, or is located in close proximity to, a SAC. Likelihood of direct impacts.	Data for SACs from Natural England ⁵¹ .
-	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 ⁵² .
-	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 ⁵³ .
-	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.	

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

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

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

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

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

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

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

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

2.6 SA Objective 4: Climate change mitigation

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

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

Likely Impact		Notes
Carbon Emissions		
--	Residential-led development which could potentially result in an increase in CO ₂ emissions by 1% or more in comparison to current levels.	<p>Figures calculated using UK local authority CO₂ emissions data⁵⁷ and the number of people per dwelling⁵⁸, such that proposals for the following housing numbers are expected to increase carbon emissions by 1% or more in comparison to the current estimates:</p> <ul style="list-style-type: none"> Dudley – 963 homes; Sandwell – 1,346 homes; Walsall – 1,165 homes; and Wolverhampton – 1,095 homes. <p>Proposals for the following housing numbers are expected to increase carbon emissions by 0.1% or more in comparison to current estimates:</p> <ul style="list-style-type: none"> Dudley – 96 homes; Sandwell – 135 homes; Walsall – 117 homes; and Wolverhampton – 110 homes.
-	Residential-led development which could potentially result in an increase in CO ₂ emissions by 0.1% or more in comparison to current levels.	
0	Development would be expected to result in a negligible increase in CO ₂ emissions.	
+/-	Non-residential development where the carbon emissions produced as a result of the proposed development is uncertain.	
+	<p>Development proposals which include energy saving or renewable energy technologies.</p> <p>Development proposals which would reduce reliance on personal car use, encourage active travel or the use of public transport.</p>	

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

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

2.7 SA Objective 5: Climate change adaptation

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

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

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

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

⁶⁰ 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 [Date Accessed: 23/05/22]

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

2.8 SA Objective 6: Natural resources

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

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

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

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

⁶³ 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]

⁶⁴ 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 [Date Accessed: 23/05/22]

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

2.9 SA Objective 7: Pollution

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

Box 2.7: SA Objective 7: Pollution strategic assessment methodology

Likely Impact		Notes
AQMA		
-	All development proposals in the Black Country are located within an AQMA.	UK AQMA data available from Defra ⁶⁶ .
Main road		
-	Development proposals located within 200m of a main road.	Road data available from the Ordnance Survey ⁶⁷ . A 200m buffer distance from main roads (motorways and A-roads) has been used, in line with the Department for Transport guidance ⁶⁸ .
0	Development proposals located over 200m from a main road.	
+	Development proposals which would help to reduce the number of cars used, promote the use of public transport and active travel and reduce congestion on nearby roads.	
Water quality		
-	Development proposals located within 10m of a watercourse.	Watercourse mapping data available from the Ordnance Survey ⁶⁹ . 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 ⁷⁰ .
0	Development proposals located over 10m from a watercourse.	
+	Development proposal includes integration of GI or the naturalisation of watercourses.	

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

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

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

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

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

Likely Impact		Notes
Groundwater SPZ		
-	Development proposal coincides with a groundwater SPZ.	SPZ data available from the Environment Agency ⁷¹ . Groundwater source catchments are divided into three zones: <ul style="list-style-type: none">• Inner Zone (Zone I) – 50-day travel time from any point below the water table to the source;• Outer Zone (Zone II) – 400-day travel time; and• Total Catchment (Zone III) – within which all groundwater recharge is presumed to be discharged at the source.
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 ⁷² . 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.	

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

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

2.10 SA Objective 8: Waste

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

Box 2.8: SA Objective 8: Waste strategic assessment methodology

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

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

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

2.11 SA Objective 9: Transport and accessibility

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

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

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

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

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

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

⁷⁸ Ibid

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

2.12 SA Objective 10: Housing

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

Box 2.10: SA Objective 10: Housing strategic assessment methodology

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

2.13 SA Objective 11: Equality

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

Box 2.11: SA Objective 11: Equality strategic assessment methodology

Likely Impact		Notes
Index of Multiple Deprivation		
-	Development proposals within most deprived 10 percent LSOAs in England. Development proposals would result in the loss of affordable housing, community services or could potentially increase crime/the fear of crime in the area.	UK Indices of Multiple Deprivation (IMD) available from MHCLG ⁷⁹ .
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.	

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

2.14 SA Objective 12: Health

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

Box 2.12: SA Objective 12: Health strategic assessment methodology

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

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

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

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

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

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

Likely Impact		Notes
Public Transport Access to GP Surgery		
-	Development proposals are located over a 15-minute travel time via public transport to a healthcare location.	Data on healthcare locations and accessibility modelling (travel time to healthcare) provided by BCA.
+	Development proposals are located within a 15-minute travel time via public transport to a healthcare location.	
Access to / Net Loss of Greenspace		
-	Development proposals which coincide with greenspace. Development proposals located over 600m from greenspace.	Assessment of proximity to/net loss of greenspaces based on Ordnance Survey Open Greenspaces ⁸⁵ . 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 ⁸⁶ .
0	Development proposals do not coincide with greenspace.	
+	Development proposals located within 600m of a greenspace.	
Access to PRoW / Cycle Routes		
-	Development proposals which are located over 600m from a PRoW and cycle route.	PRoW data provided by BCA. Strategic cycle route data available from Transport for West Midlands ⁸⁷ . 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.	

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

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

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

2.15 SA Objective 13: Economy

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

Box 2.13: SA Objective 13: Economy strategic assessment methodology

Likely Impact		Notes
Pedestrian Access to Employment Opportunities		
-	Residential development proposals are located over a 30-minute walk to a key employment location.	Data on key employment locations and accessibility modelling (travel time to employment) provided by BCA.
0	Development proposals for non-residential use.	
+	Residential development proposals are located within a 30-minute walk to a key employment location.	
Public Transport Access to Employment Opportunities		
-	Residential development proposals are located over a 30-minute travel time via public transport to a key employment location.	Data on key employment locations and accessibility modelling (travel time to employment) provided by BCA.
0	Development proposals for non-residential use.	
+	Residential development proposals are located within a 30-minute travel time via public transport to a key employment location.	
Employment Floorspace		
--	Development proposals which result in a significant net decrease in employment floorspace.	Assessment of current land use has been made through reference to aerial photography and the use of Google Maps ⁸⁸ .
-	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.	

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

2.16 SA Objective 14: Education, skills and training

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

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

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

2.17 Overview of Site Assessments Pre-Mitigation

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

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

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

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

SA1: Cultural Heritage

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

SA2: Landscape

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

SA3: Biodiversity

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

SA4: Climate Change Mitigation

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

SA5: Climate Change Adaptation

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

SA6: Natural Resources

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

SA7: Pollution

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

SA8: Waste

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

SA9: Transport

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

SA10: Housing

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

SA11: Equality

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

SA12: Health

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

SA13: Economy

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

SA14: Education

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

3 Selection and Rejection of Sites

3.1 Overview

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

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

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

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

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

Table 3.1: Updated Selected / Rejected Sites in Walsall

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

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

4 Next steps

4.1 Sustainability Appraisal and Publication/Submission

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

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

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

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

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

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

4.2 Consultation of the Regulation 18 (II) SA Report

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

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

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

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

Email: blackcountryplan@dudley.gov.uk

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

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

Habitat Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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CHEL TENHAM

Appendix A: SA Framework

SA Objective		Decision making criteria: Will the option/proposal...		Indicators (this list is not exhaustive)
1	Cultural heritage: 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"> Number and type of features and areas of historic designations in the Core Strategy area. Statutory and non-statutory sites in the Historic Environment Record (HER). Number of historic assets on the Heritage at Risk register.
		Q1b	Will it preserve or enhance archaeological sites/remains?	
		Q1c	Will it preserve or enhance the setting of cultural heritage assets?	
2	Landscape: 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"> National Character Area. Tranquillity rating of area. Re-use of derelict buildings or re-use of buildings in a prominent location. Landscape sensitivity.
		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	Biodiversity, flora, fauna and geodiversity: 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"> Number and diversity of European Protected Species, and NERC Act Section 41 species in the area. Area and condition of priority habitats. Area and condition of sites designated for biological and geological interest.
		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	Climate change mitigation: 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"> Proximity to public transport links. Frequency of nearby public transport services. Distance to local services and amenities. Energy efficiency of buildings and transport. Percentage of energy in the area generated from renewable sources.
		Q4b	Will it encourage renewable energy generation or use of energy from renewable sources?	
5	Climate change adaptation: 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"> Number of properties at risk of flooding. Area of new greenspace created per capita. Connectivity of GI. Implementation of adaptive techniques, such as SUDS and passive heating/cooling.
		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	Natural resources: Protect and conserve natural resources.	Q6a	Will it utilise previously developed, degraded and under-used land?	<ul style="list-style-type: none"> Re-use of previously developed land. Area of best and most versatile agricultural land lost to development. Groundwater Source Protection Zone. Proposed Mineral Safeguarding Area(s).
		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	Pollution: Reduce air, soil, water and noise pollution.	Q7a	Will it maintain and improve air quality?	<ul style="list-style-type: none"> Provision of GI. Remediation of contaminated land. Proximity to watercourses with poor quality status. Percentage change in pollution incidents. Development with potential to generate a significant increase in road traffic emissions or other air pollutants.
		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	Waste: 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"> Number and capacity of waste management facilities. Re-use of recycled and recyclable materials. Management of local authority collected waste.
		Q8b	Will it minimise and where possible eliminate generation of waste?	
9	Transport and accessibility: Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	Q9a	Will it reduce the need to travel and/or reduce travel time?	<ul style="list-style-type: none"> Distance to place of work. Distance to local amenities and key services. Distance to existing or proposed bus routes. Frequency of bus services. Proximity and connectivity of walking and cycling links. Distance to train or metro station.
		Q9b	Will it provide adequate means of access by a range of sustainable transport modes (i.e. walking/cycling/public transport)?	
10	Housing: 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"> Varied housing mix. Percentage of dwellings delivered as affordable housing. Number of extra care homes.
		Q10b	Will it provide housing suitable for the growing elderly population?	
		Q10c	Will it provide decent, affordable and accessible homes?	
11	Equality: 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"> No. of people with NVQ2 qualifications. Percentage of adults surveyed who feel they can influence decisions affecting their own local area. % respondents very or fairly satisfied with their neighbourhood. Crime Deprivation Index. Education, Skills & Training Deprivation Index. Availability of libraries. Index of Multiple Deprivation
		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	Health: 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"> Travel time by public transport to nearest health centre and sports facilities. Provision and accessibility of open greenspace and GI. Accessibility to sports facilities e.g. football pitches, playing fields, tennis courts and leisure centres.
		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	Economy: 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"> Number of residents working within the Black Country. Number of employment opportunities in professional occupations. Number of new business start-ups as a result of the development. Total amount of employment land. Number of vacant units in strategic centres. Amount of additional retail, office and leisure floorspace completed in established centres.
		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	Education, skills and training: 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"> Distance to education and training, particularly primary schools and secondary schools. Provision of new education and training facilities and opportunities. Accessibility of education and training facilities by public transport. Capacity of local schools to meet demand from new development.
		Q14b	Will it encourage a diversity of education and training opportunities?	

Appendix B: Reasonable Alternative Site Assessments

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B.1 Introduction

B.1.1 Overview

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

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

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

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

Table B.1.1: Reasonable alternative sites

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

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

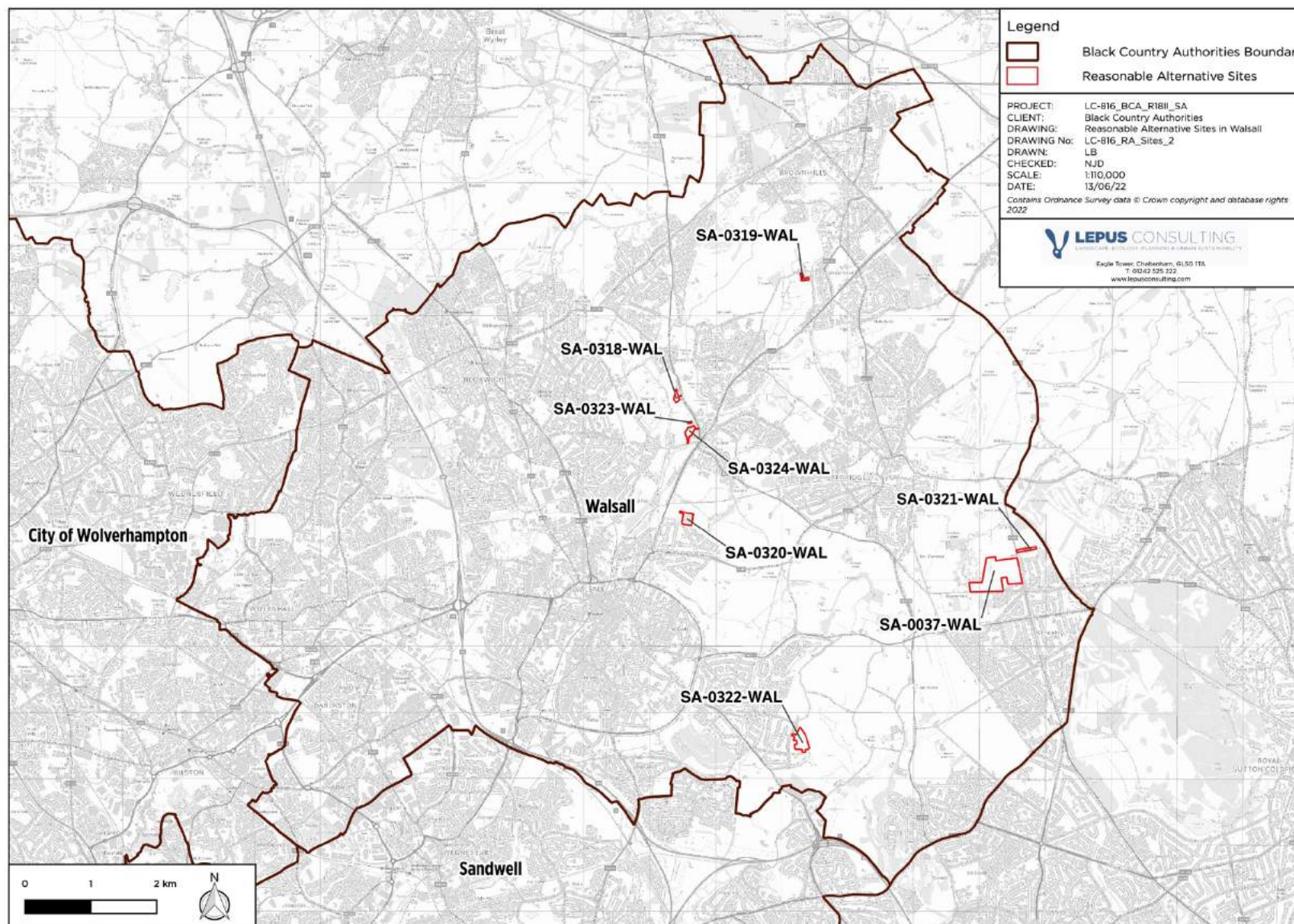


Figure B.1.1: Location of the eight R18 (II) reasonable alternative sites, within Walsall Borough

B.2 SA Objective 1: Cultural Heritage

B.2.1 Grade I Listed Buildings

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

B.2.2 Grade II* Listed Buildings

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

B.2.3 Grade II Listed Buildings

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

B.2.4 Conservation Area

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

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

B.2.5 Scheduled Monument

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

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

B.2.6 Registered Park and Garden

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

B.2.7 Archaeological Priority Area

B.2.7.1 Archaeological Priority Areas (APAs) have been identified throughout Walsall's urban and undeveloped areas. Site SA-0037-WAL is located adjacent to 'Bourne Pool Area' APA which contains prehistoric remains, and the Black Country Historic Landscape Characterisation (HLC) Study² notes that "*unsympathetic development ie. Groundworks associated with quarrying or housing development would detrimentally affect any surviving archaeological remains within the APA*". Site SA-0320-WAL is located wholly within 'Rushall Moated Manor Site' APA which contains a nationally rare moated site and burial mound, where the HLC notes that "*development within the surrounds of the scheduled monument could impact upon*

² 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 [Date Accessed: 13/06/22]

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

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

B.2.8 Historic Landscape Characterisation

B.2.8.1 The Black Country HLC Study³ has identified a range of Historic Environment Area Designations within the Black Country, covering Walsall's parkland and Green Belt as well as a number of features within the urban areas, including along the canal network.

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

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

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

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

³ 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 [Date Accessed: 13/06/22]

B.3 SA Objective 2: Landscape

B.3.1 Cannock Chase AONB

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

B.3.2 Landscape Sensitivity

- B.3.2.1 The Black Country Landscape Sensitivity Assessment⁴ identified the extent to which the character and quality of Black Country Green Belt land is susceptible to change as a result of future development. Of the four BCA, Walsall has the largest proportion of Green Belt, which is generally in the north and east of the borough, where all eight proposed sites are located.
- B.3.2.2 Sites SA-0037-WAL and SA-0321-WAL are located within areas of 'Moderate' landscape sensitivity, and therefore, the proposed development at these two sites could potentially result in minor negative impacts on the local landscape. Sites SA-0318-WAL, SA-0319-WAL, SA-0320-WAL, SA-0322-WAL, SA-0323-WAL and SA-0324-WAL are located within areas of 'Moderate-High' landscape sensitivity, and therefore, the proposed development at these six sites could potentially result in a major negative impact on the local landscape.

B.3.3 Views for PRow Network Users

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

⁴ 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 [Date Accessed: 20/05/22]

B.3.4 Views for Local Residents

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

B.3.5 Green Belt

- B.3.5.1 The Green Belt Study⁵ classified parcels of Green Belt land into different 'harm' ratings, based on the assessment of potential harm caused by removing each parcel from the Green Belt based on a range of criteria.
- B.3.5.2 According to the Green Belt Study, Site SA-0321-WAL is located within an area where 'Moderate-High' Green Belt harm could be expected if developed. Sites SA-0318-WAL, SA-0323-WAL and the majority of Sites SA-0324-WAL and SA-0037-WAL are located within an area where 'High' Green Belt harm could be expected if developed. Sites SA-0319-WAL, SA-0320-WAL and a small proportion of Site SA-0037-WAL are located within an area where 'Very High' Green Belt harm could be expected upon development. Therefore, the proposed development at these seven sites could potentially result in a major negative impact on the landscape objective.
- B.3.5.3 Site SA-0322-WAL is located within an area where 'Moderate' Green Belt harm could be expected upon development, therefore the proposed development at this site could result in a minor negative impact on the landscape objective.

⁵ 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 [Date Accessed: 20/05/22]

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

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

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

B.4.1 Habitats Sites

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

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

B.4.2 Sites of Special Scientific Interest

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

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

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

B.4.3 National Nature Reserves

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

B.4.4 Ancient Woodland

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

B.4.5 Local Nature Reserves

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

B.4.6 Sites of Importance for Nature Conservation

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

B.4.7 Sites of Local Importance for Nature Conservation

- B.4.7.1 There are approximately 98 Sites of Local Importance for Nature Conservation (SLINCs) within Walsall covering a range of habitats, hedgerows and semi-natural spaces including ‘Corporation Wood’, ‘Jockey Fields’ and ‘Daw End Canal’. Site SA-0037-WAL is located adjacent to ‘Corporation Wood and Tower’s Covert’ SLINC, and Site SA-0319-WAL is located adjacent to ‘Jockey Fields’ SLINC. Site SA-0324-WAL coincides with ‘Ford Brook’ SLINC. The proposed development at these three sites could potentially result in a minor negative impact on these SLINCs, due to an increased risk of development related threats and pressures.
- B.4.7.2 Sites SA-0318-WAL, SA-0320-WAL, SA-0321-WAL, SA-0322-WAL and SA-0323-WAL are located further away from SLINCs, and as such, the proposed development at these two sites would be less likely to significantly impact any SLINC.

B.4.8 Geological Sites

- B.4.8.1 Geological sites have been identified throughout the borough, which form part of the Black Country Global Geopark⁶. These sites include a range of notable geological features and formations, including a number of SSSIs and SINC. None of the proposed sites coincide with any identified geological sites, and therefore, a negligible impact would be expected.

B.4.9 Priority Habitats

- B.4.9.1 Priority habitats, protected under the 2006 NERC Act⁷, can be found in small sections throughout Walsall, although the majority are restricted to the Green Belt. These habitats include ‘good quality semi-improved grassland’, ‘deciduous woodland’ and ‘traditional orchard’. A large proportion of Site SA-0320-WAL coincides with deciduous woodland priority habitat. The proposed development at this site could potentially result in the loss of this habitat, and therefore, have a minor negative impact on the overall presence of priority habitats in the Plan area.
- B.4.9.2 The remaining sites do not coincide with priority habitat, and therefore the proposed development at these seven sites would be likely to have a negligible impact on the overall presence of priority habitats within the Plan area.

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

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

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

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

B.5 SA Objective 4: Climate Change Mitigation

B.5.1 Potential Increase in Carbon Footprint

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

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

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

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

B.6 SA Objective 5: Climate Change Adaptation

B.6.1 Flood Zones

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

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

B.6.2 Indicative Flood Zone 3b

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

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

B.6.3 Surface Water Flood Risk

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

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

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

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

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

B.7 SA Objective 6: Natural Resources

B.7.1 Previously Undeveloped Land / Land with Environmental Value

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

B.7.2 Agricultural Land Classification

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

B.7.3 Mineral Safeguarding Areas / Areas of Search

- B.7.3.1 The Black Country contains potentially important mineral resources, which should be safeguarded against loss or sterilisation by non-mineral development⁸. 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 Minerals⁹ recommended the BCA to adopt more tightly defined MSAs focused on these resources.
- B.7.3.2 Mineral Safeguarding Areas (MSAs) have been proposed across a large proportion of Walsall borough, in the east. These include sand and gravel, brick clay and fireclay resources. Development proposals that are located within an MSA may therefore result in a minor negative impact on the accessibility of the mineral resources they contain.
- B.7.3.3 Four proposed sites are located within MSAs. Sites SA-0037-WAL and SA-0321-WAL are located within an MSA for sand and gravel, and Sites SA-0319-WAL and SA-0322-WAL are located within an MSA for brick clay. Therefore, a minor negative impact on natural resources could be expected at these four sites.
- B.7.3.4 The remaining four sites are not located within MSAs and the proposed development at these sites would be expected to have a negligible impact on mineral resources.

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

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

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

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

B.8 SA Objective 7: Pollution

B.8.1 Air Quality Management Area

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

B.8.2 Main Road

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

B.8.3 Watercourse

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

B.8.4 Groundwater Source Protection Zone

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

B.8.5 Potential Increase in Air Pollution

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

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

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

B.9 SA Objective 8: Waste

B.9.1 Potential Increase in Household Waste Generation

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

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

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

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

B.10 SA Objective 9: Transport and Accessibility

B.10.1 Bus Stop

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

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

B.10.2 Railway Station

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

B.10.3 Pedestrian Access

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

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

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

B.10.4 Road Access

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

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

B.10.5 Pedestrian Access to Local Services

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

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

B.10.6 Public Transport Access to Local Services

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

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

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

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

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

B.11 SA Objective 10: Housing

B.11.1 Housing Provision

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

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

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

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

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

B.12 SA Objective 11: Equality

B.12.1 Index of Multiple Deprivation

- B.12.1.1 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England¹⁰. Out of 317 Local Authorities in England, Walsall is ranked as the 25th most deprived¹¹. Overall deprivation is relatively high across the Black Country, with 42 of the LSOAs in Walsall ranked among the 10% most deprived in England.
- B.12.1.2 Deprivation levels within the borough of Walsall varies throughout the community, although generally the more deprived areas are within the central and western parts of the borough, such as Walsall and Bloxwich town centres.
- B.12.1.3 None of the proposed development sites are located within the 10% most deprived LSOAs, and therefore, the proposed development at these eight sites may have a negligible impact on equality.
- B.12.1.4 It should be noted that there is a degree of uncertainty in regard to the impacts of each site on equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.

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

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

¹⁰ 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]

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

B.13 SA Objective 12: Health

B.13.1 NHS Hospital with Accident & Emergency Department

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

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

B.13.2 Pedestrian Access to GP Surgery

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

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

B.13.3 Public Transport Access to GP Surgery

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

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

B.13.4 Air Quality Management Area

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

B.13.5 Main Road

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

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

B.13.6 Access to Greenspace

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

B.13.7 Net Loss of Greenspace

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

B.13.8 Public Right of Way / Cycle Path

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

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

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

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

B.14 SA Objective 13: Economy

B.14.1 Employment Floorspace Provision

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

B.14.2 Pedestrian Access to Employment Opportunities

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

B.14.3 Public Transport Access to Employment Opportunities

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

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

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

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

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

B.15.1 Pedestrian Access to Primary School

- B.15.1.1 Accessibility modelling data has been provided to Lepus by the BCA, mapping the location of primary schools and areas within a sustainable travel time to these schools. There are 87 primary schools within Walsall, although these are mainly distributed within the west of the borough where current residential areas are most dense. The majority of the built-up areas are located within a 15-minute walk to a primary school, however, a large proportion towards the east of the borough is likely to have more restricted access, including the Green Belt where the majority of proposed sites are located.
- B.15.1.2 As such, Sites SA-0037-WAL, SA-0319-WAL, SA-0320-WAL, SA-0321-WAL and SA_0322-WAL are located outside of a 15-minute walk to a primary school. Therefore, the proposed development at these five sites could potentially have a minor negative impact on pedestrian access to primary schools, based on current infrastructure. Residents in these areas may be reliant on less sustainable travel methods to reach primary schools.
- B.15.1.3 Sites SA-0318-WAL, SA-0323-WAL and SA-0324-WAL are located within a 15-minute walk to a primary school, and therefore, the proposed development at these three sites could potentially have a minor positive impact on pedestrian access to primary schools.

B.15.2 Pedestrian Access to Secondary School

- B.15.2.1 Accessibility modelling data has been provided to Lepus by the BCA, mapping the location of secondary schools and areas within a sustainable travel time to these schools. Most secondary schools within Walsall are located within the built-up areas in the west of the borough, and therefore serve those communities well. Sites within existing settlements are likely to have better pedestrian access compared to the outskirts of settlements or Green Belt.
- B.15.2.2 Sites SA-0318-WAL, SA-0319-WAL and SA-0320-WAL are located within a 25-minute walk to a secondary school, and therefore, the proposed development at these three sites could be expected to encourage pedestrian access to secondary schools and have a minor positive impact on education, skills and training. However, Sites SA-0037-WAL, SA-0321-WAL, SA-0322-WAL, SA-0323-WAL and SA-0324-WAL are situated in the areas outside of a 25-minute walk to a secondary school, and as such, the proposed development at these five sites could potentially have a minor negative impact on sustainable access to secondary schools, based on current infrastructure.

B.15.3 Public Transport Access to Secondary School

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

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

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



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Cabinet –June 2022

Walsall Revised Local Development Scheme

Portfolio: Councillor A Andrew- Deputy Leader and Regeneration Portfolio

Related portfolios: n/a

Service: Regeneration, Housing & Economy

Wards: All

Key decision: Yes

Forward plan: Yes

1. Aim

- 1.1 To update the Walsall Local Development Scheme (LDS) to reflect the proposed changes to the published LDS and to include the additional regulation 18 consultation for new potential suitable Walsall housing sites. The Council is required by law to determine planning applications in accordance with the development plan unless material considerations indicate otherwise. Statutory development plans are therefore key plans for economic development and regeneration, protecting land uses and supporting the physical enhancement of the borough, which have to be carefully prepared, subjected to public scrutiny, and examined by independent Planning Inspectors, before they can be adopted.
- 1.2 Currently the Council is undertaking a significant piece of work with the Black Country Local Authorities to review the Black Country Plan (BCP) - and known currently as the adopted Black Country Core Strategy (2011-2016) - and by updating the LDS, the Council will be formalising the proposed changes to the timetable for this work. It is important to communicate to stakeholders of the Black Country Authority's intentions so the aim of the report is to publish a revised timetable for the BCP.

2. Summary

- 2.1 This report sets out the proposed revisions to the Walsall Local Development Scheme (LDS) following two changes that require it to be updated- The revised LDS can be found at **Appendix A** to this report. These changes are the proposed amendments to the Black Country Plan timetable and the need for an additional regulation 18 consultation. Cabinet last approved the LDS in October 2020. It is

now necessary to present the reasons for the proposed revisions to Cabinet in order that the LDS can be re-published and to ensure the Council meets its statutory responsibilities under section 15 of the Planning and Compulsory Purchase Act 2004 (as amended)

- 2.2 The report is a key decision as whilst the revisions to the LDS do not in themselves impact on the borough as a whole the Local Plan for which the LDS describes does have impact and is the matter of separate Cabinet decisions at the appropriate time. There will be an increase in the budget required to implement the revisions.

3. Recommendations

- 3.1 That Cabinet approves the revised Local Development Scheme (at **Appendix A** to this report) and resolves to bring it into effect as of 22 June 2022.
- 3.2 That Cabinet approves delegated approval to the Executive Director of Economy, Environment and Communities to make any necessary factual amendments, apart from in relation to the timetable, to the content of the Local Development Scheme.

4. Report detail – Know

- 4.1 Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended) requires Local Planning Authorities to prepare and maintain a Local Development Scheme (LDS). This means the Council has a statutory requirement to have an LDS. The LDS must set out what plans are to form part of the Local Plan, the subject matter and geographical area to which each plan is to relate, and the timetable for their preparation.
- 4.2 The review of the Black Country Plan (BCP) provides the updated statutory framework within which the four Black Country Local Planning Authorities will make decisions about the use and development of land. It will support each council's economic and corporate priorities, and enable the progression of regeneration plans, transportation strategies and other key documents. The revised plan will allocate land for development including housing (including affordable housing) and for industry and business (including investment in strategic and town centres), as well as including policies to protect the environment and important heritage assets to 2039. Work on the review of the BCCS began in 2016 and has focussed on production of key evidence to establish up-to-date housing and employment land requirements; this work informed the development of an Issues and Options Report. Consultation on issues and options took place from 3 July 2017 for 10 weeks and included a 'Call for Sites' inviting landowners and developers to put forward potential development sites. The consultation included a launch event for key stakeholders, local events, press articles and a social media campaign involving a series of videos.

- 4.3 At its meeting on 22 October 2020 Cabinet received a report setting out the reasons for an amendment to the then published timetable for the review of the BCP. It detailed the adoption in January 2019 of the Walsall Site Allocation Document (SAD) and Walsall Town Centre Area Action Plan (AAP), and the proposed amendments to the Black Country Plan timetable. The published timetable within Walsall's LDS is set out in Table 1 below:

Table 1

Plan preparation stage	Timescale
Publish revised timetable, publish further evidence and re-open 'call for sites'.	July 2020
Publish delivery evidence to update development capacity across the Black Country	December 2020
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

- 4.4 Since the last update to Cabinet, the regulation 18 draft consultation for the plan has taken place. Regulation 18 required the Local Planning Authority to consult on the content of a local plan, including site allocations. The next stage is regulation 19 publication, which will be informed by the previous consultation; this version would seek representations on the soundness of the plan, which is the main criteria considered by the Planning Inspectorate at the future examination. For this reason, it is not considered that any new suitable sites can be added at regulation 19 stage and so an additional regulation 18 consultation is therefore required for these new Walsall allocations.
- 4.5 Following the consideration of the regulation 18 representations and the assessment of the need for additional or updated evidence work, the Black Country Plan Project Manager (BCPM) should update the detailed work programme. The work programme should consider the inter-relationships between the remaining tasks and include any additional information with regard to the evidence base and DtC work. A contingency should be included within the timetable to allow for any delays in the process. For this reason the timetable needs to be amended.

- 4.6 Additional potentially suitable sites have been found through an assessment of regulation 18 consultation responses received. The requirement to consult on these additional sites would also benefit from a change in the timetable.
- 4.10 Taking these considerations into account, the Association of Black Country Authorities have been consulted on a revised BCP timetable as set out in Table 2. It is this revised timetable that is now included in the revised LDS at **Appendix A**.

Table 2

Plan preparation stage	Timescale
Focussed consultation on additional sites	July - September 2022
Cabinet/ Council consider Publication Plan (Regulation 19)	October 2022
Regulation 19 Consultation	November – December 2022
Submission	Early 2023
Examination	Summer – Autumn 2023
Adoption	Early 2024

- 4.11 Cabinet will recall that the Black Country Plan does not identify sufficient land for housing or employment needs and that it proposes a shortfall. Therefore, this additional consultation further demonstrates our determination to demonstrate that all potential sites to meet our housing and employments needs have been exhausted before we look to our neighbouring authorities and how they can meet the Black Country's needs through the allocation of sites in their upcoming plans.

Council Corporate Plan priorities

- 4.12 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

- 4.13 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 which may compromise our ability to make decisions locally. Delays in the timetable means it is important to consider the implications of the commitments made to Government as part of the West Midlands Housing Deal. This requires Local Plans for both constituent and non-constituent local authorities ‘to be updated, as necessary, by the end of 2019 to deliver and accommodate 215,000 homes by 2030/31’. A delay to the timetable is a risk to these commitments.

Financial implications

- 4.14 The Council’s contribution to the work on the LDS is being met through existing mainstream revenue budgets which provides the staffing and strategic resource towards the schemes preparation.

Legal Implications

- 4.18 Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended) requires Local Planning Authorities to maintain a LDS.
- 4.19 The need to follow the statutory and policy requirements has informed the timetables for plan production in the LDS, including the need for various assessments, for evidence and for public involvement. As stated above in the section 5 of the report there is a need to have an up-to-date LDS in order to be able to submit plans for examination.

Procurement Implications/Social Value

- 4.20 There are no procurement or social value implications directly arising from this report.

Property implications

- 4.21 There are no property implications directly arising from this report. The policies and proposals in the BCP will apply to all land, including any Council land and property which is subject to a development proposal. Liaison with corporate and public sector landlords will be required on an on-going basis.

Health and wellbeing implications

- 4.22 There are no health and wellbeing implications directly arising from this report. 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. Preparation of the BCP includes the carrying out of an integrated Sustainability Appraisal, Equality Impact Assessment and Health Impact Assessment.

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 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.

Consultation

- 4.25 The Local Plan documents are being prepared in accordance with the approach to community involvement as set out in legislation and national policy and in the Council's Statement of Community Involvement (SCI).

5.0 Decide

- 5.1 As part of the preparation of the revised LDS the Black Country Authorities have prepared and considered alternative timetable options, having also considered how such timescales meet a range of strategic, political and technical objectives. Having consulted on these options with Black Country senior officers, Portfolio Holders and Leaders the timetable presented in the revised LDS represents the preferred timetable for the reasons considered elsewhere in this report.

6. Respond

- 6.1 Should Cabinet resolved to approve the revised LDS then the new timetable will be published. Offices are continuing to prepare the BCP in parallel to the recommendations of this report.

7. Review

- 7.1 The process of plan making is a one involving continual review given the need to collate, present and consult on plans, policies and site allocations. The LDS itself will continue to be kept under review as required by the legislation and reported to Cabinet accordingly.

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/Black-Country-Plan)

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Portfolio Holder

Date

Date



WALSALL LOCAL PLAN

LOCAL DEVELOPMENT SCHEME

10th Revision

(Effective from June 2022)

SUMMARY

The Local Development Scheme (LDS) is the list of documents that comprise the Council's development plan. These are the documents that are used to determine planning applications and for various other statutory purposes. The LDS also specifies the timetable that the Council intends to follow to prepare and revise new and existing development plan documents (DPDs). These documents will form part of the Local Plan (also known as the Local Development Framework - LDF) once they are adopted.

Walsall's LDS was first produced in 2005 and has been revised several times as the council has kept its plans under review. The last revision was in December 2020. That reflected the adoption of the Site Allocation Document and Town Centre Area Action Plan and updated the timetable for the Black Country Plan (BCP, formerly the Black Country Core Strategy Review). The current revision is needed to take account of the outcome of consultation on the draft BCP in 2021, and to add an additional stage of consultation about extra sites that are now proposed for allocation in Walsall.

The outcome of this additional consultation may require further change to the BCP timetable. In addition, the Levelling-up and Regeneration Bill published on 11th May 2022 proposes major changes to the hierarchy of development plans and the process of preparing them, as well as related matters such as the introduction of an infrastructure levy. It is likely that there will be transitional arrangements for plans that are already in preparing, but these arrangements have not yet been announced by Government.

The Council's website contains full information about our plans and supporting documents. See https://go.walsall.gov.uk/planning/planning_policy.

A number of terms and abbreviations are used through this document. These are explained in the Glossary at the end.

HOW TO FIND OUT MORE

For more information about any of the issues raised in this LDS please contact:

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1. INTRODUCTION

The Local Development Scheme

1.1 Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended) requires local planning authorities to prepare and maintain a scheme to be known as their Local Development Scheme (LDS). This must specify which Local Development Documents (LDDs) are to be Development Plan Documents (DPDs), the subject matter and geographical area to which each DPD is to relate, and the timetable for the preparation and revision of the DPDs.

1.2 DPDs form part of a portfolio of documents that together comprise the Local Plan. There are three types of LDDs prepared by the Council¹ that can comprise the Local Plan:

- Old-style plans – adopted plans pre-dating the 2004 system, such as UDPs;
- Development Plan Documents (DPDs) – plans that can allocate sites for development and/or set out policies that are used as the basis to determine planning applications; and
- Supplementary Planning Documents (SPDs) – plans that supplement the policies in an old-style plan or an adopted DPD.

1.3 Adopted DPDs and ‘saved’ policies from old-style plans together comprise the statutory Development Plan. When making decisions on planning applications and for certain other functions, the Council (and planning inspectors or the Secretary of State when applications go to appeal or are called in) have to make determinations in accordance with the development plan unless material considerations indicate otherwise. Statutory development plans are therefore very important plans, which have to be carefully prepared, subjected to public scrutiny, and examined by independent Planning Inspectors, before they can be adopted.

1.4 The intention was that over time, the old-style UDPs and other similar plans would be replaced with new DPDs. These have tended to include a Core Strategy, which provides an overall ‘spatial strategy’ and broad strategic policies for the area, and a Site Allocation Document, which identifies specific sites and areas for development. Planning authorities can also prepare Area Action Plans (AAPs) for particular areas where major change or regeneration is expected to take place. Over recent years Government has encouraged a move towards areas having fewer plans, with one plan fulfilling a variety of roles, but now it appears there is an allowance for flexibility as to what plans are produced, so long as each authority is moving towards having ‘a’ Local Plan that is up-to-date.

1.5 As well as the LDS, the Council also has to have a Statement of Community Involvement (SCI), a plan that sets out how the Council will involve local communities in the planning process. The Council also has to produce an Authority’s Monitoring

¹ Neighbourhood Plans, prepared by local communities under the Localism Act 2011 can also become part of the Local Plan; There are no neighbourhood plans in Walsall at present.

Report (AMR) at least annually, to summarise the progress the Council has made on preparing new LDDs, and implementing the policies in adopted LDDs.

1.6 When the Local Plan system under the 2004 Act first came into effect, the LDS was required to include details of all the LDDs being prepared, including the SCI and SPDs, but this is no longer the case. Following the Planning Act 2008, the LDS is only required to contain details of the DPDs in preparation. However, for completeness, in the section below and in Appendix 4 we have included a summary of all of the plans currently in the Walsall Local Plan, and the dates they were adopted. The glossary at the end of this LDS gives a fuller explanation of some of the main terminology used in the Local Plan system.

1.7 The LDS will be reviewed as necessary. Reviews are needed to take into account changing circumstances, such as where the AMR tells us that policies in adopted plans are not working. There may also be a need to review the LDS when new plans are adopted, or to take account of changes to the planning system, new development trends, or the changing priorities of the Council and its partners. The Levelling-up and Regeneration Bill published on 11th May 2022 proposes major changes to the hierarchy of development plans and the process of preparing them. The LDS is also required to be updated to reflect progress on completing new DPDs.

Walsall's Local Plan

1.8 Since the first version of the LDS was produced in March 2005, the Council has produced the following documents:

- The Black Country Core Strategy (BCCS) has been prepared in conjunction with Dudley MBC, Sandwell MBC and Wolverhampton City Council, and was adopted on 3 February 2011.
- The Walsall Site Allocation Document (SAD) adopted on 7 January 2019
- The Walsall Town Centre Area Action Plan (AAP) adopted on 7 January 2019
- SPDs on:
 - (1) Affordable Housing (July 2005, Revised April 2008)
 - (2) Open Space, Sport and Recreation (April 2006)
 - (3) Walsall Waterfront (November 2006)
 - (3) Healthcare (January 2007 but revoked in February 2012)
 - (4) Education (February 2007 but revoked in February 2012)
 - (5) Designing Walsall (February 2008 and revised July 2013)
 - (6) Natural Environment (April 2008 and revised July 2013)
 - (7) Shop Fronts (April 2005)
 - (8) Black Country Air Quality (February 2017- prepared in conjunction with Dudley MBC, Sandwell MBC and Wolverhampton City Council)

1.9 Appendix 4 lists the LDDs that have been completed. In addition, The Statement of Community Involvement (SCI) was adopted by the Council in June 2006 and revised

in both February 2012 and November 2018. A temporary amendment was made in January 2021 to address consultation arrangements as a result of Covid.

The Statutory Development Plan for Walsall

1.10 The Council is required by law to determine planning applications in accordance with the development plan unless material considerations indicate otherwise. Statutory development plans are therefore very important plans, which have to be carefully prepared, subjected to public scrutiny, and examined by independent Planning Inspectors, before they can be adopted.

1.11 Until 2004, the statutory development plan for Walsall was contained within a single plan: the Walsall UDP. However, the 2004 planning reforms changed this. The legal definition of the statutory development plan (in Section 38 and Schedule 8 of the Planning and Compulsory Purchase Act 2004 as amended) currently comprises 'saved' policies in adopted old plans and the development plan documents adopted or approved for the area. Regional Spatial Strategies were also formerly part of the development plan until they were revoked under the Localism Act 2011.

1.12 The Walsall UDP policies were automatically 'saved' under the transitional arrangements for the new planning system for 3 years from adoption. However, in response to a request from the Council, a Direction issued by the Secretary of State in December 2007 saved almost all of the policies in the plan.² Four policies that were not 'saved' ceased to have effect from 8th March 2008.

1.13 The adoption of the BCCS in 2011 has meant that some of the 'saved' UDP policies have now been replaced by new policies in the BCCS. However, the 'saved' policies that have not been replaced by the BCCS will remain part of the development plan until they are replaced by policies in future DPDs. Appendix 2 lists the policies in the 2005 Walsall UDP, showing which ones have not been 'saved', which ones have been replaced by policies in the BCCS, and which were to be replaced by the new DPDs.

1.14 In addition to the UDP, the BCCS, the SAD and the APP, the Council has prepared various Supplementary Planning Guidance (SPG) documents and Supplementary Planning Documents (SPDs) to elaborate and explain UDP policies. As mentioned above, SPDs no longer have to be included in the LDS, although the SPDs that have been completed, revised or revoked are listed in Appendix 4.

The Relationship of Walsall's Local Plan to Other Plans

1.15 As well as providing the overall planning framework for the area and being consistent with other development plans for adjoining areas, the Local Plan is expected to be sensitive to related local requirements and aspirations. Accordingly, the BCCS embraced the proposals of the Sustainable Community Strategies prepared by the authorities' Local Strategic Partnerships (in Walsall the 'Walsall Borough Strategic Partnership', WBSP), and other local strategies. The Deregulation Act 2015 has

² See

https://go.walsall.gov.uk/Portals/0/images/importeddocuments/walsall_udp_saved_gowm_letter_06_dec_2007.pdf

removed the statutory requirements for sustainable community strategies to be prepared and for Local Plans to have to have regard to such strategies.

1.16 Future work on the Local Plan could support community aspirations for 'neighbourhood planning'. However, no applications to set up neighbourhood forums or prepare neighbourhood plans have been submitted in Walsall to date. Any neighbourhood plans would need to be in general conformity with the strategic policies of the adopted BCCS, the SAD and the AAP.

2. OVERVIEW OF THE APPROACH TO THE LOCAL PLAN

Structure of the Local Plan

2.1 Besides this Local Development Scheme (LDS) and the saved policies of Walsall's UDP that have not been replaced by the BCCS, the basic components of the Walsall Local Plan are as follows.

A) Borough-Wide Documents:

- Black Country Core Strategy (BCCS)
- Site Allocation DPD (the 'Walsall SAD') this does not include Walsall Town Centre or the five district centres of Aldridge, Brownhills, Bloxwich, Willenhall or Darlaston).

B) Area Action Plans:

- Walsall Town Centre Area Action Plan (AAP)

C) Supplementary Planning Documents

- As required (see paragraph 1.8 and Appendix 4, no SPDs are in preparation at the time of writing).

2.2 Other Documents that are or have been the subject of preparation work.

- Statement of Community Involvement (SCI)
- Authority's Monitoring Report
- Charging Schedule for the Community Infrastructure Levy (CIL) (was in preparation with the SAD and AAP but has been suspended in light of the Government Review announced in the 2017 Housing White Paper)

A) Borough-Wide Documents

Black Country Core Strategy

2.3 The key DPD is the Core Strategy, which, as noted previously, has been prepared and adopted jointly with Dudley, Sandwell and Wolverhampton councils to cover all four Black Country boroughs. The Core Strategy seeks to apply a regeneration strategy across the area and bring it together with other local plans and strategies to provide a strategic spatial plan for the area. It sets out the main objectives for the area, a spatial strategy, and core policies, and it explains how these will be implemented and monitored. The BCCS sets out the amounts of development to be planned for and the broad locations where it can be accommodated most sustainably. The broad locations and strategy are illustrated on a spatial strategy diagram and more detailed diagrams illustrate how the strategy might look for strategic centres (including Walsall Town Centre) and for regeneration corridors.

2.4 The BCCS was adopted in February 2011. It has replaced some of Walsall's UDP policies that had previously been saved. This LDS revision sets out the programme for consultation on a review of the BCCS.

Site Allocation DPD (the 'Walsall SAD')

2.5 Whilst the BCCS sets out the strategy for the Black Country, identifies some strategic locations and puts forward important over-arching policies, it does not allocate sites for development. To make such allocations for housing, employment and other uses, to identify assets for protection and to update the UDP it is necessary to have site allocations. This is considered to be particularly important in ensuring that the Borough can safeguard and provide sufficient land for employment, and to support infrastructure planning. The Site Allocation DPD is accompanied by an update of Walsall's UDP Proposals Map. The Proposals Map is known as the Adopted Policies Map. The Site Allocation DPD and Walsall Town Centre AAP was adopted on 7 January 2019.

2.6 Rather than include development management policies, as proposed previously, it was concluded that that the necessary policies can be provided through the use of 'saved' UDP policies and national policies, with the possibility of a separate future document when resources allow.

B) Area Action Plans (AAPs)

Walsall Town Centre Area Action Plan

2.7 The BCCS confirms that Walsall Town Centre has a strategic role and as one of the Black Country's 'Strategic Centres' (with Brierley Hill, West Bromwich Town Centre and Wolverhampton City Centre) its ability to attract and accommodate investment in shopping, offices, leisure and culture will be of vital importance for the regeneration strategy. However, the work for the BCCS indicated concerns that Walsall would lose market share if it did not compete with developments elsewhere, whilst at the BCCS Examination in Public issues were raised, concerning the locations for investment in the centre, which would most effectively be addressed at the local level. In response, an AAP has been prepared for Walsall Town Centre. This identifies and allocates sites and opportunities for development and investment and co-ordinates these with the necessary infrastructure as well as with environmental and management improvements (which can be brought forward in parallel with the statutory processes).

2.8 The need for subsequent replacement of the UDP Inset Plans for the smaller Town / District Centres (Aldridge, Bloxwich, Brownhills, Darlaston and Willenhall) will be considered in future reviews of the LDS. The UDP Inset Plans for the District Centres will be saved and then modified as necessary as replacement DPDs are adopted.

C) Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPD)

2.9 Walsall has a number of items of SPG prepared under the old planning system, as listed in an appendix to the UDP. This SPG cannot be automatically transferred into a Local Plan document with the status of the new-style SPD, but it can retain its status as a material consideration, as long as it is linked to saved policies in the UDP that are still in operation. Whilst, on the same basis as for SPD, there is no requirement for existing SPG to be set out in the LDS, the SPG that have been linked to the UDP are listed in Appendix 3 for ease of reference.

2.10 SPDs, under the Local Plan system, have been prepared to elaborate upon development plan policies. So far, these have been on saved UDP policies; an SPD

on Affordable Housing has been adopted and then reviewed, and SPDs have been adopted on Open Space, 'Walsall Waterfront', Healthcare, Education Provision, Design and also the Natural Environment. The SPDs on Healthcare and Education provision have subsequently been revoked as they did not comply with the CIL Regulations and there was a lack of supporting up to date evidence. The Design and Natural Environment SPDs have been revised to take account of changes in legislation and policy, including the adoption of the BCCS. A more recent SPD has been produced on Shop Fronts which is based on both UDP and BCCS policies. The latest SPD to be adopted was produced jointly between the four Black country authorities and elaborates on the BCCS policies along with national policies and guidance. The programme for future work on SPDs no longer has to be set out in the LDS, but Walsall's existing SPDs are listed in Appendix 4. No further SPDs are in preparation at the time of writing, however, consideration may be given to future plan making work beyond what is set out in this LDS, and this might include the future production of SPDs.

Other Documents

Statement of Community Involvement

2.11 The Statement of Community Involvement (SCI) outlines how the Council will involve local communities, stakeholders and others in the preparation of LDDs and the consideration of planning applications. It has regard to the consultation strategies of the Council and the then Walsall Borough Strategic Partnership (WBSP), and it aimed to reduce any potential duplication of consultation activity that may be taking place on other initiatives. The original version was adopted by the Council in June 2006 and revised versions were adopted in February 2012, November 2018 and January 2021.

Authority's Monitoring Report (previously the Annual Monitoring Report)

2.12 Local authorities are required to produce a report at least once per year on what developments have taken place to measure progress against targets and indicators set out in the development plan as well as by Government. This includes progress on plan-making in terms of the extent to which the programme in this LDS is being met. Walsall's latest Authority's Monitoring Report can be found on the Council's website³. Aspects of the BCCS will be monitored jointly with Dudley, Sandwell and Wolverhampton Councils.

Charging Schedule for the Community Infrastructure Levy

2.13 The Community Infrastructure Levy (CIL) was introduced as a mechanism to fund the provision of infrastructure such as open space. It was proposed by the Government in part to replace contributions that were previously provided through Section 106 agreements made in conjunction with planning permissions. CIL is charged on new developments based on a fixed rate per square metre for each type of land use.

2.14 It was the intention that the CIL Charging Schedule would be submitted for independent examination by an appointed examiner at the same time as the SAD and

³ <https://go.walsall.gov.uk/annualmonitoringreport>

AAP was submitted to the Secretary of State. However, the Housing White Paper published on 7th February 2017 stated that the Government will examine the options for reforming the system of developer contributions. In view of this likelihood of significant changes to CIL taking place before the Council was in a position to adopt and implement a charging regime, Cabinet on 15th March 2017 accepted the recommendation that the draft Charging Schedule should not be submitted for examination at this time and that work on CIL should be suspended. This was to avoid potentially abortive further work being done. At present there is no agreed timetable for progressing CIL in the short term, however work is currently taking place to explore how the additional infrastructure that is likely to be required to support the growth proposed in the emerging Black Country Plan will be delivered. It may be that the result of this work will require the introduction of a Charging Schedule.

2.15 The Charging Schedule would not form part of the statutory development plan nor would it have to be included within the Council's LDS.

3. PROGRAMME FOR FUTURE DPD PREPARATION

Black Country Core Strategy Review (otherwise known as the Black Country Plan)

3.3 When the current Black Country Core Strategy (BCCS) was adopted there was a commitment to review it after 5 years. This was deemed necessary by the Planning Inspectors who examined the Plan to ensure the spatial objectives and the strategy are continually up to date, and also to ensure that the Plan reflects up to date national planning policy and guidance.

3.4 The review of the BCCS will plan for further into the future – up to 2039 – and will provide the updated statutory framework within which the four Black Country Local Planning Authorities will make decisions about the use and development of land.

3.5 The current programming for the review of the Core Strategy (now known as the Black Country Plan) is set out in the table below. The timetable has been updated since the previous LDS in 2020 to take account of changes in stages of the plan's production. In commencing the review of the BCCS it has been determined that the in order to meet the projected housing and employment needs of the area that an allocations document will be needed. This means that whilst it was intended that the review would continue as a tier 1 strategic plan, the Black Country Plan (BCP) will now become a tier 2 document. The revised plan will allocate land for development including housing (including affordable housing) and for industry and business (including investment in strategic and town centres), as well as including policies to protect the environment and important heritage assets.

3.6 Along with a change in the approach to the preparation of the BCP there have also been changes made to the stages of the plan in order to support the delivery of the plan in the most expedient timescale possible with such a complex set of land use and policy considerations to resolve. The LDS 2018 removed 'Preferred Options' as a separate stage, so consultation took place in 2021 on the Draft Plan. The rolling of the Preferred Options stage into the Draft Plan allowed for more time to understand complex evidence and address fully the consultation responses to the Issues and Options stage without a delay in the overall anticipated adoption date for the plan. The DPD profile on the Black Country Plan which can be viewed in Appendix 1, contains more detailed information on the proposed timescales and chain of conformity. In view of the complexity of the issues the Black Country Plan has to address and the likelihood that these might be affected by changing circumstances or new evidence⁴ this programme will have to be kept under review.

Other Documents

3.6 There is no requirement to set out the programme for future work on any SPDs, on Walsall's SCI, nor on the Authority's Monitoring Report.

⁴ For example, the potential impact of Covid-19 on economic projections, and the introduction by Government of the Standard Method for calculating housing need..

3.7 This LDS has to be primarily concerned with the programme of work on the DPDs currently in preparation, and the major commitment involved in commencing the review of the Black Country Core Strategy/ the Black Country Plan. This is as far as it seems appropriate to take matters in this LDS; future reviews of the LDS will roll things forward. If further LDDs are required as a result of the Black Country Plan or because of other changes, they will be set out in a future revision of the LDS.

LDS PROGRAMME SUMMARY:

Black Country Plan 2017 – 2024

Plan preparation stage	Timescale
Progress to date	
Issues and Options Cabinet Report	July 2017
Issues and Options Report Consultation	July- August 2017
Draft Plan Consultation (Regulation 18)	August – October 2021
Publish consultation responses	18 March 2022
Next steps	
Focussed consultation on additional sites	July - September 2022
Cabinet/ Council consider Publication Plan (Regulation 19)	October 2022
Regulation 19 Consultation	November – December 2022
Submission	Early 2023
Examination	Summer – Autumn 2023
Adoption	Early 2024

4. RESOURCES AND MANAGEMENT

Staff Resources for LDD preparation

4.1 The broad resource and management arrangements for each LDD are set out in the profiles in Appendix 1. The main resources for Local Plan preparation and the overall management lead will come from the Planning Policy Team in the Economy,

Environment and Communities Directorate and this is programmed in the relevant service plan. Significant contributions on some matters will, however, also come from other teams within the Economy, Environment and Communities Directorate – namely but not exclusively the Development Team, Development Management and Transport Strategy. In some cases these other teams will take the lead on the preparation of individual documents or issues.

4.2 In addition there will be important contributions from others Directorates of the Council.

4.3 Local Plan documents will also be prepared in close liaison with external partners and organisations. The Council will work in partnership with the ‘key partners’ identified in the Statement of Community Involvement (SCI) to facilitate contact with local communities when it comes to consultation on Local Plan documents.

4.4 The BCP is being produced jointly between the four Black Country authorities. This is an effective way of managing resources and sharing expertise but means that the progress on the plan is dependent on joint decision making and in some cases the work of others. As the BCP is a multi-dimensional strategy it will require professional input from a range of technical disciplines and statutory consultees at all stages of production

Political Management

4.5 The Council is responsible for approving DPDs, upon the recommendation of Cabinet. Specific responsibility for the Local Plan within the Cabinet will be taken by the Portfolio Holder for Regeneration. Responsibility for approving the LDS rests with Cabinet, although there is delegated authority for officers to make minor changes and up-dates. Cabinet is responsible for approving the SCI and SPDs, as documents that are not part of the Local Plan.

4.6 Walsall’s Cabinet and Council are also responsible for key political decisions on the BCP, and the other Black Country authorities equally have responsibility to make key decisions through their own political arrangements. However, the views of the four authorities are coordinated through informal meetings of the Association of Black Country Authorities (ABCA) which brings together Council Leaders and Chief Executives.

Financial Resources

4.7 In addition to the staff resources noted above, a budget will be needed to support Local Plan preparation on an ongoing basis. This will be used, for example, to fund any commissioned survey or consultancy work; the printing of documents; publicity and consultation; and the administrative costs involved in public examinations into DPDs. It is recognised that a significantly increased level of resources will be needed in the years when public examinations will be held – and this will become more frequent as work on the Local Plan proceeds.. Further financial contributions towards particular aspects of Local Plan work may also be sought from Government and from other services or other organisations in the future.

4.8 A joint budget has been agreed to undertake the BCP. This covers all stages of the plan making from the Issues and Options Consultation to examination and adoption. Producing a joint plan is a cost effective way to plan for the area. There may be a need

to revisit the budget assigned to the review if further or more detailed evidence is required. The budget will be kept under review at all stages.

Factors Influencing Delivery

4.9 The proposals for DPD preparation set out in this revised LDS are presently considered by the Council to be achievable. However, there is inevitably a level of uncertainty associated with the process especially in terms of future plan production and it is relevant to consider any factors that might affect delivery so that these can be anticipated and planned for as far as possible. The following are seen as the main areas of risk.

Staff and Other Resources

4.10 The Council is very much aware that there will be many conflicting demands on its limited staff resources throughout the Local Plan preparation process. Many of these place unforeseen pressure on staff time for example responding to Government Consultations or responding to planning applications in neighbouring areas. The LDS work programme seeks to allow for this.

Council Procedures

4.11 The timetable for producing DPDs is very much dependent upon obtaining, where necessary, Council and Cabinet approval for their revision, submission and approval. Although the timetables have been produced with this in mind, factors, including the unforeseen rescheduling of Council meetings and any subsequent changes to 'lead in times' when preparing reports, together with the pre-election period during Council elections could have implications for delivering the DPDs in accordance with their anticipated timetables. This will be monitored closely and we will inform the public and relevant stakeholders if it is likely that further amendments to their timetables are required.

The Planning System

4.12 Despite recent amendments, the development plan system remains very complex and demanding. Changes that have happened or been proposed in recent years include CIL, 'neighbourhood planning', amendments to the regime for managing changes of use of land and buildings, and efforts to boost the housing market. The National Planning Policy Framework has been revised and this places new requirements on Councils, such the introduction of a 5 year housing delivery test, which if failed, requires Council to production action plans, which can take resources away from plan making.

4.13 Further significant change will arise from the Levelling-up and Regeneration Bill. However, this has only just been published and much of the detail is expected to be contained in supporting statutory instruments and policy statements that are yet to be announced. This version of the LDS does not take account of the Bill.

4.14 The continuing flow of initiatives could result in both planning objectives and the delivery process being reoriented towards meeting targets that might differ from the current strategy for the Black Country as set out in the BCP. Under the 'Duty to Cooperate', it is necessary to respond to local plans and other proposals both in the areas of Walsall's immediate neighbours and also further afield.

4.15 At the same time, the Government is seeking to place increasing emphasis on plan-making, in terms of legislative requirements (notably the Neighbourhood Planning Act 2017), policy requirements (the revised NPPF) and Practice Guidance (such as the proposal to consult on how the latest household projections might be used to prescribe local housing need figures that would support the Government's policy aspirations).

Impact of Partners

4.16 Implementation is dependent on partners, both within and outside the Council. These may not be committed to the formal planning system, may not understand the requirements or may lack the resources or skills to do what's required. The BCP involves joint working with a number different partners and stakeholders including discussions over cross-boundary issues outside of the Black Country. This may in turn impact on the programme for the BCP.

Level of Public Involvement

4.17 It is difficult to predict precisely what the level of public interest and involvement will be for particular LDDs and hence the amount of time and resources that will need to be devoted to consultation. It is possible given the nature of the BCP that there will be substantial public interest in the plans as the four authorities look to plan to meet future needs. The Council's intentions for public involvement are detailed in the SCI and this aims to strike a careful balance between the two objectives of public involvement and speed of preparation.

4.18 The Government has set great store in the need for 'front-loading' the involvement of stakeholders, developers and landowners in the plan preparation process (i.e. this taking place earlier in the process). This is aimed at removing the introduction of new issues and proposals at later stages of the process and thereby hopefully reducing the objections that will need to be considered at a public examination.

Capacity of the Planning Inspectorate

4.19 The Local Plan system envisages a greater number of independent public examinations, although they are expected to be shorter and more focussed. The capacity of the Planning Inspectorate to achieve this will obviously have implications for the programming of DPDs by all local authorities.

The Economy

4.20 The adopted policies of the Local Plan have been prepared during time of economic uncertainty and yet have recognised economic trends and provided evidence through examination that they are flexible to respond to changing circumstances. By their nature the BCCS and Walsall SAD and Town Centre AAP are regeneration strategies to support economic growth (and recovery). The economic crisis in 2008 saw a marked decrease in lending and house building. The subsequent recession showed the relatively narrow base of the Black Country economy and the limited viability of many potential development sites, particularly where these involve previously developed land that may be contaminated or suffer from ground instability. There was a period during the recovery from recession that has meant there has been a significant decline in development and fewer resources available from planning obligations in that intervening period.

4.21 The UK, the Black Country, and Walsall face a combination of economic uncertainties and challenges following Brexit, the worldwide Covid-19 pandemic and Russia's invasion of Ukraine. At the time of updating the LDS it is forecast that the UK will see growth halve amid soaring inflation and tax rises. The economic changes have had an impact on delivery of recent DPD targets and it is assumed they have had an impact on the evidence base being collated for the Black Country Plan (BCP). The revised timetable of the BCP has in part been revised to take account of these uncertainties in the Black Country economy, with the revised timetable allowing time ahead of regulation Publication consultation, to refresh the evidence base in response to the draft consultation.

4.22 Overall it is unfortunate but likely that a whole range of objectives are likely to be more difficult and take longer to achieve. Public resources, in particular those available to local authorities, are continuing to be reduced. The preparation of DPDs will endeavour to take account of these circumstances and the LDS may need further revisions accordingly.

5. INFORMATION, MONITORING AND SUSTAINABILITY

The Evidence Base

5.1 A range of background work needs to be undertaken to produce the new planning documents. All LDDs need to be underpinned by an appropriate evidence base. Any new DPD will be examined by an independent Planning Inspector, and will have to pass the test of 'soundness'. Demonstrating 'soundness' will depend in part on the quality, robustness and credibility of the information and technical work underpinning the DPDs. Any supporting technical papers produced either by, or for, the Council will be made publicly available to assist public involvement in the Local Plan process.

5.2 The Black Country Plan review requires new technical work to be undertaken at a Black Country level to update the previous evidence base used to inform the strategy. This will involve careful consideration of the Black Country's future growth needs and the ability to accommodate such growth.

5.3 The Authority's Monitoring Report (AMR), and reviews of the LDS, will provide an opportunity to assess whether there are any new areas of technical work that will be needed to support LDD preparation (as well as possibly identifying the need to prepare or review individual LDDs).

Sustainability Appraisal / Strategic Environmental Assessment, etc.

5.4 A Sustainability Appraisal (SA) was carried out during the preparation of Walsall's UDP which was consistent with legislation and guidance at that time. For DPDs, the requirements are more rigorous. Current planning legislation requires all DPDs to be subject to a SA, whilst local authorities are also increasingly expected to consider the equality and health impacts of their proposals, with such assessments integrated with the SA. This was done in respect of the existing BCCS.

5.5 An SA was undertaken for each stage of the production of the Site Allocation DPD and Town Centre AAP. This was an iterative process which influenced the plans' development to ensure they deliver sustainable development. The SA was submitted with the DPDs for examination. A Strategic Environmental Assessment (SEA); Equality Impact Assessment (EqIA); and Health Impact Assessment (HIA) were incorporated into the SA for completeness and to ensure the potential impacts of the plans are fully considered.

5.6 Preparation of the Black Country Plan will include the carrying out of an integrated Sustainability Appraisal at each formal stage – and at later stages an Equality Impact Assessment and Health Impact Assessment.

5.7 Changes to the legislation mean that the SCI, SPDs and the CIL Charging Schedule no longer have to be subject to SA.

5.8 Separate legislation from EU Directives, transposed into UK law, also requires the impacts of local authority plans and programmes to be subjected to Strategic Environmental Assessment where there are likely to be significant environmental effects, and to require an 'appropriate assessment' under the Habitats Regulations where it is determined that there is likely to be harm the integrity of an internationally important biodiversity site. In relevant cases DPDs and also SPDs will need to be

screened and discussed with the relevant statutory bodies, to check whether assessments are required including potential impacts outside the area being planned⁵.

5.9 The Black Country Plan will also be screened to determine if any of the proposed updates to the strategy since the previous HRA screenings and appropriate assessment could have likely significant effects on European Sites.

Monitoring

5.10 Walsall has, over many years, collected a comprehensive range of monitoring statistics relevant to measuring the performance of development plans. Much of this information has also contributed to monitoring systems covering the West Midlands Region. The Council regards monitoring as an integral part of the planning process and sees an objective-led monitoring system as essential so that the effectiveness of policies and the implementation of proposals can be evaluated and reviewed on an ongoing basis. Walsall's UDP and the BCCS include a comprehensive set of monitoring indicators across all topic areas.

5.11 The findings of the AMR should inform the review of the LDS, including decisions on the need for preparation or review of particular LDDs and the evidence base to support this work. The AMR is publicly available, including on the council's website⁶. The potential for linkages with monitoring carried for other purposes (e.g. for the Sustainable Community Strategy) will be explored and the Black Country councils have agreed to joint monitoring of key parts of the BCCS.

5.12 The scope of the AMR includes:

- Assessing progress with LDD (especially DPD) preparation against the programme set out in the LDS;
- Assessing progress towards targets and implementation milestones within individual LDDs (including the saved policies of Walsall's UDP);
- Providing contextual monitoring information in relation to trends at the national, regional and local levels;
- Reviewing any significant changes in the policy context (e.g. revisions to Government policy) that might have bearing on the Local Plan;
- Identifying the need for review to LDDs in circumstances where policies are not working effectively, objectives are not being met or there is the need for updating.

⁵ See:

The Environmental Assessment of Plans and Programmes Regulations 2004 (No. 1633)(the SEA Regulations) <http://www.legislation.gov.uk/ukxi/2004/1633/contents/made> The Conservation of Habitats and Species Regulations 2010 (No. 490)

<http://www.legislation.gov.uk/ukxi/2010/490/contents/made>

⁶ <https://go.walsall.gov.uk/annualmonitoringreport>

APPENDIX 1: PROFILES OF PROPOSED DEVELOPMENT PLAN DOCUMENTS

BLACK COUNTRY CORE STRATEGY REVIEW- THE BLACK COUNTRY PLAN

Overview

Role & Content

To provide an updated statutory framework within which the four Black Country Local Planning Authorities will make decisions about the use and development of land. To ensure the Black Country Plan continues to provide a strategy for growth that meets the Black Country's needs up to -2039

To support the Council's economic and corporate priorities, and enable the progression of regeneration plans and transportation strategies. The final stage of the plan will allocate land for development including housing and for industry and business, as well as including policies to protect the environment and important heritage assets.

Coverage

The Black Country (Dudley, Sandwell, Walsall & Wolverhampton)

Status

Development Plan Document
Conformity

Timetable

With the NPPF

Stage

Start
Consultation
Issues and Options
Draft Plan
Publication
Submission to Secretary of State
Examination Begins
Adoption

Dates

July 2017
July – September 2017
August – October 2021
November - December 2022
March 2023
April 2023
April 2024

Arrangements for Production

Political

DPDs will be approved by the full Council advised by Cabinet – particular responsibility will rest with the Portfolio Holder for Regeneration.

Internal

Resources

Lead by the Planning Policy Team and other internal service areas as appropriate, working jointly with Planning Teams from the four Black Country authorities

External Resources

The review is being undertaken jointly with the colleagues from the four Black Country authorities. Consultants will undertake work on evidence to support the review including studies on the amount of housing and employment land required to meet the future needs of the area. Consultants will also undertake the necessary the Sustainability Appraisal / Strategic Environmental Assessment.

Community and Stakeholder Involvement

Post Production

In accordance with the SCI and Duty to Cooperate.

Monitoring & Review

The effectiveness and continued relevance of the DPD will be kept under review through the Annual Monitoring Report process and reviews brought forward as necessary through future revisions to the LDS.

APPENDIX 2 – WALSALL UDP ‘SAVED’ POLICIES

The purpose of this Appendix is to outline the present position on the policies and proposals of the adopted Walsall Unitary Development Plan (UDP) 2005, and how the UDP has been affected by changes following adoption.

The Walsall UDP was adopted in April 2005, and included the following:

- Part I - general Strategic Policy Statements
- Part II – policies on General Principles, Environment & Amenity, Jobs & Prosperity, Strengthening Our Centres, Housing, Transport, Leisure & Community, Waste Management and Minerals
- Town and District Centre Policies – for Walsall Town Centre, Aldridge, Bloxwich, Brownhills, Darlaston and Willenhall
- Proposals Map – site allocations and designations such as Green Belt
- Inset Maps – details of proposals in the Town and District Centres

In 2007, the adopted UDP policies were reviewed by the Secretary of State. A Direction issued in December 2007 confirmed that all but four of the policies in Walsall’s UDP were to be ‘saved’⁷. The four policies that were not ‘saved’ (ENV22, ENV39, H8 and BR3) ceased to have effect from 8 March 2008.

In February 2011, Walsall Council adopted the Black Country Core Strategy (BCCS). This is a joint Core Strategy covering Dudley, Sandwell and Wolverhampton as well as Walsall. It sets out a spatial strategy and strategic policies for the whole of the Black Country. On adoption, the Core Strategy replaced many of the ‘saved’ UDP policies, including much of Part I, although the Proposals Map has not been altered. The UDP policies which have been replaced by new Core Strategy policies ceased to have effect from 3 February 2011.

The table on the following pages summarises the current status of the UDP policies. Policies that are no longer effective either because they have not been ‘saved’ or have been replaced by BCCS policies are struck through (e.g. ~~GP7 Community Safety~~). Where relevant, references to BCCS replacement policies are also given. The ‘saved’ policies not struck through are still in place, and still form part of the statutory development plan for Walsall. The table also indicates where ‘saved’ UDP policies are expected to be replaced by the proposed Site Allocation DPD or Walsall Town Centre AAP (these might be subject to change).

Key to Abbreviations in Table:

UDP = Walsall Unitary Development Plan

BCCS = Black Country Core Strategy

SADPD – Site Allocation DPD

WTCAAP = Walsall Town Centre AAP

⁷ https://go.walsall.gov.uk/language/en-us/planning_and_building_control/planning_policy/unitary_development_plan

Walsall UDP 2005 – Status of UDP Policies at June 2017

UDP Policy/ Proposal		Policy not “saved” 08.03.08	after	Policy Replaced by BCCS Policy from 03.02.11	Policy to be Replaced New DPD	by
Ref.	Chapter 2: General Principles					
2.1-2.4	Strategic Policy Statement			Vision and Sustainability Objectives		
GP1	The Sustainable Location of Development			Vision and Sustainability Objectives		
GP2	Environmental Protection				No	
GP3	Planning Obligations				No	
GP4	Local Area Regeneration			Vision and Sustainability Objectives		
Fig. 2.1	Regeneration: Main Initiatives					
GP5	Equal Opportunities				No	
GP6	Disabled People				No	
GP7	Community Safety			CSP4, ENV3		
Ref.	Chapter 3: Environment & Amenity					

UDP Policy/ Proposal		Policy not “saved” 08.03.08	after	Policy Replaced by BCCS Policy from 03.02.11	Policy to be Replaced New DPD	by
3.1, 3.10, 3.12, 3.16- 3.18	Strategic Policy Statement			Vision and Sustainability Objectives, CSP3-4, ENV1-4, ENV7		
3.2-3.9, 3.11, 3.13- 3.15	Strategic Policy Statement				No	
ENV1	The Boundary of the Green Belt				SADPD GB1	
ENV2	Control of Development in the Green Belt				SADPD GB2	
ENV3	Detailed Evaluation of Proposals in the Green Belt				SADPD GB2	
ENV4	Major Developed Sites in the Green Belt				SADPD GB2	
ENV5	Stabling and Riding of Horses and Ponies				No	
ENV6	Protection and Encouragement of Agriculture				No	
ENV7	Countryside Character				No	
Fig. 3.1	Countryside Area Profiles				No (this figure is not crossreferenced in the UDP text so is for information only)	
ENV8	Great Barr Hall & Estate and St. Margaret’s Hospital				SADPD EN7	
ENV9	Environmental Improvement Initiatives				No	

UDP Policy/ Proposal		Policy not “saved” 08.03.08	after	Policy Replaced by BCCS Policy from 03.02.11	Policy to be Replaced New DPD by
ENV10	Pollution				No
ENV11	Light Pollution				No
ENV12	Hazardous Installations				No
ENV13	Development Near Power Lines, Substations & Transformers				No
ENV14	Development of Derelict and Previously-Developed Sites				No
ENV15	Forest of Mercia				Replaced as no longer considered relevant (the programme is no longer operational and the boundaries
					are not shown on the SADPD Policies Map)
ENV16	Black Country Urban Forest				No (however, this programme is no longer operational)
ENV17	New Planting				No
ENV18	Existing Woodlands, Trees and Hedgerows				No
ENV19	Habitat & Species Protection			ENV1	See also SADPD EN1

UDP Policy/ Proposal		Policy not “saved” 08.03.08	after	Policy Replaced by BCCS Policy from 03.02.11	Policy to be Replaced New DPD by
ENV20	Local Nature Reserves			ENV1	See also SADPD EN1
ENV21	Sites of Local Importance for Nature Conservation			ENV1	See also SADPD EN1
ENV22	Protected Species			ENV1	
ENV23	Nature Conservation and New Development				No
ENV24	Wildlife Corridors				No But see also SADPD EN1
Fig 3.2	Wildlife Corridors				A revised map of wildlife corridors is contained in the SADPD (Map 7.3) and in the Technical Appendix
ENV25	Archaeology				No
ENV26	Industrial Archaeology				No
ENV27	Buildings of Architectural Interest				No
ENV28	The Local List of Buildings of Historic or Architectural Interest				No

UDP Policy/ Proposal		Policy not “saved” 08.03.08	after	Policy Replaced by BCCS Policy from 03.02.11	Policy to be Replaced New DPD	by
ENV29	Conservation Areas				SADPD EN5 and TCAAP AAPLV5 - 7 (but saved for use in District Centres)	
ENV30	Registered Parks and Gardens				No	
ENV31	Continued Protection of the Historic Built Environment			ENV2		
ENV32	Design and Development Proposals				No	
ENV33	Landscape Design				No	
ENV34	Public Art				No	
ENV 35	Appearance of Commercial Buildings				No	
ENV36	Poster Hoardings				No	
ENV37	Small Poster Panel Advertisements				No	
ENV38	Telecommunications Equipment				No	
ENV39	Renewable Energy and Energy Conservation			ENV7		
ENV40	Conservation, Protection and Use of Water Resources				No But see also SADPD EN3 and TCAAP AAPINV7	

UDP Policy/ Proposal		Policy not “saved” 08.03.08	after	Policy Replaced by BCCS Policy from 03.02.11	Policy to be Replaced New DPD	by
Fig. 3.3	Flood Zones				The SADDP Policies Map, SADPD Map 7.8, TCAAP AAPINV7 and AAP Technical Appendices show more detailed and up to date flood zones	
Ref.	Chapter 4: Jobs & Prosperity					
4.1-4.2	Strategic Policy Statement			EMP1–3		
4.4, 4.5	Core Employment Areas and Best Quality Sites			EMP2 and EMP3	SADPD IND1 – IND3	
4.6	The Service Sector				No	
JP1	New Employment Sites				SADPD IND1, IND2, IND5	
JP2	Improving the Employment Land Supply			EMP1		
JP3	Rail-Served Sites			TRAN3		
JP4.1	East of M6 Junction 10				SADPD IND2	
JP4.2	James Bridge (former IMI Works)				SADPD IND2	

UDP Policy/ Proposal		Policy not “saved” 08.03.08	after	Policy Replaced by BCCS Policy from 03.02.11	Policy to be Replaced by New DPD
JP5	Core Employment Areas				SADPD IND1 - 5 (but saved for use in District Centres as a small part of Willenhall District Centre is a Core Employment Area)
JP6	Best Quality Sites				SADPD IND1, IND2 and IND5
JP7	Use of Land and Buildings in Other Employment Areas				SADPD IND1 - 5 (but saved for use in District Centres)
JP8	Bad Neighbour Industrial Uses				No
Ref.	Chapter 5: Strengthening Our Centres				
5.1—5.3	Strategic Policy Statement			CEN1-2	
5.4-5.11	Strategic Policy Statement				No
S1	Definition of Town Centre Uses				No
S2	The Hierarchy of Centres				No

UDP Policy/ Proposal		Policy not “saved” 08.03.08	after	Policy Replaced by BCCS Policy from 03.02.11	Policy to be Replaced by New DPD
Fig. 5.1	Shopping Provision in Walsall Borough April 2004				No (this figure is for information only as the centres are shown on the Policies Map: note also that Darlaston Green (34) was deleted as a local centre by the BCCS)
S3	Integration of Developments into Centres				No
S4	The Town & District Centres: General Principles				No
S5	The Local Centres				SADPD SLC1 and SLC2
S6	Meeting Local Needs				No
S7	Out-of-Centre and Edge-of-Centre Developments				No
S8	Housing in Town Centres				No
S9	Amusement Centres & Arcades				No
S10	Hot Food Take-Aways				No
S11	Drive-Through Facilities				No
S12	Petrol Filling Station Shops				No
S13	Nurseries, Garden Centres and Builder’s Merchants				No
S14	Farm Shops				No
S15	Banking and Cashpoint Facilities				No

UDP Policy/ Proposal		Policy not “saved” 08.03.08	after	Policy Replaced by BCCS Policy from 03.02.11	Policy to be Replaced New DPD	by
S16	Internet Shopping				No	
S17	Shopmobility				No	
Ref.	Chapter 6: Housing					
6.1-6.2	Strategic Policy Statement				No	
6.3-6.6	Strategic Policy Statement			HOU1-4		
H1	Renewal of Existing Residential Areas				No	
H2	Land Allocated for New Housing Development				SADPD HC1	
H3	Windfall Sites and Conversion of Existing Buildings				SADPD HC2 and WTCAAP AAPLV1 (but saved for use in District Centres)	
H4	Affordable Housing			HOU3 (parts a), b) c) d) e) and f))	No Parts g) h) i) and j) of UDP to be saved	
H5	Housing for People with Special Needs				SADPD HC3 (but saved for use in District Centres)	
H6	Nursing Homes and Rest Homes for the Elderly				No	
H7	Hostels and Houses in Multiple Occupation				No	
H8	Accommodation for Travelling People			HOU4		
H9	Minimum Densities			HOU2		
H10	Layout, Design and Dwelling Mix			HOU2, ENV2-3		

UDP Policy/ Proposal		Policy not “saved” 08.03.08	after	Policy Replaced by BCCS Policy from 03.02.11	Policy to be Replaced New DPD	by
Ref.	Chapter 7: Transport					
7.1, 7.27.3, 7.5, 7.6, 7.7, 7.8 7.9	Strategic Policy Statement			TRAN1-2, TRAN4		
7.4	Strategic Policy Statement				No	
T1	Helping People to Get Around				No	
T2	Bus Services				SADPD T2 and WTCAAP AAPT3 (but saved for use in District Centres)	
T3	The Rail and Metro Network				SADPD T3 and WTCAAP AAPT3 (but saved for use in District Centres)	
Fig. 7.1	Rail Network (Existing and Proposed)				SADPD T3, WTCAAP AAPT3 (but saved for use in District	

UDP Policy/ Proposal		Policy not “saved” 08.03.08	after	Policy Replaced by BCCS Policy from 03.02.11	Policy to be Replaced New DPD by
					Centres)
T4	The Highway Network				SADPD T4, WTCAAP AAPT4 (but saved for use in District Centres)
Fig. 7.2	Strategic Highway Network and District Distributors				SADPD Map 10.1, WTCAAP Policies Map (but saved for use in District Centres)
T5	Highway Improvements				SADPD T5, WTCAAP AAPT4 (but saved for use in District Centres)
T6	Traffic Calming				No

UDP Policy/ Proposal		Policy not “saved” 08.03.08	after	Policy Replaced by BCCS Policy from 03.02.11	Policy to be Replaced New DPD	by
T7	Car Parking				No but see also AAPT5	
T8	Walking				No but see also AAPT1	
T9	Cycling				No but see also AAPT5	
T10	Accessibility Standards – General				No	
T11	Access for Pedestrians & Cyclists				No	
T12	Access by Public Transport				No	
T13	Parking Provision for Cars, Cycles and Taxis				No	
Ref.	Chapter 8: Providing for Leisure & Community Needs					
8.1-8.2, 8.4-8.6	Strategic Policy Statement			CSP1, CSP3-4, ENV4, ENV6, CEN1-5		
8.3, 8.7- 8.9	Strategic Policy Statement				No	
LC1	Urban Open Spaces				SADPD OS1 and WTAAP AAPLV8	

UDP Policy/ Proposal		Policy not “saved” 08.03.08	after	Policy Replaced by BCCS Policy from 03.02.11	Policy to be Replaced New DPD by
					(but saved for use in District Centres)
LC2	Proposed Open Space				SADPD OS1
LC3	Children’s Play Areas				No
LC4	Allotment Gardens				No
LC5	Greenways				SADPD LC5 and WTAAP AAPT1 (but saved for use in District Centres)
LC6	Sports Pitches				No
LC7	Indoor Sport Including Health & Fitness Centres				No
LC8	Local Community Facilities				No
LC9	Canals			ENV4	But see also SADPD EN4 and TCAAP AAPLE4
LC10	Wolverhampton University, Walsall Campus, Broadway				SADPD UW1
LC11	Land for Cemetery Extension, Bentley Lane				SADPD LC11
Ref.	Chapter 9: Minerals				
9.1-9.11	Strategic Policy Statement			TRAN3, WM4-5, MIN1-5, Minerals Key Diagram	

UDP Policy/ Proposal		Policy not “saved” 08.03.08	after	Policy Replaced by BCCS Policy from 03.02.11	Policy to be Replaced by New DPD
M1	Minerals Safeguarding Areas			MIN1, Minerals Key Diagram	But see also SADPD M1 and SAD Policies Map, and TCAAP AAPINV7 and
					AAP Policies Map
M2	Branton Hill Lane Quarry, Aldridge			ENV5, MIN2, MIN5, Minerals Key Diagram	But see also SADPD M5 and SAD Policies Map
M3	Birch Lane Quarry, Aldridge			ENV5, MIN2, MIN5, Minerals Key Diagram	But see also SADPD M4 and SAD Policies Map
M4	Working of Etruria Marl and Fireclay			MIN3-5, Minerals Key Diagram	But see also SADPD M7, M8, M9 and SAD Policies Map
M5	Etruria Marl — North of Stubbers Green Road			MIN3-5, Minerals Key Diagram	But see also SADPD M8 (MP9) and SAD Policies Map

UDP Policy/ Proposal		Policy not “saved” 08.03.08	after	Policy Replaced by BCCS Policy from 03.02.11	Policy to be Replaced by New DPD
M6	Etruria Marl – South of Stubbers Green Road			MIN3-5, Minerals Key Diagram	But see also SADPD M8 (MP6) and SAD Policies Map
M7	Birch Coppice				SADPD M9 (MP3) and SAD Policies Map
M8	Brownhills Common			CSP2, ENV1, MIN4-5, Minerals Key Diagram	But see also SADPD M8 (MP5) and SAD Policies Map
M9	Working of Coal			CSP2, ENV1, MIN4-5	But see also SADPD M9 and
					SAD Policies Map
Ref.	Chapter 10: Waste Management				
10.1-7	Strategic Policy Statement			CSP3, ENV7, WM1-5	
WM1	Consideration of Proposals for Waste Management Activities			WM1-2, WM4	But see also SADPD W2, W3, W4
WM2	Control of Landfill, Land Raising and Other Waste Deposition			WM4, MIN5	But see also SADPD W4
WM3	Special Wastes			WM3	

UDP Policy/ Proposal		Policy not “saved” 08.03.08	after	Policy Replaced by BCCS Policy from 03.02.11	Policy to be Replaced New DPD	by
WM4	Provision of Recycling Facilities in Development Schemes			WM5		
Policy	Chapter 12: Walsall Town Centre					
WA1	Primary Shopping Area				TCAAP AAPS1 - 2	
WA2	The Market				TCAAP AAPS3	
WA3	Other Town Centre Uses				TCAAP AAP1 and AAPLV1	
WA4	Walsall College of Art and Technology – St Paul’s Campus				TCAAP AAPLV2	
WA5	Conservation Areas and Areas of High Townscape Value				TCAAP AAPLV5 - 7	
WA6	Community Safety - CCTV				TCAAP AAPLV6	
WA7	Development/ Investment Opportunities				TCAAP Chapter 8	
WA8	Hatherton Street/ Littleton Street/ Albert Street				TCAAP Chapter 8	
WA9	Intown				TCAAP Chapter 8	
WA10	Lower Hall Lane/ Digbeth/ Old Square				TCAAP Chapter 8	
WA11	Upper Rushall Street/ Ablewell Street/ The Ditch				TCAAP Chapter 8	
WA12	Town Wharf				TCAAP Chapter 8	

UDP Policy/ Proposal		Policy not “saved” 08.03.08	after	Policy Replaced by BCCS Policy from 03.02.11	Policy to be Replaced by New DPD
WA13	Littleton Street West/ Wisemore/ Garden Street/ Portland Street				TCAAP Chapter 8
WA14	Town Centre Transport Interchange				TCAAP AAPT1 - 3
WA15	Bus Services				TCAAP AAPT3
WA16	Rail Services				TCAAP AAPT3
WA17	Road Improvements				TCAAP AAPT4
WA18	Provision of Car Parking				TCAAP AAPT5
WA19	Pedestrians, Cyclists and Disabled People				TCAAP AAPT1
Policy	Chapter 13: Aldridge District Centre Inset Plan				
AL1	Primary Shopping Area				No
AL2	Environmental Improvement				No
AL3	The Croft				No
AL4	The Precinct				No
AL5	Land at High Street/ Little Aston Road				No
AL6	Rail Station				No
AL7	Pedestrian and Cycle Routes				No
AL8	Traffic Circulation and Bus Priority				No
AL9	Car Parking				No
Policy	Chapter 14: Bloxwich District Centre Inset Plan				
BX1	Primary Shopping Area				No
BX2	The Market				No
BX3	Conservation Areas				No

UDP Policy/ Proposal		Policy not “saved” 08.03.08	after	Policy Replaced by BCCS Policy from 03.02.11	Policy to be Replaced New DPD	by
BX4	Urban Open Spaces				No	
BX5	Environmental Improvements				No	
BX6	Development/ Investment Opportunities				No	
BX7	The Market Centre				No	
BX8	South East End of High Street				No	
BX9	Improved Passenger Rail Facilities				No	
BX10	Improvements to Bus Facilities				No	
Policy	Chapter 15: Brownhills District Centre Inset Plan					
BX11	Pedestrian and Cycle Routes				No	
BX12	Traffic within the District Centre				No	
BX13	Car Parking				No	
BR1	Primary Shopping Area				No	
BR2	Brownhills Market				No	
BR3	Neighbourhood Resource Centre					
BR4	Redevelopment/ Refurbishment Schemes				No	
BR5	Heritage				No	
BR6	Public Art				No	
BR7	Environmental Enhancement				No	
BR8	Retail Development Opportunities				No	
BR9	Leisure, Service and Community Development Opportunities				No	
BR10	Transport Interchange				No	
BR11	Traffic within the Centre				No	
BR12	Bus Facility Improvements				No	
BR13	Pedestrian Routes				No	

UDP Policy/ Proposal		Policy not “saved” 08.03.08	after	Policy Replaced by BCCS Policy from 03.02.11	Policy to be Replaced New DPD	by
BR14	Cycle Access and Parking				No	
BR15	Car Parking Provision				No	
Policy	Chapter 16: Darlaston District Centre Inset Plan					
DA1	Primary Shopping Area				No	
DA2	Darlaston Market				No	
DA3	Environmental Enhancement				No	
DA4	Urban Open Spaces				No	
DA5	Housing Developments				No	
DA6	Other Town Centre Uses				No	
DA7	Bus Facilities				No	
DA8	Pedestrians and Cyclists				No	
DA9	Car Parking				No	
Policy	Chapter 17: Willenhall District Centre Inset Plan					
WH1	Primary Shopping Area				No	
WH2	The Market				No	
WH3	Environmental Enhancement				No	
WH4	Development/ Investment Opportunities				No	
WH5	Rail Station and Transport Interchange				No	
WH6	Buses				No	
WH7	Pedestrians				No	
WH8	Provision for Cyclists				No	
WH9	Traffic Management				No	

UDP Policy/ Proposal		Policy not “saved” 08.03.08	after	Policy Replaced by BCCS Policy from 03.02.11	Policy to be Replaced New DPD	by
WH10	Parking				No	
	Proposals Map & Inset Maps					
	UDP Proposals Map				SADPD Policies Map	
	Walsall Town Centre Inset Map				WTCAAP Policies Map	
	Aldridge District Centre Inset Map				No	
	Bloxwich District Centre Inset Map				No	
	Brownhills District Centre Inset Map				No	
	Darlaston District Centre Inset Map				No	
	Willenhall District Centre Inset Map				No	

APPENDIX 3: SUPPLEMENTARY PLANNING GUIDANCE

Introduction

Supplementary Planning Guidance (SPG) prepared before 2004 does not have the same status as a supplementary planning document (SPD) prepared under the current development planning system, which when adopted, forms part of the LDF. However, where it can be demonstrated that existing SPG is linked to a 'saved' UDP policy, and has gone through a process similar to that required for SPDs, it can still be a 'material consideration' for relevant planning applications.

In Walsall, the general principles for the preparation of SPG under the previous development plan system were that the SPG should accord with policies of the Walsall UDP, and that the SPG was approved by the Council after a period of public consultation. Therefore, where previously prepared SPG is still linked to a saved UDP policy and remains relevant, it will still have the status of a 'material consideration'.

The following table lists the existing SPG that is still in place, with references to the UDP policies it supports. However, it is recognised that some of the SPG is now out-of-date, for example, where sites covered by development briefs have been developed or where policies or legislation have changed. If resources allow, the Council will carry out a review of existing SPG as well as SPDs, with a view to cancelling obsolete guidance.

Supplementary Planning Guidance (SPG) – Remaining SPG at June 2011

<i>Title of SPG</i>	<i>Linked to "saved" UDP Policy</i>	<i>Date Approved</i>	<i>Superseded by</i>
Topic-Based SPG			
Birmingham & Black Country Biodiversity Action Plan	ENV23-24, Appendix 2	2000	
Shutters and Security Grilles	ENV35, Appendix 2	1998	Shop Front SPD April 2015
Area-Wide SPG			
Walsall Town Centre Strategy	WA1-19, Appendix 2	1998	Walsall Town Centre AAP when adopted
Strategy for Bloxwich Town Centre	BX1-13, Appendix 2	2000	
Brownhills Town Centre Action Plan	BR1-2 BR4-15, Appendix 2	1999	
Brownhills Town Centre Townscape Master Plan	BR1-2 BR4-15, Appendix 2	1999	
Darlaston Town Centre Plan	DA1-9, Appendix 2	1999	
Barr Beacon Countryside Area Profile	ENV7, Appendix 2	1993	
Longwood Gap Countryside Area Profile	ENV7, Appendix 2	1994	

<i>Title of SPG</i>	<i>Linked to "saved" UDP Policy</i>	<i>Date Approved</i>	<i>Superseded by</i>
Rough Wood Chase Countryside Area Profile	ENV7, Appendix 2	1996	
Area of Special Townscape Character, Thornhill Road / Middleton Road / Foley Road East, Streetly	ENV32, Appendix 2	2003	
Site Specific Planning Briefs			
Butts Centre, Butts Road / Cecil Street, Walsall	Appendix 2	2001	
Land at Castle Street / Booth Street, Darlaston	Appendix 2	1988	
Strategy for Digbeth / Old Square, Walsall Town Centre	WA7, WA10, Appendix 2	2000	Walsall Town Centre AAP when adopted
Planning Brief for Site G, Land to West of Essington Road, New Invention, Willenhall	Appendix 2	1988	
Land at Granville Street, Willenhall	Appendix 2	2001	
Revised Development Guidelines – Land at High Bridges, Lichfield Road, Pelsall	Appendix 2	2002	
Land at Hollyhedge Lane, Walsall (Revised)	Appendix 2	1998	
Development Brief: Former Site of Kings Hill JMI School, Old Park Road, Darlaston. (Revised)	Appendix 2	2000	
Design Guidelines - Land at Littleton Street East / Hatherton Street / Lower Forster Street, Walsall	Appendix 2	1998	
Land at Middlemore Lane, Aldridge	Appendix 2	2002	
Land at Mill Street / Cannon Street, Walsall	Appendix 2	2001	

<i>Title of SPG</i>	<i>Linked to "saved" UDP Policy</i>	<i>Date Approved</i>	<i>Superseded by</i>
Noose Lane Opportunity Area: Planning Brief	Appendix 2	1992	
Planning Guidelines For Former Portobello	Appendix 2	2002	
School, School Street, Willenhall			
Development Guidance – Land at Roebuck Road (Revised)	Appendix 2	2003	
Planning Guidelines for the Rowley View Nursery Site, Moxley	Appendix 2	2003	
Land at Sherlock Close, Lane Head, Willenhall	Appendix 2	1993	
Development Guidelines – Land West of Sherlock Close, Lane Head, Willenhall	Appendix 2	2002	
Revised Development Guidelines – Land West of Sherlock Close, Willenhall	Appendix 2	2004 (Draft)	
Development Guidelines – Land at Stroud Avenue, Willenhall	Appendix 2	2003	
Development Guidance – Land at Sunningdale Way	Appendix 2	2004	
Development Brief – Land at Taylor Avenue/ Walker Road/ Well Lane/ Guild Avenue, Walker Road, Victoria House/ Church Place, Blakenall Close (Blakenall New Deal for Communities)	Appendix 2	2003	
Development Guidelines – Land at Turnberry Road	Appendix 2	2004	

APPENDIX 4: ADOPTED LOCAL PLAN DOCUMENTS

Walsall's Unitary Development Plan (Saved Policies)

http://cms.walsall.gov.uk/annotated_2011_udp_-_february_2011.pdf

- Document: **Walsall Unitary Development Plan (annotated version)** Date of Adoption: March 2005 ('saved' December 2007)

Black Country Core Strategy

http://www.walsall.gov.uk/index/environment/planning/local_development_framework/ldf_core_strategy.htm &
<http://blackcountrycorestrategy.dudley.gov.uk/>

- Document: **Black Country Core Strategy**
 Date of Adoption: February 2011

Walsall Site Allocation Document

https://go.walsall.gov.uk/site_allocation_document

- Document: Walsall Site Allocation Document
 Date of Adoption: January 2019

Walsall Town Centre Area Action Plan

https://go.walsall.gov.uk/walsall_town_centre_area_action_plan

- Document: Walsall Town Centre Area Action Plan
 Date of Adoption: January 2019

Walsall Supplementary Planning Documents

http://www.walsall.gov.uk/index/environment/planning/local_development_framework/ldf_supplementary_planning_documents.htm

- Document: **Affordable Housing SPD**
 Date of Adoption: July 2005, Review Adopted April 2008
- Document: **Open Space, Sport and Recreation SPD** Date of Adoption: April 2006
- Document: **Walsall Waterfront SPD**
 Date of Adoption: November 2006
 Note this will be superseded by the Town Centre AAP when it is adopted.
- ~~• Document: **Healthcare SPD**
 Date of adoption: January 2007 Revoked February 2012~~
- ~~• Document: **Education SPD**
 Date of adoption: February 2007—Revoked February 2012~~
- Document: **'Designing Walsall' Design Guide SPD**
 Date of adoption: February 2008 July 2013 (revision)
- Document: **Natural Environment SPD**

Date of adoption: ~~April 2008~~ July 2013 (revision)

□ Document: **Shop Front SPD**

Date of adoption: April 2015

□ Document: **Black Country Air Quality SPD** Date of adoption: February 2017

APPENDIX 5: GLOSSARY

<i>Term</i>	<i>Acronym</i>	<i>Detail</i>
Authority's Monitoring Report	AMR	A report that assesses progress with the implementation of the LDS and the extent to which the policies in LDDs are being achieved. Formerly known as the Annual Monitoring Report.
Area Action Plans	AAP	These plans focus on areas which are subject to significant change and will benefit from having development plan status. As with other DPDs, they will be subject to independent examination.
Area Partnerships		Six Area Partnerships have previously been established across Walsall Borough to seek to encourage agreement on how local areas might be managed and improved. They bring together representatives of the Council, local residents, businesses and partner organisations. As of May 2017 these have been replaced by four 'Localities'.
Black Country Plan	BCP	The proposed DPD that is currently being prepared via a review of the Black Country Core Strategy. It will update the current Core Strategy and allocate land for housing and employment whilst including policies to protect the environment and important heritage assets.
Core Strategy	BCCS	The DPD that sets out the vision, objectives and spatial strategy for the Borough (in this case for the Black Country, i.e. Dudley, Sandwell and Wolverhampton as well as Walsall)).
Community Infrastructure Levy	CIL	The legislation enabling the introduction of CIL came into force in April 2010. It allows local authorities to raise funds from developers undertaking new building projects in their area. The money can be used to fund a wide range of infrastructure that is needed as a result of development. The Housing White Paper of February 2017 has committed to a Government Review and an announcement in the 2017 Autumn Statement.
Development Plan Document	DPD	One of a number of documents that are part of the development plan for the Borough and which are subject to independent examination.
Local Development Document	LDD	One of a number of documents that make up the LDF, including Development Plan Documents and Supplementary Planning Documents.

<i>Term</i>	<i>Acronym</i>	<i>Detail</i>
Local Development Framework	LDF	The folder of Local Development Documents that will constitute the planning policies for the Borough. Also known as the 'Local Plan'.
Local Development Scheme	LDS	A project plan for preparing the documents that will make up the LDF. It will be reviewed at least annually.
Localities		Walsall Council has often sought to work locally to encourage involvement in the management and improvement of all areas of the borough. As of May 2017 the previous 'Area Partnerships' have been replaced by four 'Localities'. These maintain the previous approach of bringing together representatives of the Council, local residents, businesses and partner organisations.
Neighbourhood Plans	NP	Plans prepared by local communities (as Neighbourhood Planning Forums) under the Localism Act 2011.
Regional Spatial Strategy	RSS	The former strategic plan for the whole region. The West Midlands RSS was revoked in May 2013.
Statement of Community Involvement	SCI	A document setting out how local communities, stake-holders and other interested people and organisations will be involved in the process of producing LDDs. The SCI will itself be subject to public consultation, but no longer has to be independently examined.
Supplementary Planning Document	SPD	A document that elaborates on policies in DPDs and does not have development plan status. It still requires community involvement in line with the SCI or minimum regulations but is not subject to independent examination.
Supplementary Planning Guidance	SPG	Existing planning documents prepared under the old planning system which elaborate upon UDP policies, many of which will be retained as 'material considerations'.
Sustainability Appraisal	SA	The evaluation of the effect of proposals on sustainable development in environmental, economic and social terms. Includes Strategic Environmental Assessment (SEA) where this is required.

<i>Term</i>	<i>Acronym</i>	<i>Detail</i>
Walsall Unitary Development Plan	UDP	The 'old style' development plan for the Borough, which was adopted in 2005. Following the changes introduced by the 2004 Planning Act, most of the policies have been "saved" although some have subsequently been replaced by policies in the BCCS. The remaining policies will eventually be replaced by other 'new style' LDF documents to be prepared in the future.

Cabinet – June 2022

Adult Social Care charging policy, minimising debt and maximising income

Portfolio: Councillor Keir Pedley

Related portfolios: All

Service: Adult Social Care

Wards: All

Key decision: Yes

Forward plan: Yes

1. Aim

- 1.1. To provide Cabinet with a progress update on Adult Social Care charging policy and associated activity.

2. Summary

- 2.1. Adult Social sought approval from Cabinet in December 2021 to commence consultation on proposed changes to the Walsall Adult Social Care Charging Policy. Prior to this, in September 2021, Adult Social Care provided Cabinet/CMT with an update on activity that has been undertaken, in reviewing the Adult Social Care (ASC) charging policy and the operational changes that would be required to maximise income and minimise debt.
- 2.2. In December 2021 Cabinet approved:
 - a. Commencement of consultation on proposed policy changes; that the consultation seeks to gather feedback on proposals to amend the current charging policy and most substantively to set a fee for the arrangement of brokerage services, which will be paid on each occasion a self-funding service user requests the Council arrange a care package on their behalf. If approved, and subject to consultation, it is proposed that the arrangement fee will be introduced from May 2022.
 - b. That following consultation, Cabinet delegates to the Executive Director of Adult Social Care, in conjunction with the Portfolio Holder for Adult Social Care, authority to make appropriate changes to the Adult Social Care Policy by way of updating and bringing the Policy in line with current legislation, regulations and guidance.
 - c. Cabinet also noted further changes are envisaged for the Adult Social Care Charging Policy, due to national policy changes aimed at the health and social care sector. This will result in a further report to Cabinet during 2023, to reflect the impact of these

changes and alignment of residential and community care charging to the Local Authority Circular, a requirement to ensure that charges to individuals in receipt of Adult Social Care services are equitable, whilst maximising income that the council can realise.

3. Recommendations

- 3.1. That Cabinet notes the activity undertaken thus far, in relation to debt; streamlining process and maximising income.
- 3.2. That Cabinet approve interim process revisions continue to be implemented, in order to continue the improve trajectory across debt management and income maximisation; improve customer satisfaction and process efficiency.
- 3.3. That Cabinet approve the Adult Social Care Charging Policy changes are consolidated into one Adult Social Care Charging Policy, which fully reflects the Health and Social Care financial reforms, considers the March 2021 consultation outputs and brings alignment of residential and community care charging Local Authority Circular.

4. Report detail - Know

- 4.1. The Council agreed the existing Adult Social Care Charging Policy in 2017. An internal review of the Policy was undertaken from August 2021 to November 2021. The review has identified a number of potential changes to the Policy and Cabinet approved the commencement of public consultation in advance of deciding whether to implement these changes. The consultation concluded on 1st March 2022. The consultation outputs are attached in appendix 1.
- 4.2. Since the last Cabinet Report pertaining to Adult Social Care Charging, the Health and Care Bill is now a Health and Care Act, the implications of which are now being fully analysed. It is therefore, proposed the aforementioned consultation outputs from March 2022 are utilised to inform future developments of the Adult Social Care Charging policy aligned to national social care financial reform. This will in turn ensure one comprehensive set of changes are implemented across the borough for residents in receipt of social care, whether council commissioned or self-funded.
- 4.3. The Act sets out an extensive set of revisions in terms of adult social care financial reform, which will fundamentally change the way in which local authorities across the country assess, administer and process citizen's individual financial contribution to lifetime costs of care.
- 4.4. The scale and impact of the changes are being modelled across the Walsall demographic.
- 4.5. A summary of the Act and extent of the changes linked to social care financial reform are as follows:
 - Contributions to the cost of care cap introduced, this includes all citizens who currently self-fund and self-commission their care
 - Everyone can request local authorities arrange their care irrespective of status and self-funders care cost alignment to principle of personal budget
 - Daily living costs in residential care not counted towards the care cap

- Care accounts will be required with the production of individual statements and monitoring against care cost contributions cap, to ensure nobody exceeds the financial cap life time care cost contribution
 - Capital limit threshold changes – proposed to increase
 - Unfreezing social care allowances aligned to inflation
- 4.6. Consultation on the Health and Social Care Reforms concluded 1st April 2022; this was followed by the Bill being passed and becoming the Health and Social Care Act 2022. The national implementation timetable is June 2022-23; there are a small number of trailblazer local authorities across the country, of which Walsall will continue to connect with through regional and local forums, in order to understand and take learning; all local authorities are invited to pilot changes from April 2023; full implementation is October 2023. Therefore, a challenging timeline lies ahead in order to fully assess impact and implement the changes in a compliant way.

Interim Changes to existing policy

- 4.7. In light of the extensive information now available in relation to the Social Care Financial Reform as summarised above, Adult Social Care are progressing with pace interim changes, in order to reduce debt and maximise income in an efficient way.
- 4.8. This includes streamlining the way individual financial assessments are re-assessed, whilst at the same time maximising benefits; rolling out refreshed electronic learning packages for staff to ensure responsibilities are well understood and executed; ensuring financial assessments are completed at the earliest point for any new care packages across community or within a residential setting. This aims to maximise income and avert further debt accruing.
- 4.9. Activity is also underway to reduce debt levels by undertaking targeted case reviews and bringing greater alignment to community care statutory annual reviews.
- 4.10. Activity is also well underway on developing a future form and function model which will optimise digital solutions; centralise delivery of all administration; management and oversight; future proofing in line of the social care reforms.

Council Corporate Plan priorities

- 4.11. This proposal links to the Council's corporate priority 'People have increased independence, improved health and can positively contribute to their communities.'
- 4.12. The principles and actions contained within this report are in full accordance with the Marmot objective enabling all people to maximise their capabilities and have control over their lives.

Risk management

- 4.13. There is a risk that some customers, carers, residents and groups will experience a level of anxiety or uncertainty about the impact of social care financial reforms
- 4.14. Walsall Council will seek to mitigate these risks by:

- Designing and communicating the consultation in a way that encourages contributions and concerns to be raised through that medium rather than through complaints.
- Carefully explaining the implications of the changes, in the context of reducing public finances and the expectation that all the community's needs will be met.

Financial implications

- 4.15. At this stage, the full financial implications of the national legislative changes in relation to the Social Care Financial Reforms, are not fully understood. Initial modelling work is underway subject and financial impact will be clearer once further guidance is published.

Legal implications

- 4.16. The legislative framework, which currently governs the contents of these policies, is dominated by the Care Act 2014, which, together with the related statutory instruments and regulations, provides a single framework for charging for care and support. Section 14 of the Act affords local authorities the power to charge individuals in receipt of care and support services, for these services where the local authority is permitted to charge. The same Section also provides the power to charge for services meeting carers' needs, by providing services directly to the carer. There are also certain types of care and support, which Local Authorities are not permitted to charge for.
- 4.17. The legislative impact of social care financial reforms will of course be adhered to going forward.

Procurement Implications/Social Value

- 4.18. There are no procurement implications arising out this report.

Property implications

- 4.19. There are no property implications arising out this report.

Health and wellbeing implications

- 4.20. The Council will take into consideration the mental capacity of clients and residents as well as any illness or condition they may have, when communicating with them. In line with the Care Act 2014, and the principles set out in the Mental Capacity Act 2005, the Council will assume that clients, residents will have mental capacity and can make decisions for themselves unless it is established otherwise, in which case appropriate support will be identified. The Council is in the process of re-modelling their wellbeing services, which will provide additional support around financial wellbeing and benefit maximisation.

Staffing implications

- 4.21. There are no staffing implications arising out of this specific report. However, as referenced in previous cabinet reports, any future delivery model developments, to respond to legislative changes, whole system improvements in reducing debt and maximising income, could result in staffing implications. Any envisaged changes will be undertaken in accordance with the Council's HR policies and procedures.

Reducing Inequalities

- 4.22. A further Equality Impact Report will be completed as required.

Climate Change

- 4.23. There are no climate change implications arising out of this report.

Consultation

- 4.24. There are no specific consultation requirements pertaining to this Cabinet update.

5.0 Decide

- 5.1. As this is an update to Cabinet there are no specific decision to make.

6.0 Respond

- 6.1. Subject to Cabinet agreeing with this report recommendations, interval updates in relation to readiness for Social Care Reform will be submitted for approval, in a timely way.
- 6.2. Cabinet will also receive a refreshed Adult Social Care Charging Policy in due course, which reflect the new legislation.

Background papers none

Appendices:

- Appendix 1 – March 2022 Consultation outputs
Appendix 2 – Cabinet Report December 2021

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Kerrie Allward
Executive Director
Adult Social Care, Public Health and Hub
10 June 2022



Councillor Keir Pedley
Portfolio Holder
Adult Social Care
13 June 2022

Adult Social Care Charging Policy Consultation 2022

Summary of findings March 2022



Walsall Council



IMPROVE
outcomes and
customer experience



IMPROVE
employee satisfaction
and engagement



IMPROVE
service efficiency
and performance

Background and methodology

A revised policy has been produced to comply with the Care Act 2014 seeking to provide clear, transparent and consistent guidance on Adult Social Care charging for Residential and Community Care services

Revisions to the Walsall Adult Social Care Charging Policy are required to ensure residents in receipt of Adult Social Care services continue to be treated in an equitable way, is in line with legislation, which both maximises Council income and critically ensures residents are 'paying what they can afford'.

The proposed policy changes will contribute to more timely collection of contributions and seeks to address current weaknesses within the existing policy, which can result in complaints; resident uncertainty; delays in charge being known and income collection levels.

In revising the policy and underpinning operational infrastructure we are confident that the council's promises to customer – improved outcomes; staff – improved work experience and benefits cashable and non will be met.



Background and methodology

Key Dates and Activity

December 2021 – Cabinet approved public consultation on a revised Adult Social Care Charging Policy.

4th January 2022 – Consultation launched via survey to 211 existing residents who self fund their care are would be directly impacted by the proposed changes.

February 2022, reminder letters issued to encourage further involvement.

Additionally, the survey was emailed to community organisations and residential & nursing care homes

January 2022 – press release issues and a range of social media channels were also utilised to promote engagement.

January 2022 – Borough libraries were issued hard copy survey information

January 2022 – easy read versions were produced and made available online

Contact details for any questions were also published

By the deadline of 1st March 2022, a total of 44 residents had responded

Demographics: Clients were asked a range of equality questions which are reflected in the EqlA.

Results

44 responses were received.

(Please note that some people did not answer every question so the totals will appear to be incomplete.)

Respondents were categorised as follows:

- Cohort A - 4 responses - Someone who currently receives care and support services
- Cohort B – 29 responses - On behalf of someone who currently receives care and support services
- Cohort C – 8 responses - I do not currently receive care and support services
- Cohort D - 1 responses - Key stakeholder / professional
- Cohort E – 2 responses - other



Please tell us what sector you work in/ represent?

Faith, community and voluntary sector organisation 0

Housing 0

Health 1

Education 0

Public sector e.g. Police, Fire 0

Business / commercial 0

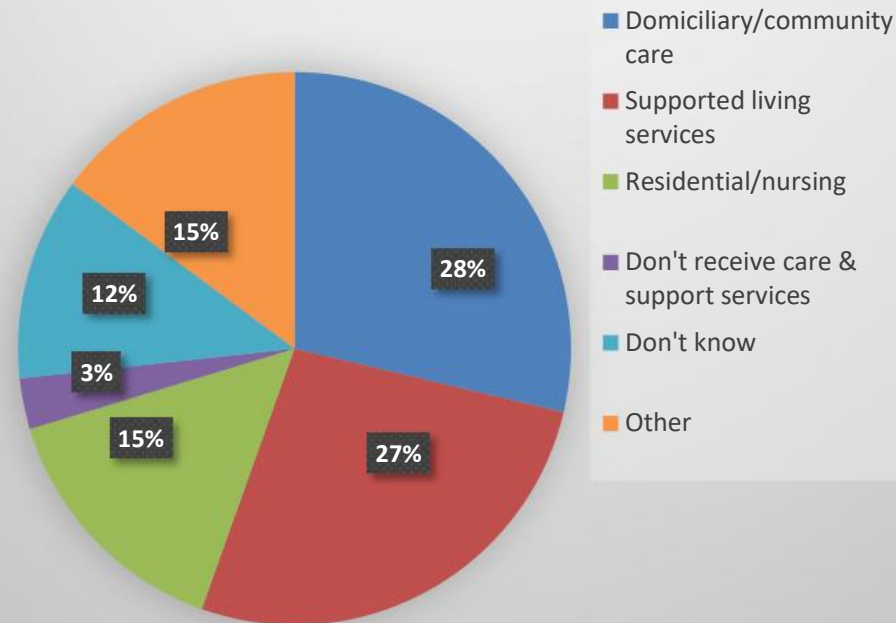
Representative body / association 0

Other, please state below 0



Services survey respondents receive

Which, if any, of the following care and support services do you or the person you are completing this for currently receive?



Breakdown of respondents in terms of services:

Domiciliary/community care – **10 respondents**

Supported living services – **9 respondents**

Residential nursing – **5 respondents**

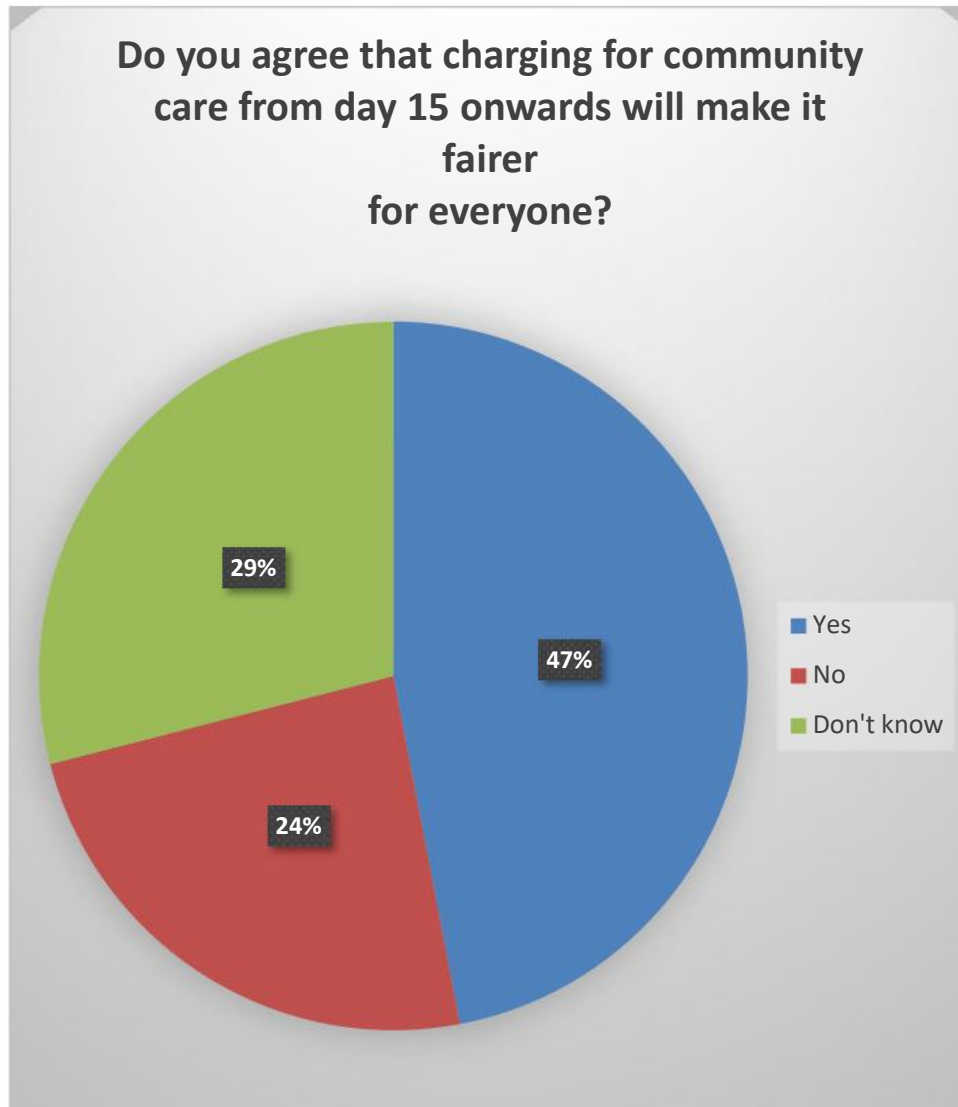
Don't receive care and support services – **1 respondent**

Don't know – **4 respondents**

Other – **5 respondents**



Proposed Introduction of a nominal charge



Majority of respondents agreed with the charging from day 15 onwards, of which 81% (13) were current or potential self funders.

Yes – 16 respondents

No – 8 respondents

Don't know – 10 respondents



Reasons for response on day 15 charging

Fairer system for all

*Everyone will be charged
at the same time*

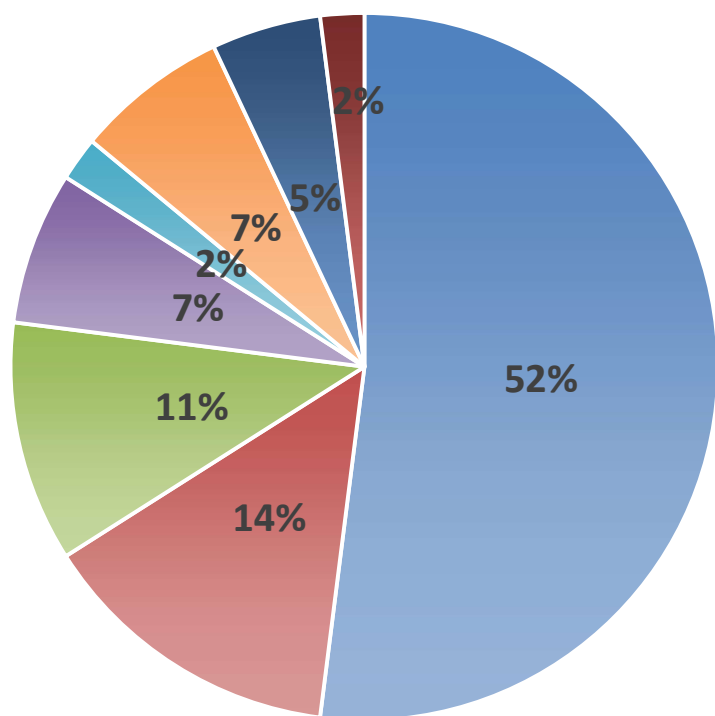
It seems like fairer
system as long as the
customer is informed
of their charge before
day 15, so as not
to put them in debt if
charges are backdated.

*16 days is too soon and is
likely to result in many
people receiving back
dated demands at a time
when they are vulnerable
and worried.*

*Everyone's
circumstances are
different and issues
arise that are
beyond the control
of community care
clients.*

*I don't have enough
experience of the
system to understand
how this works so can't
give an opinion*

Based on the above, which of the following applies to you / the person you are completing this for?



- I pay for all of the care and support services I receive (self-funder)
- I pay for some of the care and support services I receive
- I do not pay for the care and support services I receive (council funded)
- I do not currently receive care and support services but if I did I would be required to pay for it (self-fund)
- I do not currently receive care and support services but if I did I would be required to pay for some of it
- I do not currently receive care and support services but if I did I would not be required to pay for it (council funded)
- Doesn't apply

60% the respondents were current or potential self-funders.

I pay for all of the care and support services I receive (self-funder) – **23 respondents**

I pay for some of the care and support services I receive – **6 respondents**

I do not pay for the care and support services I receive (council funded) – **5 respondents**

I do not currently receive care and support services but if I did I would be required to pay for it (self-fund) – **3 respondents**

I do not currently receive care and support services but if I did I would be required to pay for some of it – **1 respondent**

I do not currently receive care and support services but if I did I would not be required to pay for it (council funded) – **3 respondents**

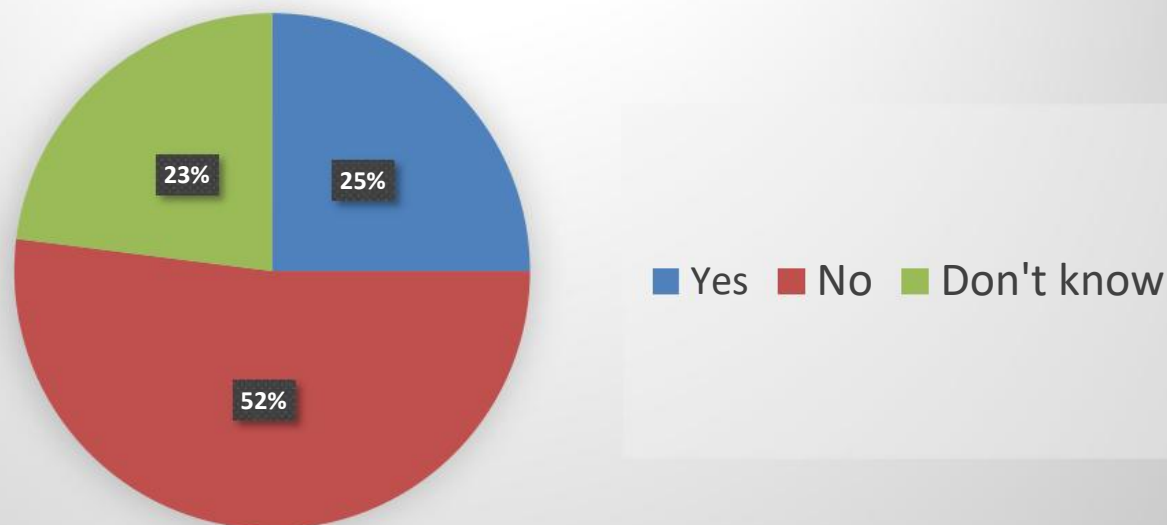
Doesn't apply – **2 respondents**

Don't know – **1 respondent**



Proposed changes for Self-Funders of Care

Should the council charge self-funders a one off fee of £300 for setting up care and support services on their behalf?



Majority of respondents didn't agree with the introduction of the one off fee (£300), of which 61% (14) were current or potential self-funders.

Yes – 11 respondents

No – 23 respondents

Don't know – 10 respondents

Reasons for response for one off self-funders fee

This is justifiable given the amount of people involved in setting up care plans.

Council incur costs for setting up care plans for people.

I know setting up care plan and support can be lengthy and costly

Self funders are almost paying a lot for care - the admin should not be passed onto them

Self funders already pay enough. The charge should apply, to those who get everything else for free, not just self funders.

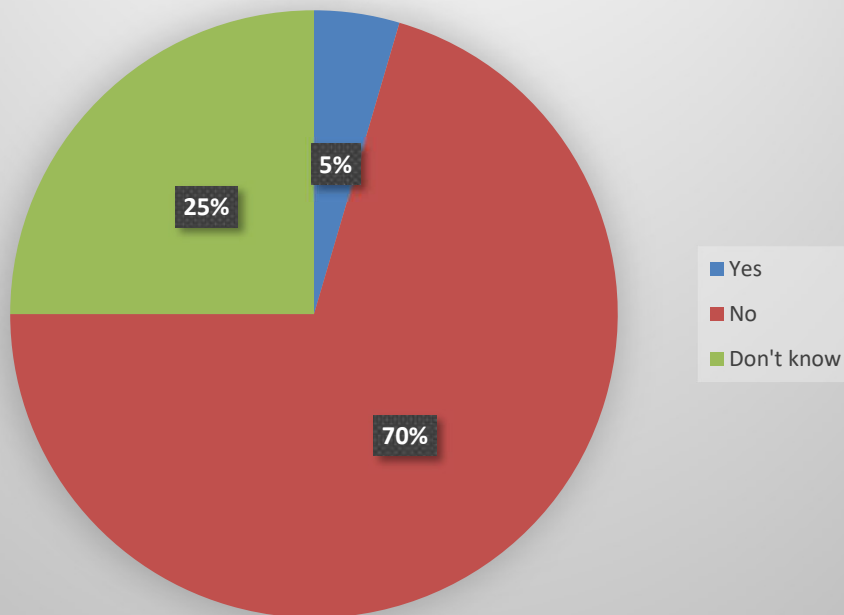
I can see a business sense for the council in this but does it make the council an elitist service? Will there be perceived differences in the standard of service received?

I believe this would be an additional unfair charge



Proposed Fees for Self-funders

Should the council charge self-funders an annual fee for £265 for the ongoing management of their care and support services?



Majority of respondents did not support the introduction of an annual fee (£265), of which 68% were current or potential self-funders.

Yes – **2 respondents**

No – **31 respondents**

Don't know – **11 respondents**



Reasons for response for annual self-funders fee

As self funders are already saving the council £1000s it is too much to charge even more. It is important to understand the stress involved in self-funding - having to make an assessment of whether or not the person is likely to live longer than they are able to fund.

Sensible.

Would impact financially on self-funders only. Unfair to have flat fee for self-funders only if it was implemented. Adjustment should be made for level of care based upon usage with cap in place.

It makes care more expensive

Self funders already pay enough. The charge should apply, to those who get everything else for free, not just self funders.

Surely all should pay the same.



Other ways of Walsall Council covering the cost of supporting people to arrange their own care and support

Costs could be reduced by directing care agencies to bill self funders directly

Assess circumstances, hardship its not everyone fits all.

Look at finances and if possible find the money from elsewhere

A small increase in council taxes, shared by the community to support vulnerable. Also more, effective and efficient administration- there should be negligible administration costs..

Setting up care arrangements for new clients one off fee.

Be more structured in budgets

Would not object to paying a lower annual fee

Take the money from what self funders pay. I am sure the £300 could be paid out of the money they pay.

Collect unpaid council tax and better allocation of what self-funders have paid in for may years prior



Other ways of Walsall Council covering the cost of supporting people to arrange their own care and support continued

This should be funded via national insurance or tax payments (PAYE)

Self-funders could be billed and pay direct to care provider once established. Eliminating any management of care by Walsall council

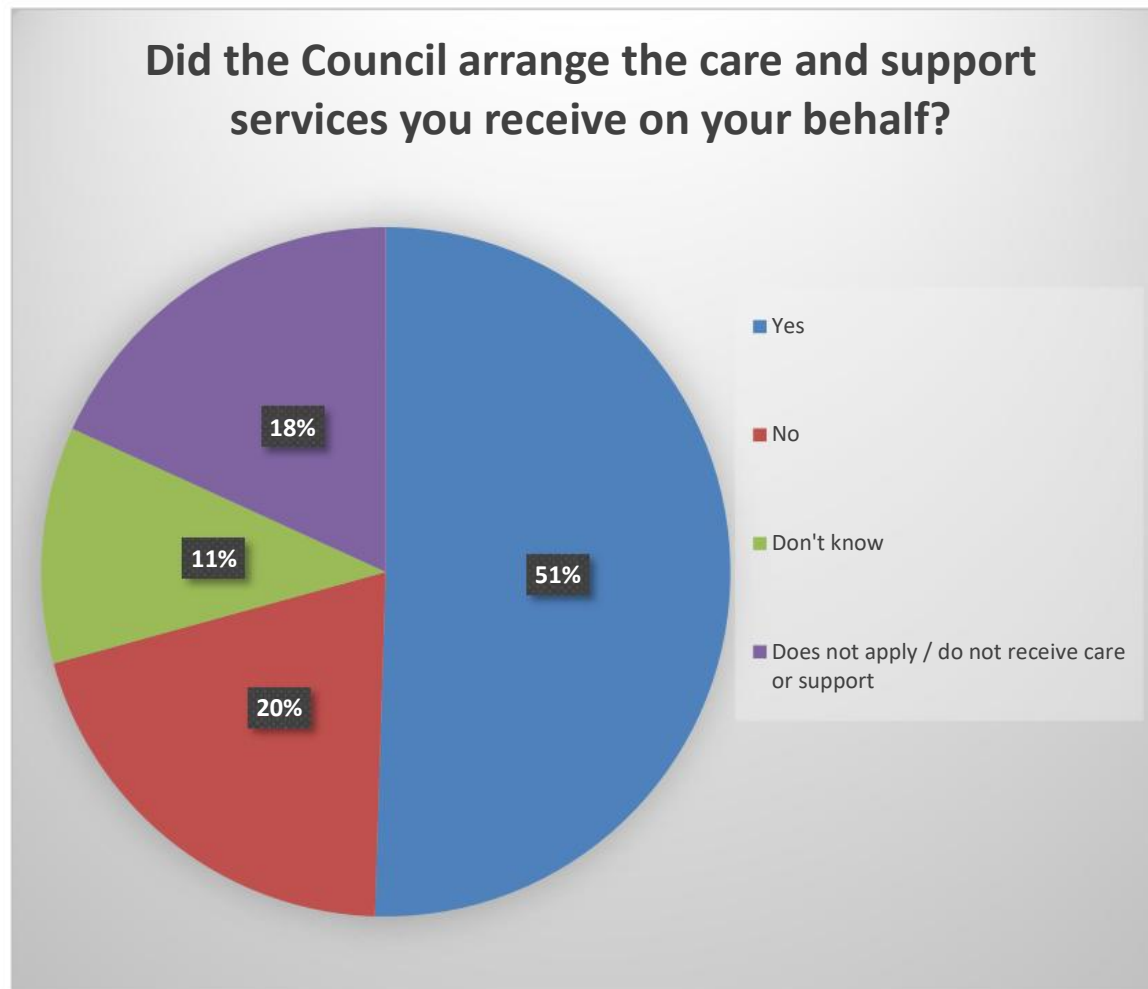
Press Government

Make savings back office end and upskill staff to be more proficient

Giving extra support to the family



Existing Support



Majority of respondents had their care arranged by the Council.

Yes – **22 respondents**

No – **9 respondents**

Don't know – **5 respondents**

Does not apply / do not receive care or support – **8 respondents**

How, if at all, would the introduction of fees for the setup and management of care impact you?

Make paying bills difficult

Will need to the cut package down

A reduction in savings & income

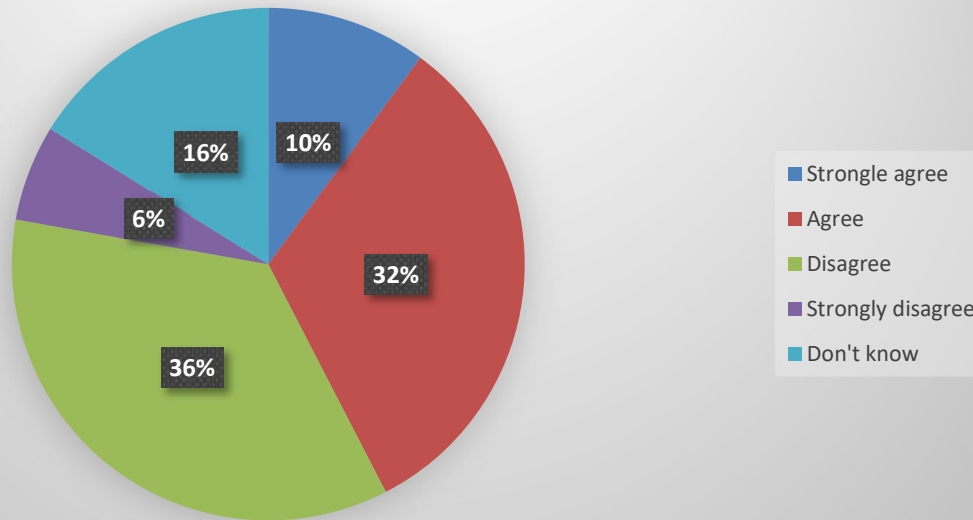
Just means marginal self-funders will slip into social care funded all the quicker. Social care funded customers may have also received council tax rebates for years. Unfair level of care for the borough's elderly - effectively same people pay twice.

It puts the family under a lot of pressure when funds are just over the limit set. Information hard to come by, help is hard to find



Understanding the Policy Document

To what extent do you agree or disagree that the proposed charging policy is easy to understand?



There is a 50% split between respondents agreeing & disagreeing that the policy is easy to understand.

Strongly agree – 3 respondents

Agree – 10 respondents

Disagree – 11 respondents

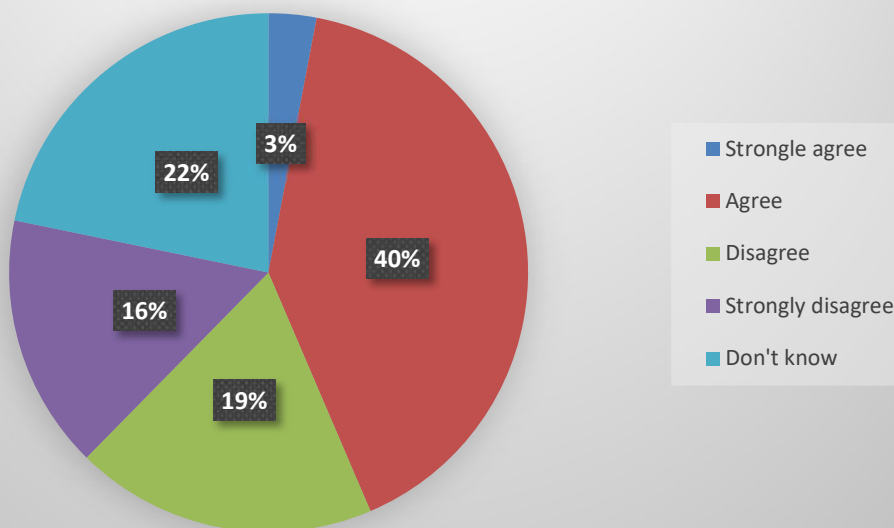
Strongly disagree – 2 respondents

Don't know – 5 respondents



Transparency of the Policy Document

To what extent do you agree or disagree that the proposed charging policy is transparent?



Majority of respondents agree that the policy is transparent.

Strongly agree – **1 respondent**

Agree – **13 respondents**

Disagree – **6 respondents**

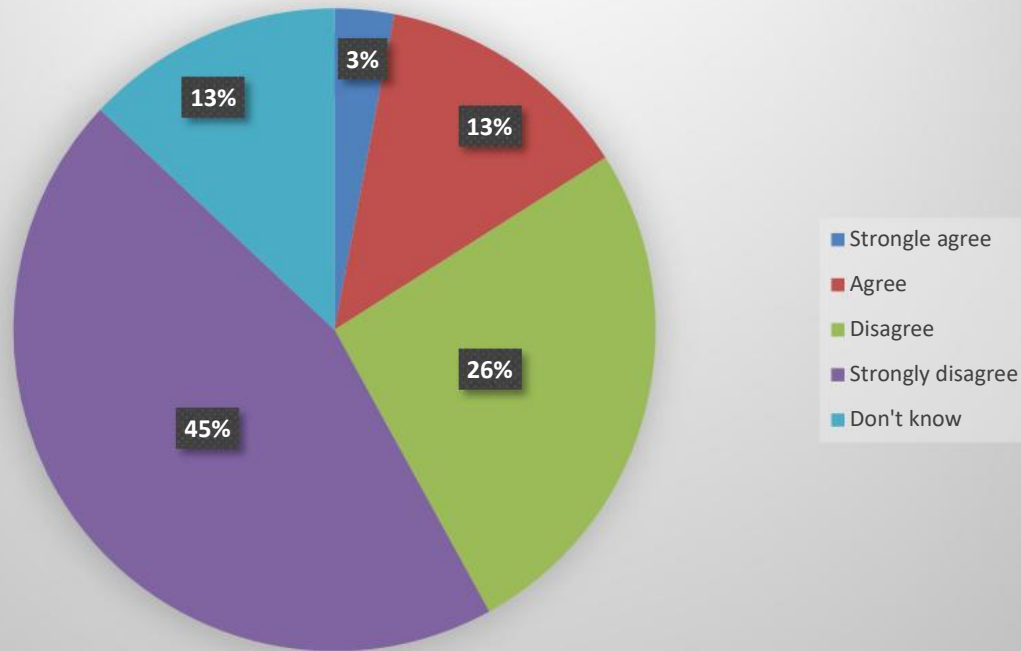
Strongly disagree – **5 respondents**

Don't know – **7 respondents**



Fairness of the Policy Document

To what extent do you agree or disagree that the proposed charging policy is fair?



Majority of respondents disagree that the policy is fair.

Strongly agree – **1 respondent**

Agree – **4 respondents**

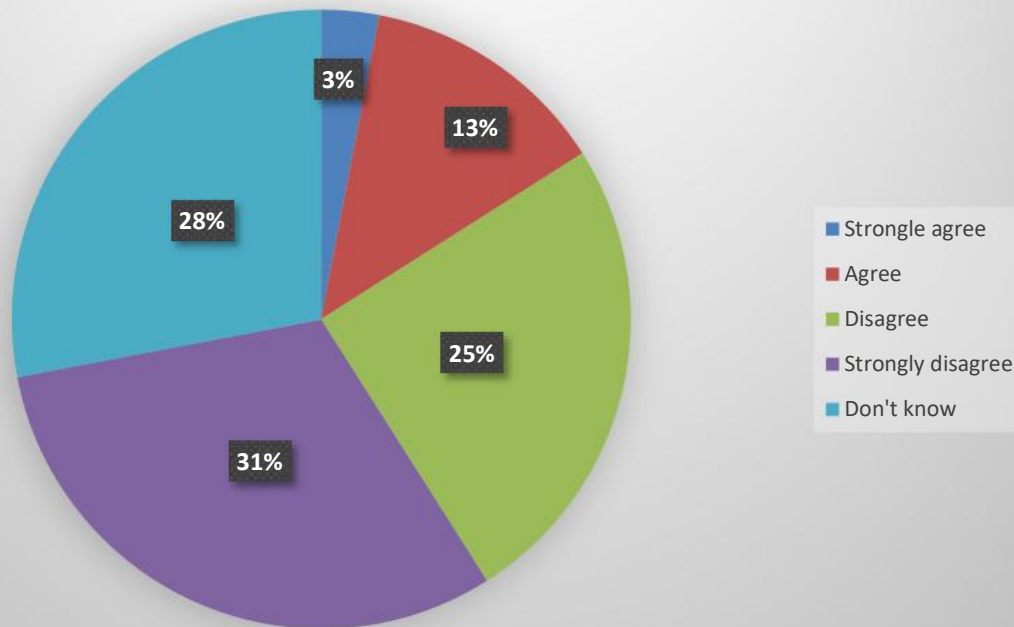
Disagree – **8 respondents**

Strongly disagree – **14 respondents**

Don't know – **4 respondents**

Fit for Purpose Policy Document

To what extent do you agree or disagree that the proposed charging policy is fit for purpose?



Majority of respondents disagree that the policy is fit for purpose.

Strongly agree – **1 respondent**

Agree – **4 respondents**

Disagree – **8 respondents**

Strongly disagree – **10 respondents**

Don't know – **9 respondents**



Do you have any other comments on the draft Adult Social Care charging policy overall?

Certain people should not be charged full stop. many truly disabled people have never worked and support themselves and require all the support they can get. there are far too many people claiming benefits who have zero entitlement

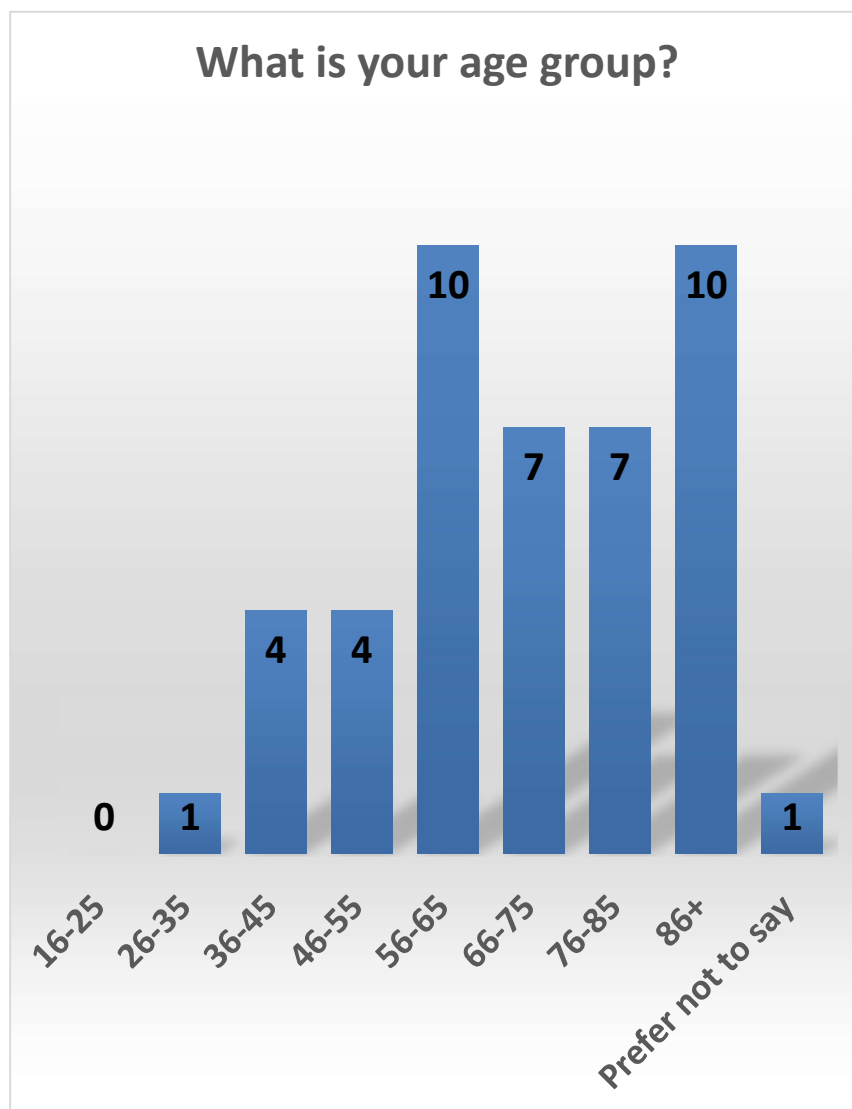
Will not pay for annual fees, no need for support will look for care ourselves from other company's

People to be treated individually. Circumstances and hardship differs in all cases

It is not clear what the admin costs are supposed to be covering



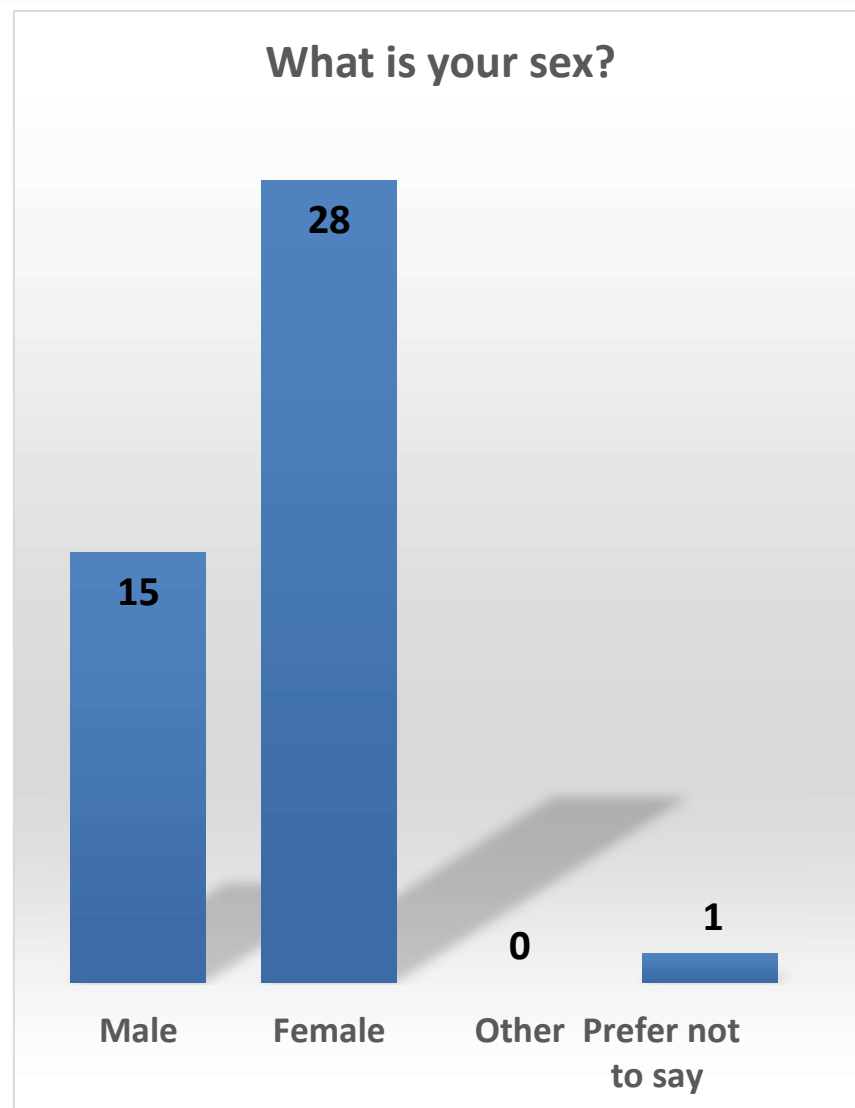
Respondent demographics



The highest respondents were aged between 55-65 & 86+. This supports the trend in Walsall's age demographic, highlighted within the Equality Impact Assessment, relating to those in receipt of Walsall's Adult Social Care services.



Respondent demographics

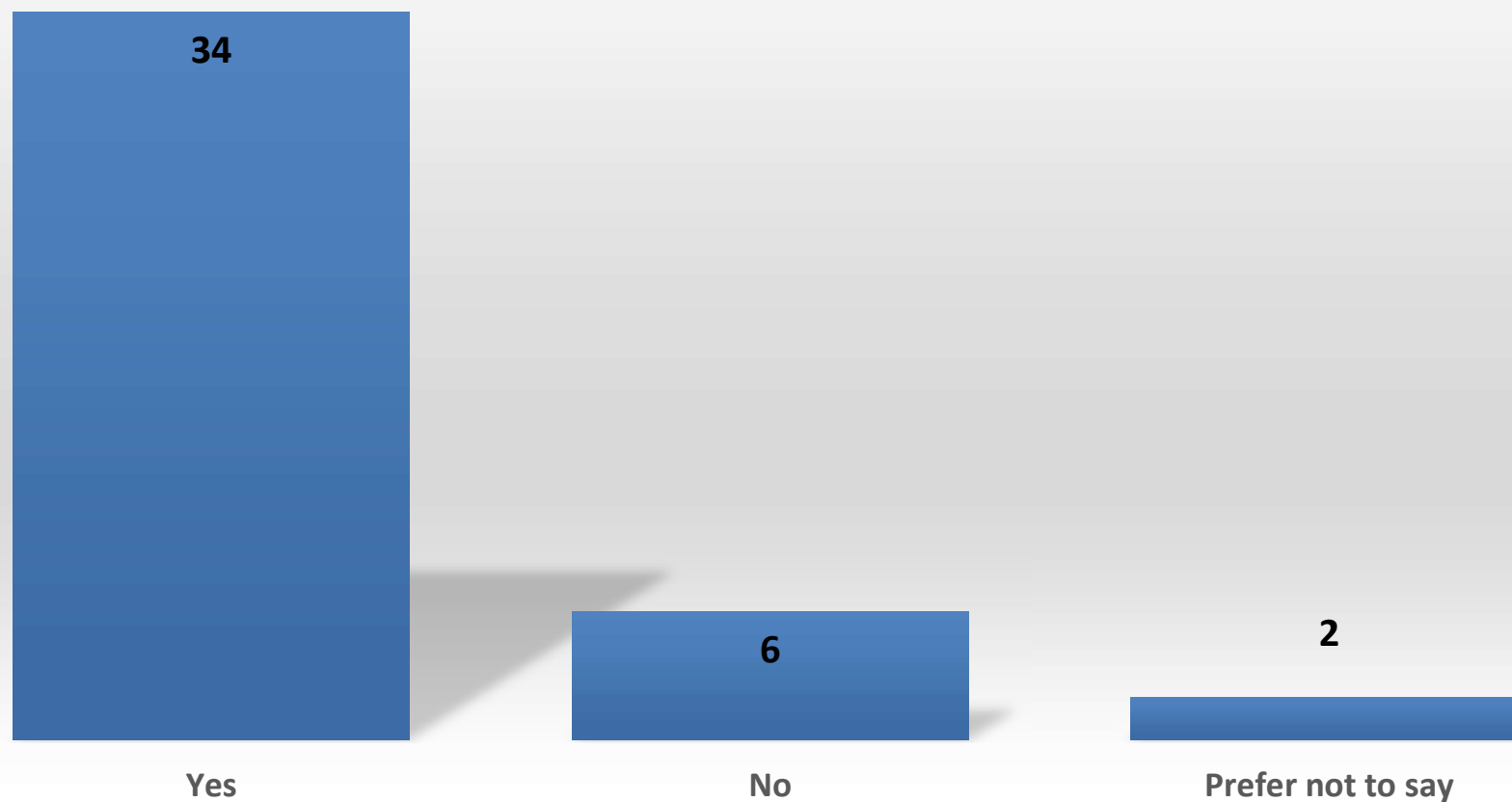


The highest number of respondents were female. This supports the trend in Walsall's gender demographic, highlighted within the Equality Impact Assessments, relating to those in receipt of Walsall's Adult Social Care services.



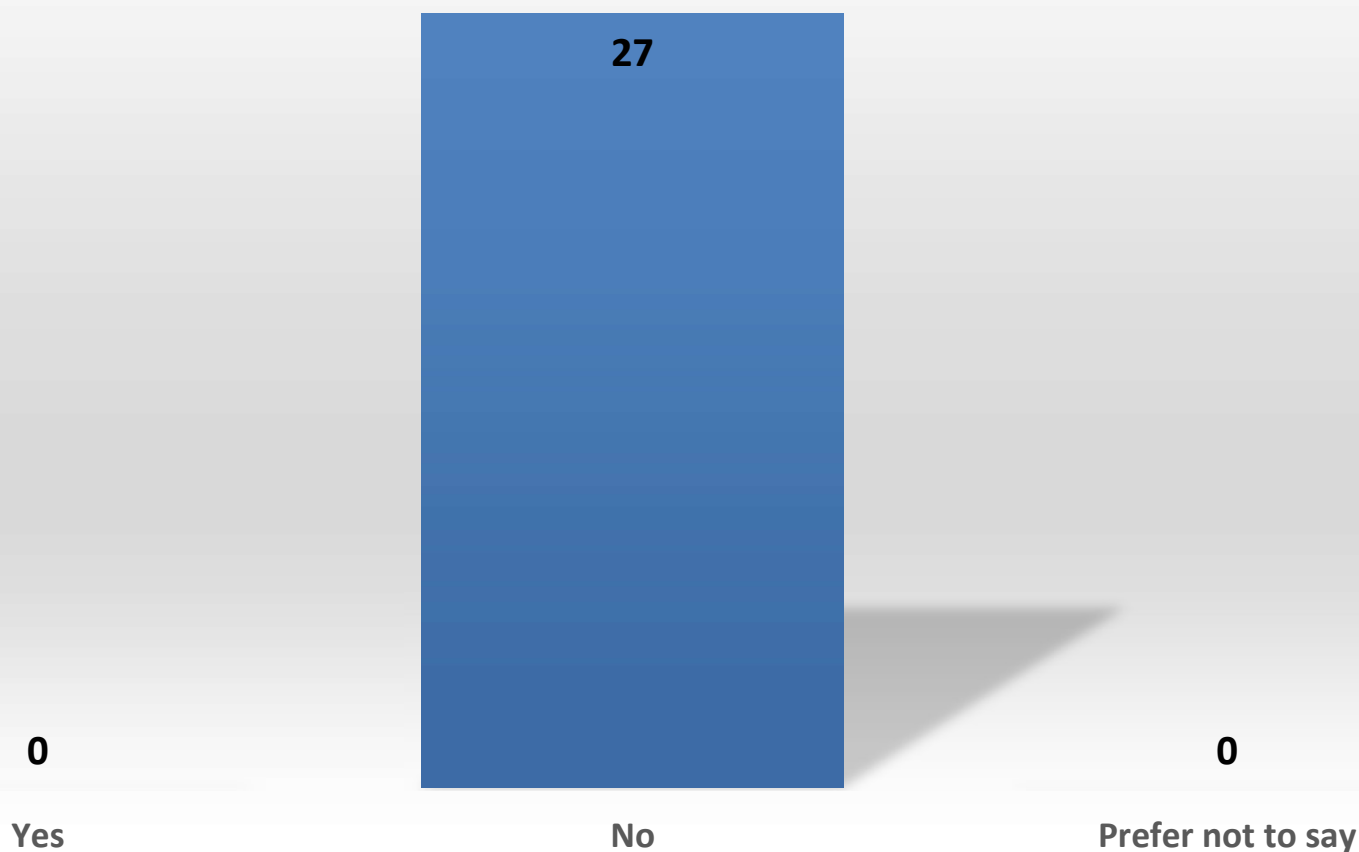
Respondent demographics

Is your gender identity the same as the gender you were assigned at birth?



Respondent demographics

Are you currently pregnant or providing care for a baby up to 26 weeks old?



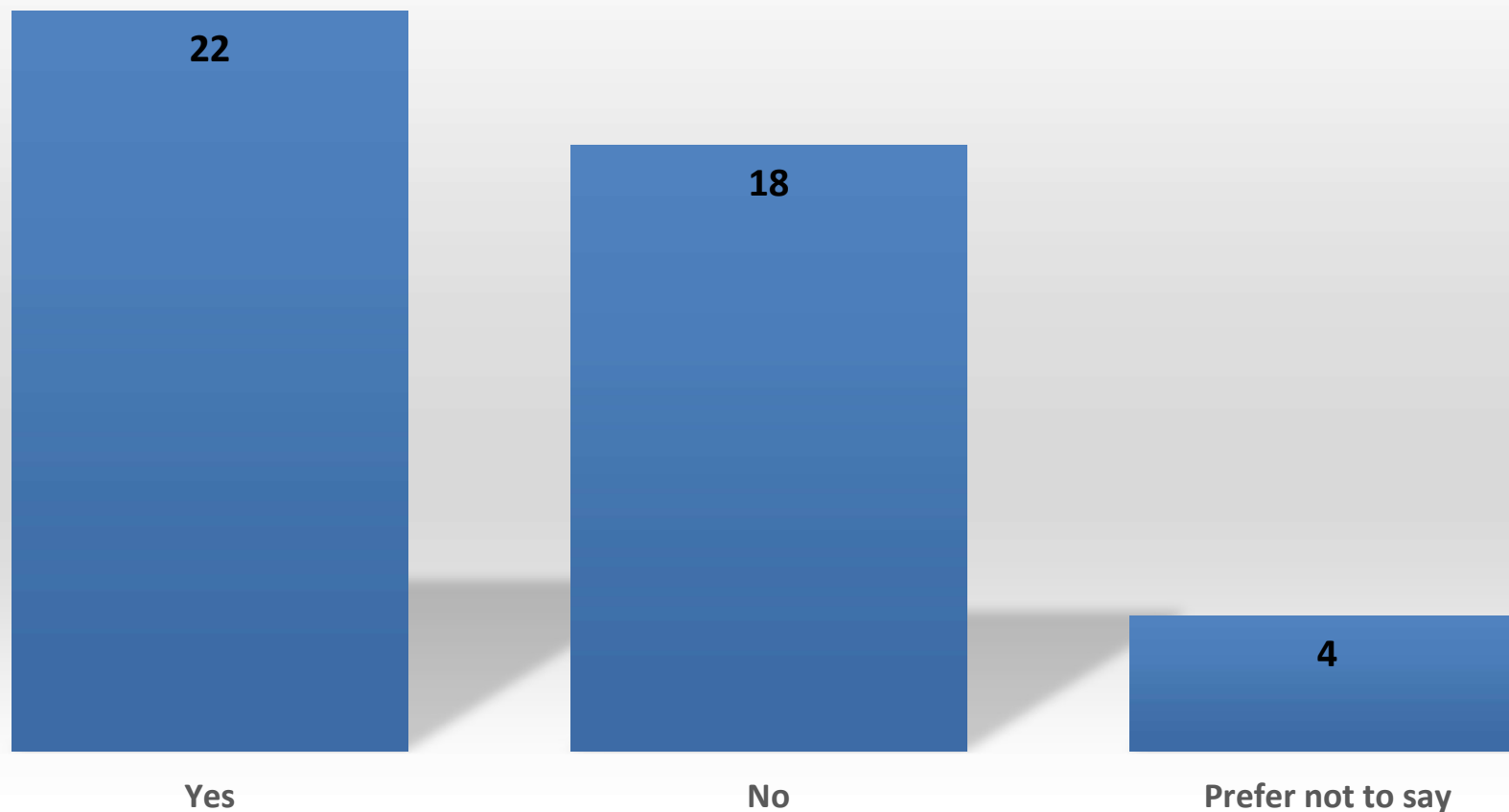
Respondent demographics

Which of the following options best describes how you think of yourself?



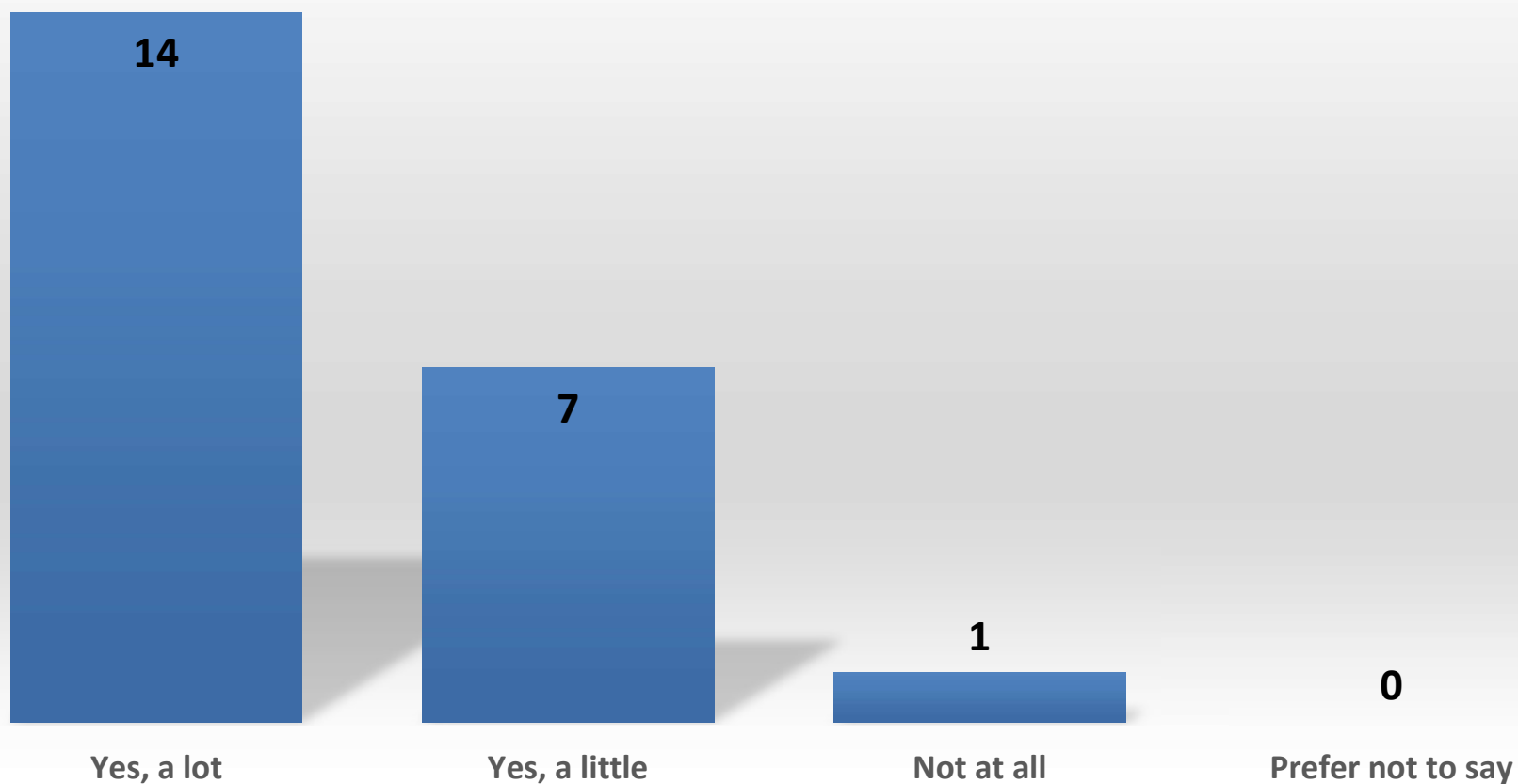
Respondent demographics

Do you have any physical or mental health conditions or illnesses lasting or expected to last 12 months or more?



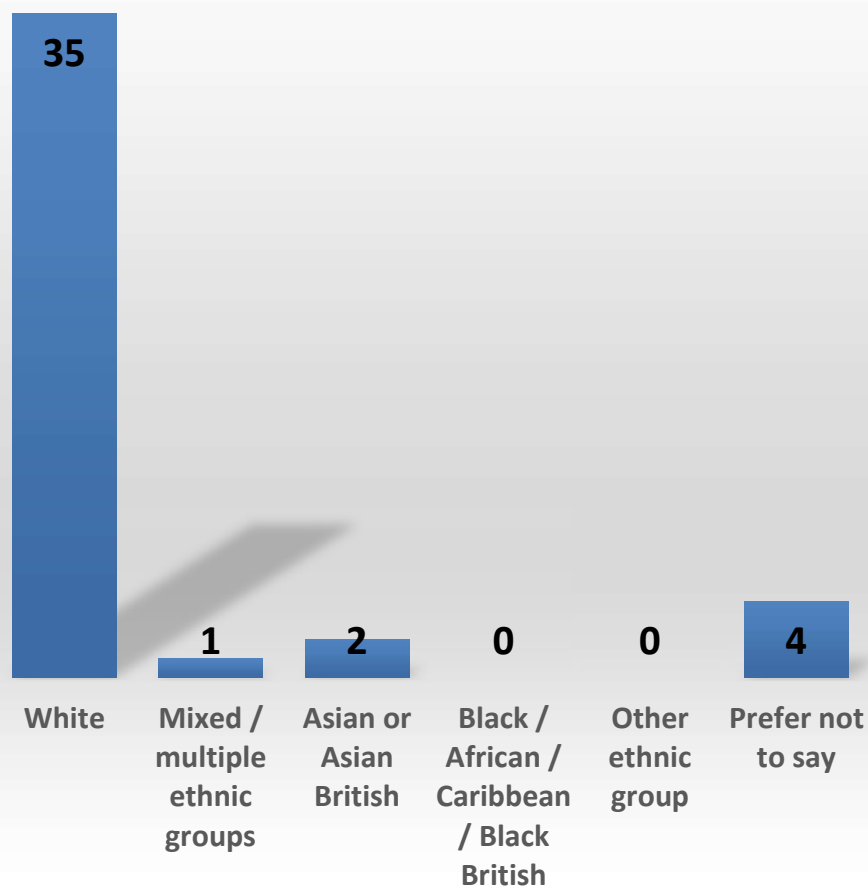
Respondent demographics

Does your condition or illness / do any of your conditions or illnesses reduce your ability to carry out day-to-day activities?



Respondent demographics

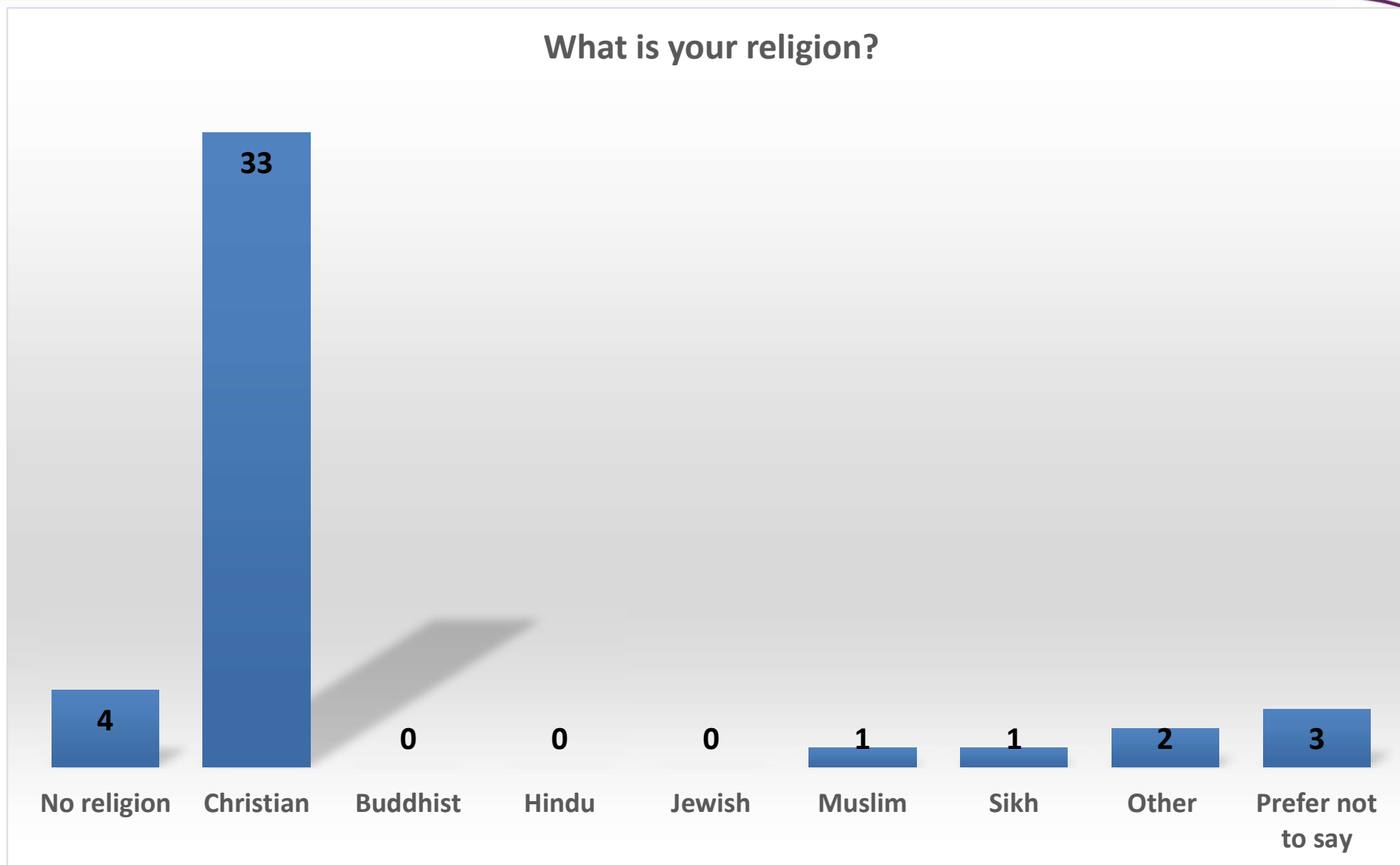
What is your ethnic group?



The highest number of respondents were from the white ethnicity group. This supports the trend in Walsall's ethnicity demographic, highlighted within the Equality Impact Assessment, relating to those in receipt of Walsall's Adult Social Care services.



Respondent demographics



Respondent demographics

What is your marital status?

Never married and never registered in a civil partnership	5
Married	16
In a registered civil partnership	0
Separated, but still legally married	0
Separated, but still legally in a civil partnership	0
Divorced	3
Formerly in a civil partnership which is now legally dissolved	0
Widowed	14
Surviving partner from a registered civil partnership	0
Other	1
Prefer not to say	4



Cabinet – December 15 2021

Adult Social Care Charging Policy

Portfolio: Councillor Keir Pedley

Related portfolios: All

Service: Adult Social Care

Wards: All

Key decision: Yes

Forward plan: Yes

1. Aim

- 1.1 To present proposals for a public consultation on the new Adult Social Care charging policy for Walsall and to gain approval to launch the public consultation necessary to inform the content of the final policy.
- 1.2 The draft policy has been produced to comply with the Care Act 2014 and aims to provide clear, transparent, and consistent guidance on Adult Social Care charging for Residential and Community Care services.

2. Summary

- 2.1. Changes to the Walsall Adult Social Care Charging Policy are necessary in order to ensure that charges to individuals in receipt of Adult Social Care services are equitable and to maximise the amount of income that the council can realise whilst ensuring the principle of “people paying what they can afford” is adhered to. Residents receiving residential services are charged according to national guidance. For people who receive services to support them at home, the Council is able to make some choices about the way they decide to charge. This is explained in the Adult Social Care Charging Policy.
- 2.2. The proposed changes will enable timely collection of service user contributions and ensure that everyone is treated equally, currently there are sometimes delays to the collection of income because financial assessment forms are returned late by the customer. This can result in sporadic collection of income and difficulties in applying the policy as the expectation is that the person pays once we have received the form and the Council has assessed their contribution. In some cases, receipt of forms has been months after care has commenced and this makes backdated collection difficult.

- 2.3. The changes to the policy will also introduce a charge for arranging support for people who fund their own care. Currently, the Council incurs costs as it utilises its own resources to arrange this. Councils are permitted to charge for this as set out in national guidance.
- 2.4. It is considered, subject to consultation, that the proposed changes to the Policy are an appropriate way for the Council to respond. They have been developed on the basis that individuals who have been assessed as being required to make a financial contribution to the cost of providing them with services should make that contribution and that the operation of the charging policy should be clear, fair and efficient. The proposed changes are considered to be proportionate and lawful and bring this Council in line with other Councils. The guiding principle is that if people can afford to pay towards their care then they should do so.
- 2.5. Proposal 1 identified in the report, if approved, will have an impact on all service users. In order to be consistent and fair for all residents, the new policy will charge all Community based clients from day 15 of commencement of care. Completed financial assessment forms also known as 'data capture forms' will need to be returned back to the Council by service users within 14 days of care commencing. Returned forms will need to be accompanied with supporting documents, such as copies of bank statements, proof of income and outgoings. However, service users who do not return their financial assessment form within 14 days will be charged the full cost of the services they receive, unless they have provided written evidence of extenuating circumstances.
- 2.6. Proposal 2 identified in the report, if approved, will have impact on service users who are known as self-funders. A self-funder is an individual who organises or funds their care in residential or community settings and have income and savings above £23,250, as opposed to receiving financial support from the local authority or another third party. Proposal 2 is only relevant to self-funders within a community care setting. The proposed change will implement a charge to cover the Councils costs in arranging support for those individuals. It is important to note that no individual would ever be asked to contribute more than they can afford to pay towards the cost of their care. The legal framework for charging is set out in the Care Act 2014, sections 14 and 17. The Council cannot charge more than the cost that it incurs in meeting the assessed needs of the person.

3. Recommendations

- 3.1. That Cabinet approves the commencement of a public consultation on the draft Adult Social Care Charging Policy for Walsall as set out in **Appendix 1** to this report.
- 3.2. That Cabinet agrees to commence consultation on the proposed changes to the Adult Social Care Charging Policy and that the consultation seeks to gather feedback on proposals to amend the current charging policy and most substantively to set a fee for the arrangement of brokerage services which will be paid on each occasion a self-funding service user requests the Council arrange a care package for them. If approved, and subject to consultation, it is proposed that the arrangement fee will be introduced from May 2022.

- 3.3. That following consultation, Cabinet delegates to the Executive Director of Adult Social Care, in conjunction with the Portfolio Holder for Adult Social Care, authority to make appropriate changes to the Adult Social Care Policy by way of updating and bringing the Policy in line with current legislation, regulations and guidance.
- 3.4. That Cabinet note that further changes are envisaged for the Adult Social Care Charging Policy due to imminent national policy changes aimed at the health and social care sector, which will result in a further submission of a report to Cabinet during 2023 to reflect the impact of these changes to residents and alignment of residential and community care charging to the Local Authority Circular.

4. Report detail - Know

- 4.1. The existing Community Care policy was agreed by the Council in 2017. It is good practice to review policies regularly and to make sure they are up to date, clear and easy to understand. An internal review of the Adult Social Care Charging Policy was carried out August 2021 to November 2021. The review has identified a number of potential changes to the Policy, and it would be appropriate for the Council to carry out a public consultation in advance of deciding whether to implement these changes. This report sets out the background to the review and the rationale for those changes on which it is proposed to consult and seeks approval to go out to public consultation.

Context

- 4.2. As well as significant reductions in funding the Council has to respond to increases in demand for its services. There are increasing demands on health and social care services with life expectancy rising for both men and women.
- 4.3. The number of people aged 65 and over is projected to grow by 20.4% over 10 years and by nearly 60% over 25 years in England.
- 4.4. Walsall is expected to see continued and consistent population growth, projected to increase by 7% to an estimated 304,400 by 2030 and further by 13% to an estimated 320,400 by 2040 (2020 ONS, 2018-based projections). The largest increases are expected to be seen within older age groups; the population over 65 years of age will increase their share of the population from approximately 18% to 20% by 2040.
- 4.5. Adult Social Care supported approximately 4,201 clients during April 2020 to March 2021 the majority of these service user clients were over 65 years of age.
- 4.6. 2167 service users were in a receipt of a long-term community care service as at 30/09/2021, of which 170 are marked as full cost (self-funders). 835 service users were in a long-term placement as at 30/09/2021, of which 71 are marked as full cost. *NB: service users marked as full cost on Mosaic can include those people for which we have not yet received a completed financial assessment form.*
- 4.7. People are living longer with complex needs; there are increasing numbers of people living with co-morbidities, an increased number of people living at home with dementia and more people who choose to receive end of life care in their own home.

- 4.8. As funding decreases and demand in areas like Adult Social Care increase, the ability of the Council to fund other areas of activity reduces. The cost of Adult Social Care services cannot therefore be divorced from its impacts on the Council's ability to respond to other needs and pressures in other directorate areas.
- 4.9. It is imperative in those circumstances that the Council reviews opportunities to generate additional income to offset the cost of providing services. In particular it is important to review its policies in relation to contributions for Adult Social Care services so that service users (people receiving services paid for by the Council after their needs have been assessed) are paying appropriate amounts towards their own care. Such contributions from service users are already an important part of income in the Council's Adult Social Care budget.

The Policy and its Review

- 4.10. The Policy under consideration is the Adult Social Care Charging Policy for Residential, Nursing and Community Care services. The Policy governs those areas of discretion where the Council can influence the way in which and the amounts that service users are charged for non-residential care services.
- 4.11. This Policy is governed by the Care Act 2014, the Care and Support (Charging and Assessment of Resources) Regulations 2014 and the detailed Statutory Guidance on Charging and Financial Assessment. This detailed legal background lays down a number of rules for the calculation of service user contributions that the Council must follow. Within this framework, however, the Council has a degree of discretion as to how it operates the charging framework.
- 4.12. Council officers have been guided by a number of aims. Firstly, to ensure that the Policy is up to date with the latest law and guidance and reflects conscious decisions concerning those matters that the guidance urges Councils to consider. Secondly, to identify areas where the operation of the Policy could be made administratively less burdensome for the service users and the Council, fairer, more equitable and more consistent. Thirdly, to identify areas where amendments to the Policy would potentially increase the Council's income from contributions by service users to the cost of their care. The review has resulted in two types of changes:-
- General changes to update the policy that do not require consultation; and
 - Significant changes with impacts on service users which require consultation prior to any decision to implement being made.
- 4.13. Operational effectiveness of the financial assessment process is simultaneously being reviewed alongside this review.

Proposal 1 - To introduce a new rule about when people are expected to start paying their contribution

- 4.14. The current Community Care Charging Policy states that contributions for community services apply from the date the service user is told of the outcome of their financial assessment.

- 4.15. Under the Care Act councils are entitled to charge and ask service users to pay contributions, from commencement of care.
- 4.16. It is therefore proposed that residents in receipt of Community Care will be charged from day 15 of care commencing. To allow sufficient time to gather evidence and complete their financial assessment form.
- 4.17. Residents will continue to be expected to return their financial assessment form, also known as 'data capture form' back to the Council within 14 days of receipt of the form. This is particularly important, if their care has already commenced, prior to receiving the financial assessment form. Returned forms will need to be accompanied with copies of supporting documents, such as bank statements, proof of income and outgoings.
- 4.18. In certain circumstances, people may have longer than 14 days to return their form (for example if their care doesn't start immediately). However, in all instances the financial assessment form must be returned within 14 days of care commencing and ideally sooner.
- 4.19. Residents who do not return their financial assessment form within the specified time-frame (within 14 days) will result in the resident being charged full cost of the services they receive unless they have provided written evidence of extenuating circumstances
- 4.20. Where the form is not returned and it is clear that there is no intention to provide the information, legally that person will be treated by the Council as someone who has to pay the full cost of the services they receive. The full cost contribution will be charged from day 15.
- 4.21. The Council is proposing this policy change so that service users are treated equally and can be clear about what happens if financial information is not returned quickly.

Proposal 2 - To introduce an administration fee to cover the cost of arranging services for people who have savings and/or assets over the capital limits (ie self-funders)

- 4.22. Regulations made under the Care Act 2014 give the council a power to charge what is known as an 'arrangement fee' for providing support to set up a service for someone who would be liable to fully fund their own care. The regulations state that arrangement fees charged by the council must cover only the costs that are actually incurred in arranging the care. Arrangement fees should take account of the cost of negotiating and/or managing the contract with a provider. It may also cover any administration costs. This is a service Walsall Council currently provides free of charge but will align to wider council practice in place across England.
- 4.23. However, any such fee must not be higher than the cost the local authority has incurred in arranging that care and support. Currently Walsall Council does not charge self-funders for support planning; arranging their care and support or any ongoing costs incurred by the council. In summary therefore, Walsall Council can charge an arrangement fee within the scope of the Care and Support Statutory

Guidance provided the self-funder has specifically requested that Walsall Council provide the relevant care and support service on their behalf.

- 4.24. The council proposes to introduce fees for self-funding clients who specifically ask the council to arrange for care and support to be put into place on their behalf for non-residential care services (See Table 1). It is important to note that no individual would ever be asked to contribute more than they can afford to pay towards the cost of their care.
- 4.25. The impact of any future charging will be monitored and reviewed annually. The charge will help recoup the costs associated with negotiating and/or managing the contract with a provider and cover any administration costs incurred.
- 4.26. This includes;
- The cost of contacting care providers to arrange care
 - Setting up a contract with the Care Provider
 - This proposal would mean that the council would recoup all of the costs it currently spends on helping those who are not eligible for council funding as self-funding clients.

- 4.27. Table 1: Proposed Fees and Charges for Self-Funders 2022/23

Type of Fee / Charge	Rate/Amount
Administration fee for setting up care arrangements	£300
Annual fee for ongoing management of care arrangements	£265

- 4.28. The above rate/amount is based on internal benchmarking undertaken during 2019 comparing a number of local authorities charging approaches. See Appendix 2 for further information.

Council Corporate Plan priorities

- 4.29. This proposal links to the Council's corporate priority 'People have increased independence, improved health and can positively contribute to their communities.'
- 4.30. The principles and actions contained within this report are in full accordance with the Marmot objective enabling all people to maximise their capabilities and have control over their lives.

Risk management

- 4.31. There is a risk that some customers, carers, residents and groups will experience a level of anxiety or uncertainty about the areas to be consulted on, particularly in relation to decisions about changes to the charging policy. Consequently, there may be further reputational and financial risks associated with this. This could

occur both during the consultation, as well as following the implementation of the Act.

4.32. Walsall Council will seek to mitigate these risks by:

- Designing and communicating the consultation in a way that encourages contributions and concerns to be raised through that medium rather than through complaints.
- Carefully explaining the implications of the changes, in the context of reducing public finances and the expectation that all the community's needs will be met.

Financial implications

4.33. The introduction of arrangement fees for self-funders will result in additional income within Adult Social Care. It is estimated that the additional income that will be received, resulting from the implementation of the new charges to self-funders will be £53,830, based upon activity over the last two financial years.

Legal implications

4.34. The legislative framework which governs the contents of these policies is dominated by the Care Act 2014 which, together with the related statutory instruments and regulations, provides a single framework for charging for care and support. Section 14 of the Act affords local authorities the power to charge individuals in receipt of care and support services, for these services where the local authority is permitted to charge. The same Section also provides the power to charge for services meeting carers' needs, by providing services directly to the carer. There are also certain types of care and support which Local Authorities are not permitted to charge for.

Procurement Implications/Social Value

4.35. There are no procurement implications arising out this report.

Property implications

4.36. There are no property implications arising out this report.

Health and wellbeing implications

4.37. The Council will take into consideration the mental capacity of clients and residents as well as any illness or condition they may have, when communicating with them. In line with the Care Act 2014, and the principles set out in the Mental Capacity Act 2005, the Council will assume that clients, residents will have mental capacity and can make decisions for themselves unless it is established otherwise, in which case appropriate support will be identified. The Council is in the process of re-modelling their wellbeing services, which will provide additional support around financial wellbeing and benefit maximisation.

Staffing implications

- 4.38. There are no staffing implications arising out of this report. However, activity is currently underway to improve the financial assessment 'end to end' process, digitise processes, improve operational efficiencies which will result in the re-alignment of roles, responsibilities, activity, and potentially resources. Any envisaged changes will be undertaken in accordance with the Council's HR policies and procedures.

Reducing Inequalities

- 4.39. The consultation will be undertaken in a way that will allow the contribution of people with protected characteristics, particularly those who are likely to be disproportionately affected by the provisions of the Act, i.e., older people and people with disability, although all people with protected characteristics will be invited to participate.
- 4.40. The consultation will take specific account of the need to involve under-represented groups, such as minority and ethnic communities and any barriers to participation will be removed wherever possible.
- 4.41. An Equality Impact Report has been undertaken and is in Appendix 3.

Climate Change

- 4.42. There are no climate change implications arising out of this report.

Consultation

- 4.43. Consultation will primarily be designed to gather the views of those directly and indirectly affected by the draft proposal. Self-funders as well as all other service users in receipt of care will be invited to have their say via a questionnaire sent to them/their nominated person.
- 4.44. In addition, anyone will be able to have their say through an open questionnaire hosted online and key stakeholders will also be contacted and invited to respond. So that as many people as possible have the opportunity to have their say, the consultation will be widely publicised through a range of channels including social media and existing local networks.
- 4.45. To elicit meaningful comment, a wide range of supporting information will be published online for anyone to access. Easy read versions as well as alternative formats will be made available online and on request.
- 4.46. The key timelines for the delivery of the consultation process are as follows:
- Consultation commences on **4th January 2022** and closes on **1st March 2022 (8 weeks)**.
 - Council analysis of consultation responses and outcomes **1st March to 18th March 2022**
 - Final report completed **21st March 2022**
 - Report **20th April 2022**

Joint Strategic Needs Assessment (JSNA)

4.47. The Council must take into account the JSNA when exercising its functions.

4.48. The JSNA for Walsall is an overarching needs assessment. A wide range of data and information was reviewed to identify key issues for the population to be used in planning, commissioning and providing programmes and services to meet identified needs:-

- Promoting healthier lifestyles
- Improving the health and wellbeing of older people
- Delivering high quality systematic care for major causes of ill health and disability
- Improving health and social outcomes and reducing inequalities for children
- Tackling the social determinants of health

4.49. The proposals for consultation in this report are considered to provide a fair and proportionate way of determining the contributions service users should be expected to make to the cost of the Council meeting their needs. In supporting the sustainability of the Council's services the proposals as well as the services they underpin support the theme of improving the health and wellbeing of older people in Walsall. This issue will be addressed again however in the light of the consultation feedback.

5. Decide

Option 1 - Not to consult to vary the policy

5.1. The Council could maintain the current policy (2017 version), but this may lead to criticism from the Local Government and Social Care Ombudsman if someone suffers an injustice as a result of the policy failing to reflect the statutory guidance or best practice currently in force.

5.2. Opportunities to increase the income of the Council will not have been considered leading to potential increased pressure to make savings from Adult Social Care and other directorate budgets. Opportunities will be lost to consider ways to introduce greater equity and fairness into the operation of the charging regime.

5.3. This option is not recommended.

Option 2 - Commence consultation to vary the policy

5.4. The Council can consider findings from the consultation and seek to revise the policy ensuring that it reflects best practice, law and guidance currently in force.

5.5. If approved the introduction of arrangement fees for self-funders would align to wider council practice in place across England and consequently will introduce income that can be re-invested back into Adult Social Care services to support the delivery of care and support services to the most vulnerable client groups.

5.6. The proposals are considered to be appropriate revisions to the policy, subject to consultation, increases fairness while ensuring that service users make appropriate contribution to the cost of their care thereby relieving pressure on Adult Care and other Council budgets.

5.7. This option is recommended.

6. Respond

6.1. Cabinet is asked to approve the commencement of consultation of the ASC Charging Policy, which is attached as Appendix 1.

7. Review

Responses received from the consultation process will be monitored regularly and will be presented in a report to Cabinet.

Background papers none

Appendices:

Appendix 1 – Draft Adult Social Care Charging Policy

Appendix 2 – Self-funders benchmarking against other local authorities

Appendix 3 – Equality Impact Assessment

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Kerrie Allward
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Adult Social Care, Public Health and Hub

7 December 2021



Councillor Keir Pedley
Portfolio Holder
Adult Social Care

7 December 2021

Cabinet – 22 June 2022

Housing Renewal Assistance Policy

Portfolio:	Councillor Ali
Service:	Money Home Job, Childrens Services
Wards:	Borough Wide
Key decision:	Yes
Forward plan:	Yes

1. Aim

To ensure that the council can assist residents with a range of property related grants (including Disabled Facility Grants) to improve the condition, accessibility and energy efficiency of dwellings in the borough.

2. Summary

- 2.1 The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 gave local authorities a discretionary power to provide assistance for housing renewal in a number of ways through a Housing Renewal Assistance Policy. The Council is required to produce and publish a policy and this report describes and seeks approval for the new Housing Renewal Assistance Policy ('the Policy') for 2022 to 31 December 2025
- 2.2 Major improvements have been secured to the fabric of thousands of homes in the borough, extending their life span, removing hazards that can seriously injure or kill residents and adapt them for the resident's needs. The council continues to bid and be successful in securing external funds to help with capital works of improvement to residents homes within the borough and this Policy will help with the delivery of the same. The Policy considers the limited resources available for private sector housing works and targets those resources to people most in need and to meet local priorities in line with the adopted Housing Strategy and Home Energy Conservation Act (HECA) Action Plan.
- 2.3 This is a key decision because this Policy and the grants provided via it will have a significant effect on two or more wards.

3. Recommendations

- 3.1 Cabinet is recommended to request Council to adopt and publish the Housing Renewal Assistance Policy 2022-25 as contained in Appendix A of this report with the commencement dates as listed in the Policy document.

4.1 Report detail - know

Context

- 4.1.1 The Council has statutory powers to offer advice and discretionary financial assistance to owner occupiers, tenants and private sector landlords to improve the quality and availability of housing. Where there is a disabled person in a household, in many circumstances local authorities have a mandatory duty to offer a Disabled Facility Grant (DFG) to assist with the cost of adaptation work.
- 4.1.2 As resources are limited and there is substantial demand, especially for mandatory DFGs, it is essential to ensure that financial assistance is offered on a fair, priority basis that takes account of competing needs. The funds for the DFG provided by government form part of the Better Care Fund.
- 4.1.3 The responsibility to maintain private property rests firmly with the owner, but the condition and availability of private sector housing stock does have substantial implications for this Council's Housing Strategy, especially in terms of access to affordable housing.
- 4.1.4 The proposed Policy for 2022- 2025 is contained in **Appendix A** of this report. The Policy links with national, regional and local strategic priorities. It aims to offer assistance to vulnerable households on an individual basis to help sustain the private sector for long term public benefit.

Excellent track record

- 4.1.5 The Council has an excellent track record of securing external funding for a variety of housing initiatives and based on the above the following priorities have been set out using identified funding sources:

Table 1

Priority	Area of work	Funded by (where available)
1	Mandatory Disabled Facilities Grant	Government annual allocation currently as part of the Better Care Fund allocation
2	Aids and adaptations including, 'inflationary allowance', 'exceptional top-up' assistance, low cost adaptation grants, Handyperson Service, Walsall Society for Blind referral scheme, relocation grants, palliative assistance, hospital discharge scheme.	Council capital resources and external loan and grant funds.
3	Address Category 1 hazards under the Housing Health and Safety Rating System.	Council capital resources External loan and grant funds. As at 2022 there is no funding available for this except via statutory enforcement.
4	Create decent private sector homes reducing deaths and hospital admissions due to cold / damp properties.	
5	Reduce fuel poverty and CO2 emissions from heating in dwellings.	External loan and grant funds.

6	Tackling long term empty homes	Council capital resources and external loan and grant funds. As at June 2022 there is no funding available for this except via statutory enforcement.
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Maximising Help via ‘Recycling’ of Funds

- 4.1.6 Since January 2010 Cabinet approved the use of land charges in line with national guidance for statutory DFGs this was expanded in January 2011 to cover a range of other types of assistance where recovery through land charges should take place and the 2022-25 Policy continues this.

4.2 Council Corporate Plan priorities

- 4.2.1 The proposal is in accordance with the:

- a) Housing Strategy (2020-2025), which highlights that the council is committed to improving the condition of homes in the borough;
- b) council's Home Energy Conservation Act (HECA) Action Plan June 2021, which seeks to reduce fuel poverty and tackle domestic carbon emissions.

- 4.2.2 The Policy for consideration and delivery of grants is in line with ‘Our Council Plan 2022-25’ in particular:

Communities: Empower our communities so that they feel they are connected and belong in Walsall, creating safe and healthy places whilst building a strong sense of community.

4.3 Risk management

- 4.3.1 The principal risk relates to the high demand for assistance through mandatory DFGs. This is being mitigated as far as possible through the;

- use of assessment and referral criteria for assessment previously approved by cabinet;
- support for residents as promptly as possible to help reduce the need for more expensive adaptations
- continued council capital support for DFGs and related adaptation works and early help (Handyperson works, minor works);
- use of land charging on DFGs and where possible on other grant schemes.

- 4.3.2 The council continues to lead the way in developing tenders that enable it to:

- provide a range of Agency Grant Services and
- have a detailed up to date schedule of rates (SoR) to which contractor's submitted quotations can be compared.

Both of the above have helped the council ensure that grant offers are reasonable and appropriate and that excessive costs are not paid. This means that the council is able to help more people for the same capital allocations and it helps significantly when competing for external funding.

4.4 Financial implications

- 4.4.1 The grants under the Policy will only be considered and awarded if funding is available. The council will never make financial commitments without budgets being in place.

- 4.4.2 As with previous versions of the Policy this new one ensures that the funds available to support housing renewal in the borough secure maximum benefits and the continuation of land charging for a wide range of projects will help over time to re-circulate funding. It is again proposed that these 'recirculated' funds be directed back to housing renewal in the future.

4.5 *Legal implications*

- 4.5.1 The Regulatory Reform (Housing Assistance) (England & Wales) Order 2002 gives the Council power to offer housing assistance in any form, subject to that power being carried out in accordance with a policy which the Council has adopted and published. It allows Councils to adopt a flexible approach to giving financial help reflecting local circumstances, needs and resources.
- 4.5.2 The legislation for offering Disabled Facilities Grants is set out by the Housing Grants, Construction and Regeneration Act (the Act) 1996, as amended. The Act places a statutory duty on local housing authorities to provide grant aid to people with disabilities (who meet the criteria) for a range of adaptations to their homes.
- 4.5.3 The Localism Act 2011 gives the Council a general power of competence, under which it is able to support sustainable development, incur expenditure and give financial assistance for things such as renewable energy. This power will be used to provide assistance for relevant funding schemes within this Policy.

4.6 *Procurement Implications/Social Value*

- 4.6.1 Where the council delivers, on behalf of applicants, DFGs and related adaptation works or directly manages energy / insulation grants it will do this using organisations secured in compliance with the Public Contracts Regulations 2015 and in compliance with the council's Contract Rules. For example, the council has already tendered for a range of DFG works including installation and maintenance of lifts and hoists to assist residents.
- 4.6.2 All funding will be considered in line with the Policy including applicants providing relevant competitive quotation(s) for the works.

4.7 *Property implications*

- 4.7.1 The council owns a very limited number of dwellings. The housing standards and Improvement service will continue to seek to support and attract external funds to improve this portfolio.

4.8 *Health and wellbeing implications*

- 4.8.1 Funding offered under the Policy will have a direct positive impact on the health and well-being of residents of the borough and in vulnerable households. Works will enable residents to remain living in their home longer, reduce the risk of harm and illness as a result of their housing conditions and directly reduce excess winter deaths and fuel poverty.

4.9 *Staffing implications*

- 4.9.1 The Policy will continue to enable staff to give clear advice and support on housing renewal issues.
- 4.9.2 In line with national best practice the council has for over 10 years had Occupational Therapists (OT) based within the DFG team. This continues to improve the service for customers through closer liaison and reduction in time during the DFG process.

4.10 Reducing Inequalities

- 4.10.1 An Equality Impact Assessment has been produced for this Policy.
- 4.10.2 The Policy promotes the delivery of limited resources to the most vulnerable members of the community including providing significant support for residents with disabilities.
- 4.10.3 Where discretionary assistance is available this has been structured to enable those in greatest financial need to receive the highest but most affordable assistance. The Policy includes a range of schemes to help particular vulnerable groups including but not limited to the direct support for those referred for help from Walsall Society for the Blind and those households covered by the Armed Forces Covenant.

4.11 Climate Change

- 4.11.1 Domestic related carbon emissions have reduced in Walsall from 609 Kt CO in 2009 to 377 Kt CO in 2019 (latest figures) a drop of 38% which mirrors the regional and English reductions. The Policy continues to support households with improving the energy efficiency of their homes and enabling (if resources permit) others to produce their own green energy (solar PV and or air source heat pumps).

4.12 Consultation

- 4.12.1 This Policy is in accordance with the Housing Strategy which benefited from significant consultation prior to its adoption and a copy of the adopted Policy will be available on-line.

5. Decide

- 5.1 An alternative to the recommendation in this report is not to update the existing Policy but this would lead to potentially missed opportunities to assist households with new funding.
- 5.2 Cabinet is requested to approve the recommendations made in section 3 of this report.

6. Respond

- 6.1 In the event that Cabinet approves the Policy it will be published online.

7. Review

- 7.1 The Housing Standards and Improvement service will continue to monitor the effectiveness of the Policy in delivering housing improvements and the Policy The policy will normally be reviewed annually and amendments to the policy can be

approved by the delegated powers held by the Executive Director, or relevant Director in consultation with appropriate Portfolio Holder.

Background papers

None

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14.06.2022

Walsall Housing Renewal Assistance Policy 2022 – 2025

June 2022

**Housing Standards and Improvement
Walsall Council**

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Appendix 1- Types of Housing Assistance

1. INTRODUCTION

The council has both statutory duties and discretionary powers to offer help and financial assistance to improve private sector housing conditions in the borough. The policy has been developed with regard to local, regional and national priorities and available funding.

This policy will come into effect from 1 July 2022.

The policy will normally be reviewed annually and amendments to the policy can be approved by the delegated powers held by the Executive Director, or relevant Director in consultation with appropriate Portfolio Holder.

Should new grant funds be secured between 2022 and January 2025, by the Council, for delivery of housing related assistance for the public that is not covered by this Policy the assistance criteria and delivery can be approved by the delegated powers held by the Executive Director, or Director in consultation with the Portfolio Holder, Regeneration and Transport. It is noted that many external grant sources have their own specific criteria for eligibility for example stating what an eligible households, dwelling and works are and in administering these the council must ensure that they are met.

Previous Renewal Assistance Policies have been approved with agreement that funds returned to the Council through the land charging process for all grants and loans continue to be made available for future private sector housing renewal assistance. This will remain a key to the continued support of residents through this new Policy.

2. BACKGROUND

The Regulatory Reform Order 2002 gave local authorities a discretionary power to provide assistance for housing renewal in a number of ways through a Housing Renewal Assistance Policy. The policy considers the limited resources available for housing (especially private sector housing) and targets those resources to people most in need and to meet local priorities.

The Council is required to publish the policy and this will be available free of charge on-line.

3. THE COUNCILS PRIORITIES AND HOUSING VISION

We reviewed our housing vision and priorities and adopted a new Housing Strategy in 2020, which lasts until 2025. This can be found using [this link](#)

Our revised vision and priorities are a result of; consultation with residents and partner agencies, an analysis of our local situation and housing need, and national and regional policy. Investment in housing improvements in the private sector can have a significant positive impact upon the well-being of residents, communities and the environment.

Priorities relating to home energy, insulation, tackling fuel poverty, domestic carbon emissions and reducing excess seasonal deaths are also specifically contained within the councils published:

- Home Energy Conservation Act (HECA) Action Plan link
- Energy Company Obligation (ECO) Statement of Intent

The delivery of adaptations including but not limited to Disabled Facility Grants (DFGs) is also undertaken in full accordance with the published Walsall Joint Strategic needs Assessment which can be found using this [link](#).

4. PURPOSE OF THE POLICY

4.1 Overview

The Housing Acts give councils the power to offer informal help and discretionary financial assistance to owner occupiers, tenants and private sector landlords to improve the quality and availability of housing. Where there is a disabled person in a household, in many circumstances local authorities have a mandatory duty to offer a Disabled Facilities Grant (DFG) to assist with the cost of adaptation work.

As resources are limited and there is substantial demand especially for mandatory DFGs, it is essential to ensure that financial assistance is offered on a fair, priority basis that takes account of competing needs. This Policy aims to offer assistance to vulnerable households on an individual basis to help sustain the private sector for long term public benefit.

4.2 Private dwellings

The responsibility to maintain private property rests firmly with the owner, but the condition and availability of private sector housing stock does have substantial implications for this Council's housing strategy, especially in terms of access to affordable housing. Owners are encouraged to:

- keep their homes in good repair and prioritise regular maintenance
- have relevant and adequate property (home) insurance

Between 2022 and 2025 the council does not expect to receive or be able to fund any works of repair or maintenance to any homes in the borough whether they be owner occupied or not.

4.3 Social Housing and Private renting

Landlords of social housing and private rented dwellings have a wide range of legal duties and responsibility to maintain their properties for the benefits of their tenants. The council has no grants or funding to help landlords or tenants repair or maintain their homes.

Where deemed necessary the council will take relevant enforcement action in line with its published Enforcement Policy to ensure appropriate housing standards are met. The Enforcement Policy can be found using this [link](#).

4.2 Strategic Priorities 2022 - 2025

This Policy links with national, regional and local strategic priorities.

The council has an excellent track record of securing external funding for a variety of housing and regeneration initiatives. Based on the above the council has prioritised the following using identified funding sources:

Priority	Area of work	Funded by (where available)
1	Mandatory Disabled Facilities Grant	Government annual allocation currently as part of the better care Fund allocation
2	Aids and adaptations including, 'inflationary allowance', 'exceptional top-up' assistance, low cost adaptation grants, Handyperson Service, Walsall Society for Blind referral scheme, relocation grants, palliative assistance, hospital discharge scheme.	Council capital resources and external loan and grant funds.
3	Address Category 1 hazards under the Housing Health and Safety Rating System.	Council capital resources External loan and grant funds.
4	Create decent private sector homes reducing deaths and hospital admissions due to cold / damp properties.	As at 2022 there is no funding available for this except via statutory enforcement.
5	Reduce fuel poverty and CO2 emissions from heating in dwellings.	External loan and grant funds.
6	Tackling long term empty homes	Council capital resources External loan and grant funds. As at 2022 there is no funding available for this except via statutory enforcement.

4.3 Bids for external funding

Some forms of funding are 'ring-fenced' or available for specific purposes and in some cases these help secure additional funding from external partners. The council will continue to bid for external funding to improve housing stock in the borough and particularly to meet its key priorities.

4.4 Key legislation

Section 18 details the key legislation governing the Housing Renewal Policy.

5. IMPROVING HOUSING CONDITIONS

5.1 Overview

In addition to ensuring effective delivery of the mandatory disabled facilities grants the aim of the policy is to improve housing conditions in the borough.

The council seeks to ensure that all homes in the borough are free of any category 1 hazards as assessed under the Housing Health and Safety Rating System (HHSRS).

5.2 Priorities

Limited financial resources are available for assistance in Walsall. These resources are therefore prioritised to ensure a property:

- 1) is free from any category 1 hazards assessed under the HHSRS
- 2) is accessible in terms of 'adaptations' for the disabled and or elderly
- 3) has adequate thermal comfort especially where a household has a severe cold / damp or excess heat related illness

- 4) has improved insulation and heating to provide thermal comfort, reduce CO2 emissions and fuel poverty and renewable home energy / micro-generation will also be promoted in line with 2) and 3) above where possible.

The council has also previously (a number of years back) had discretionary funds available to assist with returning long term empty homes into productive use i.e. back into occupied housing. No funds are currently available for this and any funds will normally be directed towards alternative measures to secure the property is brought back into use such as funding of Compulsory Purchase Orders or agreed purchases of empty homes.

Many dwellings have items of repair and maintenance. These are the responsibility of the owner. If the items do not meet the priorities listed above we are unable to provide financial assistance (loans / grants) but will seek to offer impartial free advice to owners about:

- identifying and prioritising repairs to their home,
- obtaining estimates / quotations for the repairs,
- appointing contractors.

The council will not recommend contractors or specific products.

6. TYPES OF ASSISTANCE

The following types of assistance and initiatives are available under this policy:

- a) Mandatory Disabled Facilities Grants (DFG),
- b) Discretionary Adaptation Grants including:
 - Low cost adaptation grants including Handyperson Service,
 - Hospital discharge scheme
 - Palliative assistance
 - Walsall Society for Blind referral scheme
 - Inflationary allowance Awards above the mandatory DFG limit,
 - Exceptional top-up' assistance above the mandatory DFG limit
 - Relocation grants / assistance,
 - Support for those covered by the Walsall Armed Forces Covenant
- c) Health Through Warmth grants / loans,
- d) Addressing hard to insulate properties loans / grants,
- e) Addressing fuel poverty / renewable energy grants / loans.

Appendix 1 provides a full summary of the different types of assistance available, their purpose, eligible client groups, amounts available and conditions applicable.

7. RESOURCES

7.1 Overview

No grant / loan will be offered until the relevant funding has been secured by the Council. Priority for funding will remain for the provision of mandatory DFGs which must be considered within a reasonable time from their valid receipt and paid within a reasonable time (both no longer than 6 months).

7.2 Maximising the benefits of limited funding

With the reducing availability and level of funds to assist residents, wherever practicable, the Council will only offer assistance as grants that are 100% recoverable through a land / property charge. This charge will be recoverable in full on the sale or other relevant disposal of the property. In summary the following grants will be recoverable:

Grant Name	Level / conditions	Time limit on recovery
Statutory Disabled Facility Grants including Disabled Persons Relocation Grant Low cost adaptation grants of £5,000 to £12,000 inclusive.	100% of costs in excess of £5,000 up to a maximum charge of £10,000, in line with legislation.	10 years from date of completion certified by the Council
Inflationary Allowance Awards for adaptations.	100% of the award. The maximum award will be £5,000.	10 years from date of completion certified by the Council
Exceptional Top Up Assistance for adaptations	100% of the award. The maximum award will be £10,000 per property.	No time limit on recovery
Funding for tackling housing enforcement matters and or hazards in the home and for use in top ups of Energy Company Obligation (ECO or ECOflex) schemes.	100% of the award if the funding is council capital	

All grants / loans provided (except for statutory disabled facility grants) will be subject to the following land charge conditions;

- The land charge will be for the full cost of the grant / loan including fees. It will be based upon the final grant / loan award paid.
- There will be no time limit on the land charge i.e. It does not expire after a set time period.
- The land charge will be repayable in full in all cases.
- The land charge will be repayable upon the sale or relevant disposal of the property (including but not limited to transfer of the property between family members / relatives)

All applicants will be advised to seek independent legal advice on the implications of a charge being placed on their property. Land charges will be applied irrespective of the age at application of the applicant.

Energy Company Obligation (ECO) scheme

Walsall Council has supported hundreds of residents secure ECO funding from contractors and or energy companies over the last few years. This has been through promotion of the same and publication of a Statement of Intent (which highlights to ECO companies what the council's priorities are for funding). Round 4 of ECO is due

to be launched in summer 2022 and it is expected that the council role in this will be increased including identification and agreement to all improvement works and verification of full eligibility. These checks are expected to be significantly more than the ECO3 or ECOflex3 scheme. The Council via relevant Executive Director and Portfolio Holder will make a decision as to whether a fee is levied for this detailed administrative work which may for example be a set percentage of the estimated cost of the capital works.

In some cases the ECO fund and ECO flex funds may not meet the full cost of the desired works and where possible the Council will support residents to access other external funding (charitable etc.) to assist. Where this is not possible and if funds permit the Council may provide a land charged discretionary contribution from the Health Through Warmth (HTW) budget. The decision will rest with the council on provision of any funding.

7.3 Partnership working

External resources are also available to enhance the council programme through signposting to other schemes and partnership working. These include:

- Smoke detectors and carbon monoxide fitted by West Midlands Fire Service under the brigade home safety checks;
- Undertake projects to minimise bills for residents such as collective fuel switch schemes and providing advice to enable residents to maximise their benefits;
- Time limited Government projects to specifically assist micro-heat or energy generation

7.4 Council Agency Service and external advisors

The Council provides a discretionary Agency Service for the management of various grants. The decision to provide this service for any scheme or individual enquiry rests solely with the council and will be based on staffing resources, ability (as determined by the council) of applicant to manage the scheme themselves and other competing demands for the agency service. To help maximise the number of residents the council can help (with the resources available to it), the council for example, may choose to only provide the service for the less complex projects and advise applicants to appoint architects or other project managers / designers for the more complex.

The agency service will not be offered in cases where it's considered not practical or it is considered unlikely to be best value for money or where an applicant proposes works that are in excess of what can be grant assisted. For example, but not limited to, where an applicant wishes to have an extension provided but a stair lift and conversion of the existing bathroom would meet the DFG requirements.

A fee is chargeable for the Agency Service and will be included within each relevant grant. Through significant streamlining of processes the Council has been able to reduce the fee charged from 15% in 2009/10 to 8% for 2021/22. It is proposed to hold the 8% fee level for 2022/23 with a review before the end of each financial year. The service includes the commissioning of building contractors, architects, specialist advisors etc. The fees of architects / advisors commissioned by the Council will be included within each relevant grant.

There is no requirement for residents to use the Council's Agency Service for mandatory DFGs.

Where an applicant uses an external 'agent' (architect, other designer or Occupational Therapist) to provide any element of design and supervision of their DFG the Council will only consider the fees as eligible for assistance if the 'agent' possesses valid / current insurances on an each and every claim basis to a minimum of £500,000 for professional and public liability.

The Council regularly reviews fees charged by third parties for services either directly to them or to members of the public. The Council in determination of all grants and (including DFGs) has a duty to consider both Value for Money and what is 'reasonable' and 'appropriate' to fund.

Between 2022 and 2025 total fees (excluding statutory Planning, Building Regulation etc. fees) for a DFG that are higher than 10% will be considered excessive and funding will be 'capped' to a maximum of 10%. For example, where both a designer and private Occupational Therapist are employed by an applicant their total fees cannot exceed 10% for the purposes of grant assistance.

Grant payments for design will not normally be made until all of the physical adaptation works have been fully completed and completion certificates submitted for the consideration of the Council. i.e. there will not normally interim or stage payments for fees for external professional advisors. The decision to waive this rests solely with the council.

8 GENERAL CONDITIONS

8.1 General conditions applicable to all forms of assistance

Approval is dependent on the council having adequate money available within the appropriate budget at the time of the application for assistance.

Applicants must:

- be aged 18 years or over at the date of application,
- not be a body mentioned in section 3(2) of the 1996 Housing Grants Construction Act 1996 for example not a Police Authority,
- own the relevant property unless the individual assistance indicates a wider tenure eligibility,
- supply household income and expenditure details where appropriate, for example test of resources / means test,
- must pursue any claims against work covered under insurance policies before an application is made,
- not have savings in excess of £50,000,
- live in the property as his or her main residence, except where the applicant is a landlord or it is an empty home AND the applicant has the owner's interest in the property OR be a tenant of the property, alone or jointly with others AND have a responsibility to carry out the works in question or have the owner's consent to do so. Where the applicant is an owner occupier, there will normally be a minimum time period for prior occupation dependent on the type of assistance,
- where appropriate give a signed undertaking to repay the financial assistance if the conditions of the grant or loan are breached,

- consent to allow the council to confirm the applicant's interest in the property.

Applications must:

- be for properties that were built or created by conversion at least 10 years ago, unless the council agrees otherwise. This does not apply to any assistance being given to adapt a property to meet disabled persons' needs,
- be made on the appropriate council application forms which we will provide free of charge upon request. These forms should be submitted, along with any additional information as described in Appendix 1, as a complete application to the Council. If all the information required is not provided the application will not be treated as complete and will not be considered for approval. Time periods for service delivery will not start until a complete application is received,
- have relevant planning and / or building regulations approval and other necessary consents,
- include written consent from all the owners of the property to the eligible works being done,
- not be for works that have already been completed. If works have started the council may consider assistance for the remaining works if it is satisfied that there were good reasons for starting the works before assistance was approved,
- must not be for repairs required as a result of deliberate damage / neglect caused by or allowed to occur by the household,
- include the relevant number of detailed tenders or quotations for the agreed scheme of works except where specific framework contractors are used or schedule of rates are in place. It is always necessary to show value for money and:
 - where the cost is below £5,000, at least two itemised quotations will be normally necessary.
 - where the cost of the work is £5,000 or more, at least three quotations will normally be necessary from different contractors showing a breakdown of the cost of carrying out the eligible works.
 - a single quotation may be accepted where the work is for specialist works or in exceptional circumstances as agreed by the council.

The council has developed a detailed Schedule of Rates (SoR) for building works and adaptations including equipment such as stair lifts and hoists. In these situations whilst applicants are encouraged to secure more than one quotation it may be possible for a single one to be allowed and compared directly with the council's schedule of rates.

The council will use its current Schedule of Rates (SoR) to assess the quotations against and will determine what the reasonable costs involved in the proposals are. In all situations the council will not make grant awards for works that appear 'over-priced' by contractor(s). It will always ensure that a grant award is reasonable and appropriate. The SoR is reviewed regularly and updated to ensure that it is at an appropriate level.

8.2 Additional conditions

a) Mobile Homes

Where an application is for a mobile home, the mobile home must be on a currently licensed site which is for permanent residential use. Financial assistance will not be

provided where the works required are to meet the requirements of a caravan site licence under the Caravan Sites and Control of Development Act 1960.

b) Shared Ownership dwellings

Where an application is for a shared ownership property the applicant must have a legal obligation to repair the property. This does not apply to any assistance being given to adapt a property to meet the needs of a person with disabilities.

c) Landlord Applications

Where appropriate it will be a condition of assistance to landlords that the property will be made available for letting for a period of 5 years. The council reserves the right to nominate tenants and the landlord will undertake to offer available accommodation to any person nominated by the council. Assistance will be prioritised to ensure that the accommodation type and rent levels meet 'housing need' in the borough as assessed by the Council.

d) Adaptation / DFG Relocation grants

Where an owner occupier applicant for a statutory DFG identifies that they wish to move to an alternative property a discretionary relocation grant may be considered. The cost of the relocation grant must be less than the expected cost of adapting the applicant's original home. The following is a list of potential costs that can be included within a discretionary relocation grant application;

- reasonable fees incurred for property purchase and sale
- reasonable removal costs
- adaptation costs as assessed by the Council as being for the minimum works that are necessary, appropriate, reasonable and practicable.

The property that the resident is moving from and to must be within the Borough of Walsall (or a neighbouring borough at the express consent of the Council). Where a relocation grant exceeds £5,000 a land / property charge will be placed on the new property in line with the statutory DFG process. The decision on all discretionary relocation grants rests with the Council Housing Standards and Improvement Service.

9 VULNERABLE HOUSEHOLDS

Many types of assistance are aimed at 'vulnerable' people and will have specific criteria to define vulnerability these may for example include, age or disability and or serious illness or medical condition, eligibility to means tested benefits or low income.

10 DISABLED FACILITIES GRANTS AND ASSISTANCE WITH ADAPTATIONS

10.1 Overall

Disabled Facilities Grants (DFGs) are subject to the Housing Grants, Construction and Regeneration Act 1996 (as amended) legislation and means testing arrangements under the Housing Renewal Grants Regulations (England).

The maximum grant limit is set by legislation issued under The Disabled Facilities Grants (maximum amounts and additional purposes) (England). The maximum grant is currently £30,000 per application.

Mandatory Disabled Facilities Grants are made available in accordance with criteria set by Government and supplemented by this policy. Where there is an application for assistance from a person with disability, an assessment of their needs, and their carer needs if applicable will be undertaken by an Occupational Therapist employed by the Council before any decision is made about the provision of equipment and or adaptations.

The council uses bespoke software to undertake the statutory Test of Resources (commonly referred to as a Means Test). Where this software highlights a nil value grant can be offered or that the applicant must make a financial contribution towards the cost of adaptations the council has no funds (grants or loans) to help with this cost. The council and its officers cannot advise applicants on how they should fund their adaptations – this is a private matter. Our website has further detail on how the Test of Resources is undertaken and can be found using this [link](#).

10.2 Land Charging Mandatory DFGs

Land charging Mandatory DFGs was introduced in Walsall on 1 March 2010 in line with Government regulations. This has helped the council 'recycle' funding for other new applications. A limited charge on adapted properties of owner occupiers is applied which applies where the property is sold or otherwise disposed of within 10 years of the grant works being completed and where the cost of the DFG exceeds £5,000. The limit of the maximum charge is set by Government and is currently, £10,000. The next table gives examples of grants and the respective charges.

DFG award	Value of land charge	Comment
Below £5,000	No land charge	Below statutory charge level
£5,500	£500	A charge relating to the value above the £5,000 grant level will be placed
£6,000	£1,000	
£8,000	£3,000	
£10,000	£5,000	
£13,000	£8,000	
£15,000	£10,000	The maximum charge of £10,000 will be placed.
£20,000		
£30,000		

The Local Authority has the discretion to reclaim any or all, of the grant paid, but it is required to consider the following:

- the extent to which the recipient would suffer financial hardship if the grant was reclaimed,
- whether the disposal of the property was to enable the recipient to take up employment, or change the location of their employment,
- whether the disposal of the property is made for reasons of the recipient's physical or mental health or well-being, or
- whether the disposal is made to enable the recipient to live with, or near any person who will provide care for the recipient by reason of their disability.

The land charge period will be a maximum of 10 years from the date of certified by the Council as being the final completion date for the adaptation works.

Under this policy the discretion not to reclaim any or all of the grant paid will be delegated to the Head of Housing.

10.3 DFG Inflationary Assistance – Discretionary funding

As stated above the current statutory DFG maximum as at June 2022 is £30,000. The council is mindful that this has not been reviewed or increased nationally for many years and that there has as a result been an inflationary pressure upon the ability of households to undertake adaptations within this level. As a result it has agreed (until the national statutory maximum is increased) to whilst resources permit to offer discretionary assistance to increase this 'maximum'. This is not an increase in statutory maximum but a discretionary increase agreed by the council to help mitigate the pressures of increased labour and materials costs. The DFG Inflationary assistance will remain at the discretion of the Council Housing Standards service and will be to a maximum value of £5,000 per scheme. It will not in any situations 'help' with cases where the contractor's quotations are considered by the Service to be 'excessive' in price.

If / when the statutory DFG maximum is increased by government the inflationary top up will cease / be reduced depending upon the level of increase introduced. For example, if the statutory DFG maximum is increased to £34,000 the Inflationary Top Up may still be available for a sum of up to £1,000.

Inflationary top ups will be reviewed on a periodic basis by the Service and amended in agreement by the relevant Executive Director and Portfolio Holder at the time. The decision to offer or amend rests solely with the Council.

DFG Inflationary Assistance - Owner occupiers and private rented

It will operate as per the following Table.

Owner occupiers and private rented		
Cost of DFG works	Type	
Under £5,000	Statutory DFG	No land charge
Grant of between £5,001 and £30,000	Statutory DFG	Land charge applied to maximum of £10,000 repayable upon the sale or relevant transfer for up to 10 years post grant completion
Works over £30,000 and up to £35,000	Statutory DFG £30,000 Inflationary Top Up to £5,000	As above 'Inflationary top up' is land charged in same way as DFG charge i.e. up to 10 years. This Inflationary top up remains at council's discretion.

DFG Inflationary Assistance - Social tenants

The Inflationary increase will be permitted as detailed above (with no land charge being applied). Costs in excess of this cannot be funded or considered and social tenants should look to their social landlord for support with:

- a) funding to contribute to the costs of the adaptation over the cost of £35,000.
- b) moving to a different dwelling that can be more readily adapted or

10.4 DFG 'Exceptional Top Ups'

The Council will consider assistance for adaptations costing more than the mandatory grant limit, which is currently £30,000. This assistance is known as an 'exceptional top-up' and is available for owner occupiers and private tenants. This assistance is available for a level above the 'Inflationary top up' (if this is in force).

Applications for this assistance will be considered on a case by case basis and in light of the resources available to the council to offer assistance.

Assistance will only be provided in exceptional cases.

Applicants for this assistance must clearly show why their household is unable to access alternative funds (savings, high street loans etc.)

Requests for assistance in excess of £10,000 are unlikely to be considered appropriate due to the amount of total funds involved for example this would equate to a grant totalling over £45,000.

Exceptional Top-Up Assistance is discretionary and the decision whether to award it or not will be made by the council.

Any 'top-up grant' will be subject to a land charge for the full amount of the 'top up' (no minimum or maximum) in addition to the land charge for the mandatory grant explained in section 10.2 and in addition to the Inflationary top up 10.3.

The exceptional top-up land charge will remain in force until property ownership changes (i.e. there is no time limit). The land charge will be recoverable upon the sale or relevant disposal. Discretion to waive the imposition of the land charge or not to reclaim the charge will be governed by the procedure and criteria within 10.2 and 10.3. The decision will be delegated to the Head of Housing.

10.5 Maintenance

The Council has previously (and for many years) assisted with the maintenance of equipment installed as part of a DFG. This has included stair-lifts and through floor lifts. There is no statutory requirement for this and repair works (that are not already factored in at grant approval stage) are precluded from Government grant funding.

New grant awards for Mandatory DFGs delivered through the Council Agency Service for vertical, stair and step lifts will (whilst resources allow) include a minimum of a 5 year warranty and service contract.

Where applicants submit their own application (or using their own private agent) for a lift or hoist they will be expected to include a warranty / service contract as part of the scheme as part of the application. This is the applicant's responsibility to ensure the price includes for this. Where equipment has been installed without such contracts the resident will be expected to meet the full cost of the servicing and repairs. The costs will only be assisted if the contractor meets all the relevant technical requirements

including that they are Lifting Operations and Lifting Equipment Regulations (LOLER) approved and their costs do not exceed the level funded by the council on other similar schemes.

The council will also consider assistance towards servicing costs for specialist 'wash-dry' toilets based on the above.

The council has no funds to assist with ongoing repair and maintenance of any other form of DFG or adaptation works.

10.6 Removal of DFG and related items

Lifts and similar equipment provided through a grant is the legal property and responsibility of the applicant / property owner (not the Council). The discretion to provide maintenance assistance as indicated in 10.5 does not in any way change this.

The decision to assist with funding of the removal of DFG and related works rests with the Council. There is no statutory obligation for the Council to arrange or fund this work. There are a number of companies who periodically agree to remove equipment at nil or low cost to the Council or applicant / home owner. If the Council is aware of these at the time of receiving a request the Council will advise the applicant any subsequent agreement between the home owner and contractor is a private matter.

Stairlifts (curved and straight) and External Step Lifts

If there is no cost to the Council the Council may arrange (if it so chooses) for the removal of stair-lifts and step lifts upon the request of an applicant or their relative (not a new property owner). Where a charge exists for the removal of a stair lift or step lift and the re-instatement of the property the Council will not undertake or fund these works.

Vertical / through floor lifts

If a resident is unable to fund the cost of removal and re-instatement of their property and formally request the Council to arrange and fund the works the Council may consider this. The full cost of removal and re-instatement may be land charged against the property at the discretion of the council (depending upon the costs involved in the works).

10.7 Terminal illness / palliative applicants

Where an applicant has a terminal illness the council will consider providing assistance for the hire of relevant equipment (i.e. stair lifts etc.) rather than full capital purchase. This is in line with best practice of other Councils and support agencies such as Macmillan Cancer support.

The council has agreed to use its discretion to not require a Test of Resources for palliative applicants for works costing up to £8,000. In the main this enables a bathroom adaptation and stair lift (curved or straight) to be undertaken. All other matters relating to DFGs will continue to apply including for example property charges.

10.7 Streamlining of the DFG process

Government best practice guidance recommends that councils deliver adaptations (commonly referred to as Disabled Facility Grants) as promptly as possible and with

the least bureaucracy. Major streamlining of the processes for delivering DFGs in Walsall started and has been in place for over 10 years and this continues to provide significant benefits for residents.

Streamlining - Handyperson Service

The Housing Standards and Improvement Section provides whilst resources permit a discretionary Handyperson service. This is available to provide assistance to prevent slips trips and falls and is allocated on a maximum of 2-hour slots per household. The assistance is for those households where they are prone to serious injury from slips, trips and falls and is for the disabled and or those aged 65 years of age and older.

Streamlining - Minor works- Adaptations up to £3,000 schemes.

In addition to the above Walsall Council has adopted this best practice advice for many years by developing a 'minor works' budget for schemes currently costing less than £3,000 in council capital. As a result we are able to offer a streamlined approach to a higher number of households meaning that they do not have to go through the inherent delays in the statutory DFG process.

There may be cases where both a minor works grant and request for Handyperson help are both considered appropriate. This decision will rest with the Housing Improvement Team.

Multiple applications for minor works assistance will be possible provided the £3,000 ceiling is not exceeded. For example in year 1 a request for help costing £1,000 and in year 2 a request for works costing £1,500.

Streamlining - Palliative Cases, those covered by the Walsall Armed Forces Covenant, applications received via Walsall Society for the Blind or those where a diagnosis of Motor Neurone Disease (MND) has been given.

The council will use its discretion, whilst resources permit, to waive the Test of Resources (Means Test) for adaptation applications for the above categories where the proposed adaptation works will not exceed £8,000. All other DFG provisions remain in place.

With MND cases wherever possible and within the limit of £8,000 as much 'future-proofing' will be provided / considered as possible during the adaptation designs this will be in discussion with the applicant and consultation with the specialist Occupational Therapists OTs).

Applications for both Minor Works assistance and a scheme under this specific process will not be permitted. Therefore, an applicant will not be able to secure £3,000 of minor works assistance without a means test and a further £8,000 without a means test. The maximum permitted will always only be £8,000. Any proposals expected to cost in excess of £8,000 will follow the full DFG application process including Test of Resources.

Streamlining - Scheme costing more than £3,000

There are a range of schemes which cost more than £3,000 that require technical input by the Housing Standards and Improvement Service that benefit from delivery through a 'streamlined' grant approach. This includes for example,

- Curved stairlifts,
- Step lifts
- Vertical (through floor) lifts
- Bathroom adaptations where an existing bath is removed and a level access shower installed (often referred to as BOSI's).

These works do not require planning permission and can normally be programmed to be installed relatively quickly.

Other key streamlining projects are based on;

a) Schemes costing between £3,000 and £5,000

Delivered using a shorter application form.

For these schemes no test of resources is undertaken and no formal proof of ownership is required.

A range of social housing providers including whg agreement has also been secured that for a range of works no formal individual consents will be required. This process has dramatically increased the speed in which adaptations can be approved and installed for social tenants.

b) Schemes costing between £5,000 and £12,000

These are delivered using a 'Medium' application form a process that has successfully operated for over 10 years. This includes:

- A mini-test of resources
- A land charge for the cost of all works exceeding £5,000 will be applied (in line with current DFG policy).
- Proof of ownership will be required.

The mini-test of resources proposed will 'passport' through to a grant a range of applicants including those expressly benefitting a child which is in line with the statutory DFG process.

These streamlined approaches are available for those cases where an applicant uses the Council's Agency Service as this provides the Council with the oversight to assess proofs of entitlement etc. and secure value for money on the works. Non-agency applications costing over £3,000 will normally continue to be delivered through the statutory DFG process.

11 Payment for completed work and completion timescale

11.1 Overview

The following conditions apply to ALL applications for financial assistance under this policy. The assistance will only be paid:

- if the housing assistance works are completed within six months from the date of approval or such further period extended as agreed by the council following notification in writing (For statutory DFGs this period is 12 months),

- if the works are carried out in accordance with the schedule of work/specifications set out in the formal approval or as varied with the written agreement of the council,
- if the work has been carried out by the contractor(s) on whose quotation the assistance was based unless the council has given written agreement to the use of different contractor(s),
- if the works are executed to the reasonable satisfaction of the council and specified documentation is submitted. For example, electrical safety or gas certificates,
- if the council is provided with a bona fide invoice or receipt for payment of works, professional fees and other charges in an acceptable format. The invoice must contain sufficient detail for the council to identify in full the works carried out and the price charged and it must not be provided by the applicant or a member of his/her family,
- if the applicant has provided a signed undertaking as to future owner occupation or availability for letting where relevant.

11.2 Paying Contractors

The council will normally only pay contractors (not applicants) for completed works.

The council has the right to make stage (interim / stage payments) should it consider that these are appropriate. The decision to make interim payments rests with the council. The council will not make interim payments that amount to more than 90% of the total value of the grant works.

Stage payments will only be made where the council is satisfied the value of the work completed exceeds the value claimed.

The council will not make advance payments in any situation.

11.3 Inspections

In some cases the council will need to inspect the works and it will seek to do this as promptly as possible. Contractors (and applicants) should contact the council to arrange this in good time and not leave this to the 'last minute'. The council seeks to make payment within 30 days of receipt of a valid invoice and all relevant documentation. Note this is receipt of all documentation and not from date of the invoice and may depend upon whether an inspection of the works has been able to be undertaken. The council will not pay for works that it considers are unsatisfactory.

The council will determine whether it needs to inspect the works or not. This decision rests solely with the council. Where an inspection is required the applicant must allow relevant access to the property to enable it to take place.

The council will not normally inspect works until an applicant has also completed, or been given the opportunity to complete, a customer satisfaction form provided by their contractor.

11.4 Work variations and retentions

If the cost of the work varies because of changes agreed in writing to the schedule of work/specification the council may vary the amount of assistance payable. The

applicant will receive written confirmation of the varied amount and a copy will be sent to the contractor for their information (usually by e-mail).

Circumstances where the amount of financial assistance will vary typically involve cases where unforeseen works arise such as the exposure of rotted timbers or excavation showing that drains need to be replaced or more substantial foundations are required.

Where assistance is payable but the works have not been executed to the satisfaction of the Council, the Council may withhold payment to the contractor.

11.5 Applicant contributions towards grant or related works

In some cases the grant (and in particular DFGs) that is approved does not cover the full cost of the works. This can occur in situations such as;

- a) Where, as a result of a Test of Resources, the applicant must make a contribution towards the cost of the works. The applicant must pay the difference to their contractor themselves and this is solely a private matter between contractor and applicant;
- b) Where the quotation submitted by the contractor is considered 'high' / excessive for the proposed works. The council has a right to consider what an appropriate cost for the proposed works is. In doing this we use a detailed schedule of rates that has been produced as a result of a major tendering activity. If the quotation is above the level at which the council considers is appropriate then the applicant will need to fund the difference. This is solely a private matter between contractor and applicant but we will make it clear to both parties at grant approval stage.

The council has no grants or other funding to help in either of the above situations and the applicant and contractor must agree how they are going to deal with paying the shortfall before the works start and it remains a private matter between the two parties (and not the council).

There are also situations where an applicant may ask their contractor to undertake works in addition to those that are being considered or eligible for grant assistance. This is solely a private matter between the applicant and their contractor. The council has no funds to help with the cost of these works.

13 Repayment of financial assistance

Where a grant or loan condition imposes a liability to repay the financial assistance, the condition will be registered by the Council as a Land Charge. If a grant or loan condition is breached the council has the right to seek repayment on demand. The Council may at its discretion require repayment of a lesser sum than the full amount of financial assistance.

Examples of circumstances where the council may exercise discretion include, where the:

- application or spouse or partner has had to move to avoid unemployment, or
- applicant's employer has required a move, or
- the property is subject to a mortgage entered into before the grant application and the mortgagee is exercising the power of sale.

The decision to allow a waiver in full or part is delegated to the Head of Housing, who may in turn delegate this decision to other members of the service.

14 Death of an Applicant

If the applicant should die before the financial assistance is approved, the application will be treated as withdrawn. If the application is a joint application with a joint owner the application may still be considered by the council.

If the applicant should die after approval of the financial assistance or while the approved works are in progress, the Council may at its discretion agree to completion or making good of the works and pay the financial assistance in full or, if the works originally agreed are not completed in full, an appropriate proportion of the financial assistance.

The decision on this to be delegated to the Head of Housing who may in turn delegate this decision to other members of the service.

There is no statutory duty for the Council to fund the completion of the works and in most cases the works will be limited to ensuring that the property is safe and habitable and no additional Category 1 Hazards exist as a result of the part completed grant works.

Applicants enter into grant applications at their own choosing. They are not compelled by the council or any of its officers to do so. Where an applicant has agreed to a land charge on their property as part of a specific grant for example DFG they will have made this decision themselves based on their specific circumstances. The council has a legal right where a land charge has been applied to enforce the repayment of the same upon the sale or relevant transfer of the grant property.

15 Applications which fall outside of the published Policy.

Where it is considered that there are exceptional and justifiable circumstances, which warrant consideration outside of this Policy, an application may be made to the Head of Housing for an appropriate decision. Each case will be considered on its own merits and regard will be given to the councils overall priorities and in particular those within 4.2 of this policy.

16 Time periods and customer service

The council has developed a wide range of processes to help streamline grant applications especially for DFGs and related adaptations. The duty to complete a valid application form (with accompanying details, quotes etc.) rests with the applicant. Council officers will help applicants to complete the application forms and collate the other information required for a full application.

Council officers will prioritise this support for people applying for mandatory disabled facilities grants (DFGs) and related adaptations including but not limited to assistance for palliative applicants.

If the grant application is approved, the notification will also specify the works, which are eligible for assistance, the value of the assistance and the form that the assistance will take for example loan, grant or combination.

If the application is refused, we will explain the reasons for the refusal and the procedure for appealing against the decision in the refusal letter / email.

The council will continue to review processes and national best practice and guidance and where resources permit especially relating to staffing it will if possible expand its offer of agency service to support grant applications. The decision on this matter rests solely with the council.

17 Implementation of the Policy and Policy Review.

This policy comes into effect after approval by Full Council in summer 2022. It is anticipated that the Policy will remain in force until the 31 December 2025.

This Policy will be reviewed annually by the Housing Service. It will also be reviewed and amended as appropriate if there are any significant changes in legislation, Government guidance, and/or any significant changes in resources available.

Amendments to the policy can be made by the Head of Housing in consultation with the relevant Portfolio Holder and noted by the relevant Executive Director.

18 Compliments, appeals and complaints

The Council is committed to improving services for customers, especially vulnerable households. We will use consultation with service users and feedback from people who have received assistance to help identify priorities for service improvements.

Refused applications

Where an application is refused the applicant is entitled to make an appeal / request for review of the decision. This should be made,

- by email to: HousingStandardsImprovement@walsall.gov.uk or
- in writing to: Housing Standards and Improvement Service, Children Services, Walsall Council, 1st Floor civic Centre, Darwall Street, Walsall, WS1 1TP

The appeal / request for review will be considered under the council's Corporate complaints process. The matter will be fully investigated and a written response provided. If an applicant is still aggrieved they have a right of further appeal to the Local Government Ombudsman (LGO) for a breach / failure to follow the respective grant process and or apply this Policy appropriately. The decision to make such an appeal rests solely with an applicant.

In developing this Policy the council has taken into account previous LGO decisions to ensure that its policy and application of the same are as supportive as possible given the available resources. Based on this this Policy identifies what is eligible, what is not eligible and whose responsibility it is to undertake key stages in the application process.

Other complaints about the grant process or decision

Applicants can use the process detailed above ie contact the service in the first instance and then if they are still unhappy with the decision raise the matter with the LGO.

19 Legislation

The legislation which enables the council to offer housing assistance is set out in the Regulatory Reform (Housing Assistance) (England & Wales) Order 2002. It allows the council to adopt a flexible approach to giving financial help reflecting local circumstances, needs and resources.

The legislation for offering Disabled Facilities Grants is set out by the Housing Grants, Construction and Regeneration Act 1996. The Act places a statutory duty on the council to provide grant aid to people who meet the criteria for assistance with adaptations to their homes.

The Local Government Act 2000 which provides the council with a wide ranging power to promote the 'environmental, economic and social well-being of its communities'. This power enables the council to support sustainable development, incur expenditure and give financial assistance for things such as renewable energy. This power will be used to provide assistance for relevant grant and loan schemes within this policy.

The Housing Act 2004 made some important changes to the legislation for private sector housing, including:

- i. introducing the Housing, Health and Safety Rating System (HHSRS) as the main approach to housing enforcement. It replaced the former housing fitness standard. It includes a mandatory duty to take action where a category 1 hazard is found,
- ii. the compulsory licensing of higher risk houses in multiple occupation (HMO),
- iii. new discretionary powers including the option for Additional Licensing of other HMOs, selective licensing of private landlords, empty dwelling management orders and tenancy deposit protection.

Although most of these changes do not directly affect the way that financial assistance is offered, it is important that private sector housing services are offered in a consistent manner. The Housing Strategy sets out how the council combines the offering of financial assistance with statutory enforcement procedures. The HHSRS does impact on the financial assistance offered as the presence of category 1 hazards assessed under the system amounts to a failure of the first criterion of the Decent Homes Standard.

The council will not normally provide grant assistance to remedy a statutory duty of a landlord.

Appendix 1 Types of Assistance

Name	DISABLED FACILITIES GRANT (DFG) including: Disabled persons relocation grant
Purpose	The Disabled Facilities Grant is for people with permanent and substantial disabilities requiring financial support to adapt their existing home to increase or maintain their functional independence.
Eligibility Criteria	DFG is available to applicants for a scheme of work following referral from an occupational therapist. Applications will be considered equally from all tenures as part of most applications the permission of the property owner to the proposed works will be required. The duty to secure this rests with the applicant.
Maximum Grant	£30,000 A means test / test of resources applies for all adult DFG applications.
Types of work	<p>The adaptation works must be necessary and appropriate, reasonable and practicable. The decision on this rests with the council Housing Standards and Improvement Service.</p> <p>The council will permit applicants should they wish to only undertake part of a DFG. For example if they are recommended to have both a stair lift and a bathroom adaptation they can decide to only have one of these items. The choice is theirs. the DFG award will be calculated to reflect this i.e. grant funding will only be based on the cost of the single item.</p> <p>Where an applicant wishes an extension to be built but the adaptations can be reasonably undertaken internally to the house the cost of the lesser option will be considered the 'reasonable' option and grant will be limited to this level. The applicant will need to fund the cost difference from non-council sources.</p> <p>Where the work involved is such that the cost of the adaptations appears disproportionate and it may be in the best interests for the applicant to move to another property which can be more readily adapted, the council may consider using discretionary assistance outside the scope of a statutory Disabled Facilities Grant funding to assist with the cost of relocation and subsequent adaptation.</p>
Application	<p>An application for a DFG must be on the prescribed DFG form (available direct from Housing Standards and Improvement). It must be accompanied by the following additional information:</p> <ul style="list-style-type: none"> a) proof of ownership and occupation (for owners) or consent from landlords (for tenants), b) proof of financial circumstances, c) quotations in line with section 8.1 of the policy d) other relevant consents for example planning and building regulations approval and or Party Wall Act Consent and or Severn Trent Build Over Approval (related to drainage) .
Approvals	Approvals remain valid from 12 months from the date of the grant approval. It is expected however that works are commenced and completed as soon as practicable from the grant approval date.

	Approvals will be made within the adopted policy and budgets available at the time.
Payment provisions	Payment will be paid directly to the contractor in line with this Policy. Any owner's contribution must be paid by the applicant to the contractor before the DFG is paid
Repayments and waivers	Land charges will be applied to all grants over £5,000 in line with details in section 7.2 of the policy.
Condition(s)	Applicants will sign a certificate to say they intend to occupy the property for 5 years.

Name	DISCRETIONARY DISABLED FACILITIES GRANTS (DFG): a) Minor Works Grants – Under £3,000
Purpose	<p>This discretionary assistance is available for people with permanent and substantial disabilities requiring financial support to adapt their existing home to increase or maintain their functional independence.</p> <p>It supports the mandatory DFGs by seeking to provide rapid assistance for people where the adaptation costs are less than £3,000.</p>
Eligibility Criteria	<p>Available to applicants for a scheme of work following referral from an occupational therapist, Trusted Assessor or other relevant officer or partner organisation (i.e. Fire Service) .</p> <p>Applications will be considered from all tenures. Only one minor works grant is permitted per applicant. This grant cannot be combined with another council grant.</p>
Maximum Grant	<p>£3,000.</p> <p>It is expected that social housing providers will also contribute towards the cost of the adaptations to their tenants home and this may reduce the amount the council needs to directly fund or increase the level of works that can be undertaken at the property.</p> <p>A means test / test of resources will not normally be applied.</p>
Types of work	The adaptation works must be necessary and appropriate, reasonable and practicable. The decision on this rests with the council Housing Standards and Improvement Service with guidance from the Occupational Therapy service.
Application	A simplified application process exists where referrals are sent direct from a range of sources and in particular the council occupational therapy service.
Approvals	<p>Approvals will be made within the adopted policy and budgets available at the time.</p> <p>Approvals remain valid from 3 months from the date of the grant approval. It is expected however that works are commenced and completed as soon as practicable from the grant approval date.</p>
Payment provisions	Payment will be paid directly to the contractor in line with this Policy or direct to a housing association if they have arranged them for their tenant. No interim payments will be made as the works cost less than £3,000.
Repayments and waivers	No land charges apply.
Condition(s)	None.

Name	DISCRETIONARY DISABLED FACILITIES GRANTS (DFG): b) Low cost adaptation grants £3,000 to £5,000
Purpose	<p>This discretionary assistance is available for people with permanent and substantial disabilities requiring financial support to adapt their existing home to increase or maintain their functional independence.</p> <p>It supports the mandatory DFGs by seeking to provide rapid assistance for people where the adaptation costs are equal to or less than £5,000.</p>
Eligibility Criteria	<p>Available to applicants for a scheme of work following referral from an occupational therapist, Trusted Assessor or other relevant officer or partner organisation (i.e. Fire Service) .</p> <p>Applications will be considered from all tenures. Only one low cost adaptation grant is permitted per applicant. This grant cannot be combined with another council grant.</p>
Maximum Grant	<p>£5,000.</p> <p>It is expected that social housing providers will also contribute towards the cost of the adaptations to their tenants home and this may reduce the amount the council needs to directly fund or increase the level of works that can be undertaken at the property. A means test / test of resources will not normally be applied.</p>
Types of work	The adaptation works must be necessary and appropriate, reasonable and practicable. The decision on this rests with the council Housing Standards and Improvement Service with guidance from the Occupational Therapy service.
Application	Applications are direct to Housing Standards and Improvement and on a prescribed form. This form includes self-certification on a number of key areas.
Approvals	<p>Approvals will be made within the adopted policy and budgets available at the time.</p> <p>Approvals remain valid from 3 months from the date of the grant approval. It is expected however that works are commenced and completed as soon as practicable from the grant approval date.</p>
Payment provisions	Payment will be paid directly to the contractor in line with this Policy or direct to a housing association if they have arranged them for their tenant. No interim payments will be made as the works cost less than £5,000.
Repayments and waivers	No land charges apply.
Condition(s)	None.

Name	DISCRETIONARY DISABLED FACILITIES GRANTS (DFG): c) Low cost adaptation grants over £5,000 and to £12,000
Purpose	<p>This assistance is available for people with permanent and substantial disabilities requiring financial support to adapt their existing home to increase or maintain their functional independence.</p> <p>It supports the mandatory DFGs by seeking to provide less complex assistance for people where the adaptation costs are equal to or less than £12,000.</p>
Eligibility Criteria	<p>Available to applicants for a scheme of work following referral from an occupational therapist.</p> <p>Applications will be considered from all tenures. Only one low cost adaptation grant is permitted per applicant. This grant cannot be combined with another council grant.</p>
Maximum Grant	<p>£12,000.</p> <p>For adult applicants a means test / test of resources will be applied.</p>
Types of work	The adaptation works must be necessary and appropriate, reasonable and practicable. The decision on this rests with the council Housing Standards and Improvement Service with guidance from the Occupational Therapy service.
Application	<p>Applications are direct to Housing Standards and Improvement and on a prescribed form. This form includes self-certification on a number of key areas. Proof of ownership will be required.</p> <p>A mini Test of Resources will be undertaken and where an applicant is not passported through their application will be considered under the full statutory DFG process with the longer prescribed forms (available from the council direct).</p>
Approvals	<p>Approvals will be made within the adopted policy and budgets available at the time.</p> <p>Approvals remain valid from 3 months from the date of the grant approval. It is expected however that works are commenced and completed as soon as practicable from the grant approval date.</p>
Payment provisions	Payment will be paid directly to the contractor in line with this Policy or direct to a housing association if they have arranged the works for their tenant. No interim payments will be made for grant works of less than £10,000.
Repayments and waivers	Land charges will be applied to all grants over £5,000 in line with details in section 7.2 of the policy.
Condition(s)	Applicants will sign a certificate to say they intend to occupy the property for 5 years.

Name	DISCRETIONARY DISABLED FACILITIES GRANTS (DFG): d) Palliative applications, Motor Neurone disease (MND), direct referrals from Walsall Society for the Blind and those covered by the Armed Forces Covenant Maximum assistance of £8,000
Purpose	This assistance is available for people with permanent and substantial disabilities requiring financial support to adapt their existing home to increase or maintain their functional independence. It supports the mandatory DFGs by seeking to provide faster assistance for key vulnerable groups and individuals where the adaptation costs are equal to or less than £8,000.
Eligibility Criteria	Available to applicants for a scheme of work following referral from an occupational therapist or direct from Walsall Society for the Blind and colleagues supporting those covered by the Arms Forces Covenant. Applications will be considered from all tenures. Only one grant is permitted per applicant. This grant cannot be combined with another council grant.
Maximum Grant	£8,000. The means test / test of resources will not normally be applied.
Types of work	The adaptation works must be necessary and appropriate, reasonable and practicable. The decision on this rests with the council Housing Standards and Improvement Service with guidance from the Occupational Therapy service.
Application	Applications are direct to Housing Standards and Improvement and on a prescribed form. This form includes self-certification on a number of key areas.
Approvals	Approvals will be made within the adopted policy and budgets available at the time. Approvals remain valid from 3 months from the date of the grant approval. It is expected however that works are commenced and completed as soon as practicable from the grant approval date.
Payment provisions	Payment will be paid directly to the contractor in line with this Policy or direct to a housing association if they have arranged the works for their tenant. No interim payments will be made for grant works of less than £8,000.
Repayments and waivers	Land charges will be applied to all grants over £5,000 in line with details in section 7.2 of the policy.
Condition(s)	Applicants will sign a certificate to say they intend to occupy the property for 5 years – this will be waived as appropriate for those who are palliative.

Name	DISCRETIONARY DISABLED FACILITIES GRANTS (DFG): e) Inflationary Top Up to Statutory DFG Maximum assistance of £5,000
Purpose	<p>This assistance is available for people with permanent and substantial disabilities requiring financial support to adapt their existing home to increase or maintain their functional independence.</p> <p>It directly supports the mandatory DFGs by seeking to provide a 'top-up' to the statutory maximum grant that is currently £30,000. It is 100% discretionary and only available for works considered eligible by the Housing Improvements Service.</p>
Eligibility Criteria	<p>Only available where the costs as assessed and agreed by the Housing Improvements Service are in excess of £30,000.</p> <p>The fund will be removed and or reduced if and when the government increases the statutory maximum</p> <p>Applications will be considered from all tenures.</p> <p>Only one grant is permitted per applicant. This grant cannot be combined with another council grant except where there is a need for funding over £35,000 for owner occupier or private rented and then an exceptional top up grant may be also considered.</p>
Maximum Grant	<p>£5,000</p> <p>The means test / test of resources will be applied for the DFG and as such the results of this will be appropriate for consideration of this specific funding too.</p>
Types of work	The adaptation works must be necessary and appropriate, reasonable and practicable. The decision on this rests with the council Housing Standards and Improvement Service with guidance from the Occupational Therapy service. The works must be part of a statutory DFG scheme.
Application	Applications are direct to Housing Standards and Improvement and on a prescribed form (DFG application form).
Approvals	<p>Approvals will be made within the adopted policy and budgets available at the time.</p> <p>Approvals remain valid from maximum of 12 months from the date of the grant approval in line with the statutory DFG. It is expected however that works are commenced and completed as soon as practicable from the grant approval date.</p>
Payment provisions	Payment will be paid directly to the contractor in line with this Policy or direct to a housing association if they have arranged the works for their tenant.
Repayments and waivers	Land charges will be applied to all grants provided under this scheme in line with details in section 7.2 of the policy and 10.3 and 10.4. Land charges cannot be made on social housing owned dwellings. The land charge will be in force for 10 years from the certified date of completion of works.
Condition(s)	Applicants will sign a certificate to say they intend to occupy the property for 5 years.

Name	DISCRETIONARY DISABLED FACILITIES GRANTS (DFG): f) Exceptional Top Up to a Statutory DFG (and inflationary top Up) Maximum assistance of £10,000
Purpose	<p>This assistance is available for people with permanent and substantial disabilities requiring financial support to adapt their existing home to increase or maintain their functional independence.</p> <p>It directly supports the mandatory DFGs by seeking to provide a 'top-up' to the statutory maximum grant that is currently £30,000. It is 100% discretionary and only available for works considered eligible by the Housing Improvements Service. It can be available for cases where an inflationary top up has also been awarded.</p>
Eligibility Criteria	<p>Only available where the costs as assessed and agreed by the Housing Improvements Service are in excess of £30,000.</p> <p>Applications will be considered from owner occupier and private rented tenants. Tenants of social landlords are not eligible as they have alternative recourse direct to their landlord for contributory funding and or for re-housing requests.</p> <p>Only one grant is permitted per applicant. This grant cannot be combined with another council grant except where there is a need for funding over £35,000 for owner occupier or private rented and then an inflationary top up grant may be also considered.</p>
Maximum Grant	<p>£10,000.</p> <p>The means test / test of resources will be applied for the DFG and as such the results of this will be appropriate for consideration of this specific funding too.</p>
Types of work	The adaptation works must be necessary and appropriate, reasonable and practicable. The decision on this rests with the council Housing Standards and Improvement Service with guidance from the Occupational Therapy service. The works must be part of a statutory DFG scheme.
Application	<p>Applications are direct to Housing Standards and Improvement and on a prescribed form (DFG application form and exceptional top Up assistance Form). This application must accompany a valid mandatory DFG application and all other relevant details).</p> <p>It must also include:</p> <ul style="list-style-type: none"> a) a statement from external loan provider that a loan has been refused based upon the lack of equity in the property, b) a statement from the applicant that they have no other means of funding the 'top-up' works
Approvals	<p>Approvals will be made within the adopted policy and budgets available at the time.</p> <p>Approvals remain valid from maximum of 12 months from the date of the grant approval in line with the statutory DFG. It is expected however that works are commenced and completed as soon as practicable from the grant approval date.</p>

Payment provisions	Payment will be paid directly to the contractor in line with this Policy.
Repayments and waivers	Land charges will be applied to all grants provided under this scheme in line with details in section 7.2. The land charge will not be time limited i.e. it will be repaid in full to the council upon the relevant sale or transfer of the dwelling.
Condition(s)	Applicants will sign a certificate to say they intend to occupy the property for 5 years.

Name	HOME REPAIR ASSISTANCE GRANTS (HRA):
Purpose	This discretionary assistance is available as a small 'safety net' grant to tackle Category 1 hazards in private owner occupied properties. The assistance is at the sole discretion of the council and only when funds exist to support the same. It will usually only be used where officers have been alerted to significant issues of hardship faced by owner occupiers.
Eligibility Criteria	HRA is available to owner occupiers whose properties represent a risk to them due to the presence of Category 1 Hazards AND who meet one of the following criteria: 1a. All resident owners over the age of 60 and in receipt of income related benefits. 1b. All residents under the age of 60 who are registered disabled and in receipt of Disability Living Allowance. The following criteria must also be met to qualify for HRA. The property: <ul style="list-style-type: none"> • must be in Council Tax bands A-D. • has not received HRA assistance within 5 years of the date of the current application • must have been owned and occupied by them as their principal family home for at least 5 years. The works should not be those that are reasonably expected to be covered by household insurance claims.
Maximum Grant	A maximum grant of £5,000 for works and fees.
Types of work	Eligible work will include works necessary to reduce or remove a Category 1 Hazard
Application	Applications for HRA will be made using the council HRA application form. Additional information will include: <ul style="list-style-type: none"> • quotations in line with section 8.1 of the policy, • proof of financial situation for example income support, • proof of age or receipt of Disability Living Allowance, • proof of ownership and occupation – completion of owner-occupier's certificate, • planning / building regulations approval where required. No discretionary Agency Service will be available for HRA's.
Approvals	Approvals will be made within the adopted policy and budgets available at the time. Approvals remain valid for a maximum of six months from the date of approval. Land charges will be applied in all cases irrespective of the cost of the works. They will be for the full amount of the grant and will have no time limit on repayment. They will be 100% repayable upon the sale or relevant transfer / disposal of the property.
Payment provisions	Payment will be paid directly to the contractor in line with this Policy.
Repayments and waivers	Land charges will be applied in all cases irrespective of the cost of the works. They will be for the full amount of the grant and will have no time limit on repayment. They will be 100% repayable upon the sale or

	relevant transfer of the property. Additional Conditions The dwelling must remain occupied by a family member as their main home throughout the condition period.
Condition(s)	The dwelling must remain occupied by a family member as their main home throughout the condition period of 5 years form the date of certified completion of the works.

Name	ENERGY AND OR INSULATION GAP' FUNDING PROJECT
Purpose	<p>To enable homeowners (not social tenants or private tenants) to benefit from the externally funded assistance towards domestic;</p> <ul style="list-style-type: none"> • Micro-energy generation • insulation • heating <p>This assistance is discretionary and will assist where possible any gap in funding that home owners are faced with in seeking to undertake the above works.</p> <p>Funding will be on a case by case basis and normally for dwellings with a current in date EPC of D or below.</p>
Eligibility Criteria	<p>Applicant dwellings must be owner occupied and must have been in the applicant's ownership as their home for at least 3 years prior to date of application.</p> <p>The applicant must be seeking to improve their home through an externally funded (not council) grant / contribution for works as detailed above.</p>
Maximum Grant	A maximum grant of £5,000 towards the cost of eligible works.
Types of work	Eligible work will include works necessary to reduce or remove a Category 1 Hazard
Application	<p>Applications for this discretionary fund will be made direct to Housing Standards and improvement on a prescribed form and or containing the information listed below:</p> <ul style="list-style-type: none"> • Quotations in line with the Policy this is to also highlight the funding gap for which assistance is sought. The information must clearly show the funds that are being provided from non-council sources, • Proof of financial situation for example that the applicant cant self-fund the gap income support, • Proof of ownership and occupation – completion of owner-occupier's certificate, • planning / building regulations approval where required. <p>No discretionary Agency Service will be available for this fund.</p>
Approvals	<p>Approvals will be made within the adopted policy and budgets available at the time. Approvals remain valid for a maximum of 4 months from the date of approval.</p> <p>Land charges will be applied in all cases irrespective of the cost of the works. They will be for the full amount of the grant and will have no time limit on repayment. They will be 100% repayable upon the sale or relevant transfer / disposal of the property.</p>
Payment provisions	Payment will be paid directly to the contractor in line with this Policy.
Repayments and waivers	Land charges will be applied in all cases irrespective of the cost of the works. They will be for the full amount of the grant and will have no

	time limit on repayment. They will be 100% repayable upon the sale or relevant transfer of the property.
Condition(s)	The dwelling must remain occupied by a family member as their main home throughout the condition period of 5 years form the date of certified completion of the works.

Name	HEALTH THROUGH WARMTH ASSISTANCE (HTW)
Purpose	To enable vulnerable private homeowners who have a cold or damp related illness to secure energy efficient heating and home insulation.
Eligibility Criteria	<p>Vulnerable private home-owners who live in Walsall and who have:</p> <ul style="list-style-type: none"> • a member of their household with a cold or damp related serious illness or • is aged 80 years of age or older • or has a child under school age who was classified as low birth weight at time of birth (less than 2.5kg). <p>The illnesses considered include:</p> <ul style="list-style-type: none"> • respiratory disease for example COPD, emphysema, chronic bronchitis, severe asthma, • cancer, • terminal illness, • cardiovascular disease such as heart disease and stroke, • diabetes particularly type 1, • osteo and rheumatoid arthritis, requiring regular treatment and review, • severely reduced mobility, • mental illness such as depression and receiving treatment, schizophrenia, manic depression. <p>This is available only for properties that have not received HTW or similar assistance within 5 years of the date of the current application.</p> <p>The applicant must have been an owner occupier of the grant property for the last 3 years at point of grant application (except in exceptional circumstances).</p> <p>Must have a household income of less than £30,000 per year after tax</p>
Maximum Grant	A maximum grant of £5,000 towards the cost of eligible works. The grants are 100% discretionary.
Types of work	<p>The works can be a combination of the following:</p> <ul style="list-style-type: none"> • loft insulation, • cavity wall insulation, • central heating works / new boilers / air source heat pumps <p>This assistance is not normally available for double glazing which whilst providing energy efficiency for dwellings does not provide a cost effective energy efficiency measure.</p>
Application	<p>Applications for this discretionary fund will be made direct to Housing Standards and improvement on a prescribed form and or containing the information listed below:</p> <ul style="list-style-type: none"> • Quotations in line with the Policy, • Proof of financial situation for example that the applicant cant self-fund the gap income support, • Proof of ownership and occupation – completion of owner-occupier's certificate, • planning / building regulations approval where required. <p>Discretionary Agency Service may be available for this fund to assist those who are unable to manage the grant scheme themselves.</p>

Approvals	<p>Approvals will be made within the adopted policy and budgets available at the time. Approvals remain valid for a maximum of 4 months from the date of approval.</p> <p>Land charges will be applied in all cases irrespective of the cost of the works. They will be for the full amount of the grant and will have no time limit on repayment. They will be 100% repayable upon the sale or relevant transfer / disposal of the property.</p>
Payment provisions	Payment will be paid directly to the contractor in line with this Policy.
Repayments and waivers	Land charges will be applied in all cases irrespective of the cost of the works. They will be for the full amount of the grant and will have no time limit on repayment. They will be 100% repayable upon the sale or relevant transfer of the property.
Condition(s)	The dwelling must remain occupied by a family member as their main home throughout the condition period of 5 years form the date of certified completion of the works.

Equality Impact Assessment (EqIA) for Policies, Procedures and Services

Proposal name	Housing Renewal Assistance Policy		
Directorate	Children's Services		
Service	Housing Standards and Improvement		
Responsible Officer	David Lockwood and Olga Cenkute		
Proposal planning start	14/04/22	Proposal start date (due or actual date)	1 July 2022
1	What is the purpose of the proposal?	Yes / No	New / revision
	Policy	Yes	Revision
2	What is the business case for this proposal? Please provide the main purpose of the service, intended outcomes and reasons for change?		
	<p>The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 gave local authorities a discretionary power to provide assistance for housing renewal in a number of ways through a Housing Renewal Assistance Policy. The Council is required to produce and publish a policy and this report describes and seeks approval for the new Housing Renewal Assistance Policy ('the Policy') for 2022 to 31 December 2025</p> <p>The current policy with an end date of 2018 has been changed over time in line with approved delegated powers. The changes that have taken place have been consolidated within the new proposed Policy for 2022 to 2025 that is due for consideration / approval by cabinet in June 2022.</p> <p>The intended outcome is to have a new up to date Policy which sets the parameters for all grant funding related to physical works to dwellings in the borough.</p> <p>The services that the Policy details are principally those delivered by the Housing Standards and Improvement Services.</p> <p>Specific reference to DFGs and related adaptations: Disabled Facilities Grants (DFG) is provided to people with a physical disability who need to pay for adaptations to their homes to enable them to continue living safely and independently. These are mandatory grants the Council is required to provide under the provisions of the Housing Grants Construction and Regeneration Act 1996 (HGCRA 1996). The Council receives most of its funding for these grants from government but the level of funding is insufficient to meet the current demand. This has historically always been the case and local authorities have over the years directly provided funding to help meet the demand for grants.</p> <p>The Policy uses available capital resources to assist residents. No funding will be approved without the council first having the relevant funds available.</p> <p>The policy will have limited impact on council owned dwellings - The council owns a very limited number of dwellings. The housing standards and Improvement service will continue to seek to support and attract external funds to improve this portfolio.</p>		



3	Who is the proposal likely to affect?		
	People in Walsall		Detail
	All	Yes	A significant proportion of the funding and assistance described in the policy relates to support for disabled residents. This includes but is not limited to Disabled Facility Grants (DFGs) which are available for all ages of disabled people. Other funding schemes are directed at tackling fuel poverty which whilst impacting on major sections of the Walsall population has a predominant impact on those with low incomes. Assistance is also prioritised towards specific groups and individuals for example those whose health is specifically made worse by cold and damp homes and currently have a risk from such properties such as elderly, very young children and those with COPD as an example.
	Specific group/s	Yes	
4	Please provide service data relating to this proposal on your customer's protected characteristics.		
	<p>For the majority of grants key is the need to improve the residents dwelling. This is the initial over-riding criteria for example where a home needs no improvement or adaptation funding will not be considered. Specific schemes will have specific target groups or resident beneficiaries for example:</p> <p>Disability - DFGs and related adaptations – 100% of these are provided for disabled residents and their wider household. Within these schemes specific additional support and assistance is provided for:</p> <ul style="list-style-type: none">• Palliative applicants• Those with motor neurone disease• Those with visual impairment – referred by partners Walsall Society for the Blind• Those residents who are covered by the Councils Armed Forces <p>The DFG service is an important Council contribution to the range of preventative services which directly impact positively on the health and wellbeing of residents and potentially avoid more expensive health and social care interventions that can also be more disruptive for residents and their wider family and support network.</p> <p>Also see reference overleaf to impact of race on disability needs.</p> <p>Age</p> <p>The majority of assistance supports residents over pensionable age as they are particularly vulnerable to issues related to poor housing conditions including for example excess winter deaths. Another key category is support for families with very young children (those under age of 5). Page 4 of Chapter 6 of the published Joint Strategic Needs Assistance https://www.walsallintelligence.org.uk/jsna/ highlights for example the level of DFGs that are awarded to the very young and very old: for example 48 DFGs approved in 2021 for children and 342 for those 60 years of age or older.</p> <p>Other assistance within the Policy seeks to support the very young and or the older members of Walsall. The reasons for this is that they are particularly vulnerable to specific risks defined within the Housing Health and Safety Rating System (HHSRS). For example excess winter deaths impacts on older residents more than those of middle age.</p>		

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Gender

There is no anticipated detrimental impact. There may be more of a positive impact for women especially for the assistance that relates to older residents for example but not limited to DFG as we know that a significant proportion of DFG applicants are older people and the life expectancy of women is generally greater than that of men nationally and also within Walsall. <https://www.walsallintelligence.org.uk/jsna/> (Chapter 4 Ageing well – data on mortality).

As children under 5 are noted as a vulnerable group likely to be positively affected by this Policy, and primary caregivers of children under 5 remain women, it may positively, though disproportionately, affect women, and specifically single mothers who may face increased need due to low income relative to their partnered counterparts, and may therefore live with excess cold or damp in their homes.

Race / ethnicity - link with disability

“Researchers found that those from a South Asian background, at every stage of adulthood, were more likely to experience poor physical functioning and had an increased risk of developing a physical disability than their White counterparts. This ethnic difference was most pronounced in women, with older South Asian women (over the age of 60) being four times more likely to report having a physical disability compared with older White British women of the same age. The increased risk among South Asians could not be attributed to socioeconomic status or existing major health conditions such as diabetes, which is particularly prevalent among UK South Asian people.

Researchers also found that African Caribbean women had elevated odds of poor physical functioning compared with White British women from middle age onwards, for example, in the older group, with 75% of African Caribbean women reporting poor physical functioning compared with 57% of White British women. The research indicated that socioeconomic status and chronic conditions, in particular obesity and hypertension, may help explain some but not all of the increased risks reported by African Caribbean females.” [Ethnic minority groups have higher risk of developing a physical disability than their White British counterparts | University of Surrey](#)

Thus the policy may positively, though disproportionately, affect those of minority ethnicity due to the prevalence of physical disability and mobility issues within minority ethnic communities at all stages of adult life, but particularly so in older populations, who may therefore require assistance and home adjustments.

Race – link with Poverty

Also, the Social Metrics Commission recently published data to show that while “data shows that the largest proportion of those in poverty (75%, equating to 10.7 million people) are in families with a head of household who is White...”, “... we find that the rate of poverty is much higher for Black and Minority Ethnic families. Nearly half (46%, equating to 900 000 people) of all people living in families where the household head is Black/African/Caribbean/Black British are in poverty, compared to just under one in five (19%) of those living in families where the head of household is White. People in Black and Minority Ethnic families are also between two and three times more likely to be in persistent poverty than people in White families” [Measuring-Poverty-2020-Web.pdf \(socialmetricscommission.org.uk\)](#)

As some schemes mentioned in the Policy are means tested and therefore more likely to affect those on lower incomes/living in poverty, it may positively, though disproportionately, affect those from minority ethnic backgrounds.

5	<p>Please provide details of all engagement and consultation undertaken for this proposal. (Please use a separate box for each engagement/consultation).</p>
	<p>The existing Policy has been online and available for residents and organisations to review and comment upon since 2014. Comments that have been made during the intervening years have helped shape the current proposal and have for example led to already agreed changes (approved under delegated powers):</p> <p>Palliative Support – feedback from impacted households and specialist Palliative Occupational Therapists has been positive and supported the introduction and expansion of a streamlined grant process that has been highly successful in delivering prompt action when households need it most;</p> <p>Those with visual impairment – A new service and system of adaptation help has been developed with the direct support of Walsall Society of the Blind. Further engagement with this organisation has been undertaken to market and promote other grant opportunities for residents.</p> <p>Support for households covered by the Armed Forces Covenant – The council through its services already supported veterans and its families and helps organisations such as the charity SAFFA to retain their funding and ensure eligible residents access funds from other sources.</p> <p>Other Policy changes The Policy has been developed following detailed input from a range of stakeholders and partners including Occupational Therapists (OTs), the national charity for Housing Improvement Agencies (Foundations), West Midlands Fire Service and colleagues in a range of departments.</p> <p>One new area of support has been specifically identified through examination of national best practice and involvement of senior OTs and that is for extra support for those residents with Motor Neurone Disease (MND) diagnosis.</p> <p>Home Energy / Insulation and Micro-generation assistance As indicated elsewhere there are significant funds available for households from a range of government and energy company sources. These change often and their availability is usually predicated on the specifics of an individual dwelling as a first key criteria i.e. does it lack a gas connection etc.</p> <p>Many funding sources have very strict criteria for the specific works and also the household qualifying criteria. The majority of this is outside the direct control of the council and is often set by the funder themselves. The two key areas the council can influence is:</p> <ul style="list-style-type: none"> • Use of the health through warmth budget and • Energy Company Obligation – Flex (ECO Flex) <p>With both of these the Policy is shaped on maximising external investment for households in the borough and seeking to prioritises dwellings in areas with the highest levels of recorded fuel poverty. The council regularly publishes an updated Home Energy Conservation Act Action Plan that is developed based on local and national statistics in line with government guidance. The council HECA action Plan is available at: https://go.walsall.gov.uk/heca_report_improving_home_energy_efficiency_together</p>

The current plan is dated July 2021 and will be updated during 2022 when the government releases new data on fuel poverty at a local level. This will enable the council to ensure that it continues to focus assistance at those areas of the borough most in need.

Complaints and concerns relating to previous policy

The service since 2014 has also had a number of complaints / concerns raised by residents about parts of the Policy and especially related to DFGs. These have been addressed and responded to at the time through the official complaints procedure and where relevant the Local Government Ombudsman (LGO). The council continues to monitor LGO decisions to ensure that its own Policy reflects national best practice.

A key area of concern raised by applicants for DFGs is on the test of resources / means test. This is a nationally applied test and the council has no discretion in terms of the factors that contribute to this specific test. The council has however as indicated in the Policy agreed that certain types of cases will fall outside the scope of the Test of Resources and these include for example minor works (previously works up to £1,500 now up to £3,000), Palliative support and support for residents with MND.

The service has also responded to the currently frequently stated concerns of residents in terms of the impact of price inflation on contractors prices and the current Policy includes new discretionary Inflationary Top Up assistance. This is the first time the council has provided this form of help and it will help those with more expensive adaptations fund these until the statutory limit of £30,000 has been increased.

National Guidance

The Policy has been shaped based on current national guidance for example:

- DFG national Guidance March 2022
- Eco 4-2022-2026 Guidance

This guidance has itself been subject to extensive consultation and EQIAs.

Consultation Activity

As stated above.

6 Concise overview of all evidence, engagement and consultation

The Policy is directed at using strictly limited resources available to the council to target assistance at priority works and themes. For example, key is to ensure that the council's statutory duty to provide DFGs is met. This duty overrides all others – as the remaining assistance is provided on a discretionary basis to seek to improve housing conditions.

Other priorities are based on tackling other key issues of removing where possible risks to life from dangerous homes including but not limited to tackling excess cold and fuel poverty. The 29 risks that are tackled are those listed within the Housing Health and Safety Rating System (HHSRS). This specifically identifies risks that can occur within a dwelling and for each risk it also identifies if there are specific groups at harm from that risk. These harm groups are usually age related.

Many of the funds described in the Policy are to tackle specific issues and must be used for clearly defined purposes. These funds are often from national government sources or from energy companies and have been provided based on detailed consultation by the

	<p>grant partners including but not limited to organisations such as OFGEM relating to the criteria for ECO.</p> <p>The Policy is designed to enable funds to be used appropriately and to not fund works that households can / should pay for themselves. For example, the Policy clearly states that the duty to repair and maintain a home rests with the owner.</p>		
7	<p>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.</p>		
	Characteristic	Affect	Reason
			Action needed Yes / No
	Age	<p>As highlighted previously specific grants are aimed at assisting older (60 years and older) and very young (usually under 5 years of age) residents as these are the key at risk groups for a range of HHSRS risks. For example eradicating falls associated with baths particularly benefits those over the age of 60 whilst those most at risk from electrical hazards are those aged under 5 years.</p> <p>The Policy is specifically written to target assistance at the relevant vulnerable age group.</p> <p>As highlighted above age is a key factor in DFGs for example in 2020/21 a total of 532 adaptations were completed:</p> <ul style="list-style-type: none"> • 296 (56%) were for residents over the age of 65 of which 199 were for residents aged 75 or older. • 21 (4%) were for children (below the age of 18). 	
	Disability	<p>As highlighted above a key part of the Policy is delivery of assistance for the disabled. The Policy supports a range of streamlining process to make access to this help easier and faster for applicants. Over the last 10 years significant work has been undertaken to reduce the average cost of a DFG so that the strictly limited funds can help even more disabled people (and their broader households and support networks). For example in 2010 the average DFG was over £12,000 whilst by 2021 it was less than £5,000.</p>	
	Pregnancy and maternity	<p>Schemes such as Health Through Warmth will support where possible those who are pregnant and those with very young children including supporting those with children who were low weight at birth. Excess cold and damp in a home can have a significant impact on those who are pregnant and new born babies.</p>	
	Gender	<p>There is no anticipated detrimental impact. There may be more of a positive impact for women especially for the assistance that relates to older residents for example but not limited to DFG as we know that a significant proportion of DFG applicants are older people and the life expectancy of women is generally greater than that of men nationally and also within Walsall. https://www.walsallintelligence.org.uk/jsna/ (Chapter 4 Ageing well – data on mortality).</p> <p>As noted above there is likely to be positive impact for women</p>	

		from the Policy as a result of women continue to be pre-dominant care givers for young children including single parents.		
	Gender reassignment Marriage and civil partnership Race Religion or belief Sex Sexual orientation	<p>Applicants with other Protected Characteristics will be all equally able to apply for funding provided they meet other specific criteria for example:</p> <ul style="list-style-type: none"> • Their dwelling requires the relevant works • Their household income is below a certain threshold (depending on the grant source) <p>The service undertakes a wide range of publicity about new grant initiatives including targeted marketing that includes where the funding is geographically focussed updates to local elected members and community organisations.</p> <p>The service has had particular success at promoting grant and assistance schemes to residents from eastern European communities via an organisation known as NASHDOM CIC. This direct liaison has helped remove barrier to access that may have otherwise existed due to language.</p> <p>Many new residents to the borough especially from overseas will be in private rented accommodation. The council has a proactive relationship with landlords (and a range of community organisations) and ensures that they are aware of available funds and their duties to ensure their properties are in good condition.</p>		
8	Does your proposal link with other proposals to have a cumulative effect on particular equality groups? If yes, give details.			NO
9	Which justifiable action does the evidence, engagement and consultation feedback suggest you take?			
	A	No major change required No potential for discrimination or adverse impact has been identified and all opportunities to promote equality have been taken.		
Action and monitoring plan				
Action Date	Action	Responsibility	Outcome Date	Outcome
Update to EqIA				
Date	Detail			
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Contact us

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Inside Walsall: http://int.walsall.gov.uk/Service_information/Equality_and_diversity

Cabinet – 22 June 2022

Housing Retro-fit 2022/23 schemes- Appointment of Contractors

Portfolio: Councillor Ali, Portfolio Holder for Customer

Service: Money Home Job, Childrens Services

Wards: Borough Wide

Key decision: Yes

Forward plan: Yes

1. Aim

To ensure that the council can use time-limited Local Authority Delivery Scheme (LADS) and Home Upgrade Grant (HUGs) funding to improve the energy efficiency of dwellings in the borough and help tackle fuel poverty, excess winter deaths and domestic carbon emissions.

2. Summary

2.1 Cabinet has previously been advised of the council's success in securing £2.06m of government funding from LADS round 1B (LADS 1B). Further successful bids were made for LADS 2 and LADS 2+ to the Midland Energy Hub (MEH) and are being delivered through our scheme partner E.on Energy Services Limited (E.on). This work is being delivered via a complaint framework (the "Framework") developed by Fusion 21 which has 3 relevant Lots (external wall insulation, loft insulation & solar PV) that enable direct awards. The LADS 2 and LADS 2+ that has been approved totals £2.43m.

2.2 Further grant bids have been approved under an over-arching title of Sustainable Warmth Competition by government and MEH for funds under LADS3 and a newly titled Home Upgrade Grant (HUGs) scheme. These are summarised below:

LADS 3	£5.33m
LADS 3 (via MEH)	£1.30m
HUGs 1	£1.25m
HUGs 1 (via MEH)	£0.32m

2.3 The council in bidding for funds has continued to be supported by E.on and also by High Aims Limited who have provided detailed ongoing specialist advice and support on property identification and scheme design as well as support for complementary projects funded under the Warm Homes Fund (providing first time gas central heating to vulnerable households). High Aims have also provided detailed support and advice on specialist contractor selection and product choice (i.e. type of insulation and heating systems including specialist advice on air source heat pumps) to be incorporated.

- 2.4 The total funding for LADs 3 and HUGs 1 is £8.2m and is expected to support between 760 and 800 principally owner occupied dwellings. High Aims are directly supporting the council team in scheme identification and verification on technical matters in line with the government's revised detailed criteria (known as PAS2035) which seeks to ensure high quality retro-fit works that do not result in future 'cold bridging' and cold homes (which can lead to damp and condensation).
- 2.5 In addition to continued use of E.on for a range of properties it is also proposed, due to the significant volume dwellings to be assisted, that an additional Fusion 21 contractor, identified by High Aims, is used for an element of the scheme. This provides the council with greater flexibility on delivery and greater certainty of meeting the strict funding timescales. The contractor identified by High Aims is YES Energy Solutions ("Yes"), a community interest company, who won two 2021 National Energy Efficiency Awards (Project Management of the Year and Insulation Project of the Year).
- 2.6 The work is in line with the council's adopted Home Energy Conservation Act (HECA) Action Plan, which seeks to lower fuel poverty in the borough (currently rate of 19.4% of all households, 11th highest nationally).
- 2.7 This is a key decision because of its significant value and due to the fact that it will have a significant effect on two or more wards.

3. Recommendations

- 3.1 That Cabinet award contracts for energy efficiency works to homes in Walsall under the Local Authority Delivery Scheme (LADS 3) and Home upgrade Grant (HUGs 1) as call offs from the Fusion 21 Framework to:
- a) E.on Energy Services Limited with an anticipated value of up to £5.20m;
 - b) YES Energy Solutions (CiC) with an anticipated value of up to £3.00m.
- 3.2 That Cabinet delegate authority to the Executive Director of Children's Services to enter into the relevant agreements with E.on Energy Services Limited and YES Energy Solutions on behalf of the council and to subsequently authorise signing of any associated contracts, deeds or other related documents.

4.1 Report detail - know

Context

LADS 3 and HUGs 1

- 4.1.1 Walsall has current fuel poverty levels of 19.4% compared to the West Midlands rate of 17.8% and England rate of 13.2%. Walsall is now 10th nationally for levels of fuel poverty. Officers and partners have continued to tackle fuel poverty and domestic carbon emissions through a range of activities including securing grant funding for residents (directly and indirectly) and supporting collective fuel switches.

- 4.1.2 Since the July 2021 approval the council has secured £8.20m of additional grant funding for external wall insulation, loft and cavity insulation, solar PV works and air-source heat pumps (ASHP).
- 4.1.3 The current grant awards under LADS 3 and HUGs 1 form part of the work to tackle fuel poverty and carbon emissions and have specific targets of improving the individual dwelling Energy Performance Certificate (EPC) level. The targets are for example D rated to C rated and F and G rated to D rated.
- 4.1.4 As with the previous work (LADS 1 and 2) the council's funding bids for LADS 3 and HUGS 1 were directly supported by E.on and this time by High Aims Limited. It is considered that these have again been instrumental in securing funding approval. Their support has included an ability to directly allocate Energy Company Obligation (ECO) funds to expand the nature of works (and investment) to eligible households and therefore increase the programme size and value.
- 4.1.5 E.on and High Aims have shown significant commitment to Walsall households and the council in helping develop the funding bids and generate 'leads' for the schemes. This work has been especially valuable and carefully thought out due to the range of Covid-related lockdowns that have been in place.

Other grant successes and forthcoming schemes

- 4.1.6 Council staff in line with cabinet approval in September 2021 submitted on behalf of Watmos Housing Association a bid for funding under the Social Housing Decarbonisation Fund (SHDF) Wave 1 scheme. This has been approved by government and a grant offered directly to Watmos by the council to undertake the works in 2022/23. Under the terms of the £7.92m award Watmos are directly procuring contractors to undertake works to their dwellings.
- 4.1.7 The council expect future SHDF Waves to be announced during 2022 as well as possible additional LADS 4 and HUGs 2 schemes.
- 4.1.8 One of the largest possible sources of funding for residents to help with insulation, heating and micro-generation is expected to be Energy Company Obligation (ECO and ECO Flex) Round 4. This is due to launch in July 2022 and officers are in ongoing discussions with E.on and High Aims about attracting as much of this national funding for Walsall residents as possible.

Accessing a compliant Framework

- 4.1.9 Having access to the Framework delivers many benefits; the primary one being a route to market that ensures compliance with all public sector procurement regulations – this means that purchasing energy efficiency goods and services can be carried out efficiently and without the need to undertake time consuming and costly tenders.

4.1.10 In addition to a compliant and efficient route to market, having a framework agreement in place with a limited number of suppliers provides opportunity to:

- Maximise the potential to deliver the LADS 3 and HUGs 1 within the tight funding timescales;
- Demonstrate proven success in LADS 3 and HUGs 1, which is expected to significantly help the council's prospects of securing funds under the future Sustainable Warmth Competitions;
- Continue to build a partnership with E.on with direct access to ECO 4 and ECO Flex 4 and with High Aims and YES who have links to other ECO 4 and ECO Flex 4 sources;
- Engage E.on and High Aims to support future funding bids to support local communities;
- Use E.on and YES's buying power with manufacturers and sub-contractors;
- Access supplier benefits at a reduced cost or free of charge, ranging from consultancy and project design and access to specialist retro-fit co-ordinators.

4.1.11 Making a direct award to E.on and separately to YES is allowed by the Framework and provides continuity of both programme and grant delivery for residents and the council. E.on is also an 'obligated' energy company and therefore will be able to allocate funds to qualifying households for additional eligible works under the ECO scheme. YES whilst not an obligated company has access to funding from alternative ECO obligated suppliers and will be seeking to direct this at additional measures during the delivery of HUGs 1 and LADS 3.

4.1.12 If the council does not have a contract in place for the delivery of these works all LADS LADS3 and HUGS 1 funding received to date will need to be returned to Central Government and/or MEH. Any offers of additional funding from them will be unlikely, because the council has no alternative delivery mechanism available given the scale of the programmes and strict funding timescales. Contracts are to be based on maximum per dwelling and measure costs and to end on 31 March 2023, unless funding providers agree time extensions.

4.2 Council Corporate Plan priorities

4.2.1 The proposal is in accordance with the:

- a) Housing Strategy (2020-2025), which highlights that the council is committed to improving the condition of homes in the borough; and
- b) council's HECA Action Plan June 2021, which seeks to reduce fuel poverty and tackle domestic carbon emissions.

4.2.2 Securing external capital funding to tackle fuel poverty and domestic carbon emissions is in line with the 'Our Council Plan 2022-25' in particular:

Communities: Empower our communities so that they feel they are connected and belong in Walsall, creating safe and healthy places whilst building a strong sense of community.

4.3 Risk management

- 4.3.1 The risks associated with entering into these contract are for the following reasons considered to be minimal.
- 4.3.2 Use of this Framework and the direct award approach provides a compliant route to delivery of the LADS and HUGS funding and the opportunity to secure ECO funding for additional works.
- 4.3.3 In line with the LADS criteria, the council will only pay funds to E.on and YES once clear evidence has been provided to the council by them of:
- works being completed to individual properties including, but not limited to, pre and post EPCs; and
 - that the programme average allocation does not exceed £10,000 per property for LADS 3 and no higher than £15,000 for HUGS 1.
- 4.3.4 E.on and YES will each have a separate legal agreement with their own sub-contractors / installers and with each resident household.

4.4 *Financial implications*

- 4.4.1 The grants awarded by government and MEH for LADS 3 and HUGs 1 are summarised in 2.2 and total £8.20m.
- 4.4.2 As indicated in 4.3.3 funding will only be released by the council to E.on and YES upon evidence of the completion of relevant works to qualifying dwellings.

4.5 *Legal implications*

The council's Framework call-off contracts with E.on and YES will be JCT Intermediate Building Contracts with Contractors Design, as required by Fusion 21. The Housing Standards and Improvement service have officers experienced in negotiating and completing this form of construction contract.

4.6 *Procurement Implications/Social Value*

- 4.6.1 The Framework has been tendered in compliance with the Public Contracts Regulations 2015 and is authorised for use by the council.
- 4.6.2 Advice and guidance has been given by the Procurement Team throughout this process. The council's sourcing exercise has been undertaken in accordance with the requirements of the Public Contracts Regulations 2015 and complies with the council's Contract Rules.

4.7 *Property implications*

There are no direct property implications for the council because no council housing stock is eligible for assistance under LADS 3 or HUGs 1.

4.8 *Health and wellbeing implications*

- 4.8.1 The LADS and HUGs will directly benefit fuel poor households in Walsall and help take them out of fuel poverty. Fuel poverty affects health by increasing illnesses and making

some illnesses worse. Ill health can cause stress and impact on other parts of resident's life such as jobs, education and social life, for example:

- Cold related illnesses;
- Respiratory illnesses;
- Allergies;
- Increased risk of heart attacks and strokes.

4.8.2 Previous council research undertaken has highlighted that undertaking home insulation and/or heating upgrades has a statistically significant positive impact on mental well-being.

4.8.3 Work to date has been undertaken by council and E.on, High aims and YES staff with residents in a Covid-safe manner and this will continue with all subcontractors and specialist installers.

4.9 *Staffing implications*

Staff within Housing Standards and Improvement will directly manage the delivery of LADS with E.on and YES supported by High Aims and will submit relevant monitoring returns to Central Government and MEH.

4.10 *Reducing Inequalities*

4.10.1 The implications for reducing inequalities have been taken into account and assessed. The proposal is in accordance with the council's approved Renewal Assistance Policy (for which an EQIA already exists).

4.10.1 The key LADS and HUGs grant criteria is property specific i.e. the dwelling must have a low rated EPC and this effectively 'leads' the prospective direction of grant funding. Occupiers of target dwellings will need to be in fuel poverty to meet the remaining LADS / HUGs criteria and the scheme will directly help them move out of fuel poverty and reduce the risk of excess winter deaths caused by cold and damp homes.

4.10.2 ECO4 and ECO Flex 4 funding for dwellings is strictly based on property and resident criteria set by government and OFGEM including as key Notional Annual Building Savings (NABS).

4.11 *Climate Change*

Domestic related carbon emissions have reduced in Walsall from 609 Kt CO in 2009 to 377 Kt CO in 2019 (latest figures) a drop of 38% which mirrors the regional and English reductions. The proposal will help continue to reduce domestic related carbon emissions in the borough through improving the energy efficiency of dwellings and enabling a range of residents to produce their own green energy (solar PV).

4.12 *Consultation*

4.12.1 The council, High Aims, Eon and YES have undertaken a range of consultation activities with residents of prospective target LADS dwellings. Promotion of the scheme has also taken place with local ward councillors and community representatives to maximise expressions of interest from residents in the target areas.

4.12.2 Discussions are ongoing with E.on and YES to secure their continued commitment to generate 'leads' for additional target dwellings for LADS 3 and HUGs 1 and this is helping the council develop prospective bids under expected future government and MEH Sustainable Warmth Competitions.

5. Decide

5.1 An alternative to the recommendation in this report is not to appoint contractors to undertake the LADS and HUGs works, but this would:

- a) require the council to return the approved grant funding to Central Government and MEH respectively; and
- b) lead to a serious negative impact on the outcome of any future bids for similar funds, such as any forthcoming Sustainable Warmth Competitions or SHDF.

5.2 Cabinet is requested to approve the recommendations made in section 3 of this report.

6. Respond

6.1 In the event that Cabinet approves the award of this contract, Housing Standards and Improvements will work closely with E.on, YES and Fusion 21 to ensure that all contractual arrangements are agreed and completed prior to physical commencement of any capital works. This will be done as soon as practicable to enable the LADS 3 and HUG 1 funds to be utilised.

6.2 Housing Standards and Improvements will then continue to monitor E.on's and YES's service delivery.

7. Review

7.1 The Housing Standards and Improvement service continues to review progress on tackling fuel poverty and reviews, at least annually, statistics relevant to this field and updates the corporate HECA Action Plan.

7.2 In line with LADS funding criteria, regular monitoring reports will be submitted to government and / or MEH as required.

Background papers

None

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01.06.2022



Councillor G Ali
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14.06.2022