

# Sustainability Appraisal of the Sandwell Local Plan

## Regulation 18 (II): Draft Plan

October 2023



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

# Sustainability Appraisal of the Sandwell Local Plan

Regulation 18 (II): Draft Plan

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This report has been produced to evaluate the potential sustainability impacts of the Sandwell

Local Plan and meets the requirements of the SEA Regulations. It is not intended to be a substitute for an Environmental Impact Assessment (EIA) or Appropriate Assessment (AA).

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# Acronyms & Abbreviations



A&E	Accident and Emergency
AAP	Area Action Plan
AHHLV	Area of High Historic Landscape Value
AHHTV	Area of High Historic Townscape Value
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
APA	Archaeological Priority Area
AQMA	Air Quality Management Area
BCCS	Black Country Core Strategy
BCP	Black Country Plan
BMV	Best and most versatile
CA	Conservation Area
CfS	Call for Sites
DEFRA	Department for Environment, Food and Rural Affairs
DLHHV	Designed Landscape of High Historic Value
DLUHC	Department for Levelling Up, Housing and Communities
DtC	Duty to Cooperate
EDNA	Economic Development Needs Assessment
EMP	Employment
EU	European Union
FEMA	Functional Economic Market Area
GHG	Greenhouse Gas
GI	Green Infrastructure
GIS	Geographical Information Systems
GP	General Practitioner
GTAA	Gypsy and Traveller Accommodation Assessment
GTTS	Gypsy, Traveller and Travelling Showpeople
HIA	Health Impact Assessment
HLC	Historic Landscape Characterisation
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
HSG	Housing
IMD	Index of Multiple Deprivation
IRZ	Impact Risk Zone
LNR	Local Nature Reserve
LSOA	Lower Super Output Area
LVA	Landscape and Visual Appraisal
LVIA	Landscape and Visual Impact Assessment
MHCLG	Ministry of Housing, Communities and Local Government
NHS	National Health Service
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
ONS	Office of National Statistics
PDL	Previously Developed Land

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PPP	Policies Plans and Programmes
PRoW	Public Rights of Way
RPG	Registered Park and Garden
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SINC	Site of Importance for Nature Conservation
SLINC	Site of Local Importance for Nature Conservation
SLP	Sandwell Local Plan
SM	Scheduled Monument
SMBC	Sandwell Metropolitan Borough Council
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Sites of Special Scientific Interest
SuDS	Sustainable Drainage System

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# Executive Summary

## About this report

- E1 Lepus Consulting is conducting an appraisal process for Sandwell Metropolitan Borough Council (SMBC) to help them prepare the Sandwell Local Plan (SLP). 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 (SMBC) and the appraisal team (Lepus Consulting). The process seeks to provide high level environmental protection and the different stages of plan making are mostly accompanied by consultation with statutory bodies, other stakeholders and the public.
- 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 Local Plan.
- E3 This report is being published following consultation with the statutory consultees between February and March 2023 on the SA Scoping Report, which identified the scope and level of detail to be included in the SA process going forward, and the Regulation 18 (I) Issues and Options SA Report, which presented an assessment of the proposed SLP Vision and Objectives and made recommendations for the emerging SLP.
- E4 This Regulation 18 (II) SA Report has been prepared to assess the draft policies and options (or 'reasonable alternatives') as presented in the Draft Sandwell Local Plan 2025-2041 Regulation 18 Consultation document. This includes options for:
- Housing growth;
  - Gypsy and Traveller growth;
  - Employment growth;
  - Spatial strategy; and
  - Development sites.
- E5 The assessment of reasonable alternatives is an important requirement of the SEA Regulations.

## Summary findings

- E6 Findings from the assessments are presented in a single-line matrix format. The high-level matrix is not a conclusive tool or model. Its main function is to identify at a strategic level whether or not the assessment requires a more detailed examination or whether satisfactory conclusions may be drawn from the high-level assessment without the need for further (time consuming) detailed analysis of a particular policy.
- E7 As required by the SEA Regulations, cumulative, indirect and synergistic effects are also identified and evaluated during the assessment, where relevant.

## **Housing Growth Options**

- E8 XXX

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### ***Gypsy and Traveller Growth Options***

E9 XXX

### ***Employment Growth Options***

E10 XXX

### ***Spatial Options***

E11 XXX

### ***Reasonable Alternative Sites***

E12 XXX

### ***Draft Policies***

E13 XXX

### **Next steps**

- E14 This Regulation 18 (II) SA Report is subject to consultation with statutory consultees, stakeholders and the general public alongside the Draft SLP.
- E15 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.
- E16 Once SMBC have reviewed Regulation 18 (II) consultation comments and have begun preparing the next version of the SLP (Regulation 19 stage), preparation of an Environmental Report will be, also known as a full SA report. The Environmental Report will include all of the legal requirements set out in Schedule 2 of the SEA Regulations.

# 1 Introduction

## 1.1 Background

- 1.1.1 Sandwell Metropolitan Council (SMBC) are in the process of writing the Sandwell Local Plan (SLP). As part of this process, a Sustainability Appraisal (SA) is being undertaken that incorporates the requirements of Strategic Environmental Assessment (SEA). The purpose of SA/SEA is to help guide and influence the decision making process for SMBC by identifying the likely sustainability effects of reasonable alternatives and various options.
- 1.1.2 The SLP is at the plan making stage known as the 'Draft Plan' stage, and follows on from the 'Issues and Options' stage. The purpose of this SA report is to assess the sustainable development implications of proposals presented in the Draft Sandwell Local Plan 2025-2041 Regulation 18 Consultation document.
- 1.1.3 A wide range of reasonable alternatives have been identified by SMBC during the plan making process. This includes growth options, spatial options and development sites, as well as a suite of draft policies. The sustainability appraisal outputs will help SMBC to identify sustainable development options and prepare a local plan which is economically, environmentally, and socially sustainable.
- 1.1.4 A sustainability appraisal is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 1.1.5 This SA/SEA document follows on from the SA Scoping Report<sup>1</sup> and the Regulation 18 Issues and Options SA Report<sup>2</sup>, both of which were consulted on with the statutory bodies (Natural England, Historic England and the Environment Agency) and the public between 6<sup>th</sup> February and 20<sup>th</sup> March 2023.

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<sup>1</sup> Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan: Scoping Report. Available at: [https://www.sandwell.gov.uk/downloads/file/33699/slp - issues and options sustainability appraisal - scoping report](https://www.sandwell.gov.uk/downloads/file/33699/slp_-_issues_and_options_sustainability_appraisal_-_scoping_report) [Date accessed: 06/06/23]

<sup>2</sup> Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan: Regulation 18 Issues and Options, January 2023. Available at: [https://www.sandwell.gov.uk/downloads/file/33698/slp - issues and options sustainability appraisal](https://www.sandwell.gov.uk/downloads/file/33698/slp_-_issues_and_options_sustainability_appraisal) [Date accessed: 06/06/23]

## 1.2 Sandwell Metropolitan Borough

- 1.2.1 Sandwell is a metropolitan borough covering approximately 8,556ha, with a population of 341,900 according to the Census (2021)<sup>3</sup>. On average, Sandwell has a younger and more ethnically diverse population than the rest of the UK. Deprivation and inequalities are key issues for the local population, Sandwell is one of the most deprived local authorities in England with approximately 25.5% of children living in low-income families and life expectancy for both men and women lower than the national average.
- 1.2.2 Sandwell lies within the Black Country, which is a predominantly urban sub-region of the West Midlands. The sub-region includes the boroughs of Dudley, Sandwell, Walsall and the City of Wolverhampton. The location of Sandwell is shown in **Figure 1.1**.
- 1.2.3 The strategic centre of Sandwell is West Bromwich, with several main towns and centres including Bearwood, Blackheath, Cape Hill, Cradley Heath, Great Bridge, Oldbury and Wednesbury, alongside smaller towns and settlements. Sandwells towns are well connected through a network of strategic transport routes, with links to other regional and national centres via the M5/M6 and rail corridors.
- 1.2.4 Industry and manufacturing form a key part of Sandwell's history, which continues in the local economy today as Sandwell is an important centre in particular for retail and wholesale, manufacturing, and health and social care sectors. Sandwell also plays a role within the wider economy in terms of electricity, gas and air conditioning as well as water supply and waste management, and transportation and storage industries. The borough also supports a range of parks and open spaces including the Rowley Hills and Sandwell Valley. The Sandwell Valley forms Sandwells only area of Green Belt land.

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<sup>3</sup> Office for National Statistics (2022) How the population changed in Sandwell: Census 2021. Available at: <https://www.ons.gov.uk/visualisations/censuspopulationchange/E08000028/> [Date accessed: 02/06/2]

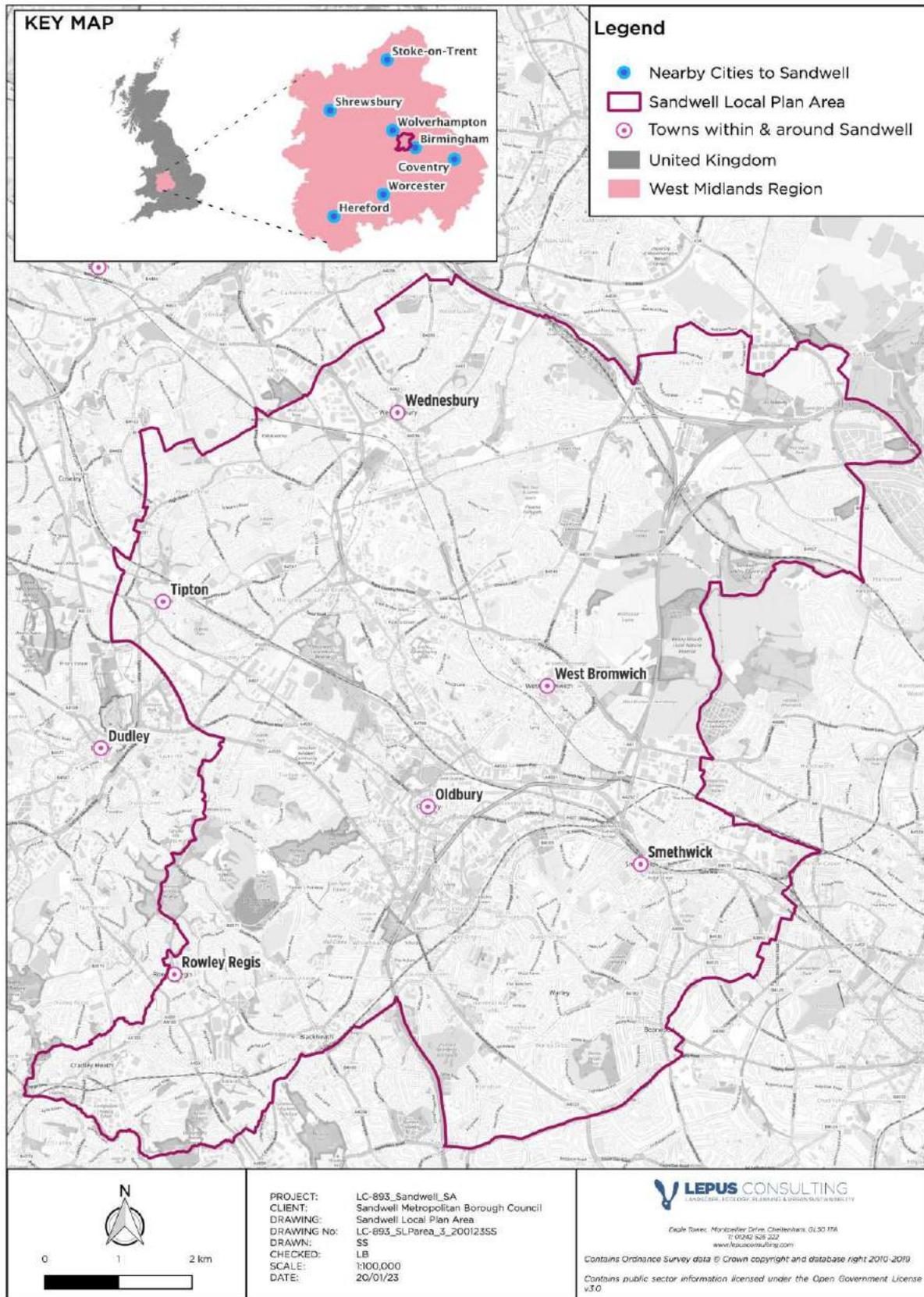


Figure 1.1: Sandwell administrative boundary

## 1.3 The Sandwell Local Plan

- 1.3.1 The Sandwell Local Plan (SLP) will include the overall strategy for development in Sandwell Metropolitan Borough for the plan period 2025 to 2041, including a vision for Sandwell in 2041 and underpinning strategic objectives, and an overall spatial strategy supported by site allocations and policies to guide land use and development within the borough.
- 1.3.2 The SLP is being prepared by SMBC, following the political decision to cease work on the joint Black Country Plan (BCP) in autumn 2022. The SLP will carry forward relevant information and evidence prepared as part of the Draft BCP, with specific changes in response to planning issues raised during the Draft BCP consultation and new evidence and information for the Sandwell authority area. This includes information gathered from the Issues and Options Consultation for the emerging SLP in early 2023<sup>4</sup>.
- 1.3.3 The BCP itself began as a review of the adopted Black Country Core Strategy (BCCS), produced by the four Black Country Authorities of Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Council and City of Wolverhampton Council.
- 1.3.4 Once adopted, the SLP will form part of the statutory development plan for the borough covering a minimum of 15 years, replacing and updating the currently adopted BCCS<sup>5</sup>, Sandwell Site Allocation and Delivery Development Plan Document (SAD)<sup>6</sup>, and various other Area Action Plans which cover the period from 2006 to 2026.

## 1.4 Duty to Cooperate

- 1.4.1 The Duty to Cooperate (DtC) was created in the Localism Act 2011<sup>7</sup> and amends the Planning and Compulsory Purchase Act 2004. Current national policy places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.
- 1.4.2 For SMBC, this means that unmet housing and economic land need should be sought to be provided for across the wider Housing Market Area (HMA), Functional Economic Market Area (FEMA) and other areas with which Sandwell has a physical or functional relationship.
- 1.4.3 A DtC Statement will be prepared, which will demonstrate how SMBC has fulfilled this duty through the plan-making process. It is intended to draft and agree Statements of Common Ground with relevant authorities and bodies on key DtC issues at the Publication stage.

<sup>4</sup> Sandwell Metropolitan Borough Council (2023) Sandwell Local Plan: Issues and Options Consultation. Available at: [https://www.sandwell.gov.uk/info/200317/planning\\_policy/4990/sandwell\\_local\\_plan](https://www.sandwell.gov.uk/info/200317/planning_policy/4990/sandwell_local_plan) [Date accessed: 11/08/23]

<sup>5</sup> Black Country Authorities (2011) Black Country Core Strategy. Available at: <https://blackcountryplan.dudley.gov.uk/t1/p2/> [Date accessed: 06/06/23]

<sup>6</sup> Sandwell Metropolitan Borough Council (2012) Site Allocations and Delivery Development Plan Document. Available at: [https://www.sandwell.gov.uk/info/200275/planning\\_and\\_buildings/676/site\\_allocations\\_and\\_delivery\\_development\\_plan\\_document](https://www.sandwell.gov.uk/info/200275/planning_and_buildings/676/site_allocations_and_delivery_development_plan_document) [Date accessed: 06/06/23]

<sup>7</sup> Localism Act 2011. Available at: <https://www.legislation.gov.uk/ukpga/2011/20/contents> [Date accessed: 02/06/23]

1.4.4 It should be noted that emerging reforms to planning policy set out the intention to repeal the DtC and replace this with a more flexible 'alignment test'<sup>8</sup>. However, at the time of writing and for the purposes of this stage of the SLP, the current DtC requirement applies.

## 1.5 Integrated approach to SA and SEA

1.5.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.

1.5.2 The European Union Directive 2001/42/EC<sup>9</sup> (SEA Directive) applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types). The objective of the SEA procedure can be summarised as follows: *"the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development"*.

1.5.3 The SEA Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004<sup>10</sup> (SEA Regulations). Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the Local Plan to be subject to SEA throughout its preparation.

1.5.4 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is a legal requirement as specified by S19(5) of the Planning and Compulsory Purchase Act 2004<sup>11</sup> and should be an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA lies in The Town and Country Planning (Local Planning) (England) Regulations 2012<sup>12</sup>. SA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.

1.5.5 Public consultation is an important aspect of the integrated SA/SEA process.

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<sup>8</sup> DLUHC (2022) Policy Paper – Levelling Up and Regeneration: Further information. Available at: <https://www.gov.uk/government/publications/levelling-up-and-regeneration-further-information/levelling-up-and-regeneration-further-information> [Date accessed: 11/08/23]

<sup>9</sup> Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (SEA Directive). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date accessed: 02/06/23]

<sup>10</sup> The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/ukxi/2004/1633/contents/made> [Date accessed: 02/06/23]

<sup>11</sup> Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 02/06/23]

<sup>12</sup> The Town and Country Planning Regulations 2012. Available at: <http://www.legislation.gov.uk/ukxi/2012/767/contents/made> [Date accessed: 02/06/23]

## 1.6 Best Practice Guidance

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

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment<sup>13</sup>.
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive<sup>14</sup>.
- Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework (NPPF)<sup>15</sup>.
- Ministry of Housing, Communities and Local Government (2021) Planning Practice Guidance (PPG)<sup>16</sup>.
- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans<sup>17</sup>.

## 1.7 Sustainability Appraisal

1.7.1 This document is a component of the SA of the SLP. It provides an assessment of the likely effects of reasonable alternatives, as per Stage B of **Figure 1.2**, according to PPG on SA<sup>18</sup>.

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<sup>13</sup> European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: [https://ec.europa.eu/environment/archives/eia/pdf/030923\\_sea\\_guidance.pdf](https://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf) [Date accessed: 02/06/23]

<sup>14</sup> Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguides\\_ea.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguides_ea.pdf) [Date accessed: 02/06/23]

<sup>15</sup> MHCLG (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 02/06/23]

<sup>16</sup> DLUHC & MHCLG (2021) Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date accessed: 02/06/23]

<sup>17</sup> Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sapracticeadvicefull2018c.pdf> [Date accessed: 02/06/23]

<sup>18</sup> DLUHC & MHCLG (2020) Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 02/06/23]



*Figure 1.2: Sustainability appraisal process*

## 1.8 The SA process so far

1.8.1 **Table 1.1** below presents a timeline of stages of the SLP and SA process so far. To date, this represents Stages A and B of **Figure 1.2**.

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

Date	SLP Stage	Sustainability Appraisal
January 2023	Plan making commences.	<b>SA Scoping Report</b> This report identifies the scope and level of detail to be included in the SA.
February–March 2023	<b>Issues and Preferred Options (Regulation 18) Consultation</b> In the Issues and Options document, the Council considered the ways in which future development needs could be met and asked the public and other stakeholders to comment on these key issues for the borough.	<b>Regulation 18: Issues and Preferred Options SA Report</b> The Regulation 18 (I) SA Report presented an assessment of the SLP Vision and Objectives as set out in the consultation document, and made recommendations for the emerging SLP.
November – December 2023	<b>Draft Plan (Regulation 18 II) Consultation</b> The Draft Plan document sets out the Councils’ preferred options for the overall levels of growth and spatial strategy as well as site allocations and policy areas, and seeks consultation views on these to help inform the SLP process going forward.	<b>Regulation 18 (II) SA Report</b> This report assesses the reasonable alternative options for housing growth, employment growth, Gypsy and Traveller growth, spatial strategy, development sites and policies identified by the Council.

## 1.9 Scoping Report

1.9.1 In order to identify the scope and level of detail of the information to be included in the SA process, an SA Scoping Report<sup>19</sup> was produced in January 2023.

1.9.2 The SA Scoping Report represented Stage A of the SA process (see **Figure 1.2**), and contains 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.

1.9.3 The Scoping Report was consulted on between 6<sup>th</sup> February and 20<sup>th</sup> March 2023 with the statutory bodies Natural England, Historic England and the Environment Agency as well as the general public. No specific comments were received regarding the SA Scoping Report.

<sup>19</sup> Lepus Consulting (2022) Sustainability Appraisal of the Sandwell Local Plan: Scoping Report. Available at: [https://www.sandwell.gov.uk/downloads/file/33699/slp - issues and options sustainability appraisal - scoping report](https://www.sandwell.gov.uk/downloads/file/33699/slp_-_issues_and_options_sustainability_appraisal_-_scoping_report) [Date accessed: 06/06/23]

## 1.10 Regulation 18 (I) Issues and Options SA

- 1.10.1 Through the Issues and Options Consultation, the Council sought to involve local people, businesses and stakeholders in identifying what the emerging SLP should address. In addition to various questions which seek to gather views from consultees, the Issues and Options consultation document identified options for the Vision and 11 draft Objectives for the SLP.
- 1.10.2 The Regulation 18 Issues and Options SA Report set out an assessment of the draft Vision and Objectives of the emerging SLP. The SA Report also set out a range of recommendations for SMBC to consider as the SLP is developed and refined, including recommendations to improve the SLP Vision and Objectives, as well as consideration of the identification, description and evaluation of reasonable alternatives which is an important aspect of this Regulation 18 (II) SA Report.
- 1.10.3 The Issues and Options SA Report was consulted on between 6<sup>th</sup> February and 20<sup>th</sup> March 2023 with statutory consultees, stakeholders and the general public, alongside the SLP Issues and Options document, and the SA Scoping Report.
- 1.10.4 Comments received during the consultation relating to the SA have informed the preparation of this Regulation 18 (II) SA Report. **Table 1.2** summarises the responses received and how these comments have been incorporated into the SA process going forward.

**Table 1.2:** Consultation responses from statutory consultees on Regulation 18 (I) Issues and Options SA Report (January 2023)

Consultee	Summary of Consultation Response	Incorporation into the SA
Natural England	No specific comments received regarding the SA Scoping Report or Issues and Options Report, but general comments and recommendations have been supplied including the following:  <i>"The Local Plan should be underpinned by up to date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites."</i>	The SA has incorporated the latest evidence available, identified through conversation with SMBC. This includes consideration of the emerging approach to Nature Recovery Networks within the borough. [add more details when assessments progressed]
Historic England	The following comments received regarding the Issues and options SA Report: <i>"3.2 we would welcome reference to the historic environment within the vision which should then help to set out a positive strategy for the historic environment. Table 3.1 we are supportive of a separate objective for cultural heritage. There is limited detail to comment on at this stage as we are awaiting to see the content of the Local Plan and the policies and allocations that the Council decides to pursue. We welcome an objective to assess cultural heritage when that detail is available. When considering relevant plans and programmes to consider within the SEA/SA process we recommend that the Council consider the documents listed in our representation above, where we have included the links for ease."</i>	The Issues and Options SA in section 4.2 included a recommendation to incorporate stronger reference to the importance of conservation and enhancement of cultural heritage and the historic environment, such as seeking opportunities for heritage-led regeneration. SMBC have since updated the Vision with stronger wording, as presented in the Draft SLP, which has

Consultee	Summary of Consultation Response	Incorporation into the SA
		been re-assessed in <b>Appendix D.</b>
Environment Agency	No response received.	N/A

## 1.11 Signposting for this report

1.11.1 This Regulation 18 Issues and Preferred Options SA Report sets out an assessment of reasonable alternatives, or 'options', set out in the Issues and Preferred Options document prepared by SMBC. These relate to options for growth and the spatial strategy, policies and development sites.

1.11.2 The appendices of this report provide essential contextual information to the main body of the report. The contents of this SA Report are listed below:

- **Chapter 1** (this chapter) sets out the purpose, context and introduction to the SLP and the accompanying SA process.
- **Chapter 2** sets out the methodology used to present and assess the findings of the SA process.
- **Chapter 3** presents the assessment of the housing growth options.
- **Chapter 4** presents the assessment of the employment growth options.
- **Chapter 5** presents the assessment of the Gypsy, Traveller and Travelling Showpeople growth options.
- **Chapter 6** presents the assessment of the spatial growth options.
- **Chapter 7** summarises the SA findings in relation to the assessment of proposed SLP policies.
- **Chapter 8** summarises the SA findings in relation to the assessment of reasonable alternative development sites pre-mitigation, considers the likely mitigating impact of the draft SLP policies in regard to identified adverse impacts, and presents selection and rejection information.
- **Chapter 9** sets out the conclusions of this Regulation 18 (II) SA, and outlines the next steps.
- **Appendix A** presents the SA Framework.
- **Appendix B** presents the detailed site assessment methodology, building on the information set out in **Chapter 2**.
- **Appendix C** presents the assessment of the reasonable alternative sites.
- **Appendix D** presents the assessment of the Draft SLP policies.

## 2 Assessment methodology and scope of appraisal

### 2.1 Assessment of reasonable alternatives

2.1.1 Each of the reasonable alternatives or options appraised in this report have been assessed for their likely impacts on each SA Objective of the SA Framework. The SA Framework, which is presented in its entirety in **Appendix A**, is comprised of 14 SA Objectives. **Table 2.1** summarises the SA Objectives and their relevance to the SEA themes.

*Table 2.1: Summary of SA Objectives*

	SA Objectives	Relevance to SEA Regulations – Schedule 2
1	<b>Cultural heritage:</b> Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance	Cultural heritage
2	<b>Landscape:</b> Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place	Landscape and cultural heritage
3	<b>Biodiversity, flora, fauna and geodiversity:</b> Protect, enhance and manage biodiversity and geodiversity.	Biodiversity, flora and fauna
4	<b>Climate change mitigation:</b> Minimise Sandwell’s contribution to climate change.	Climatic factors
5	<b>Climate change adaptation:</b> Plan for the anticipated levels of climate change.	Climatic factors, soil, water
6	<b>Natural resources:</b> Protect and conserve natural resources.	Soil, water and material assets
7	<b>Pollution:</b> Reduce air, soil, water and noise pollution	Air, water, soil and human health
8	<b>Waste:</b> Reduce waste generation and disposal and achieve the sustainable management of waste.	Material assets
9	<b>Transport and accessibility:</b> Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	Climatic factors and material assets
10	<b>Housing:</b> Provide affordable, environmentally sound and good quality housing for all.	Population
11	<b>Equality:</b> Reduce poverty, crime and social deprivation and secure economic inclusion.	Population and human health
12	<b>Health:</b> Safeguard and improve community health, safety and wellbeing.	Population and human health
13	<b>Economy:</b> Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.	Population and material assets

	SA Objectives	Relevance to SEA Regulations – Schedule 2
14	<b>Education, skills and training:</b> Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness.	Population

- 2.1.2 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 SEA Regulations<sup>20</sup>. Including the SEA topics in the SA Objectives helps to ensure that all of the environmental criteria of the SEA Regulations are represented. Consequently, the SA Objectives reflect all subject areas to ensure that the assessment process is transparent, robust and thorough.
- 2.1.3 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.
- 2.1.4 The purpose of this document is to provide an appraisal of reasonable alternatives, also known as 'options', in line with Regulation 12 of the SEA Regulations<sup>21</sup>:
- 2.1.5 *"Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report ... [which] shall identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme".*
- 2.1.6 At this stage of the plan making process, SMBC have identified options for the levels of housing, Gypsy and Traveller and employment growth, broad spatial strategy options, and reasonable alternative sites.
- 2.1.7 This document also provides information in relation to the likely characteristics of effects, as per the SEA Regulations (see **Box 2.1**).

<sup>20</sup> Schedule 2 of the SEA Regulations identifies the likely significant effects on the environment, including "issues such as (a) biodiversity, (b) population, (c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l)."

<sup>21</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 25/10/22]

**Box 2.1: Schedule 1 of the SEA Regulations<sup>22</sup>**

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

**The characteristics of plans and programmes, having regard, in particular, to:**

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme; and
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).

**Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:**

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
  - special natural characteristics or cultural heritage;
  - exceeded environmental quality standards or limit values;
  - intensive land-use; and
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

## 2.2 Impact assessment and determination of significance

2.2.1 Significance of effect is a combination of impact sensitivity and magnitude. Impact sensitivity can be expressed in relative terms, based on the principle that the more sensitive the resource, the greater the magnitude of the change, and as compared with the do-nothing comparison, the greater will be the significance of effect.

### 2.3 Sensitivity

2.3.1 Sensitivity has been measured through consideration as to how the receiving environment will be impacted by a plan proposal. This includes assessment of the value and vulnerability of the receiving environment, whether or not environmental quality standards will be exceeded, and for example, if impacts will affect designated areas or landscapes.

2.3.2 A guide to the range of scales used in determining impact sensitivity is presented in **Table 2.2**. For most receptors, sensitivity increases with geographic scale.

<sup>22</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 25/10/22]

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**Table 2.2: Impact sensitivity**

Scale	Typical criteria
International/national	Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension.
Regional	This includes the regional and sub-regional scale, including county-wide level and regional areas.
Local	This is the district and neighbourhood scale.

## 2.4 Magnitude

2.4.1 Magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude has been determined on the basis of the susceptibility of a receptor to the type of change that will arise, as well as the value of the affected receptor (see **Table 2.3**).

**Table 2.3: Impact magnitude**

Impact magnitude	Typical criteria
High	<ul style="list-style-type: none"> <li>Likely total loss of or major alteration to the receptor in question;</li> <li>Provision of a new receptor/feature; or</li> <li>The impact is permanent and frequent.</li> </ul>
Medium	Partial loss/alteration/improvement to one or more key features; or The impact is one of the following: <ul style="list-style-type: none"> <li>Frequent and short-term;</li> <li>Frequent and reversible;</li> <li>Long-term (and frequent) and reversible;</li> <li>Long-term and occasional; or</li> <li>Permanent and occasional.</li> </ul>
Low	Minor loss/alteration/improvement to one or more key features of the receptor; or The impact is one of the following: <ul style="list-style-type: none"> <li>Reversible and short-term;</li> <li>Reversible and occasional; or</li> <li>Short-term and occasional.</li> </ul>

## 2.5 Significant effects

2.5.1 A single value from **Table 2.4** has been allocated to each SA Objective for each reasonable alternative. Justification for the classification of the impact for each SA objective is presented in an accompanying narrative assessment text for all reasonable alternatives that have been assessed through the SA process.

2.5.2 The assessment of impacts and subsequent evaluation of significant effects is in accordance with Schedule 2 (6) of the SEA Regulations, where feasible, which states that the effects should include: "*short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects*".

**Table 2.4:** Guide to scoring significant effects

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

- 2.5.3 When selecting a single value to best represent the sustainability performance, and to understand the significance of effects of an option in terms of the relevant SA Objective, the precautionary principle<sup>23</sup> has been used. This is a worst-case scenario approach. If a positive effect is identified in relation to one criterion within the SA Framework (see the second column of the SA Framework in **Appendix A**) and a negative effect is identified in relation to another criterion within the same SA Objective, the overall impact has been assigned as negative for that objective. It is therefore essential to appreciate that the impacts are indicative summarily and that the accompanying assessment text provides a fuller explanation of the sustainability performance of the option or proposal being considered.
- 2.5.4 For the assessment of reasonable alternative sites, to enable further transparency and to provide the reader with contextual information that is relevant to each SA Objective, the full assessments presented in the SA report appendices have been set out per 'receptor'. The methodology used to assess reasonable alternative sites throughout the SA process, which sets out the receptors considered for each SA Objective and includes topic-specific methodologies and assumptions, is presented in **Appendix B**.
- 2.5.5 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without adverse effects on valued or important receptors (identified in the baseline).
- 2.5.6 The level of effect has been categorised as minor or major. The nature of the significant effect can be either positive or negative depending on the type of development and the design and mitigation measures proposed.
- 2.5.7 Each reasonable alternative or option that has been identified in this report has been assessed for its likely significant impact against each SA Objective in the SA Framework, as per **Table 2.4**. Likely impacts are not intended to be summed.
- 2.5.8 It is important to note that the assessment scores presented in **Table 2.4** are high level indicators. The assessment narrative text should always read alongside the significance scores, and should bear in mind the limitations of assessments of a strategic nature.
- 2.6 **Limitations of predicting effects**
- 2.6.1 SA/SEA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates expert judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.

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<sup>23</sup>The European Commission describes the precautionary principle as follows: "If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered".

2.6.2 The assessments in this report are based on the best available information, including secondary data that has been provided to Lepus by the Council and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.

2.6.3 SA operates at a strategic level which uses available secondary data for the relevant SA Objective. All reasonable alternatives and preferred options are assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all options must be assessed in the same way and any introduction of site-based detail should be made clear in the SA report as the new data could potentially introduce bias and skew the findings of the assessment process.

2.6.4 The assessment of development proposals is limited in terms of available data resources; for example, the appraisal of the SLP is limited in its assessment of carbon emissions, and greater detail of carbon data would help to better quantify effects.

## 2.7 Methodology for assessment of growth options and policies

2.7.1 The appraisal of growth options (housing, employment and Gypsy and Traveller), spatial strategy options and policies aims to assess the likely significant effects of each proposed option / policy, based on the criteria set out in the SEA Regulations (see **Box 2.1**).

2.7.2 **Table 2.5** sets out a guide to how likely impacts have been determined in the assessment of options within this report.

**Table 2.5:** 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.	--

2.7.3 The appraisal commentary provided should be read alongside the identified impact symbols, as it is often difficult to distill the wide-ranging effects of a broad growth option into one overall impact.

# 3 Assessment of Housing Growth Options [to be updated]

## 3.1 Preface

- 3.1.1 Paragraph 61 of the NPPF states that the minimum number of homes needed in an area should be informed by a local housing need assessment, conducted using the standard method outlined in PPG<sup>24</sup>, unless the local authority feel that circumstances warrant an alternative approach.
- 3.1.2 The NPPF also states that “*any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for*”.
- 3.1.3 As set out in the SLP Spatial Strategy Paper, and according to the government’s standard method calculation, there is a need for approximately 29,773 homes in Sandwell by 2041. There is an existing supply of 11,194 homes, based on the most recent evidence with regard to suitable residential land (this includes identified sites, small windfalls and surplus vacant floorspace in centres), resulting in an unmet need for 18,579 homes.
- 3.1.4 Sandwell faces challenges in meeting the identified housing needs owing to the finite supply of land suitable for housing. Given the scale of this unmet need, the Council will explore the potential of exporting some of Sandwell’s housing need to neighbouring authorities through the Duty to Co-operate to deliver more housing.
- 3.1.5 Five options for the quanta of housing growth have been identified by SMBC (see **Table 3.1**).

**Table 3.1:** Sandwell Housing Growth Options identified by SMBC

**[Note to Council:** the dwelling figures assessed are as agreed via email 17/05/23, the figures and assessments will need to be updated to reflect the changes as per the SLP spatial strategy document received 05/10/23]

Housing Growth Option	Dwellings per Annum	Total Dwellings 2023-2041
1. Meet proportion of local housing need based on supply and small windfalls identified in current SHLAA (2021) and seek contributions from adjacent authorities based on current offers and apportioned using travel to work data (DtC)	595	9,531
2. Meet a proportion of housing need across plan period (2023-2041) based on average annual levels of delivery for last 10 years (do nothing)	695	12,523
3. Meet entire housing need identified through Standard Method across plan period (2025-2041) based on 2021 census figures (based on increase in households of 7.2% <sup>25</sup> )	1,101	19,818
4. Meet entire housing need identified through Standard Method across plan period (2025-2041) based on 2014 household projections (using 2022 affordability ratio)	1,567	28,206

<sup>24</sup> DLUHC and MHCLG (2020) Planning Practice Guidance. Available at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments> [Date accessed: 22/05/23]

<sup>25</sup> 2021 Census showed number of households in Sandwell increased by 7.2% since 2011

Housing Growth Option	Dwellings per Annum	Total Dwellings 2023-2041
5. Meet housing need (Standard Method 2014 and 2022 affordability ratio) and contribute 2,000 houses to wider HMA needs	1,692	30,206

3.1.6 **Table 3.2** summarises the likely impacts of each housing growth option in relation to the 14 SA Objectives. The text within **section 3.2** sets out the accompanying assessment narrative which explains how each overall impact was identified.

3.1.7 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 SMBC, as well as expert judgement.

**Table 3.2:** Impact matrix of the five housing growth options

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Housing Growth Option	Cultural heritage	Landscape	Biodiversity, flora, fauna and	Climate change mitigation	Climate change adaptation	Natural resources	Pollution	Waste	Transport and accessibility	Housing	Equality	Health	Economy	Education, Skills and training
1	-	-	-	-	+/-	-	-	-	-	+	-	-	+	-
2	-	-	-	-	+/-	-	-	-	-	+	-	-	+	-
3	-	-	-	-	+/-	-	-	-	-	+	-	-	+	-
4	--	--	--	--	+/-	-	--	--	-	+	+/-	--	+	--
5	--	--	--	--	+/-	-	--	--	-	++	+/-	--	+	--

## 3.2 Assessment

### SA Objective 1 – Cultural Heritage

3.2.1 Within Sandwell there are two Grade I, eight Grade II\* and 195 Grade II Listed Buildings, seven Scheduled Monuments (SM), nine Conservation Areas (CA) and five Registered Parks and Gardens (RPG). There are also a range of historic character areas and areas of historic townscape / landscape value identified within the borough<sup>26</sup>. Development in close proximity to cultural heritage features has the potential to adversely affect their significance or setting. Whilst the context and specific locations of the proposed dwellings within each of the five options are not known, there is potential for a minor negative impact on cultural heritage to arise owing to the risk of encroachment into the remaining undeveloped areas of the borough leading to alteration of historic character, and potentially affecting the setting of any cultural heritage features particularly in suburban settlements. Option 5 is likely to have the largest impact on cultural heritage as it proposes the highest number of dwellings, followed by Option 4; both of which could lead to a major negative impact on cultural heritage. Conversely, Option 1 proposes the fewest number of dwellings so may have the smallest impact.

### SA Objective 2 – Landscape

3.2.2 Although the borough is highly urbanised, it also contains gently undulating hills and other pockets of undeveloped land. Green Belt land is located to the north-east of the borough and is bisected by the M5 motorway. The landscape of the borough's Green Belt is largely described as low or low-moderate sensitivity to development although open landscapes within the borough are important for maintaining separation between settlements<sup>27</sup>. One area in Sandwell Valley is described as having moderate-high sensitivity. Within the urban areas, Sandwell's history and industrial legacy provides distinctive character and a sense of local identity. Existing green spaces outside of the Green Belt also provide benefits to the local character. Whilst the context and specific locations of the proposed dwellings within each of the five options are not known, it is likely a minor negative impact on the landscape would arise owing to the risk of encroachment into the remaining undeveloped areas of the borough leading to alteration of character, tranquillity and sense of place in suburban settlements. Option 5 is likely to have the largest impact on landscape as it proposes the highest number of dwellings, followed by Option 4; both of which could lead to a major negative impact on the landscape. Conversely, Option 1 proposes the fewest number of dwellings so may have the smallest impact.

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<sup>26</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf) [Date accessed: 22/05/23]

<sup>27</sup> LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: [https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf) [Date accessed: 22/05/2023]

### **SA Objective 3 – Biodiversity, Flora, Fauna and Geodiversity**

- 3.2.3 There are nine Local Nature Reserves (LNR) within Sandwell, forming key sections of the ecological network within the SLP area in addition to the numerous Sites of Importance for Nature Conservation (SINC) and Sites of Local Importance for Nature Conservation (SLINC). There are no Sites of Special Scientific Interest (SSSI) or National Nature Reserves (NNR) within the borough, but both are present in neighbouring authorities close to the Sandwell Borough boundary. Areas of geological interest include Rowley Hills, Bumble Hole & Warrens Park LNR and Sandwell Valley Country Park. Over 50% of Sandwell's Green Belt land is described as having very high ecological value<sup>28</sup>. Some priority habitats and small areas on ancient woodland are also present in the borough.
- 3.2.4 There is potential for all of the proposed options to have an adverse impact on biodiversity and geodiversity at the landscape scale due to the increased pressure and threats associated with increased development, such as habitat fragmentation resulting from new development areas and recreational pressures on wildlife sites, despite any biodiversity net gain provisions at the site level, owing to the large quanta of housing proposed. Options 4 and 5 are expected to have the largest impact as they propose the highest quanta of new houses and as such a major negative impact is identified, whereas under Options 1, 2 and 3 fewer houses are proposed so a minor negative impact is recorded. Option 1 may have the smallest impact overall and so could perform the best for this objective, depending on site-specific characteristics and sensitivities.

### **SA Objective 4 – Climate Change Mitigation**

- 3.2.5 The two largest sources of CO<sub>2</sub> emissions in Sandwell are residential buildings and on-road transport, however, according to Sandwell Trends, in 2021 almost 30% of households within the borough did not own a car<sup>29</sup>. Investments in public transport, walking and cycling provisions could help to reduce pollution and provide better access across the borough without using privately owned transportation.
- 3.2.6 All housing options propose a large quantum of new dwellings which would have the potential to increase CO<sub>2</sub> and other GHG emissions to some extent through construction and occupation phases. Option 1 proposes the fewest number of new dwellings and as such may have the least impact on emissions, however Options 4 and 5 propose large numbers of new dwellings and as such would have potentially the largest impact on climate change mitigation.
- 3.2.7 The potential of new development under any growth option to draw on renewable or low-carbon energy supplies is not known at this stage of assessment.

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<sup>28</sup> EcoRecord (2019) An Ecological evaluation of the Black Country Green Belt. Available at: <https://blackcountryplan.dudley.gov.uk/media/13896/an-ecological-evaluation-of-the-black-country-green-belt-final-report-2019-redacted.pdf> [Date accessed: 22/05/23]

<sup>29</sup> Sandwell Metropolitan Borough Council (2023) Sandwell Trends: Housing and Car Ownership. Available at: <https://www.sandwelltrends.info/household-characteristics/> [Date accessed: 11/08/23]

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### **SA Objective 5 – Climate Change adaptation**

- 3.2.8 Given its mostly urban setting, Sandwell is likely to suffer from the 'urban heat island' effect which may be made worse by new development in the borough. Green infrastructure (GI) and open spaces can help urban areas adapt to climate change, by providing protection from extreme weather events and helping to reduce the 'urban heat island' effect, these functions could be compromised by greater urban density and loss of GI. As the location of the proposed dwellings are not known it is difficult to determine exactly what effect new developments may have in terms of climate change adaptation, but it is something which should be considered and mitigated for in any potential developments.
- 3.2.9 Sandwell is affected by flooding along the River Tame the River Stour and by surface water flooding with all six wards having been affected by previous flooding events. The introduction of new dwellings and impermeable surfaces can exacerbate surface water flooding, but implementation of adaptive technologies can help to mitigate this. Option 1 has the smallest number of proposed dwellings and, depending on the location of the developments, may have less of an impact on potential flooding than Option 5 which has the largest number of proposed dwellings.
- 3.2.10 Overall, as the location and site context of the proposed new dwellings is not known at this time the potential impacts of the housing growth options on climate change adaptation are uncertain.

### **SA Objective 6 – Natural Resources**

- 3.2.11 The majority of land within Sandwell is classified as ALC 'urban', although there are small pockets of 'non-agricultural' land and a small amount of Grade 3 and 4 land in the north east of the borough. Development within the urban area would not result in the loss of best and most versatile (BMV) agricultural land and may provide opportunities for re-use of previously developed land, helping to promote an efficient use of natural resources. There are no mineral safeguarding areas (MSA) present in Sandwell.
- 3.2.12 As the location of the proposed new homes are not currently known the exact impact the different options will have on natural resources within the borough cannot be fully determined, but whilst the options may have a negligible effect on MSAs it is likely the proposed developments would lead to encroachment into the remaining undeveloped areas of the borough to some extent which may have environmental value, even if not BMV land. As such, all options could lead to potential minor negative effects on natural resources.

### **SA Objective 7 – Pollution**

- 3.2.13 Sandwell has a borough-wide AQMA, and for several years nitrogen dioxide concentrations have exceeded legal limits in seven monitoring stations<sup>30</sup>. Where people live in more urban settings their potential exposure to air pollution is greater than in rural areas where there would likely be less traffic. As such increasing the number of new dwellings would likely have a negative impact on air quality as increased populations would also likely increase the number of cars on the road and would likely expose new residents to poor air quality. As Option 1 has the fewest number of proposed dwellings it may have the smallest impact in comparison to Option 5 with the most dwellings which would likely have the largest impact.
- 3.2.14 Soil and water pollution impacts will depend on the nature, scale and location of developments which are unknown. Overall, all housing options would be expected to increase pollution to some extent both through construction and occupation so a negative impact would be expected against this SA Objective. Options 1, 2 and 3 have been identified as having a minor negative impact on pollution overall, whereas Options 4 and 5 are more likely to have a major negative impact owing to the larger scale of proposed growth.

### **SA Objective 8 – Waste**

- 3.2.15 It is expected that all options for housing growth would increase household waste production. In 2018 the per person rate for waste in Sandwell was 593kg, higher than the national average, 394kg per person<sup>31</sup>. Although national trends suggest that the volume of household waste produced is decreasing, the Black Country Waste Study<sup>32</sup> indicates that additional capacity for certain types of waste management will be required, taking into account the large amount of projected growth in the area.
- 3.2.16 It can be expected that the higher the proposed housing number the higher the number of new residents, as such it would be likely that Options 4 and 5, with the highest numbers of proposed new dwellings, would increase the waste production the most with a major negative impact on this objective. Option 1 would be the best performing option as it has the fewest proposed new dwellings, although a minor negative impact would still be likely overall.

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<sup>30</sup> Sandwell Metropolitan Borough Council (2020) Climate change strategy 2020-2041. Available at: [https://www.sandwell.gov.uk/downloads/file/31151/climate\\_change\\_strategy](https://www.sandwell.gov.uk/downloads/file/31151/climate_change_strategy) [Date accessed: 23/05/23]

<sup>31</sup> Sandwell Metropolitan Borough Council (2020) Climate change strategy 2020-2041. Available at: [https://www.sandwell.gov.uk/downloads/file/31151/climate\\_change\\_strategy](https://www.sandwell.gov.uk/downloads/file/31151/climate_change_strategy) [Date accessed: 23/05/23]

<sup>32</sup> Wood (2020) Black Country Waste Study – Review of the Evidence Base for Waste to support Preparation of the Black Country Plan Revised Final Report. Available at: [https://blackcountryplan.dudley.gov.uk/media/15811/black-country-waste-study-final-report\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/15811/black-country-waste-study-final-report_redacted.pdf) [Date accessed: 02/06/23]

### **SA Objective 9 – Transport and Accessibility**

3.2.17 Sandwell is well served by a dense network of public transport providing links regionally and nationally. Accessible public transport links are key to sustainable development and are an important consideration when deciding the location of potential new dwellings. It is likely that new dwellings in existing urban areas would allow residents to utilise existing public transport links including buses, rail and metro, rather than relying on private cars, however it is probable there would be some increase in traffic flows and it is possible that this increase in vehicles would lead to an increase in congestion. It is expected that Options 4 and 5 would create a higher burden on the existing public transport infrastructure and road network compared to Options 1, 2 and 3, although there may be more opportunities within Options 4 and 5 to drive investment in or provide new public transport links with benefits to the local area. On balance, a minor negative impact is identified across all options on this SA Objective. Option 1 would be likely to put the least additional burden on the existing transport networks and would have the smallest number of potential extra vehicles so potentially having a smaller impact on transport and accessibility overall.

### **SA Objective 10 – Housing**

3.2.18 Within Sandwell there is an identified need for 29,773 homes by 2041; Option 5 meets this requirement and consequently would be likely to have a major positive impact on housing provision. Options 1, 2, 3 and 4 would not deliver enough homes to meet the identified need, and as such, a minor positive impact on housing provision is identified.

3.2.19 At this scale of assessment, it is uncertain what the likely contribution of each housing growth option to meeting the different needs of the population on housing mix, provision of extra care housing, accessible housing and affordable homes would be.

### **SA Objective 11 – Equality**

3.2.20 Deprivation is high across the SLP area, with 36 Lower Super Output Areas (LSOAs) in Sandwell ranked among the 10% most deprived in England<sup>33</sup>. Residential growth in urban areas could potentially help facilitate social inclusion by providing new residents with good access to key services and employment opportunities, however, increasing housing density in deprived areas could also lead to exacerbation of existing inequalities. As the location, site context and proximity to receptors of the proposed housing provision is unknown, there is some uncertainty regarding the potential impacts of the five housing growth options on equality.

3.2.21 However, as Options 1, 2, 3 and 4 would not deliver enough homes to meet the identified need, these four options could also put pressure on housing and rental costs, which could lead to issues with poorer quality accommodation and overcrowding, with adverse implications for health and wellbeing of the population. Overall, a minor negative impact could occur for Options 1, 2 and 3, whereas there is greater uncertainty in terms of equality for Options 4 and 5.

<sup>33</sup> Ministry of Housing, Communities and Local Government (2019) The English Indices of Deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date accessed: 11/08/23]

### **SA Objective 12 – Health**

- 3.2.22 Residents in Sandwell have relatively good access to health facilities with 73 healthcare centres<sup>34</sup> and Sandwell General Hospital located in the borough. The majority of the urban area has good pedestrian and public transport access to healthcare, although new residential growth would likely place pressure on the capacity of these services. Parks and green spaces are important for human health; 24% of Sandwell is made up of such green space and some of which have been awarded the Green Flag<sup>35</sup>. The green space provision per person is expected to decrease as development occurs within the borough, in addition to increased pressure for existing open spaces to be used for development.
- 3.2.23 Whilst the locations of the proposed new dwellings are not known, it is likely that Option 1 would have the least impact on health services and green spaces as it proposes the fewest number of homes, although still potentially leading to a minor negative impact overall alongside Options 2 and 3. Option 5 could potentially have the largest impact, followed by Option 4, which may cause significant over-capacity issues as it proposes the most homes leading to a need to invest in increased infrastructure to support this level of growth; consequently both Options 4 and 5 could lead to a major negative impact on health.

### **SA Objective 13 – Economy**

- 3.2.24 The options considered in this assessment focus on housing growth only. It is assumed that future housing development would not result in the loss of existing employment floorspace.
- 3.2.25 The highest density of employment locations can be found in the centre and north of the borough and along key transport routes. Housing growth within these areas, and the urban area in general, would be expected to provide residents with good sustainable access to employment opportunities and transport links. The locations of the proposed new homes are not known, however, transport modelling data<sup>36</sup> indicates that almost the entire borough lies within a 30-minute travel time via walking or public transport from employment locations. With new homes there may also be a benefit to the local economy in terms of increasing footfall and spending in the retail/commercial centres. All options could potentially lead to a minor positive impact for this objective.

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<sup>34</sup> According to Black Country Accessibility Modelling (2021) data

<sup>35</sup> Sandwell Metropolitan Borough Council Green Space Strategy 2010 – 2020. Available at: [https://www.sandwell.gov.uk/download/downloads/id/24989/april\\_2017\\_-\\_parks\\_and\\_green\\_spaces\\_strategy\\_document.pdf](https://www.sandwell.gov.uk/download/downloads/id/24989/april_2017_-_parks_and_green_spaces_strategy_document.pdf) [Date accessed: 11/08/23]

<sup>36</sup> Unpublished data provided to Lepus by the Council, produced as part of the evidence base for the former BCP

## **SA Objective 14 – Education, Skills and Training**

3.2.26 Within Sandwell there are 98 primary schools and 20 secondary schools<sup>37</sup>. It is assumed that new residents in the SLP area will require access to primary and secondary education to help facilitate good levels of education, skills and qualifications of residents. The location of proposed new homes is not known so their impact on existing education facilities is uncertain, however, a smaller number of proposed homes may put less pressure on existing provisions, as such making Option 1 the best option. The larger scale of development proposed in Options 4 and 5 may require significant extra provision to be included alongside the residential growth to take account for the increased population. Consequently, Options 1, 2 and 3 record a minor negative impact and Options 4 and 5 a major negative impact on education, skills and training.

### **3.3 Conclusion**

3.3.1 It is generally expected that the options proposing larger numbers of houses would be more likely to lead to adverse effects when analysed against environmental objectives, but that they would perform better against economic objectives. The converse is also expected that options with few houses would perform better against the environmental objectives compared to the economic objectives, as such it can be difficult to identify an overall best performing option.

3.3.2 For the impact of each option to be fully understood details of the size, location and nature of the developments are required, as these options focus on quanta alone and the assessments are necessarily high level with restricted diagnostic conclusions.

3.3.3 Across all of the SA Objectives it appears that generally Option 1 would have the smallest impact, and so could be described as best performing, but this option falls short of meeting the housing need and so would also be likely to have the lowest scope for delivering varied and high-quality homes to meet the needs of the population.

### **3.4 Selection and Rejection**

3.4.1 XXX

<sup>37</sup> According to Black Country Accessibility Modelling (2021) data

## 4 Assessment of Employment Growth Options

### 4.1 Preface

- 4.1.1 Paragraph 81 of the NPPF states that “*significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*”, whilst PPG indicates that “*strategic policy-making authorities will need to prepare a robust evidence base to understand existing business needs, which will need to be kept under review to reflect local circumstances and market conditions*”<sup>38</sup>.
- 4.1.2 Sandwell is located within the Black Country Functional Economic Market Area (FEMA) which also covers the local authorities of Dudley, Walsall and Wolverhampton. **The Black Country Economic Development Needs Assessment (EDNA) and Black Country Employment Area Review (BEAR) are the key pieces of evidence relating to employment land need and supply. As the employment land assessment continues to be carried out jointly across the Black Country, the apportionment of land demand / supply is still the subject of discussion between the four councils, three of whom are not at the same stage of plan preparation as Sandwell. As a result, it is currently difficult to identify a clear set of figures for Sandwell’s need and supply.**
- 4.1.3 Three options for the quanta of employment growth have been identified by SMBC (see **Table 4.1**).

**Table 4.1:** Sandwell Employment Growth Options identified by SMBC

Employment Growth Option	Employment Land (ha)
A. Rely on existing vacant employment land supply (do nothing)	29
B. Provide for highest estimate of need (EDNA)	238
C. Provide for lowest estimate of need (EDNA)	132

- 4.1.4 **Table 4.2** summarises the likely impacts of each employment growth option in relation to the 14 SA Objectives. The text within **section 4.2** sets out the accompanying assessment narrative which explains how each overall impact was identified.
- 4.1.5 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 SMBC, as well as expert judgement.

<sup>38</sup> DLUHC and MHCLG (2020) Planning Practice Guidance. Available at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments> [Date accessed: 23/05/23]

**Table 4.2:** Impact matrix of the three employment growth options

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

## 4.2 Assessment

### SA Objective 1 – Cultural Heritage

4.2.1 Within Sandwell there are two Grade I, eight Grade II\* and 195 Grade II Listed Buildings, seven SMS, nine CAs and five RPGs. There are also a range of historic character areas and areas of historic townscape / landscape value identified within the borough<sup>39</sup>. Development in close proximity to cultural heritage features has the potential to adversely affect their significance or setting. It is likely that Option A which utilises existing vacant employment land would focus any development in areas already characterised by employment uses and as such any new development may be in keeping with the existing built form and may also help to promote regeneration with benefits to areas with historic interest or architecture. However, as the site context and proximity to receptors is unknown at this time the potential impacts of the employment growth options on cultural heritage features are uncertain.

### SA Objective 2 – Landscape

4.2.2 Although the borough is highly urbanised, it also contains undeveloped areas including Green Belt to the north-east of the borough. The landscape of the borough’s Green Belt is largely described as low or low-moderate sensitivity to development although open landscapes within the borough are important for maintaining separation between settlements<sup>40</sup>. One area in Sandwell Valley is described as having moderate-high sensitivity. Within the urban areas, Sandwell’s history and industrial legacy provides distinctive character and a sense of local identity. Existing green spaces outside of the Green Belt also provide benefits to the local character.

<sup>39</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf) [Date accessed: 09/01/23]

<sup>40</sup> LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: [https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf) [Date accessed: 22/05/2023]

- 4.2.3 Whilst the specific location and context of the proposed employment sites for Options B and C are unknown, it is likely that development outside of the existing development boundaries would be required to some extent, leading to a potential negative impact on the landscape. Option A utilises existing vacant employment land so could help to focus new growth within areas already characterised by employment land uses, meaning that new development would likely be in keeping with the existing build form to a greater extent than Options B and C, although a minor negative impact on landscape cannot be ruled out without knowing further locational/contextual information. Options B and C require substantially more land and it is likely that some of this land would be outside the existing urban areas; therefore, these two options are likely to have a major negative impact on landscape.

### **SA Objective 3 – Biodiversity, Flora, Fauna and Geodiversity**

- 4.2.4 Within Sandwell there are nine LNRs, forming key sections of the ecological network within the SLP area in addition to the numerous SINCs and SLINCs. There are no SSSIs or NNRs within the borough, but both are present in neighbouring authorities close to the Sandwell Borough boundary. Areas of geological interest include Rowley Hills, Bumble Hole & Warrens Park LNR and Sandwell Valley Country Park. Over 50% of Sandwell's Green Belt land is described as having very high ecological value<sup>41</sup>. Some priority habitats and small areas on ancient woodland are also present in the borough.
- 4.2.5 Urban areas can support distinctive habitats, species, ecological links and GI, and there may be some loss of previously undeveloped land or brownfield land with ecological value within the urban area with these three options. However, Option A relies on utilising existing vacant employment land and as such may have less of an impact on biodiversity than Options B and C which would likely require previously undeveloped land to be utilised, to some extent. As Option A requires the smallest amount of land it is likely to have the smallest impact and so produce a minor negative impact on biodiversity; Options B and C require substantially more land so have potential to cause a greater impact on biodiversity with a major negative impact identified.
- 4.2.6 It should be noted that biodiversity net gain provisions and other policy requirements may help to reduce or offset these adverse effects to some extent and result in positive longer term effects, however at the landscape scale this level of growth could cumulatively lead to a reduction in the available space for wildlife and loss of corridors or connections between habitats.

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<sup>41</sup> EcoRecord (2019) An Ecological evaluation of the Black Country Green Belt. Available at: <https://blackcountryplan.dudley.gov.uk/media/13896/an-ecological-evaluation-of-the-black-country-green-belt-final-report-2019-redacted.pdf> [Date accessed: 22//02/23]

### **SA Objective 4 – Climate Change Mitigation**

- 4.2.7 It is likely that all three options would have the potential to increase carbon emissions during the construction and occupation of the employment sites. As the location of employment growth under each option is not known, the potential for employees to utilise existing public transport routes to commute to work is uncertain. Since Option A utilises existing vacant employment land which is likely to be within the urban area, this option could provide better access to existing public transport links. However, it would also be expected that there would be an increase in the use of private cars to commute, potentially increasing congestion and pollution in the area given that Census data indicates 53% of Sandwell's residents travel to work by driving a car or van<sup>42</sup>. Furthermore, depending on the type of employment land, new development may lead to increased journeys by Heavy Goods Vehicles (HGVs) with higher emissions. As Option A requires the smallest amount of employment growth and so potentially a smaller impact on climate change, a minor negative impact is identified. Option B requires the largest amount of growth, followed by Option C, both of which could potentially have a major negative impact on climate change.

### **SA Objective 5 – Climate Change adaptation**

- 4.2.8 As the location of the employment sites for each option is not known the impacts they may have on flooding is uncertain, although Option A utilises existing vacant employment land which is likely to be situated within the existing urban area. However, with all the options it is likely there would be an increase in the urban density or area which would then increase the extent of impermeable surfaces and so potentially increase the risk of surface water flooding. It is possible to incorporate into development design GI or adaptive technologies to mitigate for this increased impermeable surfacing but at this stage these details are not known as such a minor negative impact has been recorded for the three options.

### **SA Objective 6 – Natural Resources**

- 4.2.9 The majority of land within Sandwell is classified as ALC 'urban', although there are small pockets of 'non-agricultural' land and a small amount of Grade 3 and 4 land in the north east of the borough. BMV land would not be lost if development was focused within the urban area. There are no MSAs present in Sandwell. The location and site context of the employment sites are not known so the impacts the three options will have on natural resources are uncertain, but given the likelihood that Options B and C would require the use of previously undeveloped land a minor negative impact on natural resources is identified. Option A proposes to utilise existing vacant employment land, potentially an effective use of this vacant land, and possibly including the use of remediated contaminated land, as such a minor positive impact could be achieved against this SA Objective.

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<sup>42</sup> ONS (2022) Travel to work, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/traveltoworkenglandandwales/census2021> [Date accessed: 05/01/23]

### **SA Objective 7 – Pollution**

- 4.2.10 Sandwell has a borough-wide AQMA, and for several years nitrogen dioxide concentrations have exceeded legal limits in seven monitoring stations across the borough<sup>43</sup>. Commuting to employment sites may increase air pollution, however as the location of the sites is not known, the extent to which public transport or active travel routes could be promoted and utilised by commuters instead of private cars is uncertain. Soil and water pollution impacts will depend on the nature, scale and location of developments which are unknown at this time although Options B and C would likely result in a greater extent of previously undeveloped land being used compared to Option A. Overall, there is potential for increased pollution through the construction and occupation of development under all options to some extent, and so a minor negative impact would be expected. It is likely Option A would have the smallest impact as it proposes the smallest amount of land and would utilise existing vacant employment land. Option B would likely have the largest impact as it proposes the largest amount of land and may create the largest number of new journeys to the sites.

### **SA Objective 8 – Waste**

- 4.2.11 It is expected that employment growth would also equate to increased waste production both in quantity and range of waste types produced. As the specific site locations and the proposed nature of the developments are unknown it is uncertain what the exact impacts on waste production would be, and whether the developments would be situated in close proximity to existing waste management infrastructure. Option A proposes the smallest amount of floorspace so could produce the smallest increase in waste compared to the other options. Option B has the largest floorspace requirement and as such could produce the most additional waste. However, without knowledge of the employment uses to be carried out at new development sites, the overall impact on waste is uncertain.

### **SA Objective 9 – Transport and Accessibility**

- 4.2.12 Sandwell is well served by a dense network of public transport infrastructure, providing links regionally and nationally. Transport is an enabler of economic activity, and employment sites within or close to existing urban settings would potentially have better access to a range of transport options, and promotion of public transport or active travel may be more successful. Conversely, additional employment land may lead to more private cars being used for commuting potentially increasing congestion and pollution in the area. As the locations of the employment sites within the growth options and any potential associated infrastructure improvements that would be provided alongside development are not known, their exact impact on public transport capacity and congestion are uncertain. Nonetheless, it could be expected that Option A would produce fewer new journeys owing to its smaller scale of proposed growth, potentially leading to less congestion and transport issues than Options B and C.

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<sup>43</sup> Sandwell Metropolitan Borough Council (2020) Climate change strategy 2020-2041. Available at: [https://www.sandwell.gov.uk/downloads/file/31151/climate\\_change\\_strategy](https://www.sandwell.gov.uk/downloads/file/31151/climate_change_strategy) [Date accessed: 23/05/23]

### **SA Objective 10 – Housing**

- 4.2.13 This assessment considers employment growth options. It is expected that housing provision would not be affected either by the loss of existing housing or compromised housing delivery from these employment growth options. Consequently, a negligible impact on housing would be expected from all three employment options.

### **SA Objective 11 – Equality**

- 4.2.14 Deprivation is high across the SLP area, with 36 LSOAs in Sandwell ranked among the 10% most deprived in England<sup>44</sup>. Employment growth in urban areas could potentially help facilitate social inclusion increasing accessibility to key services and employment opportunities. However, increasing the density of development in deprived areas could also lead to exacerbation of existing inequalities, and could potentially put increased pressure on existing open spaces.
- 4.2.15 As the specific site context and proximity to receptors of the proposed employment land is unknown at this stage, there is some uncertainty regarding the potential impacts of all employment growth options on equality.
- 4.2.16 Although Option A would direct growth to vacant employment land, potentially helping to promote redevelopment, this option would not meet the identified employment need in the borough and would be more likely to lead to a minor negative impact overall for this SA Objective. Options B and C would meet the identified need, depending on the estimate used, but there is more uncertainty regarding the exact impacts of these options as the location of the employment sites is unknown.

### **SA Objective 12 – Health**

- 4.2.17 The location of employment development under each growth option is not known but it is not expected to affect the provision of healthcare facilities.
- 4.2.18 Parks and green spaces are important for human health, 24% of Sandwell is made up of green space<sup>45</sup>. The three employment options could potentially place more pressure on these green spaces either through increased use or pressure to utilise green spaces for employment development. It would be expected that Option A would have a negligible effect on green spaces, since this option would focus growth on existing vacant employment land and would be unlikely to significantly affect green spaces. Options B and C may have a minor negative impact as although the specific locations of the developments are unknown, they have potential to adversely affect green spaces and require the use of undeveloped land.

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<sup>44</sup> Ministry of Housing, Communities and Local Government (2019) The English Indices of Deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date accessed: 11/08/23]

<sup>45</sup> Sandwell Metropolitan Borough Council Green Space Strategy 2010 – 2020. Available at: [https://www.sandwell.gov.uk/download/downloads/id/24989/april\\_2017\\_-\\_parks\\_and\\_green\\_spaces\\_strategy\\_document.pdf](https://www.sandwell.gov.uk/download/downloads/id/24989/april_2017_-_parks_and_green_spaces_strategy_document.pdf) [Date accessed: 11/08/23]

### **SA Objective 13 – Economy**

- 4.2.19 Sandwell lies within the Black Country FEMA. In Sandwell, the highest density of existing employment locations can be found in the centre and north of the borough and along key transport routes. Employment development near existing employment locations may benefit from existing infrastructure and transport links and could provide additional benefits to the area, driving economic growth. It is assumed that employment growth would provide more job options and opportunities providing benefits to the local population. Option A provides the lowest quanta of new employment land and would not meet the employment land need identified in the EDNA; as such, a minor positive impact is recorded. Options B and C would both meet the identified needs, depending on the estimate used, with potential to result in a major positive impact on the economy. Option B would provide for the highest estimate of employment land need, likely delivering a larger number and range of jobs so would be the best performing option for this SA Objective.

### **SA Objective 14 – Education, Skills and Training**

- 4.2.20 It is expected that employment development would not impact the provision of or access to schools. There is potential for the employment development to provide opportunities to develop skills, provide training, and potentially jobs or apprenticeships to school leavers. Consequently, all three options would be likely to have a minor positive impact on education, skills and training.

## **4.3 Conclusion**

- 4.3.1 There is uncertainty regarding the exact impacts the employment growth options would have owing to the unknown scale and nature of the developments, and the options can act differently against each of the SA Objectives meaning identifying a clear best performing option is difficult. Option B performs best against economic objectives but performs less well against environmental objectives as it requires the most land, conversely Option A performs best against environmental objectives owing to its focus on existing vacant employment land but less well against economic objectives and it does not fulfil Sandwell's identified employment need. As such, Option C appears to perform best against all the objectives collectively as it provides enough land to meet the lower estimate of need, performs well against the economic objectives and although having negative impacts against the environmental objectives would likely have less of an impact than Option B. Some of the impacts may be able to be mitigated through the design of the developments.

## **4.4 Selection and Rejection**

- 4.4.1 XXX

# 5 Assessment of Gypsy, Traveller and Travelling Showpeople Growth Options

## 5.1 Preface

- 5.1.1 In accordance with the national planning policy for traveller sites<sup>46</sup>, Gypsies and Travellers (G&T) are defined as *"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such"*.
- 5.1.2 Travelling Showpeople (TS) are defined as *"Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above"*.
- 5.1.3 The Black Country Gypsy and Traveller Accommodation Assessment (GTAA) assessed accommodation needs for Gypsies, Travellers and Travelling Showpeople across Sandwell and the wider Black Country. The GTAA (2022) identified a need for 14 pitches and 32 plots in Sandwell.
- 5.1.4 Three options for Gypsy and Traveller and Travelling Showpeople growth have been identified by SMBC (see **Table 5.1**).

**Table 5.1:** Sandwell Gypsy and Traveller growth options identified by SMBC

Gypsy and Traveller Growth Option	Outcome G&T (pitches)	Outcome TS (plots)
A. Meet a proportion of housing need across part of the plan period (2025-2030) and schedule an early review of the SLP to readdress need across later stages	8	24
B. Meet proportion of local housing need based on supply and small windfalls identified in current SHLAA (2021) and seek contributions from adjacent authorities based on current offers and apportioned using travel to work data (DtC)	10 (SHLAA)	0
C. Meet entire need	14	32

- 5.1.5 **Table 5.2** summarises the likely impacts of each Gypsy and Traveller growth option in relation to the 14 SA Objectives. The text within **section 5.2** sets out the accompanying assessment narrative which explains how each overall impact was identified.

<sup>46</sup> MHCLG (2015) Planning policy for traveller sites. Available at: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites> [Date accessed: 02/06/23]

5.1.6 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 SMBC, as well as expert judgement.

**Table 5.2:** Impact matrix of the three Gypsy and Traveller growth options

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

## 5.2 Assessment

### SA Objective 1 – Cultural Heritage

5.2.1 Within Sandwell there are two Grade I, eight Grade II\* and 195 Grade II Listed Buildings, seven SMs, nine CAs and five RPGs. There are also a range of historic character areas and areas of historic townscape / landscape value identified within the borough<sup>47</sup>. Development in close proximity to cultural heritage features has the potential to adversely affect their setting, although given the small overall quanta of growth proposed under the options any adverse effects are likely to be small-scale and localised. However, as the location, site context and proximity to receptors is unknown, the potential impacts of the G&T/TS growth options on cultural heritage features are uncertain.

<sup>47</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf) [Date accessed: 09/01/23]

## **SA Objective 2 – Landscape**

- 5.2.2 Although the borough is highly urbanised, it also contains undeveloped areas including Green Belt to the north-east of the borough. The landscape of the borough's Green Belt is largely described as low or low-moderate sensitivity to development although open landscapes within the borough are important for maintaining separation between settlements<sup>48</sup>. One area in Sandwell Valley is described as having moderate-high sensitivity. Within the urban areas, Sandwell's history and industrial legacy provides distinctive character and a sense of local identity. Existing green spaces outside of the Green Belt also provide benefits to the local character.
- 5.2.3 The location and context of the proposed G&T/TS development is unknown, but it is likely that some development outside of the existing development boundaries would be necessary leading to a potential negative impact on the landscape. Adverse effects on the landscape arising from the introduction of G&T/TS development would likely be limited in scale, resulting in a change to the local character owing to the introduction of hardstanding and potentially some buildings. It is probable that Option B would have the least impact on the landscape as it proposes the fewest number of pitches/plots at this stage and so would likely be the best performing option, whereas Option C proposes the greatest number of pitches/plots so would likely have the largest impact on the landscape.

## **SA Objective 3 – Biodiversity, Flora, Fauna and Geodiversity**

- 5.2.4 Within Sandwell there are nine LNRs, forming key sections of the ecological network within the SLP area in addition to the numerous SINC and SLINC. There are no SSSIs or NNRs within the borough, but both are present in neighbouring authorities close to the Sandwell Borough boundary. Areas of geological interest include Rowley Hills, Bumble Hole & Warrens Park LNR and Sandwell Valley Country Park. Over 50% of Sandwell's Green Belt land is described as having very high ecological value<sup>49</sup>. Some priority habitats and small areas of ancient woodland are also present in the borough.
- 5.2.5 The locations and site-specific characteristics of the development under the different options are not known. There is potential for a minor negative impact on biodiversity as it is likely that previously undeveloped land may need to be utilised, and development could be situated in proximity to biodiversity and geodiversity designations. There is potential for biodiversity enhancements and net gains to be delivered at the site level, although adverse implications related to the fragmentation of wider ecological networks could still occur. As a result, the three G&T/TS options are identified as having a potential minor negative impact on biodiversity, with Option B likely having the smallest impact and Option C the largest.

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<sup>48</sup> LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: [https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf) [Date accessed: 22/05/2023]

<sup>49</sup> EcoRecord (2019) An Ecological evaluation of the Black Country Green Belt. Available at: <https://blackcountryplan.dudley.gov.uk/media/13896/an-ecological-evaluation-of-the-black-country-green-belt-final-report-2019-redacted.pdf> [Date accessed: 22/02/23]

#### **SA Objective 4 – Climate Change Mitigation**

- 5.2.6 The two largest sources of emissions in Sandwell are residential buildings and on-road transport, however it is not clear how G&T pitches and TS plots relate to these domestic emissions when compared to 'brick and mortar' dwellings. Sandwell supports a good public transport network which may help to facilitate use of sustainable travel options rather than reliance on private cars. As the location and site details are not currently known it is unclear exactly what impact the pitches/plots would have on climate change and whether any mitigation could be incorporated into the design to reduce carbon emissions; as such, the effects of the options on climate change are uncertain.

#### **SA Objective 5 – Climate Change adaptation**

- 5.2.7 As the location of the proposed pitches/plots are not known, the effect they will have on flooding is uncertain. An increase in impermeable ground can lead to increased surface water flooding but this can be mitigated by use of adaptive technologies and incorporation of SUDS, however at this stage these details are not known. Furthermore, careful consideration should be given in terms of the location of proposed G&T/TS development with respect to existing sources of flooding including Flood Zones 2 and 3, given the particular vulnerability of caravans. Without knowledge of the location of development, a minor negative impact is identified for all three options. Option B proposes the fewest number of pitches/plots and as such may have the smallest impact, Option C would likely have the largest impact as it has the most pitches/plots.

#### **SA Objective 6 – Natural Resources**

- 5.2.8 The majority of land within Sandwell is classified as ALC 'urban', although there are small pockets of 'non-agricultural' land and a small amount of Grade 3 and 4 land in the north east of the borough. BMV agricultural land would not be lost if development was within the urban area. There are no MSAs present in Sandwell. The specific location and site context of the Gypsy and Traveller pitches/plots are not known, so the exact impacts the three options will have on natural resources is uncertain. However, given the potential for pitches/plots to require the use of undeveloped land, a minor negative effect on natural resources has been recorded for the three options.

### **SA Objective 7 – Pollution**

- 5.2.9 Sandwell has a borough-wide AQMA, and for several years nitrogen dioxide concentrations have exceeded legal limits in seven monitoring stations across the borough<sup>50</sup>. New development within the AQMA may lead to increased pollution levels from increased travel and would potentially expose residents to poor air quality. Soil and water pollution would depend on the nature, scale and location of the developments but there is potential for increased pollution through construction and occupation of the pitches/plots, albeit to a lesser extent for G&T/TS development than housing or employment development. It is likely that Option B would have the smallest impact on pollution as it proposes the fewest number of pitches/plots so potential pollution during construction and occupation may be less than Options A and C. Option C has the potential to produce the greatest impact in terms of pollution as it proposes the largest number of pitches/plots. Overall, a minor negative impact has been recorded for the three options with regard to pollution.

### **SA Objective 8 – Waste**

- 5.2.10 Whilst it is difficult to estimate exactly how much waste a G&T pitch or TS plot creates it is expected that an increase in the number of pitches/plots would create an increase in the amount of waste produced. As such it is likely that Option B would produce the smallest increase in waste as it has the smallest number of pitches/plots, conversely Option C with the highest number of pitches/plots would likely create the most waste. Options A, B and C have been identified as having a minor negative impact on waste as all options are likely to increase the amount of waste produced, to some extent.

### **SA Objective 9 – Transport and Accessibility**

- 5.2.11 The locations of the proposed pitches/plots are currently not known but it is likely that they would be able to access the existing good public transport network in Sandwell. This public transport network would enable residents to access facilities and amenities within Sandwell in a sustainable manner. However, it is also likely that the introduction of new pitches/plots would increase the number of vehicles on the local road network. Option B proposes the smallest number of pitches/plots and so would likely lead to fewer residents and consequently the least added pressure to the existing public transport networks and the smallest impact on congestion, whereas Option C with the highest number of pitches/plots would likely have the largest impact on public transport infrastructure and congestion. As there is potential for all the options to increase the number of vehicles on the road network and place an additional burden on the public transport network a minor negative impact has been recorded, although these impacts will be dependent on the specific location and capacity of the local road networks.

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<sup>50</sup> Sandwell Metropolitan Borough Council (2020) Climate change strategy 2020-2041. Available at: [https://www.sandwell.gov.uk/downloads/file/31151/climate\\_change\\_strategy](https://www.sandwell.gov.uk/downloads/file/31151/climate_change_strategy) [Date accessed: 23/05/23]

### **SA Objective 10 – Housing**

- 5.2.12 The level of growth proposed under Option A would only meet a proportion of the identified Gypsy and Traveller and Travelling Showperson accommodation need, so would have a minor positive impact on provision of housing for the community. Option B could potentially have a minor negative impact as it only meets part of the Gypsy and Traveller pitch need it does not provide any Travelling Showperson plots. Option C fulfils all identified needs of the community providing all the required pitches and plots as such would have a major positive impact on this SA Objective.

### **SA Objective 11 – Equality**

- 5.2.13 The growth options seek to contribute towards the identified accommodation requirements for G&T/TS which would be likely to have a positive effect on meeting the accommodation needs of this ethnic group. Option C seeks to meet all identified needs and so may lead to the most benefit in this regard.
- 5.2.14 Deprivation is high across the SLP area, with 36 LSOAs in Sandwell ranked among the 10% most deprived in England<sup>51</sup>. Growth in urban areas could potentially increase social inclusion; however, it could also exacerbate existing inequalities and put increased pressure on existing services. Overall, the location of the pitches/plots are not currently known so their impact on equality is uncertain.

### **SA Objective 12 – Health**

- 5.2.15 Residents in Sandwell generally have good access to health facilities and much of the urban area has good pedestrian and public transport access to healthcare. The location of the proposed G&T/TS development is unknown, but it is likely that the pitches/plots would have good access to healthcare facilities and be able to utilise the public transport network to access them.
- 5.2.16 Green space makes up 24% of the land use in Sandwell<sup>52</sup>; as such, it is likely that any G&T/TS pitches/plots would be able to access green spaces which is important for health and wellbeing. However, it is likely that Option C would place the most pressure on existing green spaces for potential conversion to G&T/TS use as it has the greatest number of pitches/plots, Option B would likely place the least amount of pressure as it proposes fewer pitches/plots. However, as the location of the pitches/plots is unknown at this time it is uncertain exactly what impacts the three options would have on this SA Objective.

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<sup>51</sup> Ministry of Housing, Communities and Local Government (2019) The English Indices of Deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date accessed: 11/08/23]

<sup>52</sup> Sandwell Metropolitan Borough Council Green Space Strategy 2010 – 2020. Available at: [https://www.sandwell.gov.uk/download/downloads/id/24989/april\\_2017\\_-\\_parks\\_and\\_green\\_spaces\\_strategy\\_document.pdf](https://www.sandwell.gov.uk/download/downloads/id/24989/april_2017_-_parks_and_green_spaces_strategy_document.pdf) [Date accessed: 11/08/23]

### **SA Objective 13 – Economy**

- 5.2.17 In Sandwell, the highest density of employment locations can be found in the centre and north of the borough and along key transport routes. It is not known where the proposed pitches/plots are to be sited but it is likely that there would be good access to employment opportunities via the public transport network present across the majority of Sandwell. It is likely that all three options could lead to a minor positive impact in terms of access to employment.

### **SA Objective 14 – Education, Skills and Training**

- 5.2.18 The location of the pitches/plots are currently unknown so the proximity to existing schools and education facilities, and as such the level of sustainable accessibility to these services, is uncertain. The Council should seek to ensure that new residents have good access to primary and secondary education for their children, as well as opportunities to develop skills in adulthood.

## **5.3 Conclusion**

- 5.3.1 It can be difficult to determine an overall best performing option as the performance of each option depends on the SA Objective under consideration, however, it is possible to identify the best option for specific SA Objectives. It appears Option B performs the best across the most SA Objectives, this is due to Option B having the least number of proposed pitches/plots and so potentially having the smallest impact on some of the environmentally focused SA Objectives. However, a minor negative effect has been identified for Option B for the housing objective as it would only partially meet the Gypsy and Traveller need and provides no Travelling Showperson plots.
- 5.3.2 Consequently, Option A could be identified as best performing overall as it provides a proportion of both the Gypsy and Traveller and Travelling Showperson needs but also has potential for less adverse impacts across the other SA Objectives. Although, it should be acknowledged that since Option A proposes to “*schedule an early review of the SLP to readdress need across later stages*”, there is some uncertainty regarding the longer-term effects.

## **5.4 Selection and Rejection**

- 5.4.1 Reflecting on the SA findings (as set out in **section 5.3**) and SMBC’s objectives for the emerging SLP, the Council consider that “*Option B remains the most realistic option however – it delivers the required five-year supply and in the absence of any local demand for additional Travelling Showpeople plots, will have least impact*”.

# 6 Assessment of Spatial Growth Options

## 6.1 Preface

6.1.1 The spatial strategy will dictate where new growth would be allocated in Sandwell for the Plan period to 2041.

6.1.2 Given Sandwell’s highly urbanised nature with very little vacant or unused open spaces, and the importance of the existing open and green spaces for environmental and human health, the Council is limited in the number of approaches it can take to accommodate growth.

6.1.3 Four Spatial Growth Options have been identified by SMBC, as set out in **Table 6.1**. These options consider how the overall number of homes and area of employment land (and other types of land use where applicable) could be strategically distributed, thus helping to meet some of the strategic aims of the emerging SLP.

**Table 6.1:** Sandwell Growth Options identified by SMBC

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

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

6.1.4 Each option has been assessed using the SA Framework and summary findings are presented in **Table 6.2**. Full explanations and reasonings behind each score are set out for each SA Objective in **section 6.2**.

6.1.5 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 SMBC, as well as expert judgement.

**Table 6.2: Impact matrix of the four Spatial Growth Options**

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

## 6.2 Assessment

### SA Objective 1 – Cultural Heritage

- 6.2.1 All spatial growth options A, B, C, and D state they will “*protect the historic and archaeological environment and areas with geological and landscape value*” which could help to conserve the historic landscape character and heritage assets of the borough. The options all aim to focus the majority of new development within the existing urban area, however as most of Sandwell’s listed buildings and heritage assets are also within the urban area, without careful consideration of development layout, scale and design this could lead to alteration of their historic settings.
- 6.2.2 In particular, Option D promotes higher density development which could increase the potential for adverse effects on the historic environment. Although, the intention to “*redevelop areas of existing older housing*” under Option D could potentially improve the energy efficiency of historic buildings and promote their re-use, helping to conserve their historic identity. Options B and C also include reference to redevelopment, which could provide opportunities to enhance the historic character of these areas.
- 6.2.3 Option C includes a focus on economic growth and seeks to ensure development has regard to areas with industrial design and archaeological interest, which could potentially help to strengthen the sense of place and local identity.
- 6.2.4 There is potential for all the options to have an impact on the setting of heritage assets as they all propose development within the urban area to a greater or lesser extent, as such the all the options could have a minor negative impact with Option D having the potential for the largest impact given the higher density development proposed. Option C could be identified as best performing as it proposes to redevelop town centre areas.

### SA Objective 2 – Landscape

- 6.2.5 The landscape character of the borough is described as low or low-moderate sensitivity to development with one area of moderate-high sensitivity, open landscapes within the borough are important for maintaining separation between settlements and as such their sensitivity may be increased<sup>53</sup>. Green Belt land is located to the north-east of the borough, over 50% of which is described as having very high ecological value<sup>54</sup>. All the spatial growth options aim to keep new development within the existing urban area, redeveloping land or sites, utilising vacant land or under used open spaces, which would prevent Green Belt being lost. Furthermore, all options seek to protect areas with landscape value.

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<sup>53</sup> LUC (2019) Black Country Landscape Sensitivity Assessment. Available at:  
[https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf) [Date accessed: 22/05/2023]

<sup>54</sup> EcoRecord (2019) An Ecological evaluation of the Black Country Green Belt. Available at:  
<https://blackcountryplan.dudley.gov.uk/media/13896/an-ecological-evaluation-of-the-black-country-green-belt-final-report-2019-redacted.pdf> [Date accessed: 22//02/23]

- 6.2.6 Option A would promote growth in existing residential and employment areas, encouraging new developments on previously developed land and examines the potential of utilising vacant or underused land or sites within the urban areas. Option B restricts new development to brownfield or previously developed sites and aims to protect open spaces and areas of ecological value and create additional public open spaces. Option C would redevelop and redesign existing areas and provide infrastructure improvements to intensify the use of existing employment areas. It would also allocate employment sites on derelict or vacant open space within the urban area.
- 6.2.7 Option D would focus growth within existing residential and employment areas of Sandwell utilising previously developed sites and examine the potential for housing development on vacant or underused open spaces or undeveloped land within the urban areas. However, the focus on increasing density including use of taller buildings under Option D could also lead to greater challenges in terms of development potentially altering views of, or from, sensitive and important landscape features. Options B, C and D propose redevelopment of existing housing or employment areas which could help to improve the townscape or revitalise degraded areas.
- 6.2.8 Whilst all the options aim to promote development within the existing urban area, Options A, C and D propose using underused open space within the urban area which may lead to a minor negative impact on the local landscape character. Option B restricts new development to brownfield sites and aims to protect open spaces and create new public open spaces. Consequently, it is likely that Option B would have a minor positive impact on the landscape and would be the best performing option.

### **SA Objective 3 – Biodiversity, Flora, Fauna and Geodiversity**

- 6.2.9 Within Sandwell there are nine LNRs, forming key sections of the ecological network within the SLP area in addition to the numerous SINC and SLINC. There are no SSSIs or NNRs within the borough, but both are present in neighbouring authorities close to the Sandwell Borough boundary. Areas of geological interest include Rowley Hills, Bumble Hole & Warrens Park LNR and Sandwell Valley Country Park. Over 50% of Sandwell's Green Belt land is described as having very high ecological value<sup>55</sup>. Some priority habitats and small areas on ancient woodland are also present in the borough. New development could place increased pressure on the biodiversity assets within and surrounding the urban area through increased development and visitor-related pressures .

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<sup>55</sup> EcoRecord (2019) An Ecological evaluation of the Black Country Green Belt. Available at: <https://blackcountryplan.dudley.gov.uk/media/13896/an-ecological-evaluation-of-the-black-country-green-belt-final-report-2019-redacted.pdf> [Date accessed: 22//02/23]

- 6.2.10 The locations of the proposed sites within the four spatial growth options are not known so their exact impact on nearby biodiversity sites is uncertain, but the options do describe their approach to biodiversity which enables comparison. Option A aims to make improvements to or allowances for the environment in existing housing or residential sites and to protect areas with ecological and geological value and has recorded a minor positive impact on biodiversity. Option B aims to protect open spaces and areas of ecological value and create additional public open spaces within which there may be potential to increase biodiversity. Through the creation, protection and improvement of parks, woodland, open spaces and habitats, Option B would help to conserve and enhance habitats and ecological corridors within the urban area, improving resilience and adaptation to climate change.
- 6.2.11 Both Options C and D aim to protect areas of designated habitat or ecological value, but could also lead to the loss of open spaces and undeveloped land within the urban area which although would not be of significant ecological value could cumulatively reduce the amount of space and corridors available for wildlife within the urban area. Consequently, Options C and D have both recorded an uncertain impact on biodiversity overall.
- 6.2.12 All options aim to protect the environment to some extent, although Option B is likely to be the best performing with regard to biodiversity as it aims to protect existing open spaces and areas of ecological value but also intends to create new spaces and habitats which would benefit biodiversity and help with adaptation to climate change and is likely to have a major positive impact on biodiversity.

#### **SA Objective 4 – Climate Change Mitigation**

- 6.2.13 The two largest sources of emissions in Sandwell are residential buildings and on-road transport however, according to Sandwell Trends, in 2021 almost 30% of households within the borough did not own a car<sup>56</sup>. Investments in public transport, walking and cycling provisions could help to reduce pollution and provide better access across the borough without using privately owned transportation.
- 6.2.14 Option A aims to make improvements to or allowances for climate change within existing residential and employment sites.
- 6.2.15 Option B would promote the use of zero and low-carbon designs, building techniques, materials and technologies in all new developments and redevelop existing housing and employment areas to deliver cleaner and more energy efficient growth. This could help to reduce embodied carbon. This option would further ensure that new development is located in areas with the best public transport access, helping to reduce reliance on private cars for travel. Through the creation of parks, woodland, open spaces and habitats across the borough, Option B would also help to increase GI coverage with carbon storage capacity and supporting other ecosystem services, maximising both climate change adaptation and mitigation.

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<sup>56</sup> Sandwell Metropolitan Borough Council (2023) Sandwell Trends: Housing and Car Ownership. Available at: <https://www.sandwelltrends.info/household-characteristics/> [Date accessed: 11/08/23]

- 6.2.16 Option C promotes the co-location of housing with existing and proposed employment areas, which could help to reduce the need to travel to work and encourage the use of sustainable travel options. However, as this option does not include specific reference to climate change or mitigation measures the exact impact this option would have on this SA Objective would be uncertain.
- 6.2.17 Option D would aim to redevelop areas of existing older housing to provide higher density and energy efficient new housing, centred around public transport hubs. This could include retrofitting the existing building stock in the borough, further helping to reduce emissions although this may lead to the release of embodied carbon depending on the extent to which buildings could be refurbished rather than demolished and rebuilt.
- 6.2.18 Options A, and D help to promote climate change mitigation and as such have a minor positive impact. Option B is likely to be the best performing against climate change mitigation as it proposes the most modifications and technologies within new developments to help combat the effects of climate change and has been identified as producing a major positive impact on climate change mitigation.

### **SA Objective 5 – Climate Change adaptation**

- 6.2.19 Given its mostly urban setting, Sandwell is likely to suffer from the 'urban heat island' effect which may be made worse by new development in the borough. GI and open spaces can help urban areas adapt to climate change, by providing protection from extreme weather and helping to reduce the 'urban heat island' effect. Likewise, these functions could be compromised by greater urban density and loss of GI.
- 6.2.20 Sandwell is affected by flooding along the River Tame the River Stour and by surface water flooding with all six wards having been affected by previous flooding events. The introduction of new dwellings and impermeable surfaces can exacerbate surface water flooding, but implementation of adaptive technologies can help to mitigate this.
- 6.2.21 Option A aims to make improvements to or allowances for climate change within existing residential and employment sites which would likely help adaptation to climate change. Option B would promote the use of zero and low-carbon designs, building techniques, materials and technologies in all new developments and redevelop existing housing and employment areas to deliver cleaner, more energy efficient and more intensive areas of growth. Through the creation of parks, woodland, open spaces and habitats across the borough, with potential to increase the extent and quality of GI, Option B also intends to maximise climate change adaptation and mitigation. A major positive impact could be achieved.

6.2.22 Option D would aim to redevelop areas of existing older housing to provide higher density and energy efficient new housing, with benefits to climate change adaptation and potentially reduced overall land-take compared to Options A and C, resulting in a lesser impact on flooding. Although, Options A and D would include development on existing open spaces and/or undeveloped land within the urban areas which could lead to an overall loss of GI both of these options have other adaptation measures, e.g. improving/redeveloping existing housing or employment sites, and as such a minor positive result in terms of climate change adaptation has been recorded for these options. As Option C option does not include specific reference to climate change or to climate change adaptation measures, the exact impact this option would have on climate change mitigation is uncertain.

6.2.23 Option B would be the best performing against climate change adaptation as it proposes the greatest focus on climate change adaptation and technologies within new developments, as well as conserving and enhancing GI, to help combat the effects of climate change.

### **SA Objective 6 – Natural Resources**

6.2.24 The majority of land within Sandwell is classified as ALC 'urban', although there are small pockets of non-agricultural land and a small amount of Grade 3 and 4 land in the north east of the borough. There are no MSAs present in Sandwell.

6.2.25 All the Options A, B, C and D propose to keep new development within the existing urban area as such they would not be expected to impact BMV agricultural land within the borough. All options also promote the use of previously developed land. However, Options A, C and D also propose allocating underused or vacant open space or previously undeveloped land within the urban area for new development, with potential to lead to a minor negative impact on natural resources associated with the loss of soil resource which may have environmental or ecological value.

6.2.26 Option B only proposes to utilise brownfield and previously developed sites for development. As such Option B could be described as the best performing and would be likely to have an overall minor positive impact on natural resources.

### **SA Objective 7 – Pollution**

6.2.27 Sandwell has a borough-wide AQMA, and for several years nitrogen dioxide concentrations have exceeded legal limits in seven monitoring stations across the borough<sup>57</sup>. New development within the AQMA may lead to increased pollution levels from increased use of vehicles and would potentially expose residents to existing poor air quality. Soil and water pollution would depend on the nature, scale and location of the developments but there is potential for increased pollution through construction and occupation of the sites despite the intention within each option to "*protect areas of ... ecological value*".

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<sup>57</sup> Sandwell Metropolitan Borough Council (2020) Climate change strategy 2020-2041. Available at: [https://www.sandwell.gov.uk/downloads/file/31151/climate\\_change\\_strategy](https://www.sandwell.gov.uk/downloads/file/31151/climate_change_strategy) [Date accessed: 23/05/23]

- 6.2.28 Option A aims to make improvements to the capacity of existing residential and employment areas with regard to the environment, climate change and accessibility, which may help to reduce pollution levels by promoting public transport and implementing mitigation measures.
- 6.2.29 Option B would promote the use of zero and low-carbon designs, building techniques, materials and technologies in new developments to help reduce emissions during the construction and occupation phases. This option would also allocate housing and employment sites with good sustainable and public transport access which would potentially help to reduce transport-associated emissions. It also proposes to redevelop existing housing and employment sites to deliver cleaner, more energy-efficient areas of growth which would help to minimise the generation of pollution from domestic and employment sources.
- 6.2.30 Option C would locate new housing and associated services, facilities and infrastructure to serve existing and proposed employment areas, which may help to reduce the need to travel, particularly commuting by private vehicle, and so reduce potential transport-associated emissions. Option D aims to provide high density and energy-efficient housing by redeveloping areas of existing older housing. This could include retrofitting the existing building stock in the borough, further helping to reduce emissions.
- 6.2.31 Despite the provisions within Options A, C and D to minimise the generation of pollution, overall, these developments would still introduce new development within an AQMA and lead to an increase in traffic to some extent. A minor negative impact on pollution could arise. Option B provides the most initiatives to help reduce pollution both in the construction and occupation of developments and locating new developments near to sustainable transport links which may reduce commuting by private vehicle and so congestion levels and emissions within Sandwell. Therefore, Option B is likely to be the best performing option in terms of pollution and on balance could potentially have a minor positive impact on pollution overall depending on the nature and design of new developments.

### **SA Objective 8 – Waste**

- 6.2.32 It is expected that any new development either housing or employment would create additional waste, potentially in both quantity and range of waste types produced. There is not sufficient information available to accurately predict the effect that each spatial growth option would have in terms of minimising waste generation, promoting the sustainable management of waste, or encouraging recycling and re-use of waste.
- 6.2.33 Option A would locate new development in areas where existing infrastructure has capacity or where capacity has been improved to accommodate the new development which is expected to include utilities and waste infrastructure as such Option A would likely have a minor positive impact on waste.

- 6.2.34 Option B emphasises the use of sustainable construction including building techniques and materials and would ensure all development uses previously developed and brownfield land. These principles would be likely to help minimise waste from the construction phase and promote re-use of materials where possible. As the exact use of sustainable construction methods are unknown at this time, the impact this option would have on waste is uncertain.
- 6.2.35 Option C would locate new housing and services, facilities and infrastructure to serve existing and proposed development sites. However, the focus on employment growth under Option C also means that this option could lead to a larger amount or greater range of waste types depending on the specific employment uses. This is likely to produce a minor negative impact as waste quantities may be increased.
- 6.2.36 Option D would promote higher densities of development and include the use of tall buildings. Higher densities of development could place increased demand on local waste management systems due to larger quantities and more diverse waste being generated in smaller areas, potentially leading to sanitation problems if a careful design is not implemented<sup>58</sup>. Therefore, this option could potentially have a minor negative impact on waste.
- 6.2.37 Option A appears to be the best performing option with regard to waste as it proposes to locate development in areas with existing infrastructure capacity or where capacity has been improved to support development.

### **SA Objective 9 – Transport and Accessibility**

- 6.2.38 Sandwell is well served by a dense network of public transport providing links regionally and nationally. Accessible public transport links are key to sustainable development and as transport is an enabler of economic activity, employment sites within or close to existing urban settings would potentially have access to a greater transport network to utilise and promotion of public transport or active travel may be more successful.
- 6.2.39 Option A proposes to take advantage of existing and improved infrastructure to enable development on sites to be maximised. Option B aims to allocate housing in areas with high levels of sustainable transport to provide residents with sustainable access to services and to allocate employment land where good public transport links are available. Option C aims to redevelop retail and other commercial areas in town centres to provide employment sites, allocate employment sites on derelict or vacant open space within the urban area and to locate housing and services close to existing and proposed employment areas. This could potentially reduce commuting times and so possibly reliance on private vehicles as the public transport network could be utilised by commuters. Option D would focus new growth within the existing residential and employment areas and around transport hubs so residents could utilise existing transport links, including public transport and active travel.

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<sup>58</sup> London Plan Density Research: Lessons from Higher Density Development. Available at: [https://www.london.gov.uk/sites/default/files/project\\_2\\_3\\_lessons\\_from\\_higher\\_density\\_development.pdf](https://www.london.gov.uk/sites/default/files/project_2_3_lessons_from_higher_density_development.pdf) [Date accessed: 05/06/23]

- 6.2.40 All the options propose to site new development in locations where the existing public transport network can be utilised, with a likely minor positive impact on transport and accessibility for Options A, C and D. Of the four options, Option B is identified as the best performing to its focus on growth only where public transport links are best which would likely encourage more residents to choose more sustainable travel options and a major positive impact on transport and accessibility was identified for this option.

### **SA Objective 10 – Housing**

- 6.2.41 Within Sandwell there has been an identified need for 29,773 homes over the period 2021-39. Whilst the spatial growth options describe housing locations they do not quantify housing numbers for each option and so the extent to which they could contribute towards meeting the housing need in the borough is unknown. At this scale of assessment, it is also uncertain what the likely contribution of each growth option to meeting the different needs of the population on housing mix, provision of extra care housing, accessible housing and affordable homes would be.
- 6.2.42 Option A proposes to focus most new growth within the existing residential and employment areas on previously developed land and utilising existing and improved infrastructure capacity to maximise developments. Option B aims to restrict development to brownfield sites, promote low carbon designs and technologies in new development and redevelop existing housing and employment areas to deliver more energy-efficient and intensive areas of growth. Option C proposes to locate new housing and services to serve existing and proposed employment areas. Option D aims to focus new growth within the existing residential and employment areas near existing transport hubs, utilising vacant and underused open spaces and undeveloped land within the urban areas. Options D would also redevelop areas of existing older housing to provide higher density and energy-efficient housing and resolve any capacity gaps in residential services.
- 6.2.43 All the options propose new housing development but focused on different areas of Sandwell, leading to a minor positive impact on housing provision. Option D is likely to be the best performing with regard to housing as it has the largest focus on housing, and by increasing density may provide for the largest amount of housing growth.

### **SA Objective 11 – Equality**

- 6.2.44 Deprivation is high across the SLP area, with 36 LSOAs in Sandwell ranked among the 10% most deprived in England<sup>59</sup>. Options A, B, C and D propose growth in urban areas which could potentially help facilitate social inclusion increasing accessibility to key services and employment opportunities, however, increasing housing density in deprived areas could also lead to exacerbation of existing inequalities. In particular, Option D emphasises the use of increased housing densities and taller buildings, which may lead to greater pressure on existing services and open spaces with adverse implications for quality of life, and more dense living situations may potentially lead to higher crime rates.

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<sup>59</sup> Ministry of Housing, Communities and Local Government (2019) The English Indices of Deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date accessed: 11/08/23]

6.2.45 Option A proposes to focus new development in existing housing and employment areas delivering most new development on previously developed land and taking advantage of existing and improved infrastructure capacity to maximise development. Option B restricts new development to brownfield sites, allocating housing and employment land in areas with good sustainable and public transport links to services including schools, jobs, healthcare and food stores. Option C proposes to intensify existing employment areas through redevelopment and redesign and locating new housing and services to serve employment sites. Option D aims to deliver new housing in previously developed and potentially underused open space and redevelop existing older houses to provide higher density housing; this could help to promote regeneration and enhance deprived areas, but also lead to challenges associated with higher density living as outlined above.

6.2.46 On balance, mixed effects could occur as a result of Options B, C and D with an uncertain impact recorded, whereas Option A is more likely to lead to a minor positive impact overall.

6.2.47 Option A is likely to be the best performing option with regard to equality, because it balances housing, employment and utilising existing and improved infrastructure.

### **SA Objective 12 – Health**

6.2.48 Residents in Sandwell have generally good access to health facilities with 73 healthcare centres<sup>60</sup> and Sandwell General Hospital located in the borough, and the majority of the urban area has good pedestrian and public transport access to healthcare.

6.2.49 All the spatial growth options seek to take advantage of existing facilities by directing the majority of new development to the existing urban areas where healthcare provisions are most concentrated. Options B and D aim to locate new developments close to transport links to enable residents to access services using public transport; Option B would ensure housing is only developed in areas with the highest accessibility to healthcare, whereas Option D would focus growth around transport hubs and seek to fill healthcare capacity gaps. However, Options A, C and D all involve the potential of allocating vacant or under used open space for development, losing the potential to use these areas for open spaces and green links, and the associated benefits this could bring for human health and wellbeing. A minor negative impact is identified for these three options, although Option D would perform better than Options A and C.

6.2.50 Option B could be identified as the best performing overall as it allocates housing near transport links to residential services including healthcare and does not consider use of previously undeveloped open space within the urban areas, instead ensuring the protection of existing open spaces and creation of new open spaces for the public. A minor positive impact is identified overall for Option B.

### **SA Objective 13 – Economy**

6.2.51 In Sandwell, the highest density of employment locations can be found in the centre and north of the borough and along key transport routes.

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<sup>60</sup> According to Black Country Accessibility Modelling (2021) data

- 6.2.52 Option A aims to focus most new growth within the existing residential and employment areas, where sustainable transport options would be the best. Similarly, Option B proposes to locate new employment land near to good sustainable and public transport links, ensuring good sustainable access to workplaces. Both Options A and B would be likely to result in a minor positive impact on the economy.
- 6.2.53 Option C focuses on economic growth, aiming to retain, enhance and promote all types of employment land, intensify the use of employment land through redevelopment and redesign and locate new housing and services to serve employment sites. A major positive impact would be likely.
- 6.2.54 Option D aims to deliver growth in existing residential and employment areas, and reallocate areas identified as employment land for additional housing development which could compromise employment land targets and lead to a minor negative impact on the economy.
- 6.2.55 Option C is identified as the best performing with regard to the economy.

### **SA Objective 14 – Education, Skills and Training**

- 6.2.56 The extent to which all spatial options would facilitate good access to education for new residents is almost entirely dependent on the specific location of the development, which is uncertain given the broad locations set out in the spatial growth options. Access to education, skills and training are generally best within urban centres. All the options, A, B, C and D propose the majority of growth within the existing urban areas, which would likely enable good access to education facilities.
- 6.2.57 Option B aims to only locate new residential development in areas with the highest levels of sustainable access to services, including schools, a minor positive impact is recorded for this option. Whilst Option D promotes the highest housing densities it also aims to improve capacity in associated residential services including education facilities, and focus development around sustainable transport hubs producing a major positive impact for this SA Objective. The overall effect of Options A and C on access to education is uncertain, as although they remain largely urban-focused they may lead to over-capacity issues in some locations.
- 6.2.58 Overall, Option D would likely be best performing with regard to education, skills and training owing to the provision of sustainable access to schools and addressing capacity gaps.

## **6.3 Conclusion**

- 6.3.1 It is difficult to determine an overall best performing spatial option as the performance of each option varies depending on the SA Objective in question. Generally, options which perform better against economic needs put the most pressure on environmental or social resources and vice versa.

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

## 6.4 Selection and Rejection

6.4.1 Reflecting on the SA findings and SMBC's objectives for the emerging SLP, the Council consider that:

6.4.2 *"No single option would have no adverse environmental or sustainability impact; however, it is clear from the summary assessment that two options (Housing-led and Employment-led) would not support the balanced and sustainable mix of development and environmental and social benefits required to deliver transformational change in Sandwell. It is apparent that the most appropriate and deliverable strategy for housing, employment and environmental protection and improvement in Sandwell, which will also confirm our ambitions to improve the health and wellbeing of residents, would be a combination of options A and B.*

6.4.3 *This will deliver what we are referring to as the Balanced Green Growth option for the delivery of development in Sandwell. It will allow us to provide a significant quantum of housing and additional employment opportunities in the borough while at the same time promoting a bold strategy supporting the delivery of climate change adaptation and mitigation, environmental protection and enhancement, the conservation and enhancement of the historic environment and the delivery of green and blue infrastructure. This in turn will support the Council's wider aims and objectives in improving the health (physical and mental), wellbeing and life chances of people in Sandwell".*

# 7 Assessment of policies

## 7.1 Preface

7.1.1 The SLP will contain strategic and non-strategic planning policies and allocations to support the growth and regeneration of Sandwell up to 2041. The SLP Draft Plan Regulation 18 Consultation document presents a suite of draft policies for inclusion in the emerging SLP.

7.1.2 Many of the proposed SLP policies are derived from the ceased Draft BCP. A total of 63 policies were set out in the Draft BCP and were consulted on as part of the BCP process, before the decision was made to end work on the BCP in October 2022. A number of SLP policies have also been derived from the adopted Sandwell SAD.

7.1.3 SMBC have considered the extent to which each of the draft BCP policies and adopted SAD policies remain relevant and applicable to the SLP area, in light of consultation responses received during the BCP Regulation 18 consultation, and in the context of the latest national and local guidance and strategies.

7.1.4 The relevant existing policies have been updated and together with a number of new policies prepared for the SLP, this has resulted in a total of 87 policies identified and presented within the Draft SLP Regulation 18 Consultation document. The SLP also sets out a Vision for Sandwell in 2041 and a set of Objectives.

7.1.5 The sustainability performance of each draft policy has been evaluated based on the SA Framework (see **Appendix A**) and the methodology as set out in **Chapter 2**. The assessments are set out in full within **Appendix D**. This chapter summarises the results of these assessments.

## 7.2 Overview of Policy Assessments

7.2.1 The impact matrix for all policy assessments is presented in **Table 7.1**. These impacts should be read in conjunction with the assessment text narratives in **Appendix D**.

7.2.2 The proposed SLP policies seek to support the delivery of sustainable growth within Sandwell. The policies will help to ensure that potential adverse impacts on sustainability identified as a result of the development proposed within the SLP are avoided, mitigated or subject to compensatory measures wherever possible and that development proposals are accompanied by relevant supporting information to ensure that the impacts of development can be appropriately factored into land use decision making processes.

7.2.3 The SLP policies cover the themes of:

- Development strategy;
- Sandwell's natural and historic environment;
- Climate change;
- Health and wellbeing in Sandwell;
- Sandwell's housing;
- Sandwell's economy;
- Sandwell's Centres;

- West Bromwich;
- Transport;
- Infrastructure and delivery;
- Waste and minerals;
- Development constraints and industrial legacy; and
- Development management.

7.2.4 For the majority of policies, the assessment has identified negligible, minor positive or major positive effects. Negligible impacts are identified where the policy does not directly influence the achievement of that SA Objective, which is the case for many of the more ‘thematic’ policies.

7.2.5 A greater range of sustainability effects is identified for policies that have potential to introduce new development, for example, the housing and economy policies. As such, uncertain impacts have been identified for certain SA Objectives as a result of some of the policies in these sections. The range in potential impacts for these policies owes to the fact that large developments could have major negative impacts, however, policy requirements have the ability to ensure these developments create some positive impacts or reduce the potential adverse effects if designed and carried out appropriately.

7.2.6 Some policies, such as the development strategy policies, set out the broad direction for growth. As such, minor negative impacts have been identified for certain SA Objectives as a result of some policies in these sections, owing to the potential for the large amount of proposed development to lead to increases in pollution and waste, for example.

7.2.7 The full assessments, including text narrative to explain the identified impacts against each SA Objective, are set out in **Appendix D**.

7.2.8 Opportunities for enhancement may also be secured through policies in the SLP. **Where there are opportunities to improve the sustainability performance of draft policies these have been identified in SA process (see XXX).**

Table 7.1: Summary of policy assessments

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDS1	+	+	+	+	+	+	-	-	+	+	0	+	+	0
SDS2	+	+	+	+	0	++	+	0	+	+	+	+	++	+
SDS3	0	0	+	+/-	0	+	0	0	+	+	+	+	+	0
SDS4	++	++	0	+	+	0	+	0	+	0	+	+	0	0
SDS5	+	+	0	+	0	0	0	0	+	0	+	+	+	0
SDS6	+	+	0	0	0	+	0	0	0	0	0	+	0	0
SDS7	0	+	+	+	+	0	+	0	0	0	0	+	+	0
SNE1	0	+	++	+	+	0	+	0	0	0	0	+	0	0
SNE2	0	+	++	+	+	0	+	0	0	0	0	+	0	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SNE3	0	+	+	+	+	+	+	0	0	0	0	+	0	0
SNE4	+	+	+	0	0	0	0	0	0	0	0	0	+	+
SNE5	+	++	++	0	+	0	+	0	0	0	0	+	0	0
SNE6	+	+	+	0	0	0	+	0	+	+	0	+	+	0
SHE1	++	+	0	0	0	0	0	0	0	0	0	0	0	0
SHE2	++	+	+	0	0	0	0	0	0	0	0	0	+	0
SHE3	+	+	0	0	0	0	0	0	0	0	0	0	0	0
SHE4	+	+	0	0	0	0	0	0	0	0	0	0	0	+
SCC1	+	+	+	++	+	+	+	0	+	0	0	+	0	0
SCC2	0	0	0	+	+	0	+	0	0	0	0	+	0	0
SCC3	0	0	+	+	+	0	+	0	0	0	0	0	0	0
SCC4	0	0	+	0	++	0	+	0	0	0	0	+	0	0
SCC5	0	+	+	0	+	0	+	0	0	0	0	0	0	0
SCC6	0	0	0	+	0	0	+	0	0	0	0	0	0	0
SHW1	0	0	0	+	0	0	+	0	+	0	+	++	0	0
SHW2	0	0	0	+	0	0	+	0	+	0	+	++	0	0
SHW3	0	0	+	+	0	0	++	0	+	0	0	+	+	0
SHW4	0	+	+	+	+	0	+	0	+	0	+	++	0	0
SHW5	0	+	0	0	0	0	0	0	+	0	+	+	0	0
SHW6	0	+	+	0	0	0	0	0	0	0	+	+	0	0
SHO1	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-
SHO2	0	0	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-
SHO3	0	0	0	+	0	0	+	0	+	+	+	+	0	0
SHO4	0	0	0	0	0	0	0	0	0	+	+	0	0	0
SHO5	0	0	0	0	0	0	0	0	0	+	+	+	0	0
SHO6	0	0	0	0	0	0	0	0	0	+	+/-	0	0	0
SHO7	0	0	0	0	0	0	0	0	0	+	+	0	0	0
SHO8	0	0	0	0	0	0	0	0	+	+	+	+	0	0
SHO9	0	0	0	+	0	0	+	0	+	0	+	+	+	++
SHO10	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	+	+	+	+	+/-	+
SHO11	0	0	0	0	0	0	0	0	+	0	+	+	0	0
SEC1	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-
SEC2	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-
SEC3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-
SEC4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+	+/-
SEC5	0	0	0	0	0	0	0	0	+	0	+	+	+	+
SEC6	0	0	0	0	0	0	0	0	0	0	0	0	+	0
SCE1	+/-	+/-	+/-	+	+/-	+	+/-	+/-	+	+	+	+	+	+/-
SCE2	0	+	0	0	0	0	0	0	0	0	0	0	+	0
SCE3	0	0	0	0	0	0	0	0	+	+	+	+	+	+
SCE4	0	0	0	0	0	0	0	0	+	+	+	0	+	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SCE5	0	0	0	+	0	0	+	0	+	0	+	+	+	0
SCE6	0	0	0	+	0	0	+	0	+	0	+	+	+	0
SWB1	0	+	0	+	+	+	0	0	+	+	+	+	+	+
SWB2	0	+	0	+	0	+	0	0	+	+	+	+	+	+
STR1	0	0	0	+	0	0	+	0	++	0	0	+	0	0
STR2	0	0	0	+	0	0	0	0	+	0	0	0	0	0
STR3	0	0	0	+	0	0	0	0	+	0	0	0	0	0
STR4	0	0	-	0	0	0	0	0	+	0	0	0	+	0
STR5	0	0	0	+	0	0	0	0	++	0	+	+	0	0
STR6	0	0	0	+	0	0	+	0	++	0	0	0	0	0
STR7	0	0	0	0	0	0	0	0	+	0	0	0	0	0
STR8	0	0	0	0	0	0	0	0	+	0	0	0	+	0
STR9	0	0	0	+	0	0	+	0	+	0	0	0	0	0
STR10	0	0	0	+	0	0	+	0	+	0	0	0	+	0
SID1	0	0	0	+	0	0	+	0	+	0	+	0	+	0
SID2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SID3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SWA1	0	0	0	0	0	0	0	++	0	0	0	0	0	0
SWA2	0	0	0	0	0	0	0	+	0	0	0	0	0	0
SWA3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0
SWA4	0	0	0	0	0	0	0	+	0	0	0	0	0	0
SWA5	0	0	0	0	0	+	0	++	0	0	0	0	0	0
SMI1	0	0	0	0	0	+	0	0	0	0	0	0	+	0
SMI2	0	0	0	0	0	+	0	0	0	0	0	0	0	0
SCO1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SCO2	0	0	0	0	0	0	+	0	0	0	0	0	0	0
SCO3	0	+	0	0	0	+	0	0	0	0	0	0	0	0
SDM1	0	+	+	+	+	0	+	0	+	0	+	+	0	0
SDM2	0	0	0	0	0	+	0	0	0	0	0	+	0	0
SDM3	0	+	0	+	0	+	0	0	+	0	0	0	0	0
SDM4	0	+	0	0	0	0	0	0	0	0	0	0	0	0
SDM5	+	+	0	0	0	0	0	0	0	0	0	0	+	0
SDM6	0	0	0	0	0	0	0	0	0	0	+	+	0	0
SDM7	0	0	0	0	0	0	0	+	0	0	0	0	+	0
SDM8	0	0	0	0	0	0	0	0	0	0	0	0	+/-	0
SDM9	0	0	0	0	0	0	0	0	0	0	+	+	0	0
SDM10	0	0	0	0	0	0	0	0	0	0	0	0	+	0

## 8 Assessment of reasonable alternative development sites

### 8.1 Preface

8.1.1 The Black Country Call for Sites request first opened in July 2017 and re-opened from 9<sup>th</sup> July – 20<sup>th</sup> August 2020<sup>61</sup>. SMBC have carried out annual SHLAAs of sites within which have the potential to accommodate new housing development.

8.1.2 SMBC have undertaken a filtering process (or 'gateway check') of all potential sites identified through the evidence base in order to determine which sites should be considered as reasonable alternatives for the purpose of the SA.

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

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

**[Note to Council:** Please can you provide some information / context to explain how reasonable alternative sites have been identified? E.g. the filtering process. Para 8.1.3 current text is taken from the BCP SA but needs checking/updating.]

<sup>61</sup> Available at <https://blackcountryplan.dudley.gov.uk/t2/p3/> [Date accessed: 02/06/23].

8.1.4 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 8.1.3 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 Council.

8.1.5 SMBC have identified a total of 121 reasonable alternative sites, which are listed in **Table 8.1**. Some sites have been identified as reasonable alternatives for multiple uses, or mixed uses.

**[Note to Council:** We have prepared the SA using the site information provided, including site references as provided by Trisha via email 27/09/23. However, we note there may be some discrepancies between the references listed here and those listed in the appendices of the SLP itself and accompanying allocated site shapefiles provided to colleagues for the HRA. E.g. eight sites are listed as mixed use allocations in the plan which were not specified as such in the SA information, and differences in the references listed for employment sites.]

*Table 8.1: Reasonable alternative development sites identified by SMBC*

Site Reference	Site Address	Site use	Net Area (ha)	Housing Capacity (if applicable)
SEC3-181	Varney Business Park, Varney Avenue, West Bromwich	Employment	0.73	N/A
SEC4-1	Zion Street, Tipton	Employment	2.43	N/A
SEC3-9	Alexandra Ind Est, Locarno Rd/ Alexandra Rd, Tipton	Housing/Employment	1.87	75
SEC3-99	Providence Street, Cradley Heath	Employment	6.33	N/A
SH1	Brown Lion Street	Housing	0.46	20
SEC3-113	Brandon Way (east side)	Housing/Employment	0.47	19
SEC3-46	Droicon Ind Est, Portway Road	Employment	0.87	N/A
SEC3-175	Coneygre Rd, Burnt Tree, Tipton	Housing/Employment	1.02	75
SEC-36	Silverthorne Lane	Housing/Employment	1.05	100
SEC3-29	Site off Richmond St, West Bromwich	Employment	1.10	N/A
SEC3-148	Castle St, Tipton	Housing/Employment	1.49	60
SH2	Land adjacent To Asda Wolverhampton Road, Oldbury	Housing/Employment	1.60	62
SEC4-4	Soho Triangle	Employment	1.71	N/A
SEC3-191	Oldfield Trading Estate, Cradley Heath	Housing/Employment	1.76	70
SEC4-3	70-74 Crankhall Lane	Housing/Employment	1.78	50
SEC3-133	Brymill Industrial Estate, Brown Lion St, Tipton	Housing	1.98	56
SEC3-189	Waterfall Lane, Cradley Heath	Housing/Employment	1.78	50
SEC3-22	Hale Trading Estate, Tipton	Housing/Employment	2.73	120
SEC3-40	Newlyn Road, Cradley Heath	Housing/Employment	3.40	102
SEC1-4	Severn Trent land off Roway Lane	Employment	3.65	N/A

Site Reference	Site Address	Site use	Net Area (ha)	Housing Capacity (if applicable)
SH3	88/90 Dudley Rd West	Housing/Employment	0.36	12
SH4	Lower High Street (Station Hotel & Dunns Site)	Housing/Employment	0.28	20
SH5	Mill Street, Great Bridge	Housing	0.86	30
SH6	Swan Lane, North of A41, West Bromwich	Housing	3.77	147
SH7	The Boat Gauging House & Adjoining Land, Factory Road, Tipton	Housing/GTTS	0.57	50
SH8	Alma Street, Wednesbury	Housing	0.52	19
SH9	The Phoenix Collegiate, Friar Park Road, Wednesbury	Housing	4.80	84
29	Star and Garter, 252 Duchess Parade, West Bromwich	Housing	0.05	60
SH10	Tipton Conservative and Unionist Club, 64 Union St, Tipton	Housing	0.19	14
SH11	Sandwell District & General Hospital	Housing	0.82	121
SH12	Fmr Springfield & Brickhouse Neighbourhood Office and adjacent land Dudley Road, Rowley Regis	Housing	0.65	26
34	John Dando House, 235 Hamstead Road, Great Barr Birmingham	Housing	0.86	26
35	Intersection House, 110 Birmingham Road, West Brom	Housing/Employment	0.80	136
36	Vacant Land Off Friardale Close, School Road, Carrington Road, Wednesbury	Housing	0.76	30
38	173 Rolfe Street, Smethwick	Housing	0.40	12
40	Metro House 410-416 High Street West Bromwich	Housing	0.38	34
42	Land between St Pauls Road & Tollhouse Way	Housing	0.33	11
43	Land adjacent Compton Grange, Whiteall Road, St Annes Road, Cradley Heath	Housing	0.30	15
44	Crosswells Road, Langley	Housing	0.29	12
45	164 Birmingham Road, West Bromwich	Housing/Employment	0.22	16
46	5 Lombard Street West Bromwich	Housing	0.16	44
SH13	Silverthorne Lane/ Forge Lane Cradley Heath	Housing	1.05	74
SH14	Langley Maltings, Western Road, Langley	Housing	2.72	95
SH15	Macarthur Road Industrial Estate, Cradley Heath	Housing	0.30	10
52	Land off Overend Road, Cradley Heath Business Park	Employment	3.04	N/A

Site Reference	Site Address	Site use	Net Area (ha)	Housing Capacity (if applicable)
SH16	Cradley Heath Factory Centre, Woods Lane, Cradley Heath	Housing	5.41	160
SH17	Land adj to Droicon Estate, Portway Road, Rowley Regis	Housing/GTTS	0.70	28
SH18	STW/SMBC Land, Friar Park Road, Wednesbury	Housing/Employment	26.60	630
56	Perrott Street/ Kitchener Street, Black Patch, Smethwick	Housing	1.39	49
SH19	Land at Horseley Heath, Alexandra Road, and Lower Church Lane, Tipton	Housing/Employment	1.90	60
SH20	Elbow Street, Old Hill	Housing/Employment/GTTS	0.77	25
SH21	Dudley Road East/Brades Road	Housing/Employment	2.65	106
SH22	Tatbank Road, Oldbury	Housing/Employment	1.15	40
SH23	28-64 High Street, West Bromwich	Housing	0.60	58
63	Site between Dudley St & Victoria St, Wednesbury	Housing/Employment	1.18	41
SH24	Cokeland Place / Graingers Lane, Cradley Heath	Housing	0.36	13
SH25	Bradleys Lane / High Street, Tipton	Housing/Employment	5.60	230
SH26	Lower City Road, Oldbury	Housing/Employment	1.83	63
SH27	Site surrounding former Post office and Telephone exchange, Horseley Heath, Tipton	Housing/Employment	1.16	42
SH28	Friar Street, Wednesbury	Housing/Employment	1.01	38
SH29	Used Car Sales site on corner of Lower Church Lane and Horseley Heath, Tipton	Housing/Employment	0.56	20
71	Grafton Lodge, Grafton Road, Oldbury	Housing	0.53	19
74	The Corner of Great Bridge & Richmond Street South	Employment	0.23	N/A
SH30	Land to east of Black Lake, West Bromwich	Housing/Employment	2.45	86
SH31	Summertown Road, Oldbury	Housing/Employment/GTTS	0.89	32
SH32	Bank Street (West), Hateley Heath	Housing/Employment/GTTS	0.85	43
SH33	Wellington Road, Tipton	Housing/Employment/GTTS	0.91	31
SH34	Brandhall Golf Course	Housing	36.90	190
SH35	Rattlechain Site Land to the north of Temple Way, Tividale	Housing	14.8	518
SH36	Land between Addington Way and River Tame, Temple Way	Housing/Employment/GTTS	0.90	32
SH37	Edwin Richards Quarry, Portway Road, Rowley Regis	Housing	10.10	526
SEC3-66	Soho Foundry	Employment	12.60	N/A

Site Reference	Site Address	Site use	Net Area (ha)	Housing Capacity (if applicable)
SH38	Brades Road, Oldbury	Housing/Employment	1.14	54
<b>91</b>	<b>Chances Glassworks</b>	<b>Housing/Employment</b>	<b>0.64</b>	<b>22</b>
SH39	Land to West of Thomas Street, West Bromwich	Housing	0.28	30
SH40	Langley Swimming Centre, Vicarage Road, Oldbury	Housing	0.49	20
SH41	North Smethwick Canalside	Housing	8.77	400
SH42	Forge Put, junction Franchise Street and Beebee Ro	Housing	0.14	10
SEC1-3	Land at Birchley Island, Junction 2 of M5, Oldbury	Employment	1.00	N/A
110	Bloomfield Road Amenity Space	Housing/Employment	0.38	15
118	Constance Avenue Open Space	Housing	1.60	64
120	Darbys Hill Open Space	Housing	3.80	114
132	Lily Street Open Space	Housing	3.80	114
137	Poppy Drive Open Space	Housing	0.80	32
140	Timbertree Crescent Open Space	Housing	0.50	20
142	Wylde Crescent Open Space	Housing	0.50	20
SH43	Land of Tanhouse Avenue, Great Barr	Housing	1.66	46
SH44	Wyndmill crescent, West Bromwich	Housing	0.19	11
SH45	Site Of Nos 118-152	Housing	0.41	20
SH46	Site Of Former Stone Cross Neighbourhood Office	Housing	0.32	14
SH47	Groveland, Oldbury	Housing	2.26	58
<b>171</b>	<b>Evans Halshaw car showroom, Carters Green</b>	<b>Housing</b>	<b>0.89</b>	<b>140</b>
SH48	St Johns St, Carters Green	Housing	0.82	33
<b>173</b>	<b>Army Reserve, Carters Green</b>	<b>Housing</b>	<b>1.17</b>	<b>63</b>
SH49	Tentec, Guns Lane	Housing	0.60	129
SH50	Providence Place/ Bratt St	Housing	1.32	70
<b>176</b>	<b>Cultural Quarter, West Bromwich</b>	<b>Housing</b>	<b>1.09</b>	<b>52</b>
<b>177</b>	<b>Queens Square Living, West Bromwich</b>	<b>Housing</b>	<b>2.84</b>	<b>396</b>
<b>178</b>	<b>West Bromwich Central</b>	<b>Housing</b>	<b>3.84</b>	<b>343</b>
SH51	Overend Street, West Bromwich	Housing	0.71	70
<b>SH52</b>	<b>George Street Living</b>	<b>Housing</b>	<b>1.54</b>	<b>327</b>
SH53	Grove Lane/ Cranford Street/ London Street	Housing	1.23	108
SH54	Cranford Street / Heath Street / Canal	Housing	5	115
SH55	Cape Arm Cranford Street	Housing	2.13	170
SH56	Moilliett Street Park - Grove Lane masterplan	Housing	0.77	31

Site Reference	Site Address	Site use	Net Area (ha)	Housing Capacity (if applicable)
SH57	Grove Street / MMUH / School - Grove Lane MP	Housing	2.18	85
SH58	Abberley Street Grove Lane Master Plan	Housing	2.48	140
SG1	Extension to Caravan Site, Brierley Lane, Bilston	GTTS	0.73	10
188	Land Between No.32 And George Betts School, West End Avenue, Smethwick	Housing	0.32	11
189	Hawes Lane, Rowley Regis	Housing	0.56	15
SH59	Beever Road, Great Bridge	Housing	1.01	18
191	Former Sunlight Laundry, Stanhope Road, Smethwick	Housing	0.73	33
SH61	Thandi Coach Station, Alma Street, Smethwick	Housing	0.71	58
SEC1-1	Whitehall Road, Tipton	Employment	5.29	N/A
SEC1-8	Legacy 43, Ryder Street, West Bromwich	Employment	0.88	N/A
SEC1-5	Land at Coneygre, Newcomen Drive, Tipton	Employment	6.92	N/A
SEC1-6	Land off Brandon Way, West Bromwich	Employment	3.00	N/A
SEC1-2	British Gas, Land off Dudley Road, Oldbury	Employment	1.05	N/A
SEC1-7	Site off Bilport Lane, Wednesbury	Employment	5.30	N/A
199	Lion Farm Playing Fields, Oldbury	Mixed-use (including housing, employment and open space)	20.89	200
SH60	Site of 30-144 Mounts Road, Wednesbury	Housing/Employment	1.07	22

## 8.2 Overview of Site Assessments (Pre-Mitigation)

- 8.2.1 **Chapter 2** sets out the methodology used to appraise reasonable alternatives and options in the SA process, and topic-specific methodologies for the assessment of reasonable alternative sites in **Appendix B** sets out how the likely impact per receptor has been identified in line with the local context and assumptions.
- 8.2.2 The assessment of the 121 reasonable alternative sites, including rationale for the recorded impacts, is presented in full in **Appendix C**.
- 8.2.3 A summary of the impact matrices for all reasonable alternative site assessments pre-mitigation is presented in **Table 8.2**. These impacts should be read in conjunction with the assessment text narratives in **Appendix C** as well as the topic specific methodologies and assumptions presented in **Appendix B**.

- 8.2.4 It should be noted that the site assessments include an overall impact symbol, summarised in **Table 2.4**, for each of the 14 SA Objectives. **Appendix C** documents 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 8.2** below for each SA Objective is always represented by the lowest common denominator. It may be possible that positive or negligible receptor impacts are relevant to an SA Objective, however, if one of the receptor impacts is identified as a major negative impact, the SA Objective will be identified as major negative overall.
- 8.2.5 Each appraisal includes a SA impact matrix which provides an indication of the nature and magnitude of impacts pre-mitigation. 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.
- 8.2.6 The appraisal of the 121 reasonable alternative sites demonstrated that all development proposals would be likely to result in a range of sustainability impacts as shown in **Table 8.2**.

**Table 8.2:** Summary impact matrix of all reasonable alternative sites (pre-mitigation)

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Site Reference	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SEC3-181	0	+/-	+/-	+/-	-	+	-	+/-	++	0	0	++	+/-	0
SEC4-1	-	+/-	+/-	+/-	--	-	-	+/-	++	0	-	-	+/-	0
SEC3-9	0	+/-	-	+/-	--	+	-	+/-	++	+/-	-	++	+/-	++
SEC3-99	-	+/-	-	+/-	-	+	-	+/-	++	0	0	++	+/-	0
SH1	0	+/-	+/-	0	+	+	-	0	++	+	0	-	0	-
SEC3-113	0	+/-	+/-	+/-	-	+	-	+/-	++	+/-	-	++	+/-	-
SEC3-46	0	+/-	-	+/-	--	-	-	+/-	-	0	0	-	+/-	0
SEC3-175	-	+/-	+/-	+/-	+	+	-	+/-	++	+/-	0	++	+/-	-
SEC-36	0	+/-	-	+/-	-	+	-	+/-	++	+/-	0	++	+/-	-
SEC3-29	0	+/-	+/-	+/-	-	-	-	+/-	-	0	0	+	++	0
SEC3-148	-	+/-	+/-	+/-	--	+	-	+/-	++	+/-	0	++	+/-	-
SH2	0	+/-	+/-	+/-	--	-	-	+/-	-	+/-	-	++	+/-	++
SEC4-4	-	+/-	+/-	+/-	+	-	-	+/-	-	+	-	-	++	0
SEC3-191	0	+/-	+/-	+/-	--	-	-	+/-	++	+/-	-	++	+/-	++
SEC4-3	0	+/-	+/-	+/-	-	+	-	+/-	++	+/-	-	++	+/-	++
SEC3-133	0	+/-	-	0	-	-	-	0	++	+	-	-	--	-
SEC3-189	0	+/-	+/-	+/-	-	-	-	+/-	-	+/-	0	-	+/-	++
SEC3-22	0	+/-	-	+/-	-	-	-	+/-	++	+/-	0	-	+/-	++
SEC3-40	0	+/-	+/-	+/-	--	-	-	+/-	++	+/-	-	++	+/-	++
SEC1-4	0	+/-	-	+/-	--	-	-	+/-	++	0	0	++	++	++
SH3	-	+/-	+/-	+/-	--	+	-	+/-	++	+/-	0	++	+/-	0
SH4	0	+/-	+/-	+/-	+	-	-	+/-	++	+/-	0	++	+/-	-
SH5	-	+/-	-	0	--	-	-	0	++	+	-	++	-	++
SH6	0	+/-	+/-	-	-	-	--	-	++	++	-	++	--	++
SH7	--	+/-	-	+/-	-	-	-	+/-	++	+	0	++	+/-	-
SH8	0	+/-	+/-	+/-	+	+	-	0	++	+	0	++	-	-
SH9	0	+/-	-	+/-	-	-	-	0	++	+	-	-	0	++
29	-	+/-	+/-	+/-	-	+	-	0	++	+	-	++	0	++
SH10	-	+/-	+/-	+/-	+	-	-	0	++	+	-	++	0	++
SH11	0	+/-	+/-	-	-	-	--	-	++	++	0	++	-	++
SH12	0	+/-	-	0	+	+	-	0	-	+	0	-	0	++
34	0	+/-	-	0	-	-	-	0	++	+	0	++	-	++
35	0	+/-	+/-	+/-	-	+	-	+/-	-	+/-	0	++	+/-	++
36	0	+/-	+/-	0	-	-	-	0	++	+	-	++	-	++
38	-	+/-	+/-	0	+	+	-	0	++	+	-	++	0	++
40	0	+/-	+/-	0	-	+	-	0	++	+	0	++	-	++
42	-	+/-	+/-	0	-	-	-	0	++	+	0	++	0	++
43	-	+/-	+/-	0	+	-	-	0	++	+	0	++	0	-
44	0	+/-	+/-	0	-	-	-	0	++	+	0	-	0	++

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Site Reference	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
45	0	+/-	+/-	+/-	+	-	-	+/-	-	+/-	0	++	+/-	++
46	-	+/-	+/-	0	+	+	-	0	++	+	0	++	-	++
SH13	0	+/-	-	0	-	+	-	0	++	++	0	++	-	-
SH14	--	+/-	+/-	0	--	+	-	0	++	+	-	++	--	-
SH15	0	+/-	+/-	0	-	+	-	0	++	+	0	++	-	-
52	0	+/-	-	+/-	-	+	--	+/-	++	0	0	-	+/-	0
SH16	-	+/-	-	-	--	-	--	-	++	++	0	++	--	-
SH17	0	+/-	-	0	-	+	-	+/-	-	+	0	-	+/-	-
SH18	0	+/-	-	+/-	--	-	-	+/-	-	+/-	0	-	+/-	-
56	-	+/-	-	0	-	-	-	0	-	+	-	-	0	++
SH19	0	+/-	-	+/-	-	-	-	+/-	++	+/-	0	-	+/-	++
SH20	0	+/-	+/-	+/-	-	-	-	+/-	++	+/-	0	++	+/-	++
SH21	-	+/-	-	+/-	+	+	-	+/-	-	+/-	0	-	+/-	++
SH22	0	+/-	+/-	+/-	-	-	-	+/-	++	+/-	0	-	+/-	++
SH23	0	+/-	+/-	0	-	+	-	0	-	+	-	++	-	++
63	0	+/-	+/-	+/-	+	-	-	+/-	++	+/-	0	++	+/-	++
SH24	0	+/-	+/-	0	+	+	-	0	++	+	0	++	-	++
SH25	0	+/-	-	+/-	--	+	-	+/-	++	+/-	-	-	+/-	++
SH26	-	+/-	+/-	+/-	--	-	-	+/-	++	+/-	0	-	+/-	++
SH27	0	+/-	+/-	+/-	-	+	-	+/-	++	+/-	0	++	+/-	++
SH28	0	+/-	-	+/-	--	+	-	+/-	++	+/-	0	++	+/-	-
SH29	0	+/-	+/-	+/-	--	+	-	+/-	++	+/-	-	+	+/-	++
71	0	+/-	+/-	0	+	-	-	0	++	+	0	++	-	++
74	0	+/-	+/-	+/-	-	+	-	+/-	++	0	0	++	+/-	0
SH30	0	+/-	-	+/-	-	+	-	+/-	++	+/-	0	++	+/-	++
SH31	-	+/-	+/-	+/-	--	-	-	+/-	-	+/-	0	-	+/-	++
SH32	0	+/-	+/-	+/-	+	+	-	+/-	++	+/-	0	++	+/-	++
SH33	-	+/-	+/-	+/-	-	-	-	+/-	++	+/-	-	++	+/-	++
SH34	-	+/-	-	-	+	-	--	-	++	++	0	-	0	++
SH35	-	+/-	-	-	--	-	--	-	-	++	0	-	0	-
SH36	0	+/-	-	+/-	--	-	-	+/-	-	+/-	0	-	+/-	-
SH37	-	+/-	-	-	--	-	--	-	-	++	0	-	0	++
SEC3-66	--	+/-	-	+/-	-	-	--	+/-	-	0	-	-	+/-	0
SH38	-	+/-	+/-	+/-	--	+	-	+/-	-	+/-	0	-	+/-	++
91	--	+/-	+/-	+/-	-	+	-	+/-	++	+/-	-	++	+/-	++
SH39	0	+/-	+/-	0	+	+	-	0	++	+	-	++	-	++
SH40	0	+/-	+/-	0	--	+	-	0	++	+	0	-	-	++
SH41	--	+/-	-	-	--	-	--	-	++	++	-	++	--	++
SH42	0	+/-	+/-	0	-	+	-	0	-	+	0	+	0	++
SEC1-3	0	+/-	+/-	+/-	-	-	-	+/-	++	0	-	+	++	0
110	0	+/-	+/-	+/-	--	-	-	+/-	++	+/-	0	+	+/-	-

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Site Reference	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
118	0	+/-	-	0	-	-	-	0	-	+	-	++	0	++
120	0	+/-	-	0	+	-	--	0	-	++	0	++	0	++
132	0	+/-	+/-	0	--	-	--	0	++	++	-	++	0	++
137	0	0	+/-	0	+	-	-	0	++	+	0	++	0	++
140	0	+/-	-	0	+	-	-	0	-	+	0	-	0	-
142	0	+/-	+/-	0	+	-	-	0	++	+	0	-	0	++
SH43	0	+/-	--	0	-	-	-	0	-	+	0	++	-	++
SH44	0	+/-	+/-	0	+	-	-	0	++	+	-	++	0	-
SH45	0	+/-	+/-	0	+	+	-	0	++	+	-	++	0	-
SH46	0	+/-	+/-	0	--	-	-	0	++	+	0	++	0	++
SH47	-	+/-	+/-	0	+	-	-	0	++	+	0	++	-	++
171	-	+/-	+/-	-	-	+	--	-	++	++	0	++	-	++
SH48	0	+/-	+/-	0	--	+	-	0	++	+	0	++	0	++
173	0	+/-	+/-	0	--	+	-	0	++	+	0	++	-	++
SH49	0	+/-	+/-	-	+	+	--	-	++	++	0	++	-	++
SH50	-	+/-	+/-	0	-	-	-	0	++	+	0	-	0	++
176	--	+/-	+/-	0	+	-	-	0	++	+	0	++	-	++
177	-	+/-	+/-	-	-	+	--	-	++	++	-	++	--	++
178	--	+/-	+/-	-	--	+	--	-	++	++	-	++	--	++
SH51	0	+/-	+/-	0	+	-	-	0	++	+	-	++	-	++
SH52	0	+/-	+/-	-	-	+	--	-	++	++	-	++	-	++
SH53	0	+/-	+/-	0	-	+	-	0	-	+	-	-	-	++
SH54	-	+/-	+/-	-	--	-	--	0	-	++	-	-	-	++
SH55	-	+/-	+/-	0	--	-	--	0	-	++	-	-	--	++
SH56	0	+/-	+/-	0	+	+	-	0	-	+	-	-	-	++
SH57	0	+/-	+/-	0	--	+	-	0	-	+	-	-	--	++
SH58	-	+/-	+/-	-	-	-	--	-	-	++	-	-	--	++
SG1	0	+/-	+/-	+/-	--	-	-	+/-	-	+	0	-	0	++
188	0	+/-	+/-	0	+	-	-	0	++	+	-	++	0	++
189	-	+/-	+/-	0	+	-	-	0	-	+	0	-	0	++
SH59	0	+/-	-	0	--	-	-	0	++	+	0	-	0	++
191	0	+/-	+/-	0	-	-	-	0	++	+	-	-	0	++
SH61	0	+/-	+/-	0	--	+	-	0	-	+	-	-	-	++
SEC1-1	-	+/-	-	+/-	--	+	-	+/-	++	0	-	++	+/-	0
SEC1-8	0	+/-	+/-	+/-	+	-	-	+/-	++	0	0	++	++	0
SEC1-5	-	+/-	+/-	+/-	--	-	-	+/-	++	0	0	++	++	0
SEC1-6	-	+/-	+/-	+/-	--	+	-	+/-	-	0	0	++	++	0
SEC1-2	0	+/-	+/-	+/-	-	-	-	+/-	++	0	0	++	++	0
SEC1-7	0	+/-	-	+/-	--	-	-	+/-	-	0	0	-	+/-	0
199	0	+/-	+/-	+/-	--	-	--	+/-	++	+/-	0	-	++	-
SH60	0	+/-	+/-	+/-	--	-	-	+/-	++	+/-	0	++	+/-	++

## 8.3 Mitigation

- 8.3.1 The sustainability appraisal of 121 reasonable alternative sites against baseline sustainability information has identified a number of adverse effects associated with the SA Objectives in the SA Framework (see **Table 8.2**). The purpose of this section is to consider if and how these effects can be mitigated by applying the mitigation hierarchy.
- 8.3.2 The first stage of the mitigation hierarchy is to consider if the adverse effect can be avoided. This may be possible by withdrawing the potential site allocation.
- 8.3.3 For allocations which are likely to remain on the basis that the plan makers consider their inclusion to be necessary, mitigation measures should be explored to reduce the overall significance of effect. If it is not possible to mitigate identified adverse effects, these will remain at the end of the SA process and will be declared in the environmental report and non-technical summary.
- 8.3.4 One way to reduce adverse impacts identified against baseline receptors is to consider the potential mitigating effects of planning policies.
- 8.3.5 Aspects of the policies within the draft SLP (see **Appendix D**), would be anticipated to help ensure that potential adverse impacts on sustainability identified as a result of the development proposed within the SLP, are avoided.
- 8.3.6 **Tables 8.3 to 8.15** list the identified adverse impacts according to SA Objective that could potentially arise following development at the 121 reasonable alternative sites. The table then goes on to list which, if any, of the draft SLP policies would be likely to help avoid or mitigate these adverse impacts.

**Table 8.3: Mitigating SLP Policy for SA Objective 1 – Cultural Heritage**

Identified adverse impact	Potential mitigating influence of SLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Alteration of character or setting of a heritage asset</b></p>	<p>Policy SHE1 states that <i>"development proposals will be required to conserve and enhance local character and those aspects of the historic environment together with their settings"</i>. The policy also requires development proposals that would affect a heritage asset to carry out an Assessment of Significance which would inform part of a Design and Access Statement and / or a Heritage Impact Assessment.</p> <p>Policy SHE2 states that heritage assets within the borough will be <i>"retained and, wherever possible, enhanced and their settings respected"</i>.</p> <p>Policy SHE3 ensures heritage assets are conserved and enhanced, stating that development proposals affecting locally listed buildings will only be permitted where they <i>"positively contribute towards the architectural or historic significance"</i>.</p> <p>Policy SHE4 states that <i>"development should safeguard both designated and non-designated archaeological assets and the character and setting of areas of acknowledged archaeological significance"</i>. The policy also requires sites with known archaeological potential to provide an archaeological assessment and / or field evaluation.</p>	<p>These policies would be expected to mitigate potential adverse impacts on the local historic environment which may occur following development proposals, including impacts on Listed Buildings, Conservation Areas, Scheduled Monuments, Registered Parks and Gardens and Archaeological Sensitive Areas.</p>

**Table 8.4: Mitigating SLP Policy for SA Objective 2 - Landscape**

Identified adverse impact	Potential mitigating influence of SLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Threaten or result in the loss of locally distinctive landscape character</b></p>	<p>Policy SHE1 states that <i>"development proposals will be required to conserve and enhance local character"</i>.</p> <p>Policies SHE2, SHE3 and SHE4 all ensure the protection and enhancement of heritage assets within the borough, which would expect to improve the local landscape character, where heritage assets would positively contribute to local character and distinctiveness.</p> <p>Policy SDS7 provides measures to support the green and blue infrastructure within the borough, which would expect</p>	<p>These policies would be expected to mitigate potential adverse impacts on the local landscape character, ensuring that new development respects and enhances local distinctiveness.</p>

Identified adverse impact	Potential mitigating influence of SLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>to positively contribute to the locally distinctive landscape character.</p> <p>Policy SNE3 supports the provision, retention and protection of trees, woodlands and hedgerows, which would also be expected to contribute towards the conservation of landscape character.</p> <p>Policy SNE5 aims to protect the Rowley Hills from inappropriate development that would lead to the loss of valued qualities that make up the local landscape character, including panoramic views.</p> <p>Policies SDM1, SDM2, SDM3 and other Development Management policies seek to ensure that new development creates a strong sense of place and help to conserve and enhance the landscape / townscape character.</p>	

**Table 8.5:** Mitigating SLP Policy for SA Objective 3 – Biodiversity, flora, fauna and geodiversity

Identified adverse impact	Potential mitigating influence of SLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Threats or pressures to international or Habitats sites (SAC)</b></p>	<p>Policy SNE1 states that development would not be permitted where it would <i>"have an adverse impact on the integrity of an internationally designated site, such as Cannock Chase Special Area of Conservation or Fens Pools Special Area of Conservation"</i>. The policy also requires details regarding how improvements to the natural environment will be carried out, to be accompanied alongside the planning application.</p>	<p>This policy would be expected to mitigate potential adverse impacts on Habitats sites and associated functionally linked land, subject to the recommendations of the emerging HRA.</p>
<p><b>Threats or pressures to locally designated / non-statutory biodiversity or geodiversity sites, priority habitats and species</b></p>	<p>Policy SNE1 seeks to protect, conserve and enhance biodiversity assets including local designations, and requires that where the benefits of development strategically outweighs the importance of a local nature conservation site, <i>"damage must be minimised"</i> and remaining impacts will be required to be fully mitigated, with the addition of a mitigation strategy also required to accompany relevant planning applications.</p>	<p>These policies would help to conserve locally designated biodiversity sites; however, they <b>would not</b> be expected to fully mitigate potential adverse impacts on SLINCs or priority habitats where proposed development sites coincide with these assets.</p>

Identified adverse impact	Potential mitigating influence of SLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Effects on green infrastructure and ecological networks</b></p>	<p>Policy SDS7 ensures that green and blue infrastructure is protected and enhanced throughout the borough and states that “<i>development in Sandwell will be expected to maintain the existing network of green infrastructure across the borough</i>” and networks “<i>should be enhanced wherever possible</i>”.</p> <p>Policy SNE1 states that development proposals will need to take account of the Local Nature Recovery Strategy and “<i>should plan for the maintenance and where possible enhancement of such linkages</i>”.</p> <p>Policy SNE2 seeks to ensure that all developments deliver a minimum 10% biodiversity net gain in line with statutory requirements, and require development to “<i>be designed to protect and enhance existing habitats and ecological networks, including wildlife corridors and stepping stones</i>”.</p>	<p>These policies would be likely to enhance the connectivity between habitats and improve the resilience of ecological and GI networks to current and future pressures.</p>

**Table 8.6:** Mitigating SLP Policy for SA Objective 4 – Climate Change mitigation

Identified adverse impact	Potential mitigating influence of SLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Increased Carbon Emissions</b></p>	<p>Policy SCC1 ensures that development proposals in Sandwell will include opportunities for adaption to, and the mitigation of, climate change. The policy is underpinned by other policies that collectively aim to reduce the borough’s carbon footprint, including policies SCC2, SCC3, SCC6, SDS7, SDM1, STR1 and STR9.</p> <p>Policy SDS7 and SDM1 includes measures that require development proposals to incorporate green cover and urban green features.</p> <p>Policy STR1 ensures the transport network within the borough promotes active travel and that “<i>all new developments must provide adequate access for all modes of travel, including walking, cycling and public transport</i>”, reducing the need for travel via private cars.</p>	<p>Although these policies strongly support a reduction in GHG emissions associated with development, the policies <b>would not</b> be expected to fully mitigate GHG emissions from development, for example, arising from the release of embodied carbon, GHG emissions from the operation of development and potential loss of carbon stores, for example in soils.</p>

Identified adverse impact	Potential mitigating influence of SLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	Policy STR9 ensures the borough is able to provide for low emission vehicles through infrastructure such as vehicle charging points.	

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**Table 8.7: Mitigating SLP Policy for SA Objective 5 – Climate Change adaptation**

Identified adverse impact	Potential mitigating influence of SLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<b>Fluvial flood risk</b>	<p>Policy SCC4 sets out measures to identify and manage the risk of flooding throughout the borough and ensure that development is avoided in areas of high fluvial flood risk, in line with the NPPF. The policy also encourages development proposals to naturalise urban watercourses and open up culverts to provide multi-functional benefits, including for reinstating natural river channels.</p> <p>Various SLP policies including SDS7 would help to conserve and enhance GI coverage within the borough, with associated benefits for flood water storage and mitigation.</p>	These policies would be expected to mitigate potential adverse impacts associated with development in areas at risk of fluvial flooding.
<b>Risk of surface water flooding</b>	<p>Policy SCC4 requires development proposals to incorporate Sustainable Drainage Systems (SuDS) and additionally carry out a Flood Risk Assessment.</p> <p>Policy SCC5 underpins Policy SCC4 in relation to SuDS, outlining design requirements and states that “<i>surface water drainage strategies are required for all major developments, regardless of their size and the flood zone and catchment they are in</i>”.</p> <p>Policies SNE1, SDS7, and SDM1 provide measures that would protect and enhance green and blue infrastructure and ecosystem services, with likely multi-functional benefits including for flood risk reduction.</p>	These policies would be expected to mitigate potential adverse impacts associated with development in areas at risk of surface water flooding.

**Table 8.8: Mitigating SLP Policy for SA Objective 6 – Natural Resources**

Identified adverse impact	Potential mitigating influence of SLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<b>Loss of previously undeveloped land / land with environmental value</b>	<p>The proposed development strategy for the SLP promotes the use of brownfield land as much as possible. Policy SDS1 states that development within the borough will seek to achieve sustainable development through “<i>delivering development on brownfield sites in the urban area</i>”. Underpinning Policy SDS1 are Policies SDS2, SDS6, SC03, SDM3,</p>	<p>The policies would help to promote an efficient use of land and reduce the loss of undeveloped land and associated soil resources; however, the policies <b>would not</b> be expected to fully</p>

Identified adverse impact	Potential mitigating influence of SLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>and SH02. These policies include measures that ensure undeveloped land is protected and that previously developed land in urban areas are utilised.</p> <p>Policies SNE1, SNE4, SNE6, SHE1, SHE2, SHE3, and SHE4, include measures that protect land with ecological or environmental value.</p>	<p>mitigate these impacts and some small-scale losses of soil would remain.</p>

**Table 8.9:** Mitigating SLP Policy for SA Objective 7 – Pollution

Identified adverse impact	Potential mitigating influence of SLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Increase in, and exposure to, air pollution (from main road or AQMA)</b></p>	<p>Policy SHW3 requires development proposals to carry out an appropriate Air Quality Assessment (AQA) to outline how the proposal will meet air quality objectives. Policy SHW3 addresses air quality issues across the borough and is underpinned by additional policies that ensure air quality objectives will be met including Policies SDS2, SDS4, SDS7, SNE1, SNE2, SNE3, SCC1, SCC2, SCC3, SCC6, SHW1, SHW2, SHW4, SHO3, STR1, STR6, STR9, STR10, SID1, SDM1.</p> <p>Policies SDS2, SDS4, SCC1, SHW1, SHW2, SHO3, STR1, STR2, STR6, STR9, STR10 and SID1 include measures to improve accessibility, reduce the need to travel and provide low emission alternative modes of transport.</p> <p>Policies SDS7, SNE1, SNE2, SNE3, SHW4, SDM1 support the conservation and enhancement of green cover and GI features across the borough that can facilitate ecosystem services such as carbon storage and filtration of air pollutants.</p> <p>Policies SCC2, SCC3, SCC6 include measures that support energy efficient design and infrastructure across the borough.</p>	<p>These policies will help to minimise adverse impacts associated with the exposure of site end users to poor air quality associated with main roads and AQMAs. However, these policies <b>would not</b> be expected to fully mitigate these adverse impacts when considering the implications of delivering the large scale of proposed development all of which will lie within the Sandwell AQMA.</p>
<p><b>Risk of contamination of groundwater</b></p>	<p>Policy SCC4 seeks to ensure that no development is permitted within a groundwater SPZ that would physically disturb an aquifer.</p>	<p>These policies would be expected to mitigate negative impacts associated with</p>

Identified adverse impact	Potential mitigating influence of SLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<b>Source Protection Zones</b>	Policies SNE1, SNE2, SNE3, SNE7, SDM1 and SDS7 would help to increase green cover and protect biodiversity assets that would provide ecosystem services such as the filtration of water.	development on groundwater SPZs.
<b>Risk of contamination of watercourses</b>	<p>Policies SNE1, SNE2, SNE3, SNE7, SDM1 and SDS7 would help to increase green cover and protect biodiversity assets that would provide ecosystem services such as the filtration of water.</p> <p>Policy SNE6 requires development proposals likely to affect the canal network must <i>"protect and enhance water quality in the canal and protect water resource availability both in the canal and the wider environment"</i>.</p> <p>Policy SCC4 outlines the requirements for inclusion of SuDS within development proposals and is underpinned by SCC5 outlining design requirements, stating that <i>"surface water drainage strategies are required for all major developments, regardless of their size and the flood zone and catchment they are in"</i>. SuDS can provide benefits to water quality.</p>	These policies may help to lessen adverse impacts on water quality associated with new development, however they <b>would not</b> be expected to fully mitigate these effects.

**Table 8.10: Mitigating SLP Policy for SA Objective 8 – Waste**

Identified adverse impact	Potential mitigating influence of SLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<b>Increase in waste</b>	<p>Policy SWA1 sets out the waste infrastructure requirements do be adhered to throughout the borough, seeking to reduce the generation of waste and associated pollution, promote re-use and recycling of waste in line with the waste hierarchy. The policy ensures the <i>"minimisation of waste production and the re-use and recovery of waste materials"</i> by providing sufficient waste facilities.</p> <p>The policy is underpinned by Policies SWA2, SWA3, SWA4, and SWA5. These policies set out measures to ensure waste facilities meet the demand of the borough in regard to capacity and are sustainable by nature/design, whilst being strategically located in suitable locations.</p>	These policies could potentially encourage recycling and appropriate waste disposal within new developments; however, this policy <b>would not</b> be expected to fully mitigate the increase in household waste which is predicted to occur due to the increased number of dwellings in the Plan area.

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**Table 8.11: Mitigating SLP Policy for SA Objective 9 – Transport and accessibility**

Identified adverse impact	Potential mitigating influence of SLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<b>Limited access to bus services</b>	<p>Policy STR1 states that <i>"all new developments must provide adequate access for all modes of travel, prioritising walking, cycling and public transport to influence travel choices"</i>.</p> <p>Policy SDS1, STR3, STR6, SHW2, SHW3, and SDS4 include measures that would improve accessibility to bus services.</p>	<p>The policy encourages the use of Sandwell's bus network and would be expected to mitigate the restricted access to the bus services within the borough, which affects only a few sites.</p>
<b>Limited access to the railway network</b>	<p>Policy STR1 identifies the <i>"Midlands Rail Hub"</i> as a key transport priority. The policy states that that <i>"all new developments must provide adequate access for all modes of travel, including walking, cycling and public transport"</i>.</p> <p>Policy STR4 states that <i>"existing and disused railway lines will be safeguarded for rail-related uses"</i>.</p> <p>Policy SHW3, STR3, STR6, SDS1, SDS4 include measures to ensure sustainable transport methods are accessible and are being pursued, including the railway network.</p>	<p>The policy encourages the use of the railway network in the borough and would be expected to mitigate the restricted access to the railway network, which affects only a few sites.</p>
<b>Limited access to local services and facilities</b>	<p>Policy STR1 states that <i>"all new developments must provide adequate access for all modes of travel, prioritising walking, cycling and public transport to influence travel choices"</i>.</p> <p>Policy SDS1, STR3, STR5, STR6, SHW2, SHW3 and SDS4 include measures that would improve accessibility to local services and facilities.</p> <p>Sandwell's Centres policies (SCE1-SCE6) support appropriate uses within centres to meet day to day needs of residents and visitors to these areas, in accordance with the settlement hierarchy, including Policy SCE5 which supports the provision of new small-scale local facilities outside of centres.</p> <p>Policy SDM9 supports the retention of, and development of new, community facilities.</p>	<p>These policies would be expected to improve access to local services and facilities including via public transport.</p>

**Table 8.12: Mitigating SLP Policy for SA Objective 11 – Equality**

Identified adverse impact	Potential mitigating influence of SLP policies	Commentary: Will the policies mitigate the identified adverse effects?
Residents located in deprived areas	<p>Policies SDS4, SHO9, SHW2, SHW5, SEC5, SID1, SDM6 include measures that ensure residents have access to local services, including employment opportunities, various public transport methods, shops, educational facilities, leisure and sport facilities and public open space.</p> <p>Policy SHO9 states educational facilities should be <i>"wherever possible, located to address accessibility gaps"</i>.</p> <p>Policy SHW2 states that healthcare facilities should be <i>"located to address accessibility gaps"</i>.</p> <p>Policy SHW5 states that playing fields and sports facilities <i>"will be encouraged, especially in areas where public provision is deficient"</i>.</p>	The policies would be likely to ensure that new development provides site end users with good access to services and facilities, and that new infrastructure is provided to address inequalities.

**Table 8.13: Mitigating SLP Policy for SA Objective 12 – Health**

Identified adverse impact	Potential mitigating influence of SLP policies	Commentary: Will the policies mitigate the identified adverse effects?
Limited access to healthcare facilities	<p>Policy SHW2 states that new healthcare facilities should be <i>"well-designed"</i> and <i>"well-served by public transport infrastructure"</i>. Furthermore, the policy requires any development that would have unacceptable impacts upon healthcare facilities functioning to <i>"contribute to the provision or improvement of such services"</i>.</p> <p>Policy SDM9 includes measures to increase community facilities, including leisure facilities and states that <i>"the provision of additional community facilities will be encouraged, including those serving cultural and other social needs"</i>.</p> <p>Policies STR1, STR2, STR5, SDS4 provide measures that improve accessibility to healthcare and leisure facilities.</p>	These policies would help to ensure that residents across Sandwell have good sustainable access to healthcare facilities.

Identified adverse impact	Potential mitigating influence of SLP policies	Commentary: Will the policies mitigate the identified adverse effects?
Limited access to the pedestrian or cycle network	<p>Policy STR1 states that <i>"all new developments must provide adequate access for all modes of travel, prioritising walking, cycling and public transport to influence travel choices"</i>.</p> <p>Policy STR5 states that <i>"Sandwell will ensure that it can create and maintain a comprehensive cycle network based on the four tiers of the West Midlands cycle network"</i>.</p> <p>Policies SDS1, STR3, SHW2, SHW3, and SDS4 include measures that would improve accessibility to the pedestrian or cycle network.</p>	<p>These policies would be expected to mitigate adverse impacts associated with restricted access to the PRoW and cycle networks and help to encourage the uptake of these sustainable transport options.</p>
Loss of public greenspace	<p>Policy SHW5 states that <i>"the wider community use of school playing fields, other school facilities, such as sports halls, and private facilities will be encouraged, especially in areas where public provision is deficient"</i>.</p> <p>Policy SHW4 states that <i>"proposals should maintain and / or enhance the quantity, quality and accessibility of open space and address any shortfalls in provision"</i>.</p> <p>Policies STR1, STR2, STR5, SDS4 provide measures that improve accessibility to public greenspace within Sandwell.</p>	<p>These policies would be expected to ensure that development proposals do not result in the net loss of public greenspace across the Plan area.</p>

**Table 8.14:** Mitigating SLP Policy for SA Objective 13 – Economy

Identified adverse impact	Potential mitigating influence of SLP policies	Commentary: Will the policies mitigate the identified adverse effects?
Net loss of employment floorspace	<p>Policy SDS1 states that the Council alongside local communities, partners and key stakeholders will <i>"deliver at least 1,206ha of employment land"</i>.</p> <p>Policy SEC1 outlines the area of employment land to be delivered and the use of existing employment areas, where the policy states that the <i>"the council will support, with public intervention as necessary, the regeneration and renewal of"</i> existing employment areas.</p>	<p>These policies would be expected to mitigate the potential adverse impacts associated with the loss of existing employment land across the Plan area.</p>

Identified adverse impact	Potential mitigating influence of SLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>Policy SEC2 states it will <i>"ensure that uses defined by Use Class E (commercial, business and services<sup>62</sup>) remain the predominant uses within the defined retail core / primary shopping areas"</i>.</p> <p>Policy SEC4 states that development will be supported for <i>"new industrial employment uses or extensions to existing industrial employment uses"</i>.</p> <p>Policy SWM9 states that <i>"any proposal for a community facility or use that involves the loss of premises and sites identified as falling within either strategic or local employment areas will be refused"</i>.</p>	
<p>Limited access to employment opportunities</p>	<p>Policies SDS1 and SEC1 include measures to retain employment areas and introduce new employment areas.</p> <p>Policy SEC2 states that Strategic Employment Areas will be characterised by <i>"excellent accessibility"</i>.</p> <p>Policy SEC3 states that Local Employment Areas are <i>"characterised by a critical mass of industrial, warehousing and service activity with good access to local markets and employees"</i>.</p> <p>Policy SEC5 states that development proposals for new major job-creating development will <i>"be made available to the residents of Sandwell, particularly those in the most deprived areas of the borough and other priority groups"</i>.</p> <p>Policies SDM1, SCE1, STR1, STR2, STR3, STR5 ensure that residents have access to employment opportunities through well-designed places and strong transport infrastructure.</p> <p>Policies SID1 and SDM10 would improve access to employment opportunities, including home working, through the provision of a strong fibre network and telecommunications infrastructure.</p>	<p>These policies would be expected to improve access to employment opportunities across the Plan area.</p>

**Table 8.15:** Mitigating SLP Policy for SA Objective 14 – Education, skills and training

<sup>62</sup> <https://www.planningportal.co.uk/permission/common-projects/change-of-use/use-classes>

Identified adverse impact	Potential mitigating influence of SLP policies	Commentary: Will the policies mitigate the identified adverse effects?
Limited access to education opportunities	<p>Policy SHO9 states that nurseries, schools and higher education facilities should be "<i>well-designed</i>" and "<i>well-served by public transport infrastructure</i>".</p> <p>Policies SDM1, SCE1, STR1, STR2, STR3, STR5 ensure that residents have access to education opportunities through well-designed places and strong transport infrastructure.</p> <p>Policies SID1 and SDM10 provide additional access to educational opportunities by the provision of a strong fibre network and telecommunications.</p> <p>Policies SWB2 and SCE3 include measures that support the development of educational facilities.</p>	These policies would be expected to improve access to education opportunities across the Plan area.

## 8.4 Selection and Rejection of Sites

8.4.1 Planning Practice Guidance (PPG) on SEA states that the SA process should outline the reasons why alternatives were selected and the reasons the rejected options were not taken forward. An overview of the reasons for site selection and rejection have been provided by SMBC, as summarised in **Table 8.16**. Reasons for selection and rejection of the sites proposed at this stage in the plan making process have been informed by the detailed site assessment process undertaken by the Council.

8.4.2 **Table 8.16** is intended to provide an overview only. The decision making of the Council in relation to the sites taken forward reflects the findings of the evidence base documents prepared to support the preparation of the SLP, including the findings of the SA, and have been accompanied by detailed site assessment proformas.

**Table 8.16:** Outline reasons for selection / rejection of reasonable alternative sites for the SLP

[insert table when available]

## 9 Conclusions and next steps

### 9.1 Consultation on the Regulation 18 (II) SA Report

- 9.1.1 This Regulation 18 (II) SA Report is subject to consultation with statutory consultees, stakeholders and the general public alongside the Draft SLP.
- 9.1.2 This report represents the latest stage of the SA process. The SA process will take on board any comments on this report and use them to inform future SA outputs.
- 9.1.3 Once SMBC have reviewed Regulation 18 Draft Plan consultation comments and have begun preparing the next version of the SLP (Regulation 19 stage), preparation of an Environmental Report will be, also known as a full SA report. The Environmental Report will include all of the legal requirements set out in Schedule 2 of the SEA Regulations.

### 9.2 Responding to the consultation

- 9.2.1 This Regulation 18 (II) SA Report will be published by SMBC for consultation alongside the Draft SLP. Consultation findings will be used to inform subsequent stages of the SA process.
- 9.2.2 All responses on this consultation exercise should be sent to:

SLP Team

The Planning Policy Team,  
Sandwell Council,  
PO Box 2374,  
Oldbury,  
B69 3DE

Email: [Sandwell\\_LocalPlan@sandwell.gov.uk](mailto:Sandwell_LocalPlan@sandwell.gov.uk)

Habitats 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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## Appendix A: SA Framework

#	SA Objective	Relevant SEA Regulations topics	Decision making criteria: Will the option / proposal...	Indicators (this list is not exhaustive)
1	<b>Cultural heritage:</b> Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.	<ul style="list-style-type: none"> <li>Cultural heritage</li> </ul>	a) conserve features of architectural or historic interest and, where necessary, encourage their conservation and renewal? b) conserve or enhance archaeological sites/remains? c) conserve or enhance the setting of cultural heritage assets? d) improve the energy efficiency of historic buildings?	<ul style="list-style-type: none"> <li>Number and condition of historic assets on the Heritage at Risk register.</li> <li>Developments with potential to adversely affect cultural heritage designations or areas of historic value in the SLP area.</li> <li>Statutory and non-statutory sites in the Historic Environment Record (HER) and identified in the HLC.</li> </ul>
2	<b>Landscape:</b> Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place.	<ul style="list-style-type: none"> <li>Landscape</li> <li>Cultural heritage</li> </ul>	a) safeguard and enhance the character of the landscape and local distinctiveness and identity? b) protect and enhance visual amenity, including light and noise pollution? c) reuse degraded landscapes/townscapes? d) compromise the purpose of the Green Belt e.g. will it lead to coalescence of settlements and/or urban sprawl?	<ul style="list-style-type: none"> <li>Tranquillity rating of area.</li> <li>Re-use of brownfield land and/or derelict buildings.</li> <li>Developments with potential to alter existing landscape or townscape character.</li> <li>Developments in the Green Belt which contradict with the findings of the Green Belt Study.</li> <li>Developments in areas identified as being of 'moderate' or 'moderate-high' sensitivity in the Landscape Sensitivity Study.</li> </ul>
3	<b>Biodiversity, flora, fauna and geodiversity:</b> Protect, enhance and manage biodiversity and geodiversity.	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Flora</li> <li>Fauna</li> </ul>	a) maintain and enhance features and assets of nature conservation value including biodiversity and geodiversity? b) support positive management of local sites (SLINCs and SINCs) designated for nature conservation and geodiversity value? c) contribute towards wider GI networks and promote habitat connectivity? d) deliver biodiversity net gain?	<ul style="list-style-type: none"> <li>Number and diversity of protected species present in the area.</li> <li>Quality and extent of priority habitats (habitats of principle importance).</li> <li>Area and condition of sites designated for biological and geological interest.</li> <li>Provision and connectivity of GI.</li> </ul>

#	SA Objective	Relevant SEA Regulations topics	Decision making criteria: Will the option / proposal...	Indicators (this list is not exhaustive)
				<ul style="list-style-type: none"> <li>Amount of biodiversity net gain provided in new developments measured using the DEFRA Biodiversity Metric.</li> </ul>
4	<b>Climate change mitigation:</b> Minimise Sandwell's contribution to climate change.	<ul style="list-style-type: none"> <li>Climatic factors</li> </ul>	a) help to reduce the per capita carbon footprint of Sandwell? b) encourage renewable energy generation or use of energy from renewable or low-carbon sources? c) promote sustainable construction principles? d) help to reduce reliance on private car use?	<ul style="list-style-type: none"> <li>Carbon emissions from domestic / industrial / commercial sources.</li> <li>Percentage of energy in the area generated from renewable sources.</li> <li>Proximity to, and frequency of, public transport links.</li> <li>Distance to local services and amenities.</li> </ul>
5	<b>Climate change adaptation:</b> Plan for the anticipated levels of climate change.	<ul style="list-style-type: none"> <li>Climatic factors</li> <li>Soil</li> <li>Water</li> </ul>	a) avoid development in areas at high risk of flooding and seek to reduce flood risk? b) increase the coverage and connectivity of GI? c) promote use of technologies and techniques to adapt to the impacts of climate change? d) ensure that new development is resilient to the effects of extreme weather events?	<ul style="list-style-type: none"> <li>Number of properties at risk of flooding.</li> <li>Area of new greenspace created per capita.</li> <li>Area and connectivity of GI.</li> <li>Implementation of adaptive techniques, such as SuDS and passive heating/cooling.</li> </ul>
6	<b>Natural resources:</b> Protect and conserve natural resources.	<ul style="list-style-type: none"> <li>Soil</li> <li>Water</li> <li>Material assets</li> </ul>	a) utilise previously developed, degraded and under-used land? b) lead to the loss of the best and most versatile agricultural land? c) lead to the loss or sterilisation of mineral resources, or affect mineral working?	<ul style="list-style-type: none"> <li>Re-use of previously developed or brownfield land.</li> <li>Area of potential BMV agricultural land lost to development.</li> <li>Development within groundwater SPZs.</li> <li>Proposed Mineral Safeguarding Area(s).</li> </ul>
7	<b>Pollution:</b> Reduce air, soil, water and noise pollution.	<ul style="list-style-type: none"> <li>Air</li> <li>Water</li> <li>Soil</li> <li>Human health</li> </ul>	a) improve air quality and avoid generating further air pollution? b) conserve soil quality or help to remediate land affected by ground contamination? c) conserve and improve water quality? d) help to reduce noise pollution and protect sensitive receptors from existing ambient noise?	<ul style="list-style-type: none"> <li>Number of exceedances in NO<sub>2</sub>, PM<sub>10</sub> or PM<sub>2.5</sub> annual mean objectives within Sandwell AQMA.</li> <li>Development with potential to generate a significant increase in road traffic emissions or other air pollutants.</li> <li>Area of contaminated land remediated.</li> </ul>

#	SA Objective	Relevant SEA Regulations topics	Decision making criteria: Will the option / proposal...	Indicators (this list is not exhaustive)
				<ul style="list-style-type: none"> <li>Proximity to watercourses or groundwater receptors.</li> <li>Ecological and chemical status of waterbodies within the SLP area and downstream.</li> <li>Percentage change in pollution incidents.</li> </ul>
8	<b>Waste:</b> Reduce waste generation and disposal and achieve the sustainable management of waste.	<ul style="list-style-type: none"> <li>Population</li> <li>Material assets</li> </ul>	a) encourage recycling, re-use and composting of waste? b) minimise and where possible eliminate generation of waste, during both construction and occupation of development?	<ul style="list-style-type: none"> <li>Number and capacity of waste management facilities.</li> <li>Rate of recycling and composting.</li> <li>Management of local authority collected waste.</li> </ul>
9	<b>Transport and accessibility:</b> Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	<ul style="list-style-type: none"> <li>Climatic factors</li> <li>Population</li> <li>Material assets</li> </ul>	a) reduce the need to travel and/or reduce travel time? b) provide adequate means of access by a range of sustainable transport modes (i.e. walking, cycling, and public transport)? c) support a modal shift away from private car use?	<ul style="list-style-type: none"> <li>Proximity and connectivity of walking and cycling links.</li> <li>Proximity to public transport links including bus services, metro and rail.</li> <li>Frequency of bus services.</li> <li>Provision or expansion of public transport and active travel infrastructure.</li> <li>Distance / travel times to place of work, local amenities and key services.</li> </ul>
10	<b>Housing:</b> Provide affordable, environmentally sound and good quality housing for all.	<ul style="list-style-type: none"> <li>Population</li> </ul>	a) provide a mix of good-quality housing, including homes that are suitable for first-time buyers? b) provide housing suitable for the growing elderly population? c) provide decent, affordable, and accessible homes?	<ul style="list-style-type: none"> <li>Varied housing mix.</li> <li>Percentage of dwellings delivered as affordable housing.</li> <li>Number of extra care homes.</li> <li>Provision of pitches and plots for Gypsies, Travellers and Travelling Showpeople.</li> </ul>
11	<b>Equality:</b> Reduce poverty, crime and social deprivation and secure economic inclusion.	<ul style="list-style-type: none"> <li>Population</li> <li>Human health</li> </ul>	a) eliminate unlawful discrimination, victimisation and harassment? b) reduce crime and the fear of crime?	<ul style="list-style-type: none"> <li>Indices of Multiple Deprivation.</li> <li>Level of qualifications e.g. number of people with NVQ2.</li> <li>Rates of crime.</li> </ul>

#	SA Objective	Relevant SEA Regulations topics	Decision making criteria: Will the option / proposal...	Indicators (this list is not exhaustive)
			c) create safe neighbourhoods and support community cohesion? d) advance equality of opportunity? e) help to achieve life-long learning and increase learning participation and adult education?	<ul style="list-style-type: none"> <li>Provision of and access to community facilities including libraries and local centres.</li> <li>Provision of accessible and adaptable homes to meet the needs of the population.</li> </ul>
12	<b>Health:</b> Safeguard and improve community health, safety and wellbeing.	<ul style="list-style-type: none"> <li>Human health</li> <li>Population</li> </ul>	a) improve sustainable access for all to health, leisure and recreational facilities? b) improve and enhance Sandwell's GI network? c) improve road safety? d) consider the needs of Sandwell's growing elderly population?	<ul style="list-style-type: none"> <li>Travel time by active travel and/or public transport to healthcare facilities and services.</li> <li>Provision and accessibility of open greenspace and GI.</li> <li>Accessibility to sports facilities e.g. football pitches, playing fields, tennis courts and leisure centres.</li> </ul>
13	<b>Economy:</b> Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.	<ul style="list-style-type: none"> <li>Population</li> <li>Material assets</li> </ul>	a) improve sustainable access to employment opportunities? b) encourage business start-ups in the SLP area? c) protect and enhance the vitality and viability of existing employment and retail areas? d) protect and create jobs?	<ul style="list-style-type: none"> <li>Proximity and sustainable accessibility to employment opportunities.</li> <li>Number of residents working within Sandwell, and rates of unemployment.</li> <li>Number of new business start-ups as a result of the development.</li> <li>Total amount of employment land.</li> <li>Number of vacant units in strategic centres.</li> </ul>
14	<b>Education, skills and training:</b> Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness.	<ul style="list-style-type: none"> <li>Population</li> </ul>	a) improve sustainable access for all to education and training opportunities? b) encourage a diversity of education and training opportunities? c) Support the provision of an appropriately skilled workforce?	<ul style="list-style-type: none"> <li>Proximity to education and training, particularly primary schools and secondary schools.</li> <li>Provision of new education and training facilities and opportunities.</li> <li>Accessibility of education and training facilities by public transport.</li> <li>Capacity of local schools to meet demand from new development.</li> </ul>

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## B.1 Overview

### B.1.1 The purpose of this appendix

- B.1.1.1 This appendix provides additional context to **Chapter 2** of the main Regulation 18 (II) SA Report regarding the methodology used to assess reasonable alternative sites within the emerging Sandwell Local Plan (SLP).
- B.1.1.2 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 for reasonable alternative sites. There are also a number of assumptions and limitations noted within each of the following sections, which should be borne in mind when considering the assessment findings.
- B.1.1.3 The topic-specific methodologies set out in **Boxes B.2.1** to **B.15.3** explain how the likely impact per receptor has been identified in line with the local context and the impact symbols presented in **Table 2.4** within the main Regulation 18 (II) SA Report.
- B.1.1.4 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.
- B.1.1.5 **Appendix C** 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, using the methodology as set out in this appendix.
- B.1.1.6 The level of detail that can be expressed through the SA assessments depends on the level of detail provided associated with the part of the plan in question.

## B.2 SA Objective 1: Cultural heritage

### B.2.1 Introduction and context

- B.2.1.1 **Boxes B.2.1 to B.2.8** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 1: Cultural heritage.
- B.2.1.2 Impacts on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. There is a risk of adverse effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a site is in close proximity to heritage assets.
- B.2.1.3 Adverse impacts are recorded for options which have the potential to have an adverse impact on sensitive heritage designations, including Grade I, II\* and II Listed Buildings, Scheduled Monuments (SM), Registered Parks and Gardens (RPG), and Conservation Areas (CA).
- B.2.1.4 It is assumed that where a designated heritage asset coincides with a site proposal, the heritage asset will not be lost as a result of development (unless otherwise specified in the Local Plan). Development which could potentially be discordant with the local character or setting, for example, due to design, layout, scale or type, would be expected to adversely impact the setting of nearby heritage assets<sup>1</sup> that are important components of the local area. Adverse impacts on heritage assets are predominantly associated with impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset.
- B.2.1.5 Heritage assets identified on Historic England's Heritage at Risk Register may be identified as being at risk for a number of reasons, for example, due to dilapidation of the building fabric or other sources of risk such as coastal erosion, cultivation or scrub encroachment<sup>2</sup>. Where Heritage at Risk assets could potentially be impacted by the proposed development at a site, this has been stated.
- B.2.1.6 It should be noted that not all of Sandwell's historic environment resource and heritage assets are subject to statutory designations; non-designated features comprise a significant aspect of heritage, which is often experienced on a daily basis. This may include buildings and other features of historic interest which are not listed, as well as both discovered and undiscovered archaeological remains.

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<sup>1</sup> Setting is taken to mean the surroundings in which a heritage asset may be experienced, which does not relate solely to distance from proposed developments to heritage assets. Historic England (2017) The Setting of Heritage Assets. Historic Environment Good Practice Advice in Planning: 3 (2<sup>nd</sup> Edition). Available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/> [Date accessed: 27/06/23]

<sup>2</sup> Historic England (2022) Search the Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/> [Date accessed: 20/06/23]

B.2.1.7 It is anticipated that SMBC will require a Heritage Statement or Archaeological Desk-Based Assessment to be prepared to accompany future planning applications, where appropriate.

## B.2.2 Cultural heritage receptors

### *Box B.2.1: SA Objective 1: Grade I Listed Buildings*

Score	Likely Impact – Grade I Listed Buildings
--	Development proposal coincides with, is located adjacent to, or could significantly impact the setting of, a Grade I Listed Building.
-	Development proposal located within the wider setting of a Grade I Listed Building.
0	Development proposal is not considered likely to affect the setting or character of a Grade I Listed Building.
+	Development proposal which could potentially enhance a Grade I Listed Building or its setting.
<b>Notes</b>	
Grade I Listed Buildings are considered to be those of exceptional interest. Data available from Historic England <sup>3</sup> .	

### *Box B.2.2: SA Objective 1: Grade II\* Listed Buildings*

Score	Likely Impact - Grade II* Listed Buildings
--	Development proposal coincides with, or could significantly impact the setting of, a Grade II* Listed Building.
-	Development proposal located within the setting of a Grade II* Listed Building.
0	Development proposal not considered likely to impact a Grade II* Listed Building or its setting.
+	Development proposal which could potentially enhance a Grade II* Listed Building or its setting.
<b>Notes</b>	
Grade II* Listed Buildings are considered to be those of more than special interest. Data sourced from Historic England <sup>4</sup> .	

### *Box B.2.3: SA Objective 1: Grade II Listed Buildings*

Score	Likely Impact - Grade II Listed Buildings
--	Development proposal coincides with a Grade II Listed Building.
-	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.

<sup>3</sup> Historic England (2023) Download Listing Data. Available at: <https://historicengland.org.uk/listing/the-list/data-downloads/> [Date accessed: 06/06/23]

<sup>4</sup> Ibid

Score	Likely Impact - Grade II Listed Buildings
+	Development proposal which could potentially enhance a Grade II Listed Building or its setting.
Notes	
Grade II Listed Buildings are considered to those of special interest. Data sourced from Historic England <sup>5</sup> .	

**Box B.2.4: SA Objective 1: Scheduled Monuments**

Score	Likely Impact - Scheduled Monuments
--	Development proposal coincides with a SM.
-	Development proposal located within the setting of a SM.
0	Development proposal not considered to impact an SM or its setting.
+	Development proposal which could potentially enhance an SM or its setting.
Notes	
Scheduling is the selection of a sample of nationally important archaeological sites. Data sourced from Historic England <sup>6</sup> .	

**Box B.2.5: SA Objective 1: Registered Parks and Gardens**

Score	Likely Impact - Registered Parks and Gardens
--	Development proposal coincides with an RPG.
-	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.
Notes	
The main purpose of the Register is to celebrate designed landscapes of note and encourage appropriate protection. Data sourced from Historic England <sup>7</sup> .	

**Box B.2.6: SA Objective 1: Conservation Areas**

Score	Likely Impact - Conservation Areas
-	Development proposal located within a Conservation Area or considered to be located within the setting of a Conservation Area.
0	Development proposal not considered to impact a Conservation Area or its setting.

<sup>5</sup> Ibid

<sup>6</sup> Ibid

<sup>7</sup> Ibid

Score	Likely Impact - Conservation Areas
+	Development proposals which could potentially enhance the character or setting of a Conservation Area.
Notes	
Conservation Area data provided by SMBC. Information available online <sup>8</sup> .	

**Box B.2.7:** SA Objective 1: Archaeological Priority Areas

Score	Likely Impact - Archaeological Priority Area
-	Development proposal coincides with an APA.
0	Development proposal does not coincide with an APA.
+	Development proposal which could potentially enhance an APA.
Notes	
<p>The Black Country Historic Landscape Characterisation (HLC) Study<sup>9</sup> aimed to create a strategic landscape-level understanding of the historic character and environment of the Black Country, including Sandwell. The study also identified a number of Archaeological Priority Areas (APAs), which are considered to contain particularly rare or well-preserved remains of high archaeological and historic interest.</p> <p>APA data has been provided by SMBC and is detailed within the HLC report.</p>	

**Box B.2.8:** SA Objective 1: Historic Landscape Characterisation

Score	Likely Impact - 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
0	Development proposal located outside of areas of high historic landscape or townscape value and designed landscapes
+	Development proposal which could potentially enhance historic character.
Notes	
<p>The Black Country HLC Study<sup>10</sup> aimed to create a strategic landscape-level understanding of the historic character and environment of the Black Country, including Sandwell. The study identified several Historic Environment Area Designations (HEADs) within Sandwell’s Green Belt and in the urban area.</p> <p>Areas of High Historic Townscape Value (AHHTVs) and Designed Landscapes of High Historic Value (DLHHVs) have also been identified within the HLC. AHHTVs are areas “<i>where built heritage makes a significant contribution to the local character and distinctiveness</i>” and have been identified due to their sense of place, street plan and form, streetscape, views and setting, and representation. DLHHVs are “<i>designed landscapes</i>”</p>	

<sup>8</sup> Sandwell Metropolitan Borough Council (2021) Listed Buildings and conservation areas. Available at: [https://www.sandwell.gov.uk/info/200275/planning\\_and\\_buildings/444/listed\\_buildings\\_and\\_conservation\\_areas](https://www.sandwell.gov.uk/info/200275/planning_and_buildings/444/listed_buildings_and_conservation_areas) [Date accessed: 02/06/23]

<sup>9</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf) [Date accessed: 20/06/23]

<sup>10</sup> Ibid

**Notes**

*that make an important contribution to local historic character but do not meet the criteria for inclusion on the national Register of Parks and Gardens*” and have been identified due to the date, preservation, aesthetics, and associations with people and past events.

HLC data has been provided by SMBC and is detailed within the HLC report.

## B.3 SA Objective 2: Landscape

### B.3.1 Introduction and context

B.3.1.1 **Box B.3.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 2: Landscape.

B.3.1.2 Impacts on landscape are often determined by the specific layout and design of development proposals, as well as the site-specific landscape circumstances, as experienced on the ground. Detailed designs for each development proposal are uncertain at this stage of the assessment. This assessment comprises a desk-based exercise which has not been verified in the field. Therefore, the nature of the potential impacts on the landscape are, to an extent, uncertain. There is a risk of negative effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a development proposal is located in close proximity to sensitive landscape receptors. The level of impact has been assessed based on the nature and value of, and proximity to, the landscape receptor in question.

B.3.1.3 Cannock Chase Area of Outstanding Natural Beauty (AONB) lies approximately 14km to the north of Sandwell Borough at its closest point. Given this distance, there is unlikely to be any significant adverse effects on the special qualities of the AONB arising from the proposed development sites. It is assumed that any future development would be accompanied by a Landscape and Visual Impact Assessment (LVIA) or Landscape and Visual Appraisal (LVA) if necessary to consider any potential for adverse impacts.

B.3.1.4 There is no evidence available to inform the SA assessments with regard to the landscape character or sensitivity of Sandwell’s urban areas. Information relating to the historic environment, including the Historic Landscape Characterisation and associated designations has been assessed under SA Objective 1: Cultural Heritage (see **Box B.2.8**).

### B.3.2 Landscape receptors

**Box B.3.1:** SA Objective 2: Landscape sensitivity

Score	Likely Impact - Landscape Sensitivity Assessment
--	Development proposals located within areas of 'moderate-high' or 'high' landscape sensitivity.
-	Development proposals located within areas of 'low-moderate' or 'moderate' sensitivity.
+/-	Development proposals located outside of the Landscape Sensitivity Assessment study area.
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.

### Notes

The appraisal of sites is informed by the Black Country Landscape Sensitivity Assessment<sup>11</sup>, which assessed the sensitivity of land outside of the urban areas of Sandwell and the other Black Country Authorities (i.e. Green Belt land) to housing and commercial development. The aim of the study was to identify the extent to which the character and quality of Green Belt land is susceptible to change as a result of future development. Parcels of land were classified ranging from 'high' to 'low' sensitivity.

As the majority of reasonable alternative development sites identified by SMBC lie outside of the Green Belt, and as such outside of the Landscape Sensitivity Assessment study area, the potential effects of each site on sensitive landscapes are uncertain and would benefit from further site-specific studies to identify any local sensitive views or landscapes. Only one reasonable alternative site, 137 (Poppy Drive Open Space) lies partially within the Green Belt areas assessed in the Sensitivity Assessment.

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<sup>11</sup> LUC (2019) Black Country Landscape Sensitivity Assessment. Available at:  
[https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf) [Date accessed: 20/06/23]

## B.4 SA Objective 3: Biodiversity, flora, fauna and geodiversity

### B.4.1 Introduction and context

B.4.1.1 **Boxes B.4.1 to B.4.9** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 3: Biodiversity, flora, fauna and geodiversity.

B.4.1.2 The biodiversity objective considers adverse impacts of the proposed development at a landscape-scale. It focuses on an assessment of proposed development on a network of designated and undesignated sites, wildlife corridors and individual habitats within the Plan area.

B.4.1.3 Where a site is coincident with, adjacent to or located in close proximity to an ecological receptor, it is assumed that negative effects associated with development will arise to some extent. These negative effects include those that occur during the construction phase and are associated with the construction process and construction vehicles (e.g. habitat loss, habitat fragmentation, habitat degradation, noise, air, water and light pollution) and those that are associated with the operation/occupation phases of development (e.g. public access associated disturbances, increases in local congestion resulting in a reduction in air quality, changes in noise levels, visual disturbance, light pollution, impacts on water levels and quality etc.).

B.4.1.4 It is assumed that construction and occupation of previously undeveloped greenfield land would result in a net reduction in vegetation cover in the Plan area. This would also be expected to lead to greater levels of fragmentation and isolation for the wider ecological network, such as due to the loss of stepping-stones and corridors. This will restrict the ability of ecological receptors to adapt to the effects of climate change. The loss of greenfield land is considered under the Natural Resources objective (SA Objective 6) in this assessment.

B.4.1.5 It should be noted that no detailed ecological surveys have been completed by Lepus to inform the assessments made in this report.

B.4.1.6 Protected species survey information is not available for the sites within the Plan area. It is acknowledged that data is available from the local biological records centre. However, it is noted that this data may be under recorded in certain areas. This under recording does not imply species absence. As a consequence, consideration of this data on a site-by-site basis within this assessment would have the potential to skew results – favouring well recorded areas of the Plan area. As such impacts on protected species have not been assessed on a site-by-site basis.

B.4.1.7 It is anticipated that the Council will require detailed ecological surveys and assessments to accompany future planning applications. Such surveys will determine on a site-by-site basis the presence of Priority Species and Priority Habitats protected under the NERC Act.

B.4.1.8 It is assumed that mature trees and hedgerows will be retained where possible.

## B.4.2 Biodiversity receptors

### Box B.4.1: SA Objective 3: Habitats sites

Score	Likely Impact - Habitats site e.g. SAC, SPA or Ramsar site
--	Development proposal coincides with, or is located in close proximity to, a Habitats site. Likelihood of direct impacts.
-	Development proposal is located within a recognised ZoI or similar spatial catchment relative to the Habitats site. Likelihood of direct or indirect impacts.
+/-	Development located outside of a recognised ZoI where, in absence of HRA conclusions, the effect of development is uncertain.
0	Development not anticipated to result in adverse impacts on Habitats sites.
+	Development proposals which would be expected to enhance features within a Habitats site.

#### Notes

The area within which development proposals could potentially have direct, indirect and in-combination impacts on the integrity of a Habitats site is referred to as the Zone of Influence (ZOI). This is determined through an identification of sensitive receptors at each Habitats site (its qualifying features) and pathways via which the Local Plan may have an impact. At this stage, no ZOI have been formally identified for surrounding Habitats sites, and so at this stage of the assessment process, the potential impact of each development site is uncertain. It should be noted that the impact of proposed sites on Habitats sites will be tested through the Habitats Regulations Assessment (HRA) process, the findings of which will be used to inform the Regulation 19 SA. The HRA will provide further detail relating to potential impacts on Habitats sites within and surrounding the Plan area.

Data for Habitats sites is available from Natural England<sup>12</sup>.

### Box B.4.2: SA Objective 3: SSSI

Score	Likely Impact - SSSI
--	Development coincides with, or is located adjacent to, an SSSI.
-	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.

#### Notes

Natural England has developed Impact Risk Zones (IRZs) for each SSSI unit in the country. IRZs are a Geographical Information System (GIS) tool developed by Natural England which allow a rapid initial assessment of the potential risks posed by development proposals to: SSSIs, SACs, SPAs and Ramsar sites. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts.

Where a site falls within more than one SSSI IRZ the worst-case risk zone is reported upon in the assessment.

<sup>12</sup> Natural England (2023) Special Areas of Conservation (England). Available at: [https://naturalengland-defra.opendata.arcgis.com/datasets/e4142658906c498fa37f0a20d3fdcf0\\_0](https://naturalengland-defra.opendata.arcgis.com/datasets/e4142658906c498fa37f0a20d3fdcf0_0) [Date accessed: 20/06/23]

Notes
Data for SSSIs and IRZs is available from Natural England <sup>13</sup> .

**Box B.4.3: SA Objective 3: NNR**

Score	Likely Impact - NNR
--	Development coincides with an NNR. Likelihood of direct impacts.
-	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.

Notes
National Nature Reserves (NNRs) were established to protect some of England’s most important habitats, species and geology, and to provide ‘outdoor laboratories’ for research. Data for NNRs is available from Natural England <sup>14</sup> .

**Box B.4.4: SA Objective 3: Ancient woodland**

Score	Likely Impact - Ancient woodland
--	Development proposal coincides with a stand of ancient woodland. Likelihood of direct impacts.
-	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.

Notes
Ancient woodland is defined as an area that has been wooded continuously since at least 1600AD and includes ‘ancient semi-natural woodland’ and ‘plantations on ancient woodland sites’, both of which have equal protection under the NPPF <sup>15</sup> . Data for ancient woodlands is available from Natural England <sup>16</sup> .

<sup>13</sup> Natural England (2023) Natural England’s Impact Risk Zones for Sites of Special Scientific Interest, 25 May 2023. Available at: <https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/ssi-impact-risk-zones> [Date accessed: 20/06/23]

<sup>14</sup> Natural England (2023) National Nature Reserves (England). Available at: <https://data.gov.uk/dataset/726484b0-d14e-44a3-9621-29e79fc47bfc/national-nature-reserves-england> [Date accessed: 20/06/23]

<sup>15</sup> Forestry Commission and Natural England (2022) Ancient woodland, ancient trees and veteran trees: protecting them from development. Available at: <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences> [Date accessed: 20/06/23]

<sup>16</sup> Natural England (2023) Ancient Woodland (England). Available at: <https://data.gov.uk/dataset/9461f463-c363-4309-ae77-fdc7e9df7d3/ancient-woodland-england> [Date accessed: 20/06/23]

**Box B.4.5: SA Objective 3: LNR**

Score	Likely Impact - 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.
0	Development proposal not anticipated to result in adverse impacts on an LNR.
+	Development proposals which would enhance or create an LNR.

Notes
Local Nature Reserves (LNRs) are statutory designations, representing places with wildlife or geological features that are of special interest locally, which give people special opportunities to study and learn about them or simply enjoy and have contact with nature. Data for LNRs is available from Natural England <sup>17</sup> .

**Box B.4.6: SA Objective 3: SINC**

Score	Likely Impact – Sites of Importance for Nature Conservation (SINC)
--	Development proposal coincides with a SINC. Likelihood of direct impacts.
-	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.

Notes
Sites of Importance for Nature Conservation (SINCs) are non-statutory designated sites of Birmingham and the Black Country importance <sup>18</sup> . They are endorsed by the Birmingham and Black Country Local Sites Partnership. Data for SINCs has been provided by SMBC.  For the purposes of the SLP, SINCs operate as a hard constraint for site allocation because they are rated more highly for their value to ecology and the environment.

**Box B.4.7: SA Objective 3: SLINC**

Score	Likely Impact – Sites of Local Importance for Nature Conservation (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.
0	Development not anticipated to result in adverse impacts on a SLINC.
+	Development proposals which would enhance or create a SLINC.

<sup>17</sup> Natural England (2023) Local Nature Reserves (England). Available at: <https://data.gov.uk/dataset/acdf4a9e-a115-41fb-bbe9-603c819aa7f7/local-nature-reserves-england> [Date accessed: 21/06/23]

<sup>18</sup> EcoRecord (2009) Sites of Importance for Nature Conservation (SINCs). Available at: <http://www.ecorecord.org.uk/index.php?q=local-sites/sincs> [Date accessed: 20/06/23]

Notes
<p>Sites of Local Importance for Nature Conservation (SLINCs) are non-statutory designated sites of borough importance<sup>19</sup>. They are endorsed by the Birmingham and Black Country Local Sites Partnership, and then adopted by SMBC. Data for SLINCs has been provided by SMBC.</p> <p>For the purposes of the SLP, whilst SLINCs are protected, under certain circumstances development may take place adjacent to or on them where appropriate mitigation can be realised and where the value of the development is considered to be sufficient to outweigh any damage to the habitat.</p>

**Box B.4.8:** SA Objective 3: Geological conservation

Score	Likely Impact - 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.
<b>0</b>	Development proposal not anticipated to result in adverse impacts on a Geological Site.
+	Development proposal anticipated to enhance a geological site.

Notes
Data for geological sites provided by SMBC and data for underlying geological context provided by British Geological Survey.

**Box B.4.9:** SA Objective 3: Priority habitat

Score	Likely Impact - Priority Habitat
-	Development proposal coincides with a priority habitat.
<b>0</b>	Development proposal does not coincide with a priority habitat.
+	Development proposals which enhance or create a priority habitat.

Notes
For the purposes of this assessment, impacts on priority habitats have been considered in the context of Natural England’s publicly available Priority Habitat Inventory database <sup>20</sup> . It is acknowledged this may not reflect current local site conditions in all instances.

<sup>19</sup> EcoRecord (2009) Sites of Local Importance for Nature Conservation (SLINCs). Available at: <http://www.ecorecord.org.uk/index.php?q=local-sites/slincs> [Date accessed: 20/06/23]

<sup>20</sup> Natural England (2023) Priority Habitat Inventory (England). Available at: <https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england> [Date accessed: 20/06/23]

## B.5 SA Objective 4: Climate change mitigation

### B.5.1 Introduction and context

B.5.1.1 **Box B.5.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 4: Climate change mitigation.

B.5.1.2 The incorporation of GI within developments presents several opportunities to mitigate climate change, for example, through providing natural cooling to combat the ‘urban heat island’ effect, reducing the effects of air pollution and providing more pleasant outdoor environments to encourage active travel<sup>21</sup>.

B.5.1.3 However, it is likely that new development would result in an increase in local greenhouse gas (GHG) emissions due to the increase in the local population and the number of operating businesses. The increase in GHG emissions caused by new developments is often associated with impacts of the construction phase, the occupation and operation of homes and businesses, fuel consumption and increases in local road transport with associated emissions. This impact is considered to be permanent and non-reversible.

B.5.1.4 It should be noted that the appraisal of the reasonable alternatives is limited in its assessment of carbon emissions. The 1% principle as set out in **Box B.5.1** is only a coarse precautionary indicator, and greater detail of carbon data would help to better quantify effects.

### B.5.2 Climate change mitigation receptors

#### *Box B.5.1: SA Objective 4: Carbon emissions*

Score	Likely Impact - Carbon Emissions
--	Residential-led development which could potentially result in an increase in CO <sub>2</sub> emissions by 1% or more in comparison to current levels.
-	Residential-led development which could potentially result in an increase in CO <sub>2</sub> emissions by 0.1% or more in comparison to current levels.
0	Development would be expected to result in a negligible increase in CO <sub>2</sub> emissions.
+/-	Non-residential or Gypsy and Traveller development where the carbon emissions produced as a result of the proposed development is uncertain, or development sites where the proposed use is uncertain.
+	Development proposals which include energy saving or renewable energy technologies. Development proposals which would reduce reliance on private car use, encourage active travel or the use of public transport.

<sup>21</sup> TCPA (2023) What is Green Infrastructure? Available at: <https://www.tcpa.org.uk/what-is-green-infrastructure/> [Date accessed: 21/06/23]

### Notes

The estimated CO<sub>2</sub> emissions for Sandwell in 2020 was 1,093.1 kilo tonnes, with per capita emissions of 3.3 tonnes, according to UK local authority CO<sub>2</sub> emissions data<sup>22</sup>. Sandwell has an average of 2.7 people per dwelling<sup>23</sup>.

Based on these figures, and assuming new residents will generate CO<sub>2</sub> emissions in line with the current average, it has been calculated that proposals for 1,211 homes or more are expected to increase carbon emissions by 1% or more in comparison to the current estimates for Sandwell. Proposals for 121 homes or more are expected to increase carbon emissions by 0.1% or more in comparison to current estimates for Sandwell.

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<sup>22</sup> DBEIS (2022) UK local authority and regional carbon dioxide emissions national statistics: 2005-2020. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2020> [Date accessed: 13/09/23]

<sup>23</sup> People per Dwelling has been calculated using the ONS mid-2021 population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>) and dwelling stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

## B.6 SA Objective 5: Climate change adaptation

### B.6.1 Introduction and context

B.6.1.1 **Boxes B.6.1 to B.6.3** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 5: Climate change adaptation.

B.6.1.2 It is assumed that development proposals will be in perpetuity, and it is therefore likely that development will be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of fluvial or surface water flooding.

### B.6.2 Climate change adaptation receptors

#### *Box B.6.1: SA Objective 5: Fluvial flooding*

Score	Likely Impact - Fluvial Flooding
--	Development proposals which coincide with Flood Zones 3.
-	Development proposals which coincide with Flood Zone 2.
+	Development proposals which are located wholly within Flood Zone 1.

#### Notes

Data for fluvial flooding has been derived from the latest available Environment Agency Flood Map for Planning (Rivers and Sea)<sup>24</sup>, such that:

- **Flood Zone 3:** 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; and
- **Flood Zone 1:** Less than 0.1% chance of river and sea flooding in any given year.

#### *Box B.6.2: SA Objective 5: Surface water flooding*

Score	Likely Impact - Surface Water Flooding
--	Development proposals which coincide with areas at high risk of surface water flooding.
-	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.

<sup>24</sup> Environment Agency (2023) Flood Map for Planning (Rivers and Sea) – Flood Zone 2 and Flood Zone 3. Available at: <https://www.data.gov.uk/dataset/cf494c44-05cd-4060-a029-35937970c9c6/flood-map-for-planning-rivers-and-sea-flood-zone-2> and <https://www.data.gov.uk/dataset/bed63fc1-dd26-4685-b143-2941088923b3/flood-map-for-planning-rivers-and-sea-flood-zone-3> [Date accessed: 14/09/23]

Score	Likely Impact - Surface Water Flooding
+	Development proposals which include the integration of GI, open space, SUDS or other surface water flood risk alleviating measures

Notes
<p>The assessment is based on the Environment Agency surface water flood risk data<sup>25</sup>, such that<sup>26</sup>:</p> <ul style="list-style-type: none"> <li>• <b>High risk:</b> more than 3.3% chance of flooding each year;</li> <li>• <b>Medium risk:</b> between 1% - 3.3% chance of flooding each year; and</li> <li>• <b>Low risk:</b> between 0.1% - 1% chance of flooding each year.</li> </ul> <p>Areas determined to be at very low risk of flooding (less than 0.1% chance) would be expected to result in a negligible impact on surface water flooding for the purposes of this assessment.</p>

**Box B.6.3: SA Objective 5: Indicative flood zone**

Score	Likely Impact - Indicative Flood Zone
--	Development proposals which coincide with Indicative Flood Zone 3b.
0	Development proposals which do not coincide with Indicative Flood Zone 3b.

Notes
<p>Indicative Flood Zone 3b is present in areas where flooding will potentially worsen in future due to climate change. Data for Indicative Flood Zones has been provided by SMBC, which relates to the data produced by JBA Consulting as part of the Level 1 Strategic Flood Risk Assessment (SFRA)<sup>27</sup>.</p>

<sup>25</sup> Environment Agency (2021) Risk of Flooding from Surface Water Extent: 3.3 percent annual chance, 1 percent annual chance, 0.1 percent annual chance (updated 14 May 2021). Available at: <https://www.data.gov.uk/dataset/95ea1c96-f3dd-4f92-b41f-ef21603a2802/risk-of-flooding-from-surface-water-extent-3-3-percent-annual-chance> [Date accessed: 14/09/23]

<sup>26</sup> Environment Agency (2013) Risk of flooding from surface water. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/297429/LIT\\_8986\\_eff63d.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/297429/LIT_8986_eff63d.pdf) [Date accessed: 20/06/23]

<sup>27</sup> JBA Consulting (2020) The Black Country Authorities Level 1 Strategic Flood Risk Assessment Final Report 25<sup>th</sup> June 2020. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date accessed: 20/06/23]

## B.7 SA Objective 6: Natural resources

### B.7.1 Introduction and context

- B.7.1.1** **Boxes B.7.1** to **B.7.2** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 6: Natural resources.
- B.7.1.2** In accordance with the core planning principles of the NPPF, development on previously developed land is recognised as an efficient use of land. Development of previously undeveloped land and greenfield sites is not considered to be an efficient use of land.
- B.7.1.3** The natural resources objective also considers potential effects on mineral resources. Minerals are a finite, non-renewable resource and as such, their conservation and safeguarding for future generations is important. There are no Mineral Safeguarding Areas or Areas of Search identified within Sandwell in the Black Country Minerals Study<sup>28</sup>; as such all proposed development sites would be expected to have a negligible impact on mineral resources based on the current evidence available.

### B.7.2 Natural resources receptors

**Box B.7.1:** SA Objective 6: Previously developed land / land with environmental value

Score	Likely Impact - Previously Developed (Brownfield) Land / Land with Environmental Value
-	Development proposals located on previously undeveloped land, or brownfield land with potential environmental value.
+	Development proposals located on previously developed or brownfield land with no environmental value.

Notes
Assessment of sites comprising previously developed land is in accordance with the definitions in the NPPF <sup>29</sup> . Assessment of current land use and potential environmental value has been made through reference to aerial photography and the use of Google Maps. It should be noted that this may not reflect the current status of the site, and the nature of development within the site boundary is unknown, so a degree of uncertainty remains.

**Box B.7.2:** SA Objective 6: ALC

Score	Likely Impact - ALC
--	Development proposals which are situated on Grade 1, 2 or 3 ALC land comprising 20ha or more.
-	Development proposals which are situated on Grade 1, 2 or 3 ALC land comprising less than 20ha.

<sup>28</sup> wood (2020) Review of the Evidence Base for Minerals to support preparation of the Black Country Plan. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4f/> [Date accessed: 20/06/23]

<sup>29</sup> Department for Levelling Up, Housing and Communities (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 14/09/23]

Score	Likely Impact - ALC
<b>0</b>	Development proposals located on previously developed land with no environmental value.
<b>+</b>	Development proposals which are situated on Grade 4 and 5 ALC land, or land classified as 'urban' or 'non-agricultural'.

Notes
<p>The Agricultural Land Classification (ALC) system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grades 1, 2 and 3a, are referred to as the Best and Most Versatile (BMV) land<sup>30</sup>. In the absence of site-specific surveys to identify Grades 3a and 3b, and in line with the precautionary principle, ALC Grade 3 is considered as BMV land. ALC data is available from Natural England<sup>31</sup>.</p> <p>A 20ha threshold has been used based on Natural England guidance<sup>32</sup>.</p>

<sup>30</sup> MAFF. October 1988. Available at Natural England.  
<http://publications.naturalengland.org.uk/publication/6257050620264448?category=5954148537204736> [Date Accessed: 20/06/23]

<sup>31</sup> Natural England (2019) Agricultural Land Classification (ALC) (England). Available at: [https://naturalengland-defra.opendata.arcgis.com/datasets/5d2477d8d04b41d4bbc9a8742f858f4d\\_0?geometry=-3.131%2C52.513%2C-0.667%2C53.094](https://naturalengland-defra.opendata.arcgis.com/datasets/5d2477d8d04b41d4bbc9a8742f858f4d_0?geometry=-3.131%2C52.513%2C-0.667%2C53.094) [Date accessed: 20/06/23]

<sup>32</sup> Natural England (2009) Agricultural Land Classification: protecting the best and most versatile agricultural land. Available at: <http://publications.naturalengland.org.uk/publication/35012> [Date accessed: 21/06/23]

## B.8 SA Objective 7: Pollution

### B.8.1 Introduction and context

B.8.1.1 **Boxes B.8.1 to B.8.5** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 7: Pollution.

B.8.1.2 The assessment under this objective considers the potential for reasonable alternative sites to generate pollution associated with the construction and occupation of new development, as well as the potential to expose site end users to existing sources of pollution.

### B.8.2 Pollution receptors

#### *Box B.8.1: SA Objective 7: AQMA*

Score	Likely Impact - AQMA
-	All development proposals in the Black Country are located within an AQMA.

#### Notes

Air Quality Management Areas (AQMAs) are considered to be an area where the national air quality objective will not be met. Introducing new development within an AQMA would therefore be expected to expose new residents to poor air quality. UK AQMA data is available from Defra<sup>33</sup>.

#### *Box B.8.2: SA Objective 7: Main road*

Score	Likely Impact - Main road
-	Development proposals located within 200m of a main road.
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.

#### Notes

It is assumed that sites located in close proximity to main roads would expose site end users to transport associated noise and air pollution. Negative impacts on the long-term health of site end users would be anticipated where residents would be exposed to air pollution.

In line with the DMRB guidance, it is assumed that receptors would be most vulnerable to these impacts located within 200m of a main road<sup>34 35</sup>. The Department for Transport (DfT) in their Transport Analysis Guidance (TAG) consider that, "beyond 200m from the link centre, the contribution of vehicle emissions to

<sup>33</sup> Department for Environment Food and Rural Affairs (2022) UK Air Information Resource. Available at: <https://uk-air.defra.gov.uk/aqma/maps/> [Date accessed: 20/06/23]

<sup>34</sup> Design Manual for Roads and Bridges (2019) LA 105 Air Quality. Available at: <https://www.standardsforhighways.co.uk/search/10191621-07df-44a3-892e-c1d5c7a28d90> [Date Accessed: 20/06/23]

<sup>35</sup> Design Manual for Roads and Bridges (2019) LA 104 Environmental assessment and monitoring. Available at: <https://www.standardsforhighways.co.uk/search/0f6e0b6a-d08e-4673-8691-cab564d4a60a> [Date accessed: 20/06/23]

**Notes**

*local pollution levels is not significant*<sup>36</sup>. A 200m buffer distance from main roads (motorways and A-roads) has therefore been applied in this assessment. Road data is available from Ordnance Survey<sup>37</sup>.

**Box B.8.3: SA Objective 7: Water quality**

Score	Likely Impact - Water quality
-	Development proposals located within 10m of a watercourse.
+/-	Development proposals located over 10m from a watercourse.
+	Development proposal includes integration of GI or the naturalisation of watercourses.

**Notes**

Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact on the quality of the water. A 10m buffer zone from a watercourse in which no works, clearance, storage or run-off should be permitted has been used as per available guidance<sup>38,39</sup>. However, it should be noted that development further away than this has the potential to lead to adverse impacts such as those resulting from runoff and should be considered on a site-by-site basis; as such, sites over 10m from a watercourse are scored as 'uncertain' in this assessment.

Watercourse mapping data is available from the Ordnance Survey<sup>40</sup>.

**Box B.8.4: SA Objective 7: Groundwater SPZ**

Score	Likely Impact - Groundwater SPZ
-	Development proposal coincides with a groundwater SPZ.
0	Development proposal does not coincide with a groundwater SPZ.

**Notes**

The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater. Groundwater Source Protection Zones (SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants. As such, any site that is located within a groundwater SPZ could potentially have an adverse impact on groundwater quality. Groundwater source catchments are divided into three zones:

- 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

<sup>36</sup> Department for Transport (2023) TAG unit A3 Environmental Impact Appraisal. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf) [Date accessed: 20/03/23]

<sup>37</sup> Ordnance Survey (2023) OS Open Roads. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-roads> [Date accessed: 20/06/23]

<sup>38</sup> DAERA (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: 21/06/23]

<sup>39</sup> Wild Trout Trust. Buffer Zones. Available at: <https://www.wildtrout.org/content/buffer-zones> [Date accessed: 21/06/23]

<sup>40</sup> Ordnance Survey (2023) OS Open Rivers. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-rivers> [Date accessed: 21/06/23]

Notes
<ul style="list-style-type: none"> <li>Total Catchment (Zone III) – within which all groundwater recharge is presumed to be discharged at the source.</li> </ul> <p>SPZ data is available from the Environment Agency<sup>41</sup>.</p>

**Box B.8.5: SA Objective 7: Increase in air pollution**

Score	Likely Impact - Increase in Air Pollution
<b>--</b>	Development proposals which could potentially result in a significant increase in air pollution.
<b>-</b>	Development proposals which could potentially result in a minor increase in air pollution.
<b>0</b>	Development would be expected to result in a negligible increase in air pollution.
<b>+/-</b>	The air pollution likely to be generated as a result of development proposals is uncertain. Including development sites for Gypsy and Traveller use, or development sites where the proposed use is uncertain.

Notes
<p>It is assumed that development would result in an increase in traffic and thus traffic generated air pollution. Residential sites proposed for the development of between ten and 99 dwellings would therefore be expected to have a minor negative impact on local air pollution<sup>42</sup>. Residential sites proposed for the development of 100 dwellings or more would be expected to have a major negative impact. Employment sites which propose the development of between 1ha and 9.9ha of employment space would be expected to have a minor negative impact and sites which propose 10ha or more would be expected to have a major negative impact.</p> <p>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.</p>

<sup>41</sup> Environment Agency (2023) Source Protection Zones. Available at: <https://data.gov.uk/dataset/09889a48-0439-4bbe-8f2a-87bba26fbbf5/source-protection-zones-merged> [Date accessed: 21/06/23]

<sup>42</sup> Institute of Air Quality Management (2017) Land-Use Planning & Development Control: Planning for Air Quality. Paragraph 5.8. Available at: <https://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf> [Date accessed: 21/06/23]

## B.9 SA Objective 8: Waste

### B.9.1 Introduction and context

B.9.1.1 **Box B.9.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 8: Waste.

B.9.1.2 It is expected that new development would result in an increase in the local population, and consequently an increase in household waste generation.

B.9.1.3 It should be noted that the appraisal of the reasonable alternatives is limited in its assessment against waste. The 1% principle as set out in **Box B.9.1** is only a coarse precautionary indicator, and greater detail of waste data would help to better quantify effects. The amount and type of waste produced will vary depending upon the specific site circumstances and end use and may have differing implications for the management of waste; such detail is not available to inform the assessment of reasonable alternative sites.

### B.9.2 Waste receptors

#### *Box B.9.1: SA Objective 8: Waste*

Score	Likely Impact - 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 or Gypsy and Traveller use is uncertain, or development sites where the proposed use is uncertain.
+	Development proposals which include provision of waste and recycling storage.
++	Development proposals for waste or recycling facilities.

#### Notes

The estimated total household waste produced within Sandwell in 2021/2022 was 128,000 tonnes, according to UK local authority household waste data<sup>43</sup>. It is assumed that new residents in Sandwell will have an annual

<sup>43</sup> Department for Environment, Food and Rural Affairs (2022) 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: 21/06/23]

### Notes

waste production of 399kg per person, in line with the England average<sup>44</sup>. Sandwell has an average of 2.7 people per dwelling<sup>45</sup>.

Based on these figures, and assuming new residents will generate waste in line with the current average, it has been calculated that proposals for 1,180 homes or more are expected to increase household waste generation by 1% or more in comparison to the current estimates for Sandwell. Proposals for 118 homes or more are expected to increase household waste generation by 0.1% or more in comparison to current estimates for Sandwell.

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<sup>44</sup> Department for Environment Food and rural Affairs (2021) Statistics on waste managed by local authorities in England in 2020/21. Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1040756/Statistics\\_on\\_waste\\_managed\\_by\\_local\\_authorities\\_in\\_England\\_in\\_2020\\_v2rev\\_accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1040756/Statistics_on_waste_managed_by_local_authorities_in_England_in_2020_v2rev_accessible.pdf) [Date Accessed: 21/06/23]

<sup>45</sup> People per Dwelling has been calculated using the ONS mid-2021 population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>) and dwelling stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

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

### B.10.1 Introduction and context

B.10.1.1 **Boxes B.10.1 to B.10.6** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 9: Transport and accessibility.

B.10.1.2 The Local Plan should seek to ensure that residents in Sandwell have access to a range of sustainable transport modes, to help facilitate a modal shift away from private car use to help tackle air quality and congestion issues and provide for more efficient travel. The Plan should also promote a reduced need to travel overall, facilitating local journeys via active travel wherever possible.

B.10.1.3 Accessibility modelling data<sup>46</sup> indicates the level of sustainable accessibility to local services (fresh food and centres) across Sandwell and the wider Black Country.

### B.10.2 Transport and accessibility receptors

#### *Box B.10.1: SA Objective 9: Bus stop*

Score	Likely Impact – Bus Stop
-	Development proposals where the majority of the site is located over 400m from a bus stop.
+	Development proposals where the majority of the site is located within 400m of a bus stop.

#### Notes

It is desirable for site end users to be situated within walking distance of a bus stop.

Bus stop data available from Transport for West Midlands<sup>47</sup>. A target distance of 400m to a bus stop has been used in line with Barton *et al.* sustainable distances<sup>48</sup>.

#### *Box B.10.2: SA Objective 9: Railway or metro station*

Score	Likely Impact – Railway or Metro Station
-	Development proposals where the majority of the site is located over 2km from a railway or metro station.
+	Development proposals where the majority of the site is located within 2km of a railway or metro station.

<sup>46</sup> Unpublished data provided to Lepus by the Council – Black Country Accessibility Modelling (2021)

<sup>47</sup> Transport for West Midlands (2022) Transport for West Midlands Data Portal. Available at: <https://data-tfwm.opendata.arcgis.com/> [Date accessed: 21/06/23]

<sup>48</sup> Barton, H., Grant, M. & Guise, R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

Notes
<p>Railway and metro station data available from Transport for West Midlands<sup>49</sup>. The assessments have used the latest version of this dataset (2022). It is acknowledged that there are new metro stations under construction along the Wednesbury – Brierley Hill route which are not captured within this data. Any subsequent updates to the data can be incorporated into the SA assessments at a later stage.</p> <p>A target distance of 2km to a railway station has been used in line with Barton <i>et al.</i> sustainable distances<sup>50</sup>.</p>

**Box B.10.3: SA Objective 9: Pedestrian access**

Score	Likely Impact – Pedestrian Access
-	Development proposals located in areas which currently have poor access to the surrounding footpath network.
+	Development proposals which are well connected to the existing footpath network and would be expected to provide safe access for pedestrians.

Notes
<p>New development sites have been assessed in terms of their access to the surrounding footpath network, allowing for safe local travel on foot. Safe access is determined to be that which is suitable for wheelchair users and pushchairs.</p> <p>Assessment of proximity to existing footpaths has been made through reference to aerial photography and the use of Google Maps<sup>51</sup>.</p>

**Box B.10.4: SA Objective 9: Road access**

Score	Likely Impact – Road Access
-	Development proposals located in areas which currently have poor access to the surrounding road network.
+	Development proposals which are adjacent to an existing road.

Notes
<p>Assessment of proximity to existing roads has been made through reference to aerial photography and the use of Google Maps<sup>52</sup>.</p>

**Box B.10.5: SA Objective 9: Pedestrian access to local services**

Score	Likely Impact – Pedestrian Access to Local Services
-	Development proposals where the majority of the site is located over a 15-minute walk to local services.

<sup>49</sup> Transport for West Midlands (2022) Transport for West Midlands Data Portal. Available at: <https://data-tfwm.opendata.arcgis.com/> [Date accessed: 21/06/23]

<sup>50</sup> Ibid

<sup>51</sup> Google Maps (2023) Available at: <https://www.google.co.uk/maps>

<sup>52</sup> Ibid

Score	Likely Impact – Pedestrian Access to Local Services
+	Development proposals where the majority of the site is located over a 10-minute walk but within a 15-minute walk to local services.
++	Development proposals where the majority of the site is located within a 10-minute walk to local services.
Notes	
Data on fresh food centre locations and accessibility modelling (travel time to fresh food and centres) has been provided by SMBC.	

**Box B.10.6:** SA Objective 9: Public transport access to local services

Score	Likely Impact - Public Transport Access to Local Services
-	Development proposals where the majority of the site is located over a 15-minute travel time via public transport to local services.
+	Development proposals where the majority of the site is located over a 10-minute travel time but within a 15-minute travel time via public transport to local services.
++	Development proposals where the majority of the site is located within a 10-minute travel time via public transport to local services.
Notes	
Data on fresh food centre locations and accessibility modelling (travel time to fresh food centres) has been provided by SMBC.	

## B.11 SA Objective 10: Housing

### B.11.1 Introduction and context

B.11.1.1 **Box B.11.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 10: Housing.

B.11.1.2 When striving for sustainable development, housing density should be considered carefully. High population densities can limit the accessibility of local key services and facilities such as hospitals, supermarkets and open spaces, including playgrounds and sports fields. High population densities also influence perceptions of safety, social interactions and community stability<sup>53</sup>.

### B.11.2 Housing receptors

**Box B.11.1:** SA Objective 10: Provision of housing

Score	Likely Impact - Provision of Housing
--	Development proposals which result in a significant net decrease in housing (of 100 dwellings or more).
-	Development proposals which result in a minor net decrease in housing (of between one and 99 dwellings).
0	Development proposals which 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, or development sites where the proposed use is uncertain but may include residential.
+	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).

#### Notes

Estimated housing capacity for each reasonable alternative site has been provided by SMBC.

At this stage of the assessment process, information is not available relating to the specific housing mix / type that would be delivered through each reasonable alternative site, including potential for development of affordable homes. It is assumed that development options will provide a good mix of housing type and tenure opportunities.

<sup>53</sup> Dempsey. N., Brown. C. and Bramley. G. (2012) The key to sustainable urban development in UK cities? The influence of density on social sustainability. Progress in Planning 77:89-141

## B.12 SA Objective 11: Equality

### B.12.1 Introduction and context

B.12.1.1 **Box B.12.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 11: Equality.

B.12.1.2 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England. LSOAs are small areas designed to be of similar population, of approximately 1,500 residents or 650 households. According to the IMD (2019)<sup>54</sup>, Sandwell ranks as 12<sup>th</sup> out of 317 local authorities in England (with 1 being most deprived and 317 being least deprived). 1 in 5 of the LSOAs in Sandwell are ranked among the 10% most deprived in England<sup>55</sup>.

### B.12.2 Equality receptors

**Box B.12.1:** SA Objective 11: Index of Multiple Deprivation

Score	Likely Impact - 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.
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.

#### Notes

UK Indices of Multiple Deprivation (IMD) available from MHCLG<sup>56</sup>.

It should be noted that there is a degree of uncertainty in regard to the impacts of each site on deprivation and equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.

An EqIA is being prepared by the Council alongside the emerging SLP.

<sup>54</sup> Ministry of Housing, Communities and Local Government (2019) The English Indices of Deprivation 2019. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/835115/loD2019\\_Statistical\\_Release.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/loD2019_Statistical_Release.pdf) [Date accessed: 02/05/23]

<sup>55</sup> Sandwell Metropolitan Borough Council (2023) Deprivation – Sandwell in a West Midlands Context. Available at: <https://www.sandwelltrends.info/deprivation-west-midlands-context/#:~:text=England%20is%20made%20up%20of,deprived%2010%25%20nationally%20in%202019.> [Date accessed: 18/07/23]

<sup>56</sup> Ministry of Housing, Communities and Local Government (2019) Indices of Multiple Deprivation (IMD). Available at: <http://data-communities.opendata.arcgis.com/datasets/indices-of-multiple-deprivation-imd-2019-1?geometry=-2.688%2C52.422%2C-1.456%2C52.714> [Date accessed: 21/06/23]

## B.13 SA Objective 12: Health

### B.13.1 Introduction and context

- B.13.1.1 **Boxes B.13.1 to B.13.5** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 12: Health.
- B.13.1.2 In order to facilitate healthy and active lifestyles for existing and new residents, it is expected that the Local Plan should seek to ensure that residents have access to NHS hospitals, GP surgeries, leisure facilities and a diverse range of accessible natural habitats and the surrounding PRoW network.
- B.13.1.3 Accessibility modelling data<sup>57</sup> indicates the level of sustainable accessibility to healthcare (GP surgeries) across Sandwell and the wider Black Country.
- B.13.1.4 It should be noted that healthcare capacity information has not been available; the assessment is based on accessibility alone.

### B.13.2 Health receptors

#### *Box B.13.1: SA Objective 12: NHS hospital*

Score	Likely Impact - NHS Hospital
-	Development proposals where the majority of the site is located over 5km from an NHS hospital providing an A&E service.
+	Development proposals where the majority of the site is located over 5km from an NHS hospital providing an A&E service.

#### Notes

For the purposes of this assessment, accessibility to a hospital has been taken as proximity to an NHS hospital with an A&E service. Distances of sites to other NHS facilities (e.g. community hospitals and treatment centres) or private hospitals has not been taken into consideration in this assessment. NHS hospital department data available from the NHS website<sup>58</sup>, and local hospital data provided by SMBC.

The target distance of 5km to an NHS hospital with an A&E service has been used in line with Barton *et al.* sustainable distances<sup>59</sup>.

It should be noted that the current 'Birmingham City Hospital' will be replaced with the new 'Midland Metropolitan Hospital' in 2024<sup>60</sup>. Given the timescales for these changes, for the purpose of the SA accessibility to the new 'Midland Metropolitan Hospital' has been considered within the site assessments, and the 'Birmingham City Hospital' has not been included within site assessments.

<sup>57</sup> Unpublished data provided to Lepus by the Council – Black Country Accessibility Modelling (2021)

<sup>58</sup> NHS (2023) NHS hospitals overview. Available at: <https://www.nhs.uk/service-search/other-services/Accident-and-emergency-services/LocationSearch/428> [Date accessed: 20/06/23]

<sup>59</sup> Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

<sup>60</sup> SMBC (2023) Projects: Midland Metropolitan University Hospital. Available at: [https://regeneratingsandwell.co.uk/sandwell\\_projects/midland-metropolitan-university-hospital/](https://regeneratingsandwell.co.uk/sandwell_projects/midland-metropolitan-university-hospital/) [Date accessed: 14/09/23]

**Box B.13.2:** SA Objective 12: Pedestrian access to GP surgery

Score	Likely Impact - Pedestrian Access to GP Surgery
-	Development proposals where the majority of the site is located over a 15-minute walk to a healthcare location.
+	Development proposals where the majority of the site is located over a 10-minute walk but within a 15-minute walk to a healthcare location.
++	Development proposals where the majority of the site is located within a 10-minute walk to a healthcare location.

Notes
Data for healthcare locations and accessibility modelling (travel time to healthcare) has been provided by SMBC. The modelling data does not incorporate new / emerging healthcare locations such as the Wednesbury Health Centre <sup>61</sup> ; any subsequent updates to the data will be incorporated into the SA assessments at a later stage.

**Box B.13.3:** SA Objective 12: Public transport access to GP surgery

Score	Likely Impact - Public Transport Access to GP Surgery
-	Development proposals where the majority of the site is located over a 15-minute travel time via public transport to a healthcare location.
+	Development proposals where the majority of the site is located over a 10-minute travel time but within a 15-minute travel time via public transport to a healthcare location.
++	Development proposals where the majority of the site is located within a 10-minute travel time via public transport to a healthcare location.

Notes
Data for healthcare locations and accessibility modelling (travel time to healthcare) has been provided by SMBC.

**Box B.13.4:** SA Objective 12: Access to / net loss of greenspace

Score	Likely Impact - Access to / Net Loss of Greenspace
-	Development proposals which coincide with greenspace. Development proposals where the majority of the site is located over 600m from greenspace.
0	Development proposals do not coincide with greenspace.
+	Development proposals where the majority of the site is located within 600m of a greenspace.

<sup>61</sup> SMBC (2023) Projects: Wednesbury Health Centre and Housing. Available at: [https://regeneratingsandwell.co.uk/sandwell\\_projects/wednesbury-health-centre-and-housing/](https://regeneratingsandwell.co.uk/sandwell_projects/wednesbury-health-centre-and-housing/) [Date accessed: 14/09/23]

**Notes**

Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. The assessment of proximity to/net loss of greenspaces is based on Ordnance Survey Open Greenspaces<sup>62</sup>. It is assumed that these greenspaces are publicly accessible. The target distance of 600m to a public greenspace has been used in line with Barton *et al.* sustainable distances<sup>63</sup>.

**Box B.13.5: SA Objective 12: Access to PRow / cycle routes**

Score	Likely Impact - Access to PRow / Cycle Routes
-	Development proposals where the majority of the site is located over 600m from a PRow and cycle route.
+	Development proposals where the majority of the site is located within 600m from a PRow and/or cycle route.

**Notes**

New development sites have been assessed in terms of their access to the local PRow and cycle networks. PRow data provided by SMBC, and strategic cycle route data is available from Transport for West Midlands<sup>64</sup>. The target distance of 600m to a footpath or cycle path has been used in line with Barton *et al.* sustainable distances.

<sup>62</sup> Ordnance Survey (2023) OS Open Greenspace. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-greenspace> [Date accessed: 20/06/23]

<sup>63</sup> Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

<sup>64</sup> Transport for West Midlands (2021) Transport for West Midlands Data Portal. Available at: <https://data-tfwm.opendata.arcgis.com/> [Date accessed: 20/06/23]

## B.14 SA Objective 13: Economy

### B.14.1 Introduction and context

B.14.1.1 **Boxes B.14.1 to B.14.3** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 13: Economy.

B.14.1.2 Accessibility modelling data<sup>65</sup> indicates the level of sustainable accessibility to employment locations across Sandwell and the wider Black Country. It is assumed that the mapped employment locations would provide a range of job opportunities for residents.

### B.14.2 Economy receptors

#### *Box B.14.1: SA Objective 13: Pedestrian access to employment opportunities*

Score	Likely Impact - Pedestrian Access to Employment Opportunities
-	Residential development proposals where the majority of the site is located over a 30-minute walk to a key employment location.
0	Development proposals for non-residential use.
+	Residential development proposals where the majority of the site is located over a 20-minute walk but within a 30-minute walk to a key employment location.
++	Residential development proposals where the majority of the site is located within a 20-minute walk to a key employment location.
<b>Notes</b>	
Data for key employment locations and accessibility modelling (travel time to employment) has been provided by SMBC.	

#### *Box B.14.2: SA Objective 13: Public transport access to employment opportunities*

Score	Likely Impact - Public Transport Access to Employment Opportunities
-	Residential development proposals where the majority of the site is located over a 30-minute travel time via public transport to a key employment location.
0	Development proposals for non-residential use.
+	Residential development proposals where the majority of the site is located over a 20-minute travel time but within a 30-minute travel time via public transport to a key employment location.
++	Residential development proposals where the majority of the site is located within a 20-minute travel time via public transport to a key employment location.
<b>Notes</b>	
Data for key employment locations and accessibility modelling (travel time to employment) has been provided by SMBC.	

<sup>65</sup> Unpublished data provided to Lepus by the Council – Black Country Accessibility Modelling (2021)

**Box B.14.3:** SA Objective 13: Employment floorspace

Score	Likely Impact - Employment Floorspace
--	Development proposals which result in a significant net decrease in employment floorspace.
-	Development proposals which result in a minor net decrease in employment floorspace.
0	Development proposals which would not impact employment floorspace.
+/-	It is uncertain whether the proposed development would result in a net change in employment floorspace. This includes development sites where the proposed use is uncertain but may include employment.
+	Development proposals which result in a minor net increase in employment floorspace.
++	Development proposals which result in a significant net increase in employment floorspace.
<b>Notes</b>	
An assessment of current land use has been made through reference to aerial photography and the use of Google Maps <sup>66</sup> .	

<sup>66</sup> Google Maps (2023) Available at: <https://www.google.co.uk/maps>

## B.15 SA Objective 14: Education, skills and training

### B.15.1 Introduction and context

B.15.1.1 **Boxes B.15.1 to B.15.3** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 14: Education, skills and training.

B.15.1.2 It is assumed that new residents in the Plan area require access to primary and secondary education services to help facilitate good levels of education, skills and qualifications of residents. Accessibility modelling data<sup>67</sup> indicates the level of sustainable accessibility to schools across Sandwell and the wider Black Country.

B.15.1.3 It should be noted that school capacity information has not been available; the assessment is based on accessibility alone.

### B.15.2 Education receptors

#### *Box B.15.1: SA Objective 14: Pedestrian access to primary school*

Score	Likely Impact - Pedestrian Access to Primary School
-	Residential development proposals where the majority of the site is located over a 15-minute walk to a primary school.
0	Development proposals for non-residential use.
+	Residential development proposals where the majority of the site is located over a 10-minute walk but within a 15-minute walk to a primary school.
++	Residential development proposals where the majority of the site is located within a 10-minute walk to a primary school.
<b>Notes</b>	
Data for primary school locations and accessibility modelling (travel time to primary schools) has been provided by SMBC.	

#### *Box B.15.2: SA Objective 14: Pedestrian access to secondary school*

Score	Likely Impact - Pedestrian Access to Secondary School
-	Residential development proposals where the majority of the site is located over a 25-minute walk to a secondary school.
0	Development proposals for non-residential use.
+	Residential development proposals where the majority of the site is located over a 20-minute walk but within a 25-minute walk to a secondary school.

<sup>67</sup> Unpublished data provided to Lepus by the Council

Score	Likely Impact - Pedestrian Access to Secondary School
<b>++</b>	Residential development proposals where the majority of the site is located within a 20-minute walk to a secondary school.
Notes	
Data for secondary school locations and accessibility modelling (travel time to secondary schools) has been provided by SMBC.	

**Box B.15.3:** SA objective 14: Public Transport Access to Secondary School

Score	Likely Impact - Public Transport Access to Secondary School
<b>-</b>	Residential development proposals where the majority of the site is located over a 25-minute travel time via public transport to a secondary school.
<b>0</b>	Development proposals for non-residential use.
<b>+</b>	Residential development proposals where the majority of the site is located over a 20-minute travel time but within a 25-minute travel time via public transport to a secondary school.
<b>++</b>	Residential development proposals where the majority of the site is located within a 20-minute travel time via public transport to a secondary school.
Notes	
Data for secondary school locations and accessibility modelling (travel time to secondary schools) has been provided by SMBC.	

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# Appendix C: Reasonable Alternative Site Assessments

DRAFT

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## C.1 Introduction

### C.1.1 Overview

- C.1.1.1 A total of 121 reasonable alternative sites have been identified by SMBC during the preparation of the SLP. This includes 65 sites identified solely for residential use and 17 sites identified solely for employment use. One site is identified solely for Gypsy, Traveller and Travelling Showpeople (GTTS) use. One site is identified for mixed-use including residential and employment. The remaining 37 sites are identified as reasonable alternatives for multiple uses (i.e. the sites could potentially be developed for residential, employment and/or GTTS use).
- C.1.1.2 The location of the 121 reasonable alternative sites is shown in **Figure C.1.1**, and their potential uses are identified in **Table C.1.1**.
- C.1.1.3 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 C.2.1 – C.14.1 within each SA Objective chapter, in accordance with the site assessment methodology set out in Appendix B, as well as the methodology information set out in **Chapter 2** of the main SA Report.
- C.1.1.4 The receptor-only impacts, based on the red line boundary and site proposal information provided by SMBC, help to identify the potential impacts on site if there were no policy or mitigation. The potential mitigating influence of the draft SLP policies is considered within **section 8.3** of the main SA Report.
- C.1.1.5 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 SMBC as well as expert judgement.

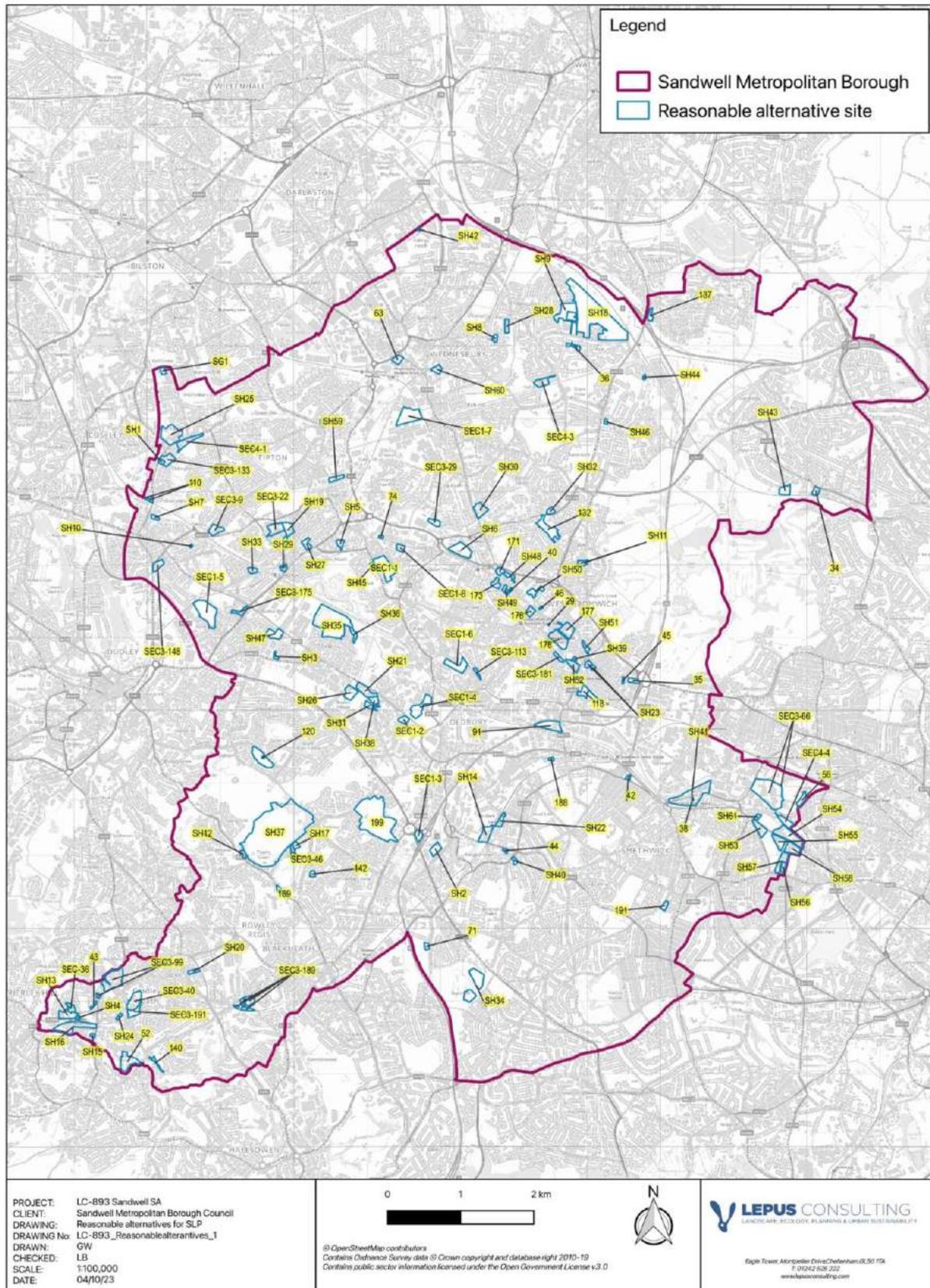


Figure C.1.1: Reasonable alternative sites identified in Sandwell

**Table C.1.1:** Reasonable alternative sites in Sandwell

**Note to Council:** We have prepared the SA using the site information provided, including site references as provided by Trisha via email 27/09/23. However, we note there may be some discrepancies between the references listed here and those listed in the appendices of the SLP itself and accompanying allocated site shapefiles provided to colleagues for the HRA. E.g. eight sites are listed as mixed use allocations in the plan which were not specified as such in the SA information, and differences in the references listed for employment sites.

Site Reference	Site Address	Site use	Net Area (ha)	Housing Capacity (if applicable)
SEC3-181	Varney Business Park, Varney Avenue, West Bromwich	Employment	0.73	N/A
SEC4-1	Zion Street, Tipton	Employment	2.43	N/A
SEC3-9	Alexandra Ind Est, Locarno Rd/ Alexandra Rd, Tipton	Housing/Employment	1.87	75
SEC3-99	Providence Street, Cradley Heath	Employment	6.33	N/A
SH1	Brown Lion Street	Housing	0.46	20
SEC3-113	Brandon Way (east side)	Housing/Employment	0.47	19
SEC3-46	Droicon Ind Est, Portway Road	Employment	0.87	N/A
SEC3-175	Coneygre Rd, Burnt Tree, Tipton	Housing/Employment	1.02	75
SEC-36	Silverthorne Lane	Housing/Employment	1.05	100
SEC3-29	Site off Richmond St, West Bromwich	Employment	1.10	N/A
SEC3-148	Castle St, Tipton	Housing/Employment	1.49	60
SH2	Land adjacent To Asda Wolverhampton Road, Oldbury	Housing/Employment	1.60	62
SEC4-4	Soho Triangle	Employment	1.71	N/A
SEC3-191	Oldfield Trading Estate, Cradley Heath	Housing/Employment	1.76	70
SEC4-3	70-74 Crankhall Lane	Housing/Employment	1.78	50
SEC3-133	Brymill Industrial Estate, Brown Lion St, Tipton	Housing	1.98	56
SEC3-189	Waterfall Lane, Cradley Heath	Housing/Employment	1.78	50
SEC3-22	Hale Trading Estate, Tipton	Housing/Employment	2.73	120
SEC3-40	Newlyn Road, Cradley Heath	Housing/Employment	3.40	102
SEC1-4	Severn Trent land off Roway Lane	Employment	3.65	N/A
SH3	88/90 Dudley Rd West	Housing/Employment	0.36	12
SH4	Lower High Street (Station Hotel & Dunns Site)	Housing/Employment	0.28	20
SH5	Mill Street, Great Bridge	Housing	0.86	30
SH6	Swan Lane, North of A41, West Bromwich	Housing	3.77	147
SH7	The Boat Gauging House & Adjoining Land, Factory Road, Tipton	Housing/GTTS	0.57	50
SH8	Alma Street, Wednesbury	Housing	0.52	19
SH9	The Phoenix Collegiate, Friar Park Road, Wednesbury	Housing	4.80	84

Site Reference	Site Address	Site use	Net Area (ha)	Housing Capacity (if applicable)
29	Star and Garter, 252 Duchess Parade, West Bromwich	Housing	0.05	60
SH10	Tipton Conservative and Unionist Club, 64 Union St, Tipton	Housing	0.19	14
SH11	Sandwell District & General Hospital	Housing	0.82	121
SH12	Fmr Springfield & Brickhouse Neighbourhood Office and adjacent land Dudley Road, Rowley Regis	Housing	0.65	26
34	John Dando House, 235 Hamstead Road, Great Barr Birmingham	Housing	0.86	26
35	Intersection House, 110 Birmingham Road, West Brom	Housing/Employment	0.80	136
36	Vacant Land Off Friardale Close, School Road, Carrington Road, Wednesbury	Housing	0.76	30
38	173 Rolfe Street, Smethwick	Housing	0.40	12
40	Metro House 410-416 High Street West Bromwich	Housing	0.38	34
42	Land between St Pauls Road & Tollhouse Way	Housing	0.33	11
43	Land adjacent Compton Grange, Whiteall Road, St Annes Road, Cradley Heath	Housing	0.30	15
44	Crosswells Road, Langley	Housing	0.29	12
45	164 Birmingham Road, West Bromwich	Housing/Employment	0.22	16
46	5 Lombard Street West Bromwich	Housing	0.16	44
SH13	Silverthorne Lane/ Forge Lane Cradley Heath	Housing	1.05	74
SH14	Langley Maltings, Western Road, Langley	Housing	2.72	95
SH15	Macarthur Road Industrial Estate, Cradley Heath	Housing	0.30	10
52	Land off Overend Road, Cradley Heath Business Park	Employment	3.04	N/A
SH16	Cradley Heath Factory Centre, Woods Lane, Cradley Heath	Housing	5.41	160
SH17	Land adj to Droicon Estate, Portway Road, Rowley Regis	Housing/GTTS	0.70	28
SH18	STW/SMBC Land, Friar Park Road, Wednesbury	Housing/Employment	26.60	630
56	Perrott Street/ Kitchener Street, Black Patch, Smethwick	Housing	1.39	49
SH19	Land at Horseley Heath, Alexandra Road, and Lower Church Lane, Tipton	Housing/Employment	1.90	60
SH20	Elbow Street, Old Hill	Housing/Employment/GTTS	0.77	25

Site Reference	Site Address	Site use	Net Area (ha)	Housing Capacity (if applicable)
SH21	Dudley Road East/Brades Road	Housing/Employment	2.65	106
SH22	Tatbank Road, Oldbury	Housing/Employment	1.15	40
SH23	28-64 High Street, West Bromwich	Housing	0.60	58
63	Site between Dudley St & Victoria St, Wednesbury	Housing/Employment	1.18	41
SH24	Cokeland Place / Graingers Lane, Cradley Heath	Housing	0.36	13
SH25	Bradleys Lane / High Street, Tipton	Housing/Employment	5.60	230
SH26	Lower City Road, Oldbury	Housing/Employment	1.83	63
SH27	Site surrounding former Post office and Telephone exchange, Horseley Heath, Tipton	Housing/Employment	1.16	42
SH28	Friar Street, Wednesbury	Housing/Employment	1.01	38
SH29	Used Car Sales site on corner of Lower Church Lane and Horseley Heath, Tipton	Housing/Employment	0.56	20
71	Grafton Lodge, Grafton Road, Oldbury	Housing	0.53	19
74	The Corner of Great Bridge & Richmond Street South	Employment	0.23	N/A
SH30	Land to east of Black Lake, West Bromwich	Housing/Employment	2.45	86
SH31	Summerton Road, Oldbury	Housing/Employment/GTTS	0.89	32
SH32	Bank Street (West), Hateley Heath	Housing/Employment/GTTS	0.85	43
SH33	Wellington Road, Tipton	Housing/Employment/GTTS	0.91	31
SH34	Brandhall Golf Course	Housing	36.90	190
SH35	Rattlechain Site Land to the north of Temple Way, Tividale	Housing	14.8	518
SH36	Land between Addington Way and River Tame, Temple Way	Housing/Employment/GTTS	0.90	32
SH37	Edwin Richards Quarry, Portway Road, Rowley Regis	Housing	10.10	526
SEC3-66	Soho Foundry	Employment	12.60	N/A
SH38	Brades Road, Oldbury	Housing/Employment	1.14	54
91	Chances Glassworks	Housing/Employment	0.64	22
SH39	Land to West of Thomas Street, West Bromwich	Housing	0.28	30
SH40	Langley Swimming Centre, Vicarage Road, Oldbury	Housing	0.49	20
SH41	North Smethwick Canalside	Housing	8.77	400
SH42	Forge Put, junction Franchise Street and Beebee Ro	Housing	0.14	10
SEC1-3	Land at Birchley Island, Junction 2 of M5, Oldbury	Employment	1.00	N/A
110	Bloomfield Road Amenity Space	Housing/Employment	0.38	15

Site Reference	Site Address	Site use	Net Area (ha)	Housing Capacity (if applicable)
118	Constance Avenue Open Space	Housing	1.60	64
120	Darbys Hill Open Space	Housing	3.80	114
132	Lily Street Open Space	Housing	3.80	114
137	Poppy Drive Open Space	Housing	0.80	32
140	Timbertree Crescent Open Space	Housing	0.50	20
142	Wylde Crescent Open Space	Housing	0.50	20
SH43	Land of Tanhouse Avenue, Great Barr	Housing	1.66	46
SH44	Wyndmill crescent, West Bromwich	Housing	0.19	11
SH45	Site Of Nos 118-152	Housing	0.41	20
SH46	Site Of Former Stone Cross Neighbourhood Office	Housing	0.32	14
SH47	Groveland, Oldbury	Housing	2.26	58
171	Evans Halshaw car showroom, Carters Green	Housing	0.89	140
SH48	St Johns St, Carters Green	Housing	0.82	33
173	Army Reserve, Carters Green	Housing	1.17	63
SH49	Tentec, Guns Lane	Housing	0.60	129
SH50	Providence Place/ Bratt St	Housing	1.32	70
176	Cultural Quarter, West Bromwich	Housing	1.09	52
177	Queens Square Living, West Bromwich	Housing	2.84	396
178	West Bromwich Central	Housing	3.84	343
SH51	Overend Street, West Bromwich	Housing	0.71	70
SH52	George Street Living	Housing	1.54	327
SH53	Grove Lane/ Cranford Street/ London Street	Housing	1.23	108
SH54	Cranford Street / Heath Street / Canal	Housing	5	115
SH55	Cape Arm Cranford Street	Housing	2.13	170
SH56	Moilliett Street Park - Grove Lane masterplan	Housing	0.77	31
SH57	Grove Street / MMUH / School - Grove Lane MP	Housing	2.18	85
SH58	Abberley Street Grove Lane Master Plan	Housing	2.48	140
SG1	Extension to Caravan Site, Brierley Lane, Bilston	GTTS	0.73	10
188	Land Between No.32 And George Betts School, West End Avenue, Smethwick	Housing	0.32	11
189	Hawes Lane, Rowley Regis	Housing	0.56	15
SH59	Beever Road, Great Bridge	Housing	1.01	18
191	Former Sunlight Laundry, Stanhope Road, Smethwick	Housing	0.73	33
SH61	Thandi Coach Station, Alma Street, Smethwick	Housing	0.71	58

Site Reference	Site Address	Site use	Net Area (ha)	Housing Capacity (if applicable)
SEC1-1	Whitehall Road, Tipton	Employment	5.29	N/A
SEC1-8	Legacy 43, Ryder Street, West Bromwich	Employment	0.88	N/A
SEC1-5	Land at Conegre, Newcomen Drive, Tipton	Employment	6.92	N/A
SEC1-6	Land off Brandon Way, West Bromwich	Employment	3.00	N/A
SEC1-2	British Gas, Land off Dudley Road, Oldbury	Employment	1.05	N/A
SEC1-7	Site off Bilport Lane, Wednesbury	Employment	5.30	N/A
199	Lion Farm Playing Fields, Oldbury	Mixed-use (including housing, employment and open space)	20.89	200
SH60	Site of 30-144 Mounts Road, Wednesbury	Housing/Employment	1.07	22

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## C.2 SA Objective 1: Cultural Heritage

### C.2.1 Grade I Listed Buildings

C.2.1.1 There are two Grade I Listed Buildings in Sandwell, 'West Bromwich Manor House' and 'Galton Bridge', and several others nearby in surrounding authority areas. Although Site SEC4-3 lies in close proximity (approximately 180m) to 'West Bromwich Manor House', the previously developed nature of the site means that adverse effects on the setting of the building are considered unlikely. The proposed development at all 121 sites in Sandwell would be unlikely to significantly impact Grade I Listed Buildings, therefore a negligible impact has been identified across these sites.

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

C.2.2.1 There are eight Grade II\* Listed Buildings within Sandwell, mostly concentrated in and around the Smethwick area in the south east of the borough. Site SEC3-66 coincides with 'Soho Foundry Former Boulton and Watt Foundry Pattern Stores and Erecting Shops'. The proposed development at this site could potentially lead to a direct major negative impact on the Grade II\* Listed Building.

C.2.2.2 Site SH41 is located adjacent to 'Engine Arm Aqueduct, Birmingham Canal Wolverhampton Level'. The proposed development at this site could potentially have a minor negative impact on the setting of this Listed Building.

C.2.2.3 However, both Sites SEC3-66 and SH41 contain some existing development and so it is acknowledged that there may also be opportunities to improve the historic setting of the area through regeneration of degraded industrial buildings currently on site.

C.2.2.4 The proposed development at all other sites within Sandwell would be unlikely to significantly impact any Grade II\* Listed Buildings, primarily due to the sites being separated from Listed Buildings by existing built form. Therefore, a negligible impact has been identified across these sites.

### C.2.3 Grade II Listed Buildings

C.2.3.1 There are many Grade II Listed Buildings throughout Sandwell, generally clustered within the built-up areas, along the canal network, and particularly within West Bromwich and Oldbury town centres. There are six sites that coincide with a Grade II Listed Building (Sites SH7, SH14, SEC3-66, 91, 176, and 178). Site SEC3-66 coincides with 'Gateway and Gates', 'Office Row', and 'Gatehouse and adjoining Office' and is adjacent to 'Towpath Bridge at Soho Foundry'. Site 91 coincides with 'Double Range of Warehouses immediately west of Hartley Bridge, Chance's glassworks', 'Warehouse between Hartley Bridge and canal bridge, chance's glassworks', and 'Two warehouses, immediately east of canal bridge, chance's glassworks', and is adjacent or close to several others. Site 176 coincides with 'Town Hall', 'Pair of K6 Telephone Kiosks outside Library and Town Hall', 'Central Public Library', and 'Law Courts'. The proposed development at these six sites could potentially result in direct major negative impacts on these Listed Buildings, without careful consideration of site layout and design.

C.2.3.2 Five sites are located adjacent to Grade II Listed Building (Sites SEC4-1, SEC4-4, SH41, 177 and SEC1-1). Furthermore, a further eight sites could potentially have an adverse impact on the setting of various Listed Buildings, due to the nature and scale of the proposed development and the proximity of Listed Buildings. For example, Site SEC4-4 is located adjacent to the Grade II Listed Building 'Towpath Bridge, Birmingham Canal Birmingham Level'. The proposed development at these 14 sites could potentially result in a minor negative impact on the setting of one or more Grade II Listed Buildings.

## C.2.4 Conservation Area

C.2.4.1 Sandwell contains nine Conservation Areas (CA), the majority of which cover sections of the urban area, as well as portions of the canal network, historic open spaces and nature reserves. There are eight sites that coincide with a CA, including Sites SH10 and SH7 which lie wholly within 'Factory Locks, Tipton' CA, Sites SH50 and 176 which lie partially within 'High Street West Bromwich' CA, and Sites 38, 91, SH41, and SH54 which lie wholly or partially within 'Smethwick Galton Valley' CA. There are a further eight sites which are adjacent or in close proximity to a CA. The proposed development at these 16 sites could potentially result in a minor negative impact on the character or setting of these CAs. The remaining sites would not be expected to have a significant impact on the setting of any CA.

## C.2.5 Scheduled Monument

C.2.5.1 There are eight Scheduled Monuments (SMs) within Sandwell, generally covering previously developed areas in relation to Birmingham Canal or areas with industrial history. Three sites coincide with a SM. Site SEC3-66 wholly coincides with 'remains of the Boulton and Watt Soho Foundry and mint, Birmingham Canal, Smethwick', Site 91 wholly coincides with 'Chances Glassworks', and Site SH41 coincides partially with 'Engine Arm Aqueduct' and wholly coincides with 'Smethwick Engine House'. The proposed development at these three sites could potentially have a direct adverse effect on these SMs, resulting in a major negative impact on cultural heritage. However, these sites contain some existing development so it is acknowledged that there may also be opportunities to improve the historic setting of the area and associated SMs through regeneration of degraded industrial buildings currently on site.

C.2.5.2 All other sites within Sandwell are not located in close proximity to any SMs, and as such, the proposed development at these sites would not be expected to significantly impact the setting of any of these SMs.

## C.2.6 Registered Park and Garden

C.2.6.1 Five Registered Parks and Gardens (RPGs) can be found within Sandwell: 'Brunswick Park', 'Victoria Park (Tipton)', 'Dartmouth Park', 'Warley Park' and a small proportion of 'Great Barr Hall'. Site SEC1-5 is located approximately 200m from 'Victoria Park (Tipton)' RPG. Although there is some intervening built form separating Site SEC1-5 from the RPG, the site comprises a large area of undeveloped land. The proposed development at the site could potentially result in a minor negative impact on the setting of the RPG. The remaining sites are deemed unlikely to have a significant impact on the setting of any RPG

due to the previously developed nature of the sites and/or presence of intervening development.

## C.2.7 Archaeological Priority Area

C.2.7.1 Archaeological Priority Areas (APAs) have been identified throughout Sandwell’s urban and undeveloped areas. Four sites coincide with APAs, including Sites 189, SH33, SH26, and SH31. A further nine sites are located adjacent to APAs. The proposed development at these 13 sites could potentially alter the setting of these APAs, and as a result have a minor negative impact on cultural heritage. The remaining sites are not located in close proximity to APAs, and therefore, would be expected to have a negligible impact on the setting of APAs.

## C.2.8 Historic Landscape Characterisation

C.2.8.1 The Black Country Historic Landscape Characterisation (HLC) Study<sup>1</sup> has identified a range of Historic Environment Area Designations within the Black Country, covering a large proportion of Sandwell’s parkland and Green Belt as well as a number of features within the urban areas. Nine of the proposed sites (SEC3-99, SH7, 43, SH14, SH16, SH33, SH34, SEC3-66, and 91) coincide wholly or partially within an area of High Historic Landscape Value (HHLV) or High Historic Townscape Value (HHTV). This includes Site SH34 which coincides with ‘Brandhall Ridge and Furrow’ HHLV, which is a rare feature in Sandwell. No sites coincide with any Designed Landscapes of High Historic Value. Development within areas of HHLV/HHTV may lead to the loss of surviving archaeological features of interest and their visual or functional links to Sandwell’s past. Therefore, the proposed development at these nine sites could potentially result in a minor negative impact on the surrounding historic environment. The remaining sites do not coincide with any identified areas of high historic value, and therefore, would be expected to have a negligible impact on the local historic environment.

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

Site Reference	Site Use	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
SEC3-181	EMP	0	0	0	0	0	0	0	0
SEC4-1	EMP	0	0	-	0	0	0	0	0
SEC3-9	HSG/EMP	0	0	0	0	0	0	0	0
SEC3-99	EMP	0	0	0	0	0	0	0	-
SH1	HSG	0	0	0	0	0	0	0	0
SEC3-113	HSG/EMP	0	0	0	0	0	0	0	0
SEC3-46	EMP	0	0	0	0	0	0	0	0

<sup>1</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf)  
 [Date Accessed: 15/09/23]

Site Reference	Site Use	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
SEC3-175	HSG/EMP	0	0	0	0	0	0	-	0
SEC-36	HSG/EMP	0	0	0	0	0	0	0	0
SEC3-29	EMP	0	0	0	0	0	0	0	0
SEC3-148	HSG/EMP	0	0	0	-	0	0	-	0
SH2	HSG/EMP	0	0	0	0	0	0	0	0
SEC4-4	EMP	0	0	-	-	0	0	0	0
SEC3-191	HSG/EMP	0	0	0	0	0	0	0	0
SEC4-3	HSG/EMP	0	0	0	0	0	0	0	0
SEC3-133	HSG	0	0	0	0	0	0	0	0
SEC3-189	HSG/EMP	0	0	0	0	0	0	0	0
SEC3-22	HSG/EMP	0	0	0	0	0	0	0	0
SEC3-40	HSG/EMP	0	0	0	0	0	0	0	0
SEC1-4	EMP	0	0	0	0	0	0	0	0
SH3	HSG/EMP	0	0	0	0	0	0	-	0
SH4	HSG/EMP	0	0	0	0	0	0	0	0
SH5	HSG	0	0	0	0	0	0	-	0
SH6	HSG	0	0	0	0	0	0	0	0
SH7	HSG/GTTS	0	0	--	-	0	0	-	-
SH8	HSG	0	0	0	0	0	0	0	0
SH9	HSG	0	0	0	0	0	0	0	0
29	HSG	0	0	-	0	0	0	0	0
SH10	HSG	0	0	0	-	0	0	0	0
SH11	HSG	0	0	0	0	0	0	0	0
SH12	HSG	0	0	0	0	0	0	0	0
34	HSG	0	0	0	0	0	0	0	0
35	HSG/EMP	0	0	0	0	0	0	0	0
36	HSG	0	0	0	0	0	0	0	0
38	HSG	0	0	0	0	0	0	0	0
40	HSG	0	0	0	0	0	0	0	0
42	HSG	0	0	0	-	0	0	0	0
43	HSG	0	0	0	0	0	0	0	-
44	HSG	0	0	0	0	0	0	0	0
45	HSG/EMP	0	0	0	0	0	0	0	0
46	HSG	0	0	0	-	0	0	0	0
SH13	HSG	0	0	0	0	0	0	0	0
SH14	HSG	0	0	--	0	0	0	0	-
SH15	HSG	0	0	0	0	0	0	0	0
52	EMP	0	0	0	0	0	0	0	0
SH16	HSG	0	0	0	0	0	0	0	-
SH17	HSG/GTTS	0	0	0	0	0	0	0	0
SH18	HSG/EMP	0	0	0	0	0	0	0	0

Site Reference	Site Use	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
56	HSG	0	0	-	0	0	0	0	0
SH19	HSG/EMP	0	0	0	0	0	0	0	0
SH20	HSG/EMP/GTTS	0	0	0	0	0	0	0	0
SH21	HSG/EMP	0	0	0	0	0	0	-	0
SH22	HSG/EMP	0	0	0	0	0	0	0	0
SH23	HSG	0	0	0	0	0	0	0	0
63	HSG/EMP	0	0	0	0	0	0	0	0
SH24	HSG	0	0	0	0	0	0	0	0
SH25	HSG/EMP	0	0	0	0	0	0	0	0
SH26	HSG/EMP	0	0	-	0	0	0	-	0
SH27	HSG/EMP	0	0	0	0	0	0	0	0
SH28	HSG/EMP	0	0	0	0	0	0	0	0
SH29	HSG/EMP	0	0	0	0	0	0	0	0
71	HSG	0	0	0	0	0	0	0	0
74	EMP	0	0	0	0	0	0	0	0
SH30	HSG/EMP	0	0	0	0	0	0	0	0
SH31	HSG/EMP/GTTS	0	0	0	0	0	0	-	0
SH32	HSG/EMP/GTTS	0	0	0	0	0	0	0	0
SH33	HSG/EMP/GTTS	0	0	0	0	0	0	-	-
SH34	HSG	0	0	0	0	0	0	0	-
SH35	HSG	0	0	-	0	0	0	0	0
SH36	HSG/EMP/GTTS	0	0	0	0	0	0	0	0
SH37	HSG	0	0	-	-	0	0	0	0
SEC3-66	EMP	0	--	--	-	--	0	0	-
SH38	HSG/EMP	0	0	0	0	0	0	-	0
91	HSG/EMP	0	0	--	-	--	0	0	-
SH39	HSG	0	0	0	0	0	0	0	0
SH40	HSG	0	0	0	0	0	0	0	0
SH41	HSG	0	-	-	-	--	0	0	0
SH42	HSG	0	0	0	0	0	0	0	0
SEC1-3	EMP	0	0	0	0	0	0	0	0
110	HSG/EMP	0	0	0	0	0	0	0	0
118	HSG	0	0	0	0	0	0	0	0
120	HSG	0	0	0	0	0	0	0	0
132	HSG	0	0	0	0	0	0	0	0
137	HSG	0	0	0	0	0	0	0	0
140	HSG	0	0	0	0	0	0	0	0
142	HSG	0	0	0	0	0	0	0	0
SH43	HSG	0	0	0	0	0	0	0	0
SH44	HSG	0	0	0	0	0	0	0	0
SH45	HSG	0	0	0	0	0	0	0	0

Site Reference	Site Use	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
SH46	HSG	0	0	0	0	0	0	0	0
SH47	HSG	0	0	-	0	0	0	-	0
171	HSG	0	0	-	0	0	0	0	0
SH48	HSG	0	0	0	0	0	0	0	0
173	HSG	0	0	0	0	0	0	0	0
SH49	HSG	0	0	0	0	0	0	0	0
SH50	HSG	0	0	-	-	0	0	0	0
176	HSG	0	0	--	-	0	0	0	0
177	HSG	0	0	-	0	0	0	0	0
178	HSG	0	0	--	0	0	0	0	0
SH51	HSG	0	0	0	0	0	0	0	0
SH52	HSG	0	0	0	0	0	0	0	0
SH53	HSG	0	0	0	0	0	0	0	0
SH54	HSG	0	0	0	-	0	0	0	0
SH55	HSG	0	0	0	-	0	0	0	0
SH56	HSG	0	0	0	0	0	0	0	0
SH57	HSG	0	0	0	0	0	0	0	0
SH58	HSG	0	0	0	-	0	0	0	0
SG1	GTTS	0	0	0	0	0	0	0	0
188	HSG	0	0	0	0	0	0	0	0
189	HSG	0	0	0	0	0	0	-	0
SH59	HSG	0	0	0	0	0	0	0	0
191	HSG	0	0	0	0	0	0	0	0
SH61	HSG	0	0	0	0	0	0	0	0
SEC1-1	EMP	0	0	-	0	0	0	0	0
SEC1-8	EMP	0	0	0	0	0	0	0	0
SEC1-5	EMP	0	0	0	0	0	-	0	0
SEC1-6	EMP	0	0	0	0	0	0	-	0
SEC1-2	EMP	0	0	0	0	0	0	0	0
SEC1-7	EMP	0	0	0	0	0	0	0	0
199	Mixed-use	0	0	0	0	0	0	0	0
SH60	HSG/EMP	0	0	0	0	0	0	0	0

## C.3 SA Objective 2: Landscape

### C.3.1 Landscape Sensitivity

- C.3.1.1 The Black Country Landscape Sensitivity Assessment<sup>2</sup> identified the extent to which the character and quality of Black Country Green Belt land is susceptible to change as a result of future development. In Sandwell, Green Belt is restricted to the north east of the borough, at Sandwell Valley. 120 reasonable alternative sites identified for the SLP lie outside of the Green Belt, and as such outside of the Landscape Sensitivity Assessment study area. Therefore, the potential effects of each site on sensitive landscapes are scored as uncertain.
- C.3.1.2 Site 137 is partially located within the Green Belt to the south of the site, within an area identified as being of 'low' landscape sensitivity. Therefore, the proposed development at this site would be expected to result in a negligible impact on sensitive landscapes.
- C.3.1.3 Information relating to the historic environment which has strong links with landscapes/townscapes in Sandwell, including the Historic Landscape Characterisation and associated designations, has been assessed under SA Objective 1 (Cultural Heritage) (see **Chapter C.2**).

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

Site Reference	Site Use	Landscape Sensitivity
SEC3-181	EMP	+/-
SEC4-1	EMP	+/-
SEC3-9	HSG/EMP	+/-
SEC3-99	EMP	+/-
SH1	HSG	+/-
SEC3-113	HSG/EMP	+/-
SEC3-46	EMP	+/-
SEC3-175	HSG/EMP	+/-
SEC-36	HSG/EMP	+/-
SEC3-29	EMP	+/-
SEC3-148	HSG/EMP	+/-
SH2	HSG/EMP	+/-
SEC4-4	EMP	+/-
SEC3-191	HSG/EMP	+/-
SEC4-3	HSG/EMP	+/-
SEC3-133	HSG	+/-
SEC3-189	HSG/EMP	+/-
SEC3-22	HSG/EMP	+/-
SEC3-40	HSG/EMP	+/-

<sup>2</sup> LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: [https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf) [Date Accessed: 04/08/23]

Site Reference	Site Use	Landscape Sensitivity
SEC1-4	EMP	+/-
SH3	HSG/EMP	+/-
SH4	HSG/EMP	+/-
SH5	HSG	+/-
SH6	HSG	+/-
SH7	HSG/GTTS	+/-
SH8	HSG	+/-
SH9	HSG	+/-
29	HSG	+/-
SH10	HSG	+/-
SH11	HSG	+/-
SH12	HSG	+/-
34	HSG	+/-
35	HSG/EMP	+/-
36	HSG	+/-
38	HSG	+/-
40	HSG	+/-
42	HSG	+/-
43	HSG	+/-
44	HSG	+/-
45	HSG/EMP	+/-
46	HSG	+/-
SH13	HSG	+/-
SH14	HSG	+/-
SH15	HSG	+/-
52	EMP	+/-
SH16	HSG	+/-
SH17	HSG/GTTS	+/-
SH18	HSG/EMP	+/-
56	HSG	+/-
SH19	HSG/EMP	+/-
SH20	HSG/EMP/GTTS	+/-
SH21	HSG/EMP	+/-
SH22	HSG/EMP	+/-
SH23	HSG	+/-
63	HSG/EMP	+/-
SH24	HSG	+/-
SH25	HSG/EMP	+/-
SH26	HSG/EMP	+/-
SH27	HSG/EMP	+/-
SH28	HSG/EMP	+/-
SH29	HSG/EMP	+/-
71	HSG	+/-
74	EMP	+/-
SH30	HSG/EMP	+/-

Site Reference	Site Use	Landscape Sensitivity
SH31	HSG/EMP/GTTS	+/-
SH32	HSG/EMP/GTTS	+/-
SH33	HSG/EMP/GTTS	+/-
SH34	HSG	+/-
SH35	HSG	+/-
SH36	HSG/EMP/GTTS	+/-
SH37	HSG	+/-
SEC3-66	EMP	+/-
SH38	HSG/EMP	+/-
91	HSG/EMP	+/-
SH39	HSG	+/-
SH40	HSG	+/-
SH41	HSG	+/-
SH42	HSG	+/-
SEC1-3	EMP	+/-
110	HSG/EMP	+/-
118	HSG	+/-
120	HSG	+/-
132	HSG	+/-
137	HSG	0
140	HSG	+/-
142	HSG	+/-
SH43	HSG	+/-
SH44	HSG	+/-
SH45	HSG	+/-
SH46	HSG	+/-
SH47	HSG	+/-
171	HSG	+/-
SH48	HSG	+/-
173	HSG	+/-
SH49	HSG	+/-
SH50	HSG	+/-
176	HSG	+/-
177	HSG	+/-
178	HSG	+/-
SH51	HSG	+/-
SH52	HSG	+/-
SH53	HSG	+/-
SH54	HSG	+/-
SH55	HSG	+/-
SH56	HSG	+/-
SH57	HSG	+/-
SH58	HSG	+/-
SG1	GTTS	+/-
188	HSG	+/-

Site Reference	Site Use	Landscape Sensitivity
189	HSG	+/-
SH59	HSG	+/-
191	HSG	+/-
SH61	HSG	+/-
SEC1-1	EMP	+/-
SEC1-8	EMP	+/-
SEC1-5	EMP	+/-
SEC1-6	EMP	+/-
SEC1-2	EMP	+/-
SEC1-7	EMP	+/-
199	Mixed-use	+/-
SH60	HSG/EMP	+/-

DRAFT

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

### C.4.1 Habitats Sites

C.4.1.1 Habitats sites are a network of nature protection areas which include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). There are no Habitats sites within Sandwell, with the nearest being 'Fens Pools' SAC located approximately 3km to the west, in Dudley. No Zone of Influence has been identified for 'Fens Pools' SAC to indicate areas where development could potentially result in significant adverse effects on its designated features, and therefore, at the time of writing the impact of all proposed sites on Habitats sites is uncertain. The emerging HRA of the SLP will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

### C.4.2 Sites of Special Scientific Interest

C.4.2.1 There are no Sites of Special Scientific Interest (SSSIs) within Sandwell Borough however nearby SSSIs include 'The Leasowes' and 'Doulton's Claypit' in the neighbouring borough of Dudley. All sites are located within IRZs which do not indicate the proposed use as a threat to nearby SSSIs, and as such, the proposed development at all sites would be likely to have a negligible impact on SSSIs.

### C.4.3 National Nature Reserves

C.4.3.1 There are no National Nature Reserves (NNRs) within Sandwell, with 'Wren's Nest' and 'Saltwells' NNRs in Dudley being the closest to the borough, located at their closest points approximately 800m and 700m to the west of Sandwell, respectively. None of the proposed sites within Sandwell are located in close proximity to these NNRs, and therefore, the proposed development at all sites would be unlikely to have a significant impact any NNR.

### C.4.4 Ancient Woodland

C.4.4.1 In Sandwell, there are some small areas of ancient woodland including 'Codsall Coppice' and 'Warley Rack Wood' in the south of the borough, and 'Dartmouth Golf Wood' and 'Chambers Wood' towards the north east. None of the proposed sites within Sandwell are located in close proximity to these areas of ancient woodland and therefore the proposed development at these sites would be unlikely to have a significant impact on any ancient woodland.

### C.4.5 Local Nature Reserves

C.4.5.1 There are nine Local Nature Reserves (LNR) within Sandwell, found within both the urban areas and Green Belt, including 'Sheepwash', 'Merrion Wood' and 'Sot's Hole with Bluebell Wood' LNRs. A small proportion of the proposed housing Site SH43 coincides with 'Forge

Mill Lake' LNR. Furthermore, seven sites are located in close proximity to LNRs, including the proposed housing Site SH13 which is located 120m from 'Saltwells' LNR and 180m from 'Mousesweet Brook' LNR, separated by some intervening development but the proposed introduction of 74 homes at the site could give rise to adverse effects. Therefore, the proposed development at these eight sites could potentially have a minor negative impact on these LNRs, due to an increased risk of development related threats and pressures. On the other hand, the remaining sites would be likely to have a negligible impact on LNRs, primarily due to being separated by existing built form.

#### C.4.6 Sites of Importance for Nature Conservation

C.4.6.1 Within Sandwell, there are 33 Sites of Importance for Nature Conservation (SINCs). A small proportion of housing/employment Site SH43 coincides with 'Forge Mill, Sandwell Valley' SINC. The proposed development at the site could potentially result in direct adverse impacts or possible loss of the SINC. A major negative impact would be expected.

C.4.6.2 Site SH30 is located adjacent to 'Ridgeacre Branch Canal' SINC and Site SH21 is located adjacent to 'Gower Branch Canal' SINC. The proposed development at these two sites could potentially have a minor negative impact on these SINCs, due to an increased risk of development related threats and pressures.

C.4.6.3 None of the remaining sites coincide with or are located adjacent to SINCs, and therefore, the proposed development at these sites would be less likely to significantly impact any SINC, although it is acknowledged that adverse effects such as from recreational pressure can arise at greater distances.

#### C.4.7 Sites of Local Importance for Nature Conservation

C.4.7.1 There are 71 Sites of Local Importance for Nature Conservation (SLINCs) found throughout Sandwell, but particularly in the south west and north east of the borough. 10 sites coincide with SLINCs, including Site SH43 which coincides with 'Tanhouse Avenue, Sandwell Valley' SLINC, and Site SH34 which coincides with 'Brandhall Golf Course' SLINC. Additionally, a further 17 sites are located adjacent to SLINCs. The proposed development at these 27 sites could potentially have a minor negative impact on these SLINCs due to an increased risk of development related threats and pressures.

C.4.7.2 The remaining sites do not coincide with, or are located adjacent to, any SLINC; therefore, the proposed development at these sites would be less likely to result in a significant impact on SLINCs, although it is acknowledged that adverse effects such as from recreational pressure can arise at greater distances.

#### C.4.8 Geological Sites

C.4.8.1 Geological sites have been identified throughout the Plan area, which form part of the Black Country Global Geopark<sup>3</sup>. These sites include a range of notable geological features and formations, including a number of SSSIs and SINCs. Within Sandwell, there are five

<sup>3</sup> Black Country Geopark (2023) Black Country Geopark. Available at: <https://blackcountrygeopark.dudley.gov.uk/bcg/>  
[Date accessed: 15/09/23]

geological sites found in the east and south west of the borough, including 'The Rowley Hills', 'Blue Rock Quarry SINC' and 'Bumble Hole & Warren's Park LNR'. The proposed development at all sites within Sandwell would be likely to have a negligible impact on geological sites as they do not coincide with any identified areas of geological importance.

### C.4.9 Priority Habitats

C.4.9.1 Some small extents of priority habitats are found throughout the Sandwell area, particularly concentrated in the Green Belt to the north east and include 'coastal and floodplain grazing marsh', 'good quality semi-improved grassland' and 'deciduous woodland'. A total of 16 sites coincide wholly or partially with priority habitats, including a large proportion of Sites 118 and 140 which coincide with 'deciduous woodland', and Site SH59 which contains large proportions of 'coastal and floodplain grazing marsh' covering the majority of the site. The proposed development at these 16 sites therefore would be likely to have a minor negative impact on these priority habitats due to the potential loss or degradation of these habitats. On the other hand, the remaining sites do not coincide with any identified priority habitat; therefore, the proposed development at these sites would be likely to have a negligible impact on the overall presence of priority habitats.

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

Site Reference	Site Use	Habitats Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRS	SINCS	SLINCS	Geological Sites	Priority Habitats
SEC3-181	EMP	+/-	0	0	0	0	0	0	0	0
SEC4-1	EMP	+/-	0	0	0	0	0	0	0	0
SEC3-9	HSG/EMP	+/-	0	0	0	0	0	-	0	0
SEC3-99	EMP	+/-	0	0	0	0	0	-	0	0
SH1	HSG	+/-	0	0	0	0	0	0	0	0
SEC3-113	HSG/EMP	+/-	0	0	0	0	0	0	0	0
SEC3-46	EMP	+/-	0	0	0	0	0	-	0	-
SEC3-175	HSG/EMP	+/-	0	0	0	0	0	0	0	0
SEC-36	HSG/EMP	+/-	0	0	0	-	0	0	0	0
SEC3-29	EMP	+/-	0	0	0	0	0	0	0	0
SEC3-148	HSG/EMP	+/-	0	0	0	0	0	0	0	0
SH2	HSG/EMP	+/-	0	0	0	0	0	0	0	0
SEC4-4	EMP	+/-	0	0	0	0	0	0	0	0
SEC3-191	HSG/EMP	+/-	0	0	0	0	0	0	0	0
SEC4-3	HSG/EMP	+/-	0	0	0	0	0	0	0	0
SEC3-133	HSG	+/-	0	0	0	0	0	-	0	0
SEC3-189	HSG/EMP	+/-	0	0	0	0	0	0	0	0
SEC3-22	HSG/EMP	+/-	0	0	0	0	0	-	0	0
SEC3-40	HSG/EMP	+/-	0	0	0	0	0	0	0	0
SEC1-4	EMP	+/-	0	0	0	0	0	0	0	-
SH3	HSG/EMP	+/-	0	0	0	0	0	0	0	0

Site Reference	Site Use	Habitats Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRs	SINCs	SLINCs	Geological Sites	Priority Habitats
SH4	HSG/EMP	+/-	0	0	0	0	0	0	0	0
SH5	HSG	+/-	0	0	0	-	0	-	0	0
SH6	HSG	+/-	0	0	0	0	0	0	0	0
SH7	HSG/GTTS	+/-	0	0	0	0	0	-	0	0
SH8	HSG	+/-	0	0	0	0	0	0	0	0
SH9	HSG	+/-	0	0	0	0	0	-	0	-
29	HSG	+/-	0	0	0	0	0	0	0	0
SH10	HSG	+/-	0	0	0	0	0	0	0	0
SH11	HSG	+/-	0	0	0	0	0	0	0	0
SH12	HSG	+/-	0	0	0	0	0	-	0	-
34	HSG	+/-	0	0	0	-	0	0	0	0
35	HSG/EMP	+/-	0	0	0	0	0	0	0	0
36	HSG	+/-	0	0	0	0	0	0	0	0
38	HSG	+/-	0	0	0	0	0	0	0	0
40	HSG	+/-	0	0	0	0	0	0	0	0
42	HSG	+/-	0	0	0	0	0	0	0	0
43	HSG	+/-	0	0	0	0	0	0	0	0
44	HSG	+/-	0	0	0	0	0	0	0	0
45	HSG/EMP	+/-	0	0	0	0	0	0	0	0
46	HSG	+/-	0	0	0	0	0	0	0	0
SH13	HSG	+/-	0	0	0	-	0	0	0	0
SH14	HSG	+/-	0	0	0	0	0	0	0	0
SH15	HSG	+/-	0	0	0	0	0	0	0	0
52	EMP	+/-	0	0	0	0	0	-	0	0
SH16	HSG	+/-	0	0	0	0	0	-	0	-
SH17	HSG/GTTS	+/-	0	0	0	0	0	-	0	0
SH18	HSG/EMP	+/-	0	0	0	0	0	-	0	-
56	HSG	+/-	0	0	0	0	0	0	0	-
SH19	HSG/EMP	+/-	0	0	0	0	0	-	0	0
SH20	HSG/EMP/GTTS	+/-	0	0	0	0	0	0	0	0
SH21	HSG/EMP	+/-	0	0	0	0	-	0	0	0
SH22	HSG/EMP	+/-	0	0	0	0	0	0	0	0
SH23	HSG	+/-	0	0	0	0	0	0	0	0
63	HSG/EMP	+/-	0	0	0	0	0	0	0	0
SH24	HSG	+/-	0	0	0	0	0	0	0	0
SH25	HSG/EMP	+/-	0	0	0	0	0	-	0	0
SH26	HSG/EMP	+/-	0	0	0	0	0	0	0	0
SH27	HSG/EMP	+/-	0	0	0	0	0	0	0	0
SH28	HSG/EMP	+/-	0	0	0	0	0	-	0	0
SH29	HSG/EMP	+/-	0	0	0	0	0	0	0	0
71	HSG	+/-	0	0	0	0	0	0	0	0
74	EMP	+/-	0	0	0	0	0	0	0	0

Site Reference	Site Use	Habitats Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRs	SINCs	SLINCs	Geological Sites	Priority Habitats
SH30	HSG/EMP	+/-	0	0	0	0	-	-	0	0
SH31	HSG/EMP/GTTS	+/-	0	0	0	0	0	0	0	0
SH32	HSG/EMP/GTTS	+/-	0	0	0	0	0	0	0	0
SH33	HSG/EMP/GTTS	+/-	0	0	0	0	0	0	0	0
SH34	HSG	+/-	0	0	0	0	0	-	0	-
SH35	HSG	+/-	0	0	0	-	0	-	0	-
SH36	HSG/EMP/GTTS	+/-	0	0	0	0	0	-	0	-
SH37	HSG	+/-	0	0	0	0	0	-	0	-
SEC3-66	EMP	+/-	0	0	0	0	0	-	0	-
SH38	HSG/EMP	+/-	0	0	0	0	0	0	0	0
91	HSG/EMP	+/-	0	0	0	0	0	0	0	0
SH39	HSG	+/-	0	0	0	0	0	0	0	0
SH40	HSG	+/-	0	0	0	0	0	0	0	0
SH41	HSG	+/-	0	0	0	0	0	0	0	-
SH42	HSG	+/-	0	0	0	0	0	0	0	0
SEC1-3	EMP	+/-	0	0	0	0	0	0	0	0
110	HSG/EMP	+/-	0	0	0	0	0	0	0	0
118	HSG	+/-	0	0	0	0	0	-	0	-
120	HSG	+/-	0	0	0	-	0	-	0	0
132	HSG	+/-	0	0	0	0	0	0	0	0
137	HSG	+/-	0	0	0	0	0	0	0	0
140	HSG	+/-	0	0	0	0	0	-	0	-
142	HSG	+/-	0	0	0	0	0	0	0	0
SH43	HSG	+/-	0	0	0	-	--	-	0	0
SH44	HSG	+/-	0	0	0	0	0	0	0	0
SH45	HSG	+/-	0	0	0	0	0	0	0	0
SH46	HSG	+/-	0	0	0	0	0	0	0	0
SH47	HSG	+/-	0	0	0	0	0	0	0	0
171	HSG	+/-	0	0	0	0	0	0	0	0
SH48	HSG	+/-	0	0	0	0	0	0	0	0
173	HSG	+/-	0	0	0	0	0	0	0	0
SH49	HSG	+/-	0	0	0	0	0	0	0	0
SH50	HSG	+/-	0	0	0	0	0	0	0	0
176	HSG	+/-	0	0	0	0	0	0	0	0
177	HSG	+/-	0	0	0	0	0	0	0	0
178	HSG	+/-	0	0	0	0	0	0	0	0
SH51	HSG	+/-	0	0	0	0	0	0	0	0
SH52	HSG	+/-	0	0	0	0	0	0	0	0
SH53	HSG	+/-	0	0	0	0	0	0	0	0
SH54	HSG	+/-	0	0	0	0	0	0	0	0
SH55	HSG	+/-	0	0	0	0	0	0	0	0
SH56	HSG	+/-	0	0	0	0	0	0	0	0

Site Reference	Site Use	Habitats Sites	SSSIs and IRZs	NINRs	Ancient Woodland	LNRs	SINCs	SLINCs	Geological Sites	Priority Habitats
SH57	HSG	+/-	0	0	0	0	0	0	0	0
SH58	HSG	+/-	0	0	0	0	0	0	0	0
SG1	GTTS	+/-	0	0	0	0	0	0	0	0
188	HSG	+/-	0	0	0	0	0	0	0	0
189	HSG	+/-	0	0	0	0	0	0	0	0
SH59	HSG	+/-	0	0	0	0	0	0	0	-
191	HSG	+/-	0	0	0	0	0	0	0	0
SH61	HSG	+/-	0	0	0	0	0	0	0	0
SEC1-1	EMP	+/-	0	0	0	-	0	0	0	0
SEC1-8	EMP	+/-	0	0	0	0	0	0	0	0
SEC1-5	EMP	+/-	0	0	0	0	0	0	0	0
SEC1-6	EMP	+/-	0	0	0	0	0	0	0	0
SEC1-2	EMP	+/-	0	0	0	0	0	0	0	0
SEC1-7	EMP	+/-	0	0	0	0	0	-	0	0
199	Mixed-use	+/-	0	0	0	0	0	0	0	0
SH60	HSG/EMP	+/-	0	0	0	0	0	0	0	0

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

### C.5.1 Potential Increase in Carbon Footprint

- C.5.1.1 Residential-led development is likely to result in an increase in carbon emissions, to some extent. 51 sites proposed solely for residential use are identified as having capacity for the development of 120 dwellings or less. The proposed development at these sites would be likely to result in a negligible contribution to Sandwell’s total carbon emissions.
- C.5.1.2 15 sites proposed solely for residential use are identified as having capacity for the development of between 121 and 1,120 dwellings. The proposed development at these sites could potentially increase local carbon emissions, as a proportion of Sandwell’s total, by more than 0.1%. Therefore, a minor negative impact on Sandwell’s carbon emissions would be expected at these 14 sites.
- C.5.1.3 The carbon emissions likely to be generated as a result of non-residential development is uncertain. This would be entirely dependent on the nature and scale of the employment land proposed, which is unknown at present. The nature and design of pitches/plots which could be developed at GTTS sites is also unknown and therefore the potential increase in carbon footprint associated with Site SG1 (proposed solely for GTTS use) is also uncertain. Therefore, the 37 sites which are identified as reasonable alternatives for multiple uses (i.e. the sites could potentially be developed for residential, employment and/or GTTS use) are also recorded as uncertain for the purpose of this assessment.
- C.5.1.4 Site 199 is proposed for mixed-use development and has a housing capacity of 200 dwellings. Therefore, the proposed development at this site would expect to have a minor negative impact on Sandwell’s carbon emissions.

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

Site Reference	Site Use	Potential increase in carbon footprint
SEC3-181	EMP	+/-
SEC4-1	EMP	+/-
SEC3-9	HSG/EMP	+/-
SEC3-99	EMP	+/-
SH1	HSG	0
SEC3-113	HSG/EMP	+/-
SEC3-46	EMP	+/-
SEC3-175	HSG/EMP	+/-
SEC-36	HSG/EMP	+/-
SEC3-29	EMP	+/-
SEC3-148	HSG/EMP	+/-
SH2	HSG/EMP	+/-
SEC4-4	EMP	+/-
SEC3-191	HSG/EMP	+/-

Site Reference	Site Use	Potential increase in carbon footprint
SEC4-3	HSG/EMP	+/-
SEC3-133	HSG	0
SEC3-189	HSG/EMP	+/-
SEC3-22	HSG/EMP	+/-
SEC3-40	HSG/EMP	+/-
SEC1-4	EMP	+/-
SH3	HSG/EMP	+/-
SH4	HSG/EMP	+/-
SH5	HSG	0
SH6	HSG	-
SH7	HSG/GTTS	+/-
SH8	HSG	0
SH9	HSG	0
29	HSG	0
SH10	HSG	0
SH11	HSG	-
SH12	HSG	0
34	HSG	0
35	HSG/EMP	+/-
36	HSG	0
38	HSG	0
40	HSG	0
42	HSG	0
43	HSG	0
44	HSG	0
45	HSG/EMP	+/-
46	HSG	0
SH13	HSG	0
SH14	HSG	0
SH15	HSG	0
52	EMP	+/-
SH16	HSG	-
SH17	HSG/GTTS	+/-
SH18	HSG/EMP	+/-
56	HSG	0
SH19	HSG/EMP	+/-
SH20	HSG/EMP/GTTS	+/-
SH21	HSG/EMP	+/-
SH22	HSG/EMP	+/-
SH23	HSG	0
63	HSG/EMP	+/-
SH24	HSG	0
SH25	HSG/EMP	+/-
SH26	HSG/EMP	+/-

Site Reference	Site Use	Potential increase in carbon footprint
SH27	HSG/EMP	+/-
SH28	HSG/EMP	+/-
SH29	HSG/EMP	+/-
71	HSG	0
74	EMP	+/-
SH30	HSG/EMP	+/-
SH31	HSG/EMP/GTTS	+/-
SH32	HSG/EMP/GTTS	+/-
SH33	HSG/EMP/GTTS	+/-
SH34	HSG	-
SH35	HSG	-
SH36	HSG/EMP/GTTS	+/-
SH37	HSG	-
SEC3-66	EMP	+/-
SH38	HSG/EMP	+/-
91	HSG/EMP	+/-
SH39	HSG	0
SH40	HSG	0
SH41	HSG	-
SH42	HSG	0
SEC1-3	EMP	+/-
110	HSG/EMP	+/-
118	HSG	0
120	HSG	0
132	HSG	0
137	HSG	0
140	HSG	0
142	HSG	0
SH43	HSG	0
SH44	HSG	0
SH45	HSG	0
SH46	HSG	0
SH47	HSG	0
171	HSG	-
SH48	HSG	0
173	HSG	0
SH49	HSG	-
SH50	HSG	0
176	HSG	0
177	HSG	-
178	HSG	-
SH51	HSG	0
SH52	HSG	-
SH53	HSG	0

Site Reference	Site Use	Potential increase in carbon footprint
SH54	HSG	-
SH55	HSG	0
SH56	HSG	0
SH57	HSG	0
SH58	HSG	-
SG1	GTTS	+/-
188	HSG	0
189	HSG	0
SH59	HSG	0
191	HSG	0
SH61	HSG	0
SEC1-1	EMP	+/-
SEC1-8	EMP	+/-
SEC1-5	EMP	+/-
SEC1-6	EMP	+/-
SEC1-2	EMP	+/-
SEC1-7	EMP	+/-
199	Mixed-use	-
SH60	HSG/EMP	+/-

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

### C.6.1 Flood Zones

C.6.1.1 Flood Zones 2 and 3 occur alongside watercourses throughout the borough, such as the River Tame, with the majority of areas at risk of fluvial flooding found towards the north. The majority of sites are located wholly within Flood Zone 1 and therefore would be expected to have a minor positive impact on flooding, as the proposed development at these sites would be likely to locate site end users away from areas at risk of fluvial flooding.

C.6.1.2 However, nine sites (SH5, SH16, SH28, SH35, SH36, 132, SH59, SEC1-7, and 199) are largely located or partially located within Flood Zone 3; therefore, the proposed development at these sites could potentially have a major negative impact on flooding in the area and exacerbate existing issues of flooding in Sandwell. Additionally, Sites SH2 and 110 are located partially within Flood Zone 2, and therefore, the proposed development at these two sites could potentially have a minor negative impact on flooding.

### C.6.2 Indicative Flood Zone 3b

C.6.2.1 Indicative Flood Zone 3b is present in areas where flooding will potentially worsen in the future due to climate change, areas of which are scattered throughout Sandwell generally covering areas currently within Flood Zone 3a according to the Level 1 Strategic Flood Risk Assessment (SFRA)<sup>4</sup>. Five sites (SEC3-9, SH35, SH36, 110, SH59) coincide with Indicative Flood Zone 3b. Therefore, the proposed development at these five sites could potentially have a major negative impact on flooding and may exacerbate existing issues of flooding in Sandwell.

C.6.2.2 There are no other sites within Sandwell which are located within Indicative Flood Zone 3b, and therefore, the remaining sites could potentially have a negligible impact on contributing to flooding issues in the future, although further site-specific assessments and reference to emerging data would help to provide a more accurate picture of changing flood risk due to climate change.

### C.6.3 Surface Water Flood Risk

C.6.3.1 Surface Water Flood Risk (SWFR) is categorised into low (1/1000), medium (1/100) and high (1/30) in relation to the probability of surface water flooding occurring in a given area. Areas affected by surface water flooding can be found throughout Sandwell, in particular along roads, as well as within urban parkland, and associated with ponds and watercourses. 36 sites coincide with an area of high SWFR, and therefore, the proposed development at these sites could potentially have a major negative impact on surface

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<sup>4</sup> JBA Consulting (2020) The Black Country Authorities Level 1 Strategic Flood Risk Assessment Final Report 25<sup>th</sup> June 2020. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date accessed: 20/06/23]

water flooding in the area, as development would be likely to locate site end users in areas at high risk of surface water flooding as well as exacerbate pluvial flood risk in surrounding locations.

C.6.3.2 Additionally, a further 52 sites coincide with areas of low and/or medium SWFR, and as such, the proposed development at these sites could potentially have a minor negative impact on surface water flooding in the area.

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

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

Site Reference	Site Use	Fluvial Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
SEC3-181	EMP	+	0	-
SEC4-1	EMP	+	0	--
SEC3-9	HSG/EMP	+	--	-
SEC3-99	EMP	+	0	-
SH1	HSG	+	0	0
SEC3-113	HSG/EMP	+	0	-
SEC3-46	EMP	+	0	--
SEC3-175	HSG/EMP	+	0	0
SEC-36	HSG/EMP	+	0	-
SEC3-29	EMP	+	0	-
SEC3-148	HSG/EMP	+	0	--
SH2	HSG/EMP	-	0	--
SEC4-4	EMP	+	0	0
SEC3-191	HSG/EMP	+	0	--
SEC4-3	HSG/EMP	+	0	-
SEC3-133	HSG	+	0	-
SEC3-189	HSG/EMP	+	0	-
SEC3-22	HSG/EMP	+	0	-
SEC3-40	HSG/EMP	+	0	--
SEC1-4	EMP	+	0	--
SH3	HSG/EMP	+	0	--
SH4	HSG/EMP	+	0	0
SH5	HSG	--	0	--
SH6	HSG	+	0	-
SH7	HSG/GTTS	+	0	-
SH8	HSG	+	0	0
SH9	HSG	+	0	-
29	HSG	+	0	-
SH10	HSG	+	0	0
SH11	HSG	+	0	-
SH12	HSG	+	0	0
34	HSG	+	0	-
35	HSG/EMP	+	0	-
36	HSG	+	0	-

Site Reference	Site Use	Fluvial Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
38	HSG	+	0	0
40	HSG	+	0	-
42	HSG	+	0	-
43	HSG	+	0	0
44	HSG	+	0	-
45	HSG/EMP	+	0	0
46	HSG	+	0	0
SH13	HSG	+	0	-
SH14	HSG	+	0	--
SH15	HSG	+	0	-
52	EMP	+	0	-
SH16	HSG	--	0	-
SH17	HSG/GTTS	+	0	-
SH18	HSG/EMP	+	0	--
56	HSG	+	0	-
SH19	HSG/EMP	+	0	-
SH20	HSG/EMP/GTTS	+	0	-
SH21	HSG/EMP	+	0	0
SH22	HSG/EMP	+	0	-
SH23	HSG	+	0	-
63	HSG/EMP	+	0	0
SH24	HSG	+	0	0
SH25	HSG/EMP	+	0	--
SH26	HSG/EMP	+	0	--
SH27	HSG/EMP	+	0	-
SH28	HSG/EMP	--	0	-
SH29	HSG/EMP	+	0	--
71	HSG	+	0	0
74	EMP	+	0	-
SH30	HSG/EMP	+	0	-
SH31	HSG/EMP/GTTS	+	0	--
SH32	HSG/EMP/GTTS	+	0	0
SH33	HSG/EMP/GTTS	+	0	-
SH34	HSG	+	0	0
SH35	HSG	--	--	--
SH36	HSG/EMP/GTTS	--	--	-
SH37	HSG	+	0	--
SEC3-66	EMP	+	0	-
SH38	HSG/EMP	+	0	--
91	HSG/EMP	+	0	-
SH39	HSG	+	0	0
SH40	HSG	+	0	--
SH41	HSG	+	0	--
SH42	HSG	+	0	-
SEC1-3	EMP	+	0	-

Site Reference	Site Use	Fluvial Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
110	HSG/EMP	-	--	0
118	HSG	+	0	-
120	HSG	+	0	0
132	HSG	--	0	--
137	HSG	+	0	0
140	HSG	+	0	0
142	HSG	+	0	0
SH43	HSG	+	0	-
SH44	HSG	+	0	0
SH45	HSG	+	0	0
SH46	HSG	+	0	--
SH47	HSG	+	0	0
171	HSG	+	0	-
SH48	HSG	+	0	--
173	HSG	+	0	--
SH49	HSG	+	0	0
SH50	HSG	+	0	-
176	HSG	+	0	0
177	HSG	+	0	-
178	HSG	+	0	--
SH51	HSG	+	0	0
SH52	HSG	+	0	-
SH53	HSG	+	0	-
SH54	HSG	+	0	--
SH55	HSG	+	0	--
SH56	HSG	+	0	0
SH57	HSG	+	0	--
SH58	HSG	+	0	-
SG1	GTTS	+	0	--
188	HSG	+	0	0
189	HSG	+	0	0
SH59	HSG	--	--	-
191	HSG	+	0	-
SH61	HSG	+	0	--
SEC1-1	EMP	+	0	--
SEC1-8	EMP	+	0	0
SEC1-5	EMP	+	0	--
SEC1-6	EMP	+	0	--
SEC1-2	EMP	+	0	-
SEC1-7	EMP	--	0	--
199	Mixed-use	--	0	--
SH60	HSG/EMP	+	0	--

## C.7 SA Objective 6: Natural Resources

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

C.7.1.1 Sandwell is principally built-up, although it also contains a range of large green spaces distributed throughout the borough and a small proportion of undeveloped Green Belt land in the north east.

C.7.1.2 51 sites in Sandwell wholly comprise previously developed land which would be likely to have little or no environmental value. The proposed development at these sites would be expected to have a minor positive impact on natural resources as development would be classed as an efficient use of land.

C.7.1.3 There are 20 sites which wholly comprise greenfield land and are likely to contain areas of environmental value such as hedgerows, trees and scrub that would expect to be lost upon development. Furthermore, 50 sites are partially previously developed / brownfield sites but also include areas of environmental value that could additionally be lost or degraded by the proposed development. The proposed development at these 70 sites would be expected to have a minor negative impact on natural resources due to the potential loss of ecologically or environmentally valuable soil resources.

### C.7.2 Agricultural Land Classification

C.7.2.1 The land within Sandwell Borough is almost entirely 'Urban' according to the Agricultural Land Classification (ALC), with a small proportion of 'Non-Agricultural' and Grade 4 land in the north east. Only a very small area in the north east, within Sandwell Valley Country Park, is classed as Grade 3, which potentially represents some of the 'best and most versatile' (BMV) land within Sandwell.

C.7.2.2 The proposed development at the 70 sites within Sandwell which wholly or partially comprise previously undeveloped land would be likely to have a minor positive impact on natural resources due to being located upon areas of less agriculturally important 'Urban' and/or 'Non-Agricultural' land, which would help to prevent the loss of BMV land across the Plan area.

C.7.2.3 The proposed development at the 51 sites which are located wholly on previously developed land would be likely to have a negligible impact on agricultural land.

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

C.7.3.1 There are no Mineral Safeguarding Areas (MSAs) or Areas of Search (AOS) identified within Sandwell. All proposed sites in Sandwell would be expected to result in a negligible impact on mineral resources.

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

Site Reference	Site Use	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Areas / Areas of Search
SEC3-181	EMP	+	0	0
SEC4-1	EMP	-	+	0
SEC3-9	HSG/EMP	+	0	0
SEC3-99	EMP	+	0	0
SH1	HSG	+	0	0
SEC3-113	HSG/EMP	+	0	0
SEC3-46	EMP	-	+	0
SEC3-175	HSG/EMP	+	0	0
SEC-36	HSG/EMP	+	0	0
SEC3-29	EMP	-	+	0
SEC3-148	HSG/EMP	+	0	0
SH2	HSG/EMP	-	+	0
SEC4-4	EMP	-	+	0
SEC3-191	HSG/EMP	-	+	0
SEC4-3	HSG/EMP	+	0	0
SEC3-133	HSG	-	+	0
SEC3-189	HSG/EMP	-	+	0
SEC3-22	HSG/EMP	-	+	0
SEC3-40	HSG/EMP	-	+	0
SEC1-4	EMP	-	+	0
SH3	HSG/EMP	+	0	0
SH4	HSG/EMP	-	+	0
SH5	HSG	-	+	0
SH6	HSG	-	+	0
SH7	HSG/GTTS	-	+	0
SH8	HSG	+	0	0
SH9	HSG	-	+	0
29	HSG	+	0	0
SH10	HSG	-	+	0
SH11	HSG	-	+	0
SH12	HSG	+	0	0
34	HSG	-	+	0
35	HSG/EMP	+	0	0
36	HSG	-	+	0
38	HSG	+	0	0
40	HSG	+	0	0
42	HSG	-	+	0
43	HSG	-	+	0
44	HSG	-	+	0
45	HSG/EMP	-	+	0
46	HSG	+	0	0

Site Reference	Site Use	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Areas / Areas of Search
SH13	HSG	+	0	0
SH14	HSG	+	0	0
SH15	HSG	+	0	0
52	EMP	+	0	0
SH16	HSG	-	+	0
SH17	HSG/GTTS	+	0	0
SH18	HSG/EMP	-	+	0
56	HSG	-	+	0
SH19	HSG/EMP	-	+	0
SH20	HSG/EMP/GTTS	-	+	0
SH21	HSG/EMP	+	0	0
SH22	HSG/EMP	-	+	0
SH23	HSG	+	0	0
63	HSG/EMP	-	+	0
SH24	HSG	+	0	0
SH25	HSG/EMP	+	0	0
SH26	HSG/EMP	-	+	0
SH27	HSG/EMP	+	0	0
SH28	HSG/EMP	+	0	0
SH29	HSG/EMP	+	0	0
71	HSG	-	+	0
74	EMP	+	0	0
SH30	HSG/EMP	+	0	0
SH31	HSG/EMP/GTTS	-	+	0
SH32	HSG/EMP/GTTS	+	0	0
SH33	HSG/EMP/GTTS	-	+	0
SH34	HSG	-	+	0
SH35	HSG	-	+	0
SH36	HSG/EMP/GTTS	-	+	0
SH37	HSG	-	+	0
SEC3-66	EMP	-	+	0
SH38	HSG/EMP	+	0	0
91	HSG/EMP	+	0	0
SH39	HSG	+	0	0
SH40	HSG	+	0	0
SH41	HSG	-	+	0
SH42	HSG	+	0	0
SEC1-3	EMP	-	+	0
110	HSG/EMP	-	+	0
118	HSG	-	+	0
120	HSG	-	+	0
132	HSG	-	+	0

Site Reference	Site Use	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Areas / Areas of Search
137	HSG	-	+	0
140	HSG	-	+	0
142	HSG	-	+	0
SH43	HSG	-	+	0
SH44	HSG	-	+	0
SH45	HSG	+	0	0
SH46	HSG	-	+	0
SH47	HSG	-	+	0
171	HSG	+	0	0
SH48	HSG	+	0	0
173	HSG	+	0	0
SH49	HSG	+	0	0
SH50	HSG	-	+	0
176	HSG	-	+	0
177	HSG	+	0	0
178	HSG	+	0	0
SH51	HSG	-	+	0
SH52	HSG	+	0	0
SH53	HSG	+	0	0
SH54	HSG	-	+	0
SH55	HSG	-	+	0
SH56	HSG	+	0	0
SH57	HSG	+	0	0
SH58	HSG	-	+	0
SG1	GTTS	-	+	0
188	HSG	-	+	0
189	HSG	-	+	0
SH59	HSG	-	+	0
191	HSG	-	+	0
SH61	HSG	+	0	0
SEC1-1	EMP	+	0	0
SEC1-8	EMP	-	+	0
SEC1-5	EMP	-	+	0
SEC1-6	EMP	+	0	0
SEC1-2	EMP	-	+	0
SEC1-7	EMP	-	+	0
199	Mixed-use	-	+	0
SH60	HSG/EMP	-	+	0

## C.8 SA Objective 7: Pollution

### C.8.1 Air Quality Management Area

C.8.1.1 The entirety of Sandwell borough is classed as 'Sandwell Air Quality Management Area' (AQMA). All sites are located wholly within this AQMA, whilst several sites are also located partially within 200m of the adjacent 'Walsall AQMA', 'Birmingham AQMA' or 'Dudley AQMA'. The proposed development at all sites would be likely to locate site end users in areas of existing poor air quality and have a minor negative impact on air pollution.

### C.8.2 Main Road

C.8.2.1 Many major roads pass through Sandwell, including the A34, A4041, M5, and the M6 Motorway. 59 of the sites proposed within Sandwell are located within 200m of a main road, including Site 137 which is adjacent to the M6 and Sites 35, 91, and SEC1-3 which are adjacent to the M5. Therefore, the proposed development at these 59 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.

C.8.2.2 The proposed development at the remaining sites which are over 200m from a main road would be expected to have a negligible impact on transport associated air and noise pollution associated with main roads.

### C.8.3 Watercourse

C.8.3.1 There are several watercourses within Sandwell, including the River Tame and various canals and brooks. 24 sites coincide with or are located within 10m of various watercourses. The proposed development at these sites would be likely to increase the risk of contamination of these watercourses, and therefore have a minor negative impact on water quality.

C.8.3.2 The remaining 97 sites which are located over 10m from watercourses are less likely to have a significant impact on the quality of watercourses, however, each site would need to be evaluated according to land use type, size of development and exact location. The proposed development at all sites has the potential to lead to adverse impacts such as those resulting from runoff. At this stage, the potential effects of these 97 sites on water quality are uncertain and would depend upon implementation.

### C.8.4 Groundwater Source Protection Zone

C.8.4.1 Source Protection Zones (SPZs) for groundwater within Sandwell are located only within the south east of the borough. SPZs are grouped from 1 to 3 based on the level of protection that the groundwater requires. 13 sites in Sandwell are located within the total catchment (zone 3) of this SPZ. The proposed development at these sites could potentially increase the risk of groundwater contamination within the SPZ and have a minor negative impact on the quality or status of groundwater resources.

C.8.4.2 The remaining sites in Sandwell do not coincide with the catchment of any SPZ; therefore, the proposed development at these 108 sites would be expected to have a negligible impact on quality or status of groundwater.

### C.8.5 Potential Increase in Air Pollution

C.8.5.1 18 sites proposed solely for residential use are identified as having capacity for the development of 100 or more dwellings and Site SEC3-66 is proposed solely for non-residential use and comprises more than 1ha. The proposed development at these 19 sites could potentially result in a significant increase in local air pollution; therefore, a major negative impact would be expected.

C.8.5.2 47 sites proposed solely for residential use are identified as having capacity for the development of between ten and 99 dwellings, and 12 sites are proposed solely for non-residential end use and comprise between one and 10ha. Therefore, the proposed development at these 59 sites could potentially have a minor negative impact on air pollution in the local area.

C.8.5.3 Four proposed employment sites SEC3-181, SEC3-46, 74, and SEC1-8 comprise less than 1ha and would be expected to have a negligible impact on local air pollution.

C.8.5.4 37 sites are identified as reasonable alternatives for multiple uses (i.e. the sites could potentially be developed for residential, employment and/or GTTS use) and therefore at the time of writing the potential increase air pollution as a result of construction and occupation is uncertain. However, a negative impact would be expected to a certain degree.

C.8.5.5 The nature and design of pitches/plots which could be developed at GTTS sites is unknown at present. Therefore, potential increases in air pollution as a result of the construction and occupation of Site 187 (proposed solely for GTTS use) are uncertain.

C.8.5.6 Site 199 is proposed for mixed-use development and has a housing capacity of 200 dwellings. Therefore, the proposed development at this site would expect to have a major negative impact on air pollution.

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

Site Reference	Site Use	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
SEC3-181	EMP	-	0	+/-	0	0
SEC4-1	EMP	-	-	+/-	0	-
SEC3-9	HSG/EMP	-	0	+/-	0	+/-
SEC3-99	EMP	-	-	+/-	0	-
SH1	HSG	-	-	+/-	0	-
SEC3-113	HSG/EMP	-	-	+/-	0	+/-
SEC3-46	EMP	-	0	+/-	0	0
SEC3-175	HSG/EMP	-	-	-	0	+/-
SEC-36	HSG/EMP	-	-	+/-	0	+/-

Site Reference	Site Use	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
SEC3-29	EMP	-	-	+/-	0	-
SEC3-148	HSG/EMP	-	-	-	0	+/-
SH2	HSG/EMP	-	-	-	0	+/-
SEC4-4	EMP	-	0	+/-	-	-
SEC3-191	HSG/EMP	-	0	+/-	0	+/-
SEC4-3	HSG/EMP	-	0	+/-	0	+/-
SEC3-133	HSG	-	-	+/-	0	-
SEC3-189	HSG/EMP	-	0	-	0	+/-
SEC3-22	HSG/EMP	-	0	+/-	0	+/-
SEC3-40	HSG/EMP	-	-	+/-	0	+/-
SEC1-4	EMP	-	-	+/-	0	-
SH3	HSG/EMP	-	-	+/-	0	+/-
SH4	HSG/EMP	-	-	+/-	0	+/-
SH5	HSG	-	-	+/-	0	-
SH6	HSG	-	-	+/-	0	--
SH7	HSG/GTTS	-	-	-	0	+/-
SH8	HSG	-	0	+/-	0	-
SH9	HSG	-	0	+/-	0	-
29	HSG	-	0	+/-	0	-
SH10	HSG	-	0	+/-	0	-
SH11	HSG	-	0	+/-	0	--
SH12	HSG	-	0	+/-	0	-
34	HSG	-	0	+/-	0	-
35	HSG/EMP	-	-	+/-	0	+/-
36	HSG	-	0	+/-	0	-
38	HSG	-	-	+/-	-	-
40	HSG	-	0	+/-	0	-
42	HSG	-	-	+/-	0	-
43	HSG	-	-	+/-	0	-
44	HSG	-	0	+/-	0	-
45	HSG/EMP	-	0	+/-	0	+/-
46	HSG	-	0	+/-	0	-
SH13	HSG	-	-	+/-	0	-
SH14	HSG	-	0	-	0	-
SH15	HSG	-	0	+/-	0	-
52	EMP	-	0	-	0	--
SH16	HSG	-	-	-	0	--
SH17	HSG/GTTS	-	0	+/-	0	+/-
SH18	HSG/EMP	-	0	+/-	0	+/-
56	HSG	-	0	+/-	-	-
SH19	HSG/EMP	-	0	+/-	0	+/-
SH20	HSG/EMP/GTTS	-	-	+/-	0	+/-
SH21	HSG/EMP	-	-	-	0	+/-

Site Reference	Site Use	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
SH22	HSG/EMP	-	0	+/-	0	+/-
SH23	HSG	-	-	+/-	0	-
63	HSG/EMP	-	-	+/-	0	+/-
SH24	HSG	-	0	+/-	0	-
SH25	HSG/EMP	-	-	+/-	0	+/-
SH26	HSG/EMP	-	-	-	0	+/-
SH27	HSG/EMP	-	-	+/-	0	+/-
SH28	HSG/EMP	-	0	+/-	0	+/-
SH29	HSG/EMP	-	-	+/-	0	+/-
71	HSG	-	0	+/-	0	-
74	EMP	-	-	+/-	0	0
SH30	HSG/EMP	-	-	+/-	0	+/-
SH31	HSG/EMP/GTTS	-	-	+/-	0	+/-
SH32	HSG/EMP/GTTS	-	0	+/-	0	+/-
SH33	HSG/EMP/GTTS	-	0	+/-	0	+/-
SH34	HSG	-	-	-	0	--
SH35	HSG	-	0	-	0	--
SH36	HSG/EMP/GTTS	-	0	-	0	+/-
SH37	HSG	-	0	+/-	0	--
SEC3-66	EMP	-	0	-	-	--
SH38	HSG/EMP	-	-	-	0	+/-
91	HSG/EMP	-	-	-	0	+/-
SH39	HSG	-	-	+/-	0	-
SH40	HSG	-	0	+/-	0	-
SH41	HSG	-	-	-	-	--
SH42	HSG	-	0	+/-	0	-
SEC1-3	EMP	-	-	+/-	0	-
110	HSG/EMP	-	-	+/-	0	+/-
118	HSG	-	-	+/-	0	-
120	HSG	-	0	+/-	0	--
132	HSG	-	0	+/-	0	--
137	HSG	-	-	+/-	0	-
140	HSG	-	0	+/-	0	-
142	HSG	-	0	+/-	0	-
SH43	HSG	-	0	+/-	0	-
SH44	HSG	-	0	+/-	0	-
SH45	HSG	-	0	+/-	0	-
SH46	HSG	-	-	+/-	0	-
SH47	HSG	-	-	-	0	-
171	HSG	-	-	+/-	0	--
SH48	HSG	-	-	+/-	0	-
173	HSG	-	-	+/-	0	-
SH49	HSG	-	0	+/-	0	--

Site Reference	Site Use	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
SH50	HSG	-	-	+/-	0	-
176	HSG	-	0	+/-	0	-
177	HSG	-	0	+/-	0	--
178	HSG	-	0	+/-	0	--
SH51	HSG	-	-	+/-	0	-
SH52	HSG	-	-	+/-	0	--
SH53	HSG	-	-	+/-	-	-
SH54	HSG	-	0	-	-	--
SH55	HSG	-	-	+/-	-	--
SH56	HSG	-	0	+/-	-	-
SH57	HSG	-	0	+/-	-	-
SH58	HSG	-	0	+/-	-	--
SG1	GTTS	-	0	+/-	0	+/-
188	HSG	-	-	-	0	-
189	HSG	-	0	+/-	0	-
SH59	HSG	-	-	-	0	-
191	HSG	-	-	-	-	-
SH61	HSG	-	-	+/-	-	-
SEC1-1	EMP	-	0	-	0	-
SEC1-8	EMP	-	0	+/-	0	0
SEC1-5	EMP	-	0	+/-	0	-
SEC1-6	EMP	-	0	-	0	-
SEC1-2	EMP	-	-	+/-	0	-
SEC1-7	EMP	-	0	+/-	0	-
199	Mixed-use	-	0	+/-	0	--
SH60	HSG/EMP	-	-	+/-	0	+/-

## C.9 SA Objective 8: Waste

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

- C.9.1.1 Residential-led development is likely to result in an increase in household waste generation, to some extent.
- C.9.1.2 52 sites proposed solely for residential development are identified as having capacity for the development of 130 dwellings or less. The proposed development at these sites would be expected to have a negligible impact on household waste generation in comparison to current levels.
- C.9.1.3 13 sites proposed solely for residential development are identified as having capacity for the development of between 131 and 1,313 dwellings. The proposed development at these sites would be expected to increase household waste generation by more than 0.1% in comparison to current levels. Therefore, the proposed development at these sites could potentially result in a minor negative impact on household waste generation.
- C.9.1.4 Site 199 is proposed for mixed-use development and has a housing capacity of 200 dwellings. Therefore, the site would expect to have a minor negative impact on household waste generation.
- C.9.1.5 The waste likely to be generated as a result of non-residential development is uncertain and therefore the impact of the proposed development at 15 employment sites is uncertain. Furthermore, the nature and design of pitches/plots which could be developed at the GTTS site 187 is unknown at present. Therefore, potential increases in household waste generation as a result of the construction and occupation of this site is also uncertain.
- C.9.1.6 37 sites are identified as reasonable alternatives for multiple uses (i.e. the sites could potentially be developed for residential, employment and/or GTTS use). The waste likely to be generated from the proposed development at these sites is therefore uncertain.

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

Site Reference	Site Use	Potential Increase in Household Waste Generation
SEC3-181	EMP	+/-
SEC4-1	EMP	+/-
SEC3-9	HSG/EMP	+/-
SEC3-99	EMP	+/-
SH1	HSG	0
SEC3-113	HSG/EMP	+/-
SEC3-46	EMP	+/-
SEC3-175	HSG/EMP	+/-
SEC-36	HSG/EMP	+/-
SEC3-29	EMP	+/-
SEC3-148	HSG/EMP	+/-
SH2	HSG/EMP	+/-

Site Reference	Site Use	Potential Increase in Household Waste Generation
SEC4-4	EMP	+/-
SEC3-191	HSG/EMP	+/-
SEC4-3	HSG/EMP	0
SEC3-133	HSG	+/-
SEC3-189	HSG/EMP	+/-
SEC3-22	HSG/EMP	+/-
SEC3-40	HSG/EMP	+/-
SEC1-4	EMP	+/-
SH3	HSG/EMP	+/-
SH4	HSG/EMP	+/-
SH5	HSG	0
SH6	HSG	-
SH7	HSG/GTTS	+/-
SH8	HSG	0
SH9	HSG	0
29	HSG	0
SH10	HSG	0
SH11	HSG	-
SH12	HSG	0
34	HSG	0
35	HSG/EMP	+/-
36	HSG	0
38	HSG	0
40	HSG	0
42	HSG	0
43	HSG	0
44	HSG	0
45	HSG/EMP	+/-
46	HSG	0
SH13	HSG	0
SH14	HSG	0
SH15	HSG	0
52	EMP	+/-
SH16	HSG	-
SH17	HSG/GTTS	+/-
SH18	HSG/EMP	+/-
56	HSG	0
SH19	HSG/EMP	+/-
SH20	HSG/EMP/GTTS	+/-
SH21	HSG/EMP	+/-
SH22	HSG/EMP	+/-
SH23	HSG	0
63	HSG/EMP	+/-
SH24	HSG	0
SH25	HSG/EMP	+/-

Site Reference	Site Use	Potential Increase in Household Waste Generation
SH26	HSG/EMP	+/-
SH27	HSG/EMP	+/-
SH28	HSG/EMP	+/-
SH29	HSG/EMP	+/-
71	HSG	0
74	EMP	+/-
SH30	HSG/EMP	+/-
SH31	HSG/EMP/GTTS	+/-
SH32	HSG/EMP/GTTS	+/-
SH33	HSG/EMP/GTTS	+/-
SH34	HSG	-
SH35	HSG	-
SH36	HSG/EMP/GTTS	+/-
SH37	HSG	-
SEC3-66	EMP	+/-
SH38	HSG/EMP	+/-
91	HSG/EMP	+/-
SH39	HSG	0
SH40	HSG	0
SH41	HSG	-
SH42	HSG	0
SEC1-3	EMP	+/-
110	HSG/EMP	+/-
118	HSG	0
120	HSG	0
132	HSG	0
137	HSG	0
140	HSG	0
142	HSG	0
SH43	HSG	0
SH44	HSG	0
SH45	HSG	0
SH46	HSG	0
SH47	HSG	0
171	HSG	-
SH48	HSG	0
173	HSG	0
SH49	HSG	-
SH50	HSG	0
176	HSG	0
177	HSG	-
178	HSG	-
SH51	HSG	0
SH52	HSG	-
SH53	HSG	0

Site Reference	Site Use	Potential Increase in Household Waste Generation
SH54	HSG	0
SH55	HSG	0
SH56	HSG	0
SH57	HSG	0
SH58	HSG	-
SG1	GTTS	+/-
188	HSG	0
189	HSG	0
SH59	HSG	0
191	HSG	0
SH61	HSG	0
SEC1-1	EMP	+/-
SEC1-8	EMP	+/-
SEC1-5	EMP	+/-
SEC1-6	EMP	+/-
SEC1-2	EMP	+/-
SEC1-7	EMP	+/-
199	Mixed-use	-
SH60	HSG/EMP	+/-

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

### C.10.1 Bus Stop

C.10.1.1 In Sandwell, there are many bus stops, which would be expected to generally provide good public transport access, with the exception of some small areas to the east of the borough and pockets in the centre where bus stops are more thinly distributed. The majority of sites within Sandwell are located within 400m of a bus stop (118 sites in total), and therefore, the proposed development at these sites would be expected to have a minor positive impact on access to sustainable transport options.

C.10.1.2 Three sites (SH18, SH35, and SH36) are located wholly or partially outside of the sustainable distance of 400m from a bus stop providing regular services, and therefore, the proposed development at these sites could potentially have a minor negative impact on site end users' access to sustainable transport.

### C.10.2 Railway Station

C.10.2.1 There are several railway stations located within the borough of Sandwell, as well as many metro stations located along the West Midlands Metro line which goes through West Bromwich Central Station. A large proportion of the borough would be expected to have good access to these stations, although small areas in the south west, south east and north east lie outside of a sustainable 2km distance from these stations. The majority of the sites are located within 2km of a railway station, and therefore, the proposed development at these 117 sites would be likely to have a minor positive impact on access to rail services.

C.10.2.2 However, four sites (SH12, SH37, SH42, and 120) are located over 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.

### C.10.3 Pedestrian Access

C.10.3.1 Sites with good pedestrian access can be described those with existing pavements or pathways which are segregated from traffic use in the area, which are generally well distributed throughout Sandwell, due to its built-up nature. The majority of the sites within Sandwell are well connected to the existing footpath networks. Therefore, the proposed development at these 119 sites would be likely to have a minor positive impact on local transport and accessibility, by potentially encouraging travel by foot and reducing requirement for new pedestrian access to be created.

C.10.3.2 However, Sites SEC3-29 and SH2 currently have poor access to the existing footpath network. Therefore, the proposed development at these two sites could potentially have a minor negative impact on local accessibility, and pedestrian access to the wider community would need improvement to be considered a viable transport option.

## C.10.4 Road Access

- C.10.4.1 A network of major and minor roads can be found throughout Sandwell, which would be expected to provide good road access in the local area and nationally. The majority of sites proposed within Sandwell are adjacent to a road, and therefore, the proposed development at these 118 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.
- C.10.4.2 However, three sites (SEC3-29, SH2, and SEC4-4) are not accessible from the current road network. The proposed development at these three sites could potentially result in a minor negative impact on accessibility as more significant infrastructure improvements would likely be required compared to other sites.

## C.10.5 Pedestrian Access to Local Services

- C.10.5.1 Sites with sustainable pedestrian access to local fresh food and services in Sandwell are considered to be those within a 15-minute walking distance. According to accessibility modelling data, a large proportion of the borough meets these criteria, however, there are some sections in the north east, south west and centre of the borough where pedestrian access to services is likely to be more restricted. 90 sites are identified to be within a 15-minute walking distance to local services. Of these 90 sites, 59 are located within a 10-minute walking distance and would be expected to have a major positive impact on sustainable access to local services, and the remaining 31 sites are located within a 15-minute walking distance and would be expected to have a minor positive impact on sustainable access to local services.
- C.10.5.2 The remaining 31 sites are located wholly or partially outside of a 15-minute walking distance to these services, and therefore, the proposed development at these sites could potentially have a minor negative impact on the sustainable access of site end users to local services, based on current infrastructure.

## C.10.6 Public Transport Access to Local Services

- C.10.6.1 Accessibility modelling data indicates that almost the entirety of the borough has good sustainable transport access to local fresh food and services, within 15 minutes travel time via public transport. The majority of sites (119 in total) are situated within the sustainable travel time via public transport to local services. Of these 119 sites, 102 sites are located within 10 minutes travel time via public transport to local services and would be expected to have a major positive impact on the access of site end users to local services. The remaining 17 sites out of the 119 are within a 15-minute travel time via public transport and would be expected to have a minor positive impact on the access of site end users to local services.
- C.10.6.2 Site 35 and 56 are wholly located outside a 15 minute travel time via public transport and would be expected to have a minor negative impact on the access of site end users to local services, based on current infrastructure.

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

Site Reference	Site Use	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
SEC3-181	EMP	+	+	+	+	+	++
SEC4-1	EMP	+	+	+	+	++	++
SEC3-9	HSG/EMP	+	+	+	+	++	++
SEC3-99	EMP	+	+	+	+	++	++
SH1	HSG	+	+	+	+	+	++
SEC3-113	HSG/EMP	+	+	+	+	+	++
SEC3-46	EMP	+	+	+	+	-	++
SEC3-175	HSG/EMP	+	+	+	+	+	++
SEC-36	HSG/EMP	+	+	+	+	++	++
SEC3-29	EMP	+	+	-	-	-	+
SEC3-148	HSG/EMP	+	+	+	+	++	++
SH2	HSG/EMP	+	+	-	-	++	++
SEC4-4	EMP	+	+	+	-	-	+
SEC3-191	HSG/EMP	+	+	+	+	++	++
SEC4-3	HSG/EMP	+	+	+	+	++	++
SEC3-133	HSG	+	+	+	+	+	++
SEC3-189	HSG/EMP	+	+	+	+	-	+
SEC3-22	HSG/EMP	+	+	+	+	++	++
SEC3-40	HSG/EMP	+	+	+	+	++	++
SEC1-4	EMP	+	+	+	+	+	++
SH3	HSG/EMP	+	+	+	+	++	++
SH4	HSG/EMP	+	+	+	+	++	++
SH5	HSG	+	+	+	+	++	++
SH6	HSG	+	+	+	+	+	++
SH7	HSG/GTTS	+	+	+	+	++	++
SH8	HSG	+	+	+	+	++	++
SH9	HSG	+	+	+	+	+	+
29	HSG	+	+	+	+	++	++
SH10	HSG	+	+	+	+	++	++
SH11	HSG	+	+	+	+	+	++
SH12	HSG	+	-	+	+	-	+
34	HSG	+	+	+	+	+	++
35	HSG/EMP	+	+	+	+	-	-
36	HSG	+	+	+	+	++	++
38	HSG	+	+	+	+	++	++
40	HSG	+	+	+	+	++	++
42	HSG	+	+	+	+	++	++
43	HSG	+	+	+	+	++	++
44	HSG	+	+	+	+	++	++
45	HSG/EMP	+	+	+	+	-	+
46	HSG	+	+	+	+	++	++

Site Reference	Site Use	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
SH13	HSG	+	+	+	+	++	++
SH14	HSG	+	+	+	+	++	++
SH15	HSG	+	+	+	+	++	++
52	EMP	+	+	+	+	+	++
SH16	HSG	+	+	+	+	+	++
SH17	HSG/GTTS	+	+	+	+	-	++
SH18	HSG/EMP	-	+	+	+	+	++
56	HSG	+	+	+	+	-	-
SH19	HSG/EMP	+	+	+	+	++	++
SH20	HSG/EMP/GTTS	+	+	+	+	++	++
SH21	HSG/EMP	+	+	+	+	-	++
SH22	HSG/EMP	+	+	+	+	++	++
SH23	HSG	+	+	+	+	-	++
63	HSG/EMP	+	+	+	+	++	++
SH24	HSG	+	+	+	+	++	++
SH25	HSG/EMP	+	+	+	+	++	++
SH26	HSG/EMP	+	+	+	+	+	+
SH27	HSG/EMP	+	+	+	+	++	++
SH28	HSG/EMP	+	+	+	+	++	++
SH29	HSG/EMP	+	+	+	+	++	++
71	HSG	+	+	+	+	++	++
74	EMP	+	+	+	+	++	++
SH30	HSG/EMP	+	+	+	+	+	+
SH31	HSG/EMP/GTTS	+	+	+	+	-	++
SH32	HSG/EMP/GTTS	+	+	+	+	++	++
SH33	HSG/EMP/GTTS	+	+	+	+	++	++
SH34	HSG	+	+	+	+	+	++
SH35	HSG	-	+	+	+	-	++
SH36	HSG/EMP/GTTS	-	+	+	+	-	++
SH37	HSG	+	-	+	+	-	+
SEC3-66	EMP	+	+	+	+	-	+
SH38	HSG/EMP	+	+	+	+	-	++
91	HSG/EMP	+	+	+	+	++	++
SH39	HSG	+	+	+	+	+	++
SH40	HSG	+	+	+	+	++	++
SH41	HSG	+	+	+	+	++	++
SH42	HSG	+	-	+	+	+	++
SEC1-3	EMP	+	+	+	+	+	++
110	HSG/EMP	+	+	+	+	+	+
118	HSG	+	+	+	+	-	++
120	HSG	+	-	+	+	+	++
132	HSG	+	+	+	+	++	++

Site Reference	Site Use	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
137	HSG	+	+	+	+	+	++
140	HSG	+	+	+	+	-	++
142	HSG	+	+	+	+	+	++
SH43	HSG	+	+	+	+	-	++
SH44	HSG	+	+	+	+	++	++
SH45	HSG	+	+	+	+	++	++
SH46	HSG	+	+	+	+	++	++
SH47	HSG	+	+	+	+	+	++
171	HSG	+	+	+	+	++	++
SH48	HSG	+	+	+	+	++	++
173	HSG	+	+	+	+	++	++
SH49	HSG	+	+	+	+	++	++
SH50	HSG	+	+	+	+	++	++
176	HSG	+	+	+	+	++	++
177	HSG	+	+	+	+	+	++
178	HSG	+	+	+	+	++	++
SH51	HSG	+	+	+	+	+	++
SH52	HSG	+	+	+	+	+	++
SH53	HSG	+	+	+	+	-	+
SH54	HSG	+	+	+	+	-	+
SH55	HSG	+	+	+	+	-	+
SH56	HSG	+	+	+	+	-	++
SH57	HSG	+	+	+	+	-	++
SH58	HSG	+	+	+	+	-	+
SG1	GTTS	+	+	+	+	-	++
188	HSG	+	+	+	+	++	++
189	HSG	+	+	+	+	-	++
SH59	HSG	+	+	+	+	+	++
191	HSG	+	+	+	+	+	++
SH61	HSG	+	+	+	+	-	+
SEC1-1	EMP	+	+	+	+	++	++
SEC1-8	EMP	+	+	+	+	++	++
SEC1-5	EMP	+	+	+	+	+	++
SEC1-6	EMP	+	+	+	+	-	+
SEC1-2	EMP	+	+	+	+	+	++
SEC1-7	EMP	+	+	+	+	-	++
199	Mixed-use	+	+	+	+	++	++
SH60	HSG/EMP	+	+	+	+	++	++

## C.11 SA Objective 10: Housing

### C.11.1 Housing Provision

- C.11.1.1 Residential-led development is likely to result in a net gain in housing. The sites in Sandwell proposed solely for residential use would therefore be expected to result in positive impacts under this objective. Sites which have been identified as having capacity for 100 or more dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision. Sites which have been identified as having capacity for 99 dwellings or less would be expected to result in a minor positive impact on housing provision.
- C.11.1.2 Site 199 is proposed for mixed-use development and has a housing capacity of 200. The site would therefore expect to have a major positive impact on housing provision.
- C.11.1.3 Employment-led sites in Sandwell would not be expected to result in a net change in housing provision and therefore a negligible impact would be likely.
- C.11.1.4 37 sites are identified as reasonable alternatives for multiple uses (i.e. the sites could potentially be developed for residential, employment and/or GTTS use). Therefore, it is uncertain whether these sites would result in a net change in housing provision. A minor positive impact is however identified for the two housing/GTTS sites as these sites would increase housing provision to some extent.

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

Site Reference	Site Use	Housing Provision
SEC3-181	EMP	0
SEC4-1	EMP	0
SEC3-9	HSG/EMP	+/-
SEC3-99	EMP	0
SH1	HSG	+
SEC3-113	HSG/EMP	+/-
SEC3-46	EMP	0
SEC3-175	HSG/EMP	+/-
SEC-36	HSG/EMP	+/-
SEC3-29	EMP	0
SEC3-148	HSG/EMP	+/-
SH2	HSG/EMP	+/-
SEC4-4	EMP	0
SEC3-191	HSG/EMP	+/-
SEC4-3	HSG/EMP	+/-
SEC3-133	HSG	+
SEC3-189	HSG/EMP	+/-
SEC3-22	HSG/EMP	+/-
SEC3-40	HSG/EMP	+/-

Site Reference	Site Use	Housing Provision
SEC1-4	EMP	0
SH3	HSG/EMP	+/-
SH4	HSG/EMP	+/-
SH5	HSG	+
SH6	HSG	++
SH7	HSG/GTTS	+
SH8	HSG	+
SH9	HSG	+
29	HSG	+
SH10	HSG	+
SH11	HSG	++
SH12	HSG	+
34	HSG	+
35	HSG/EMP	+/-
36	HSG	+
38	HSG	+
40	HSG	+
42	HSG	+
43	HSG	+
44	HSG	+
45	HSG/EMP	+/-
46	HSG	+
SH13	HSG	++
SH14	HSG	+
SH15	HSG	+
52	EMP	0
SH16	HSG	++
SH17	HSG/GTTS	+
SH18	HSG/EMP	+/-
56	HSG	+
SH19	HSG/EMP	+/-
SH20	HSG/EMP/GTTS	+/-
SH21	HSG/EMP	+/-
SH22	HSG/EMP	+/-
SH23	HSG	+
63	HSG/EMP	+/-
SH24	HSG	+
SH25	HSG/EMP	+/-
SH26	HSG/EMP	+/-
SH27	HSG/EMP	+/-
SH28	HSG/EMP	+/-
SH29	HSG/EMP	+/-
71	HSG	+

Site Reference	Site Use	Housing Provision
74	EMP	0
SH30	HSG/EMP	+/-
SH31	HSG/EMP/GTTS	+/-
SH32	HSG/EMP/GTTS	+/-
SH33	HSG/EMP/GTTS	+/-
SH34	HSG	++
SH35	HSG	++
SH36	HSG/EMP/GTTS	+/-
SH37	HSG	++
SEC3-66	EMP	0
SH38	HSG/EMP	+/-
91	HSG/EMP	+/-
SH39	HSG	+
SH40	HSG	+
SH41	HSG	++
SH42	HSG	+
SEC1-3	EMP	0
110	HSG/EMP	+/-
118	HSG	+
120	HSG	++
132	HSG	++
137	HSG	+
140	HSG	+
142	HSG	+
SH43	HSG	+
SH44	HSG	+
SH45	HSG	+
SH46	HSG	+
SH47	HSG	+
171	HSG	++
SH48	HSG	+
173	HSG	+
SH49	HSG	++
SH50	HSG	+
176	HSG	+
177	HSG	++
178	HSG	++
SH51	HSG	+
SH52	HSG	++
SH53	HSG	+
SH54	HSG	++
SH55	HSG	++
SH56	HSG	+

Site Reference	Site Use	Housing Provision
SH57	HSG	+
SH58	HSG	++
SG1	GTTS	+
188	HSG	+
189	HSG	+
SH59	HSG	+
191	HSG	+
SH61	HSG	+
SEC1-1	EMP	0
SEC1-8	EMP	0
SEC1-5	EMP	0
SEC1-6	EMP	0
SEC1-2	EMP	0
SEC1-7	EMP	0
199	Mixed-use	++
SH60	HSG/EMP	+/-

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## C.12 SA Objective 11: Equality

### C.12.1 Index of Multiple Deprivation

C.12.1.1 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England<sup>5</sup>. Out of 317 Local Authorities in England, Sandwell is ranked as the 12<sup>th</sup> most deprived<sup>6</sup>. Overall deprivation is relatively high across the Black Country, with 36 of the LSOAs in Sandwell ranked among the 10% most deprived in England. Deprivation levels within the borough of Sandwell varies from area to area, with the 36 most deprived LSOAs found throughout the borough, and in particular clustered within the south eastern and north western parts of the borough.

C.12.1.2 45 sites are located wholly or partially within the 10% most deprived LSOAs, and therefore development at these sites could potentially have a minor negative impact on equality by exacerbating existing social pressures faced by current residents and place increased pressure on local services. The remaining 76 sites are located outside of the most deprived 10% LSOAs, and therefore, the proposed development at these sites may have a negligible impact on equality.

C.12.1.3 It should be noted that there is a degree of uncertainty in regard to the impacts of each site on equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.

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

Site Reference	Site Use	IMD 10% Most Deprived
SEC3-181	EMP	0
SEC4-1	EMP	-
SEC3-9	HSG/EMP	-
SEC3-99	EMP	0
SH1	HSG	0
SEC3-113	HSG/EMP	-
SEC3-46	EMP	0
SEC3-175	HSG/EMP	0
SEC-36	HSG/EMP	0
SEC3-29	EMP	0
SEC3-148	HSG/EMP	0
SH2	HSG/EMP	-
SEC4-4	EMP	-

<sup>5</sup> Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date accessed: 15/09/23]

<sup>6</sup> Active Black Country (2023) Indices of Multiple Deprivation, 2019. Available at: <https://www.activeblackcountry.co.uk/insight-hub/data/communities/indices-of-multiple-deprivation-2019/> [Date accessed: 15/09/23]

Site Reference	Site Use	IMD 10% Most Deprived
SEC3-191	HSG/EMP	-
SEC4-3	HSG/EMP	-
SEC3-133	HSG	-
SEC3-189	HSG/EMP	0
SEC3-22	HSG/EMP	0
SEC3-40	HSG/EMP	-
SEC1-4	EMP	0
SH3	HSG/EMP	0
SH4	HSG/EMP	0
SH5	HSG	-
SH6	HSG	-
SH7	HSG/GTTS	0
SH8	HSG	0
SH9	HSG	-
29	HSG	-
SH10	HSG	-
SH11	HSG	0
SH12	HSG	0
34	HSG	0
35	HSG/EMP	0
36	HSG	0
38	HSG	0
40	HSG	0
42	HSG	0
43	HSG	0
44	HSG	0
45	HSG/EMP	0
46	HSG	0
SH13	HSG	0
SH14	HSG	-
SH15	HSG	0
52	EMP	0
SH16	HSG	0
SH17	HSG/GTTS	0
SH18	HSG/EMP	0
56	HSG	-
SH19	HSG/EMP	0
SH20	HSG/EMP/GTTS	0
SH21	HSG/EMP	0
SH22	HSG/EMP	0
SH23	HSG	-
63	HSG/EMP	0
SH24	HSG	0

Site Reference	Site Use	IMD 10% Most Deprived
SH25	HSG/EMP	-
SH26	HSG/EMP	0
SH27	HSG/EMP	0
SH28	HSG/EMP	0
SH29	HSG/EMP	-
71	HSG	0
74	EMP	0
SH30	HSG/EMP	0
SH31	HSG/EMP/GTTS	0
SH32	HSG/EMP/GTTS	0
SH33	HSG/EMP/GTTS	-
SH34	HSG	0
SH35	HSG	0
SH36	HSG/EMP/GTTS	0
SH37	HSG	0
SEC3-66	EMP	-
SH38	HSG/EMP	0
91	HSG/EMP	-
SH39	HSG	-
SH40	HSG	0
SH41	HSG	-
SH42	HSG	0
SEC1-3	EMP	-
110	HSG/EMP	0
118	HSG	-
120	HSG	0
132	HSG	-
137	HSG	0
140	HSG	0
142	HSG	0
SH43	HSG	0
SH44	HSG	-
SH45	HSG	-
SH46	HSG	0
SH47	HSG	0
171	HSG	0
SH48	HSG	0
173	HSG	0
SH49	HSG	0
SH50	HSG	0
176	HSG	0
177	HSG	-
178	HSG	-

Site Reference	Site Use	IMD 10% Most Deprived
SH51	HSG	-
SH52	HSG	-
SH53	HSG	-
SH54	HSG	-
SH55	HSG	-
SH56	HSG	-
SH57	HSG	-
SH58	HSG	-
SG1	GTTS	0
188	HSG	-
189	HSG	0
SH59	HSG	0
191	HSG	-
SH61	HSG	-
SEC1-1	EMP	-
SEC1-8	EMP	0
SEC1-5	EMP	0
SEC1-6	EMP	0
SEC1-2	EMP	0
SEC1-7	EMP	0
199	Mixed-use	0
SH60	HSG/EMP	0

## C.13 SA Objective 12: Health

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

C.13.1.1 Currently Sandwell General Hospital is the only NHS Hospital with an Accident & Emergency department within the borough itself, although there are other nearby hospitals such as Manor Hospital in Walsall to the north, and the new Midland Metropolitan Hospital scheduled to open in 2024 within Sandwell Borough, which will also provide these services. The majority of the proposed sites are located within 5km of one or more of these hospitals (109 sites in total). Therefore, the proposed development at these sites could potentially have a minor positive impact on access to emergency healthcare due being within a sustainable distance to the services.

C.13.1.2 The remaining 12 sites are located wholly over 5km from a hospital, and therefore, the proposed development at these sites could potentially have a minor negative impact on access to emergency healthcare.

### C.13.2 Pedestrian Access to GP Surgery

C.13.2.1 There are 73 GP Surgeries distributed within Sandwell, serving the existing local communities, particularly clustered within the south east and north west of the borough. Accessibility modelling data has been provided to Lepus by SMBC, mapping the location of GP surgeries and areas within a sustainable travel time to these facilities for pedestrians. A large proportion of the built-up areas are located within a 15-minute walk to a GP surgery; however, the modelling data indicates that some areas in the north east and centre of Sandwell are likely to have more restricted access for pedestrians.

C.13.2.2 The majority of proposed sites (110) in Sandwell are located within a 15-minute walking distance to a GP surgery. Of the 110 sites, 73 of these are located within a 10-minute walking distance to a GP surgery and would be expected to have a major positive impact on access to healthcare. The remaining 37 sites of the 110 are located within a 15-minute walking distance to a GP surgery and would be expected to have a minor positive impact on access to healthcare.

C.13.2.3 11 sites are located wholly or partially outside of this sustainable travel time. Therefore, the proposed development at these sites could potentially have a minor negative impact on pedestrian access to healthcare, based on existing infrastructure.

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

C.13.3.1 Good and sustainable public transport access to a local GP surgery is identified to be within a 15-minute journey. According to accessibility modelling data, this travel time to healthcare is likely to be achieved across the majority of Sandwell, with the exception of small pockets in the east and west.

C.13.3.2 All sites within Sandwell are all situated in areas within this 15-minute time frame, with the exception of Sites SEC3-22 and SH19, where Site SEC3-22 is wholly located outside this travel time and the majority of Site SH19 is located partially outside this travel time.

These two sites could potentially have a minor negative impact on sustainable access to healthcare, based on current infrastructure. Of the 119 sites that are within the sustainable travel time, 103 are located within a 10-minute journey and would be expected to have a major positive impact on sustainable access to healthcare, while the remaining 16 sites are within a 15-minute journey and would be expected to have a minor positive impact on sustainable access to healthcare.

### C.13.4 Access to Greenspace

C.13.4.1 Greenspaces are distributed throughout the borough, including parks, allotments, playing fields and Sandwell Valley Country Park located in the north east of the borough. All of the proposed in Sandwell are located within 600m of one or more greenspaces. Therefore, a minor positive impact would be expected at these 121 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.

### C.13.5 Net Loss of Greenspace

C.13.5.1 10 proposed sites coincide wholly or partially with publicly available greenspaces and/ or greenspaces with public access, including Sites SH9 and SH18 which both coincide with playing fields. The proposed development at these 10 sites could potentially result in the net loss of greenspace, and therefore, have a minor negative impact on the provision of greenspace across the Plan area.

### C.13.6 Public Right of Way / Cycle Path

C.13.6.1 104 sites in Sandwell are located within 600m of the PRow and/or cycle network. The proposed development at these sites would be likely to provide site end users with good pedestrian and/or cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents. However, the remaining 17 sites are located wholly or partially over 600m from the PRow and cycle network; therefore, the proposed development at these sites could potentially have a minor negative impact on pedestrian and cycle access.

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

Site Reference	Site Use	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	Access to Greenspace	Net Loss of Greenspace	PRow/ Cycle Path
SEC3-181	EMP	+	++	++	+	0	+
SEC4-1	EMP	-	+	++	+	0	+
SEC3-9	HSG/EMP	+	+	++	+	0	+
SEC3-99	EMP	+	++	++	+	0	+
SH1	HSG	-	-	+	+	0	+
SEC3-113	HSG/EMP	+	+	++	+	0	+

Site Reference	Site Use	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
SEC3-46	EMP	-	+	++	+	0	+
SEC3-175	HSG/EMP	+	++	++	+	0	+
SEC-36	HSG/EMP	+	++	++	+	0	+
SEC3-29	EMP	+	+	+	+	0	+
SEC3-148	HSG/EMP	+	++	++	+	0	+
SH2	HSG/EMP	+	+	++	+	0	+
SEC4-4	EMP	+	+	++	+	0	-
SEC3-191	HSG/EMP	+	+	++	+	0	+
SEC4-3	HSG/EMP	+	+	++	+	0	+
SEC3-133	HSG	-	-	++	+	0	+
SEC3-189	HSG/EMP	-	+	++	+	0	+
SEC3-22	HSG/EMP	+	+	-	+	0	+
SEC3-40	HSG/EMP	+	++	++	+	0	+
SEC1-4	EMP	+	+	++	+	0	+
SH3	HSG/EMP	+	+	++	+	0	+
SH4	HSG/EMP	+	++	++	+	0	+
SH5	HSG	+	++	++	+	0	+
SH6	HSG	+	++	++	+	0	+
SH7	HSG/GTTS	+	++	++	+	0	+
SH8	HSG	+	++	++	+	0	+
SH9	HSG	+	+	++	+	-	+
29	HSG	+	++	++	+	0	+
SH10	HSG	+	++	++	+	0	+
SH11	HSG	+	++	++	+	0	+
SH12	HSG	+	+	++	+	-	+
34	HSG	+	++	++	+	0	+
35	HSG/EMP	+	++	++	+	0	+
36	HSG	+	++	++	+	0	+
38	HSG	+	++	++	+	0	+
40	HSG	+	++	++	+	0	+
42	HSG	+	++	++	+	0	+
43	HSG	+	++	++	+	0	+
44	HSG	+	++	++	+	0	-
45	HSG/EMP	+	++	++	+	0	+
46	HSG	+	++	++	+	0	+
SH13	HSG	+	++	++	+	0	+
SH14	HSG	+	+	++	+	0	+
SH15	HSG	+	++	++	+	0	+
52	EMP	-	++	++	+	0	+
SH16	HSG	+	++	++	+	0	+
SH17	HSG/GTTS	-	+	++	+	0	+
SH18	HSG/EMP	+	-	+	+	-	+
56	HSG	+	+	++	+	0	-
SH19	HSG/EMP	+	++	-	+	0	+

Site Reference	Site Use	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
SH20	HSG/EMP/GTTS	+	++	++	+	0	+
SH21	HSG/EMP	+	-	+	+	0	+
SH22	HSG/EMP	+	++	++	+	0	-
SH23	HSG	+	++	++	+	0	+
63	HSG/EMP	+	++	++	+	0	+
SH24	HSG	+	++	++	+	0	+
SH25	HSG/EMP	-	-	++	+	0	+
SH26	HSG/EMP	+	-	+	+	0	+
SH27	HSG/EMP	+	++	++	+	0	+
SH28	HSG/EMP	+	++	++	+	0	+
SH29	HSG/EMP	+	+	+	+	0	+
71	HSG	+	+	++	+	0	+
74	EMP	+	++	++	+	0	+
SH30	HSG/EMP	+	++	++	+	0	+
SH31	HSG/EMP/GTTS	+	-	+	+	0	+
SH32	HSG/EMP/GTTS	+	++	++	+	0	+
SH33	HSG/EMP/GTTS	+	++	++	+	0	+
SH34	HSG	+	+	++	+	-	+
SH35	HSG	+	-	+	+	0	+
SH36	HSG/EMP/GTTS	+	-	+	+	0	+
SH37	HSG	+	+	++	+	-	+
SEC3-66	EMP	+	+	+	+	0	-
SH38	HSG/EMP	+	-	+	+	0	+
91	HSG/EMP	+	+	++	+	0	+
SH39	HSG	+	++	++	+	0	+
SH40	HSG	+	++	++	+	-	-
SH41	HSG	+	++	++	+	0	+
SH42	HSG	+	+	+	+	0	+
SEC1-3	EMP	+	+	+	+	0	+
110	HSG/EMP	+	+	+	+	0	+
118	HSG	+	++	++	+	0	+
120	HSG	+	++	++	+	0	+
132	HSG	+	++	++	+	0	+
137	HSG	+	+	++	+	0	+
140	HSG	-	++	++	+	0	-
142	HSG	-	+	++	+	0	+
SH43	HSG	+	++	++	+	0	+
SH44	HSG	+	+	++	+	0	+
SH45	HSG	+	++	++	+	0	+
SH46	HSG	+	++	++	+	0	+
SH47	HSG	+	+	++	+	0	+
171	HSG	+	++	++	+	0	+
SH48	HSG	+	++	++	+	0	+
173	HSG	+	++	++	+	0	+

Site Reference	Site Use	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
SH49	HSG	+	++	++	+	0	+
SH50	HSG	+	++	++	+	-	+
176	HSG	+	++	++	+	0	+
177	HSG	+	++	++	+	0	+
178	HSG	+	++	++	+	0	+
SH51	HSG	+	++	++	+	0	+
SH52	HSG	+	++	++	+	0	+
SH53	HSG	+	++	+	+	0	-
SH54	HSG	+	+	++	+	0	-
SH55	HSG	+	++	++	+	0	-
SH56	HSG	+	++	++	+	0	-
SH57	HSG	+	++	++	+	0	-
SH58	HSG	+	++	++	+	0	-
SG1	GTTS	-	++	++	+	0	+
188	HSG	+	++	++	+	0	+
189	HSG	-	++	++	+	-	+
SH59	HSG	+	+	++	+	-	+
191	HSG	+	++	++	+	0	-
SH61	HSG	+	+	+	+	0	-
SEC1-1	EMP	+	++	++	+	0	+
SEC1-8	EMP	+	++	++	+	0	+
SEC1-5	EMP	+	+	++	+	0	+
SEC1-6	EMP	+	+	++	+	0	+
SEC1-2	EMP	+	+	++	+	0	+
SEC1-7	EMP	+	-	++	+	0	+
199	Mixed-Use	+	++	++	+	-	+
SH60	HSG/EMP	+	++	++	+	0	+

## C.14 SA Objective 13: Economy

### C.14.1 Employment Floorspace Provision

- C.14.1.1 Employment floorspace provision has been assessed with consideration of current land use and the proposed development at each site.
- C.14.1.2 There are 17 sites proposed solely for employment use in Sandwell. Eight of these sites currently comprise (either wholly or the majority of the site) areas of undeveloped or vacant land; therefore, the proposed development at these sites would be expected to result in a significant net gain in employment floorspace and have a major positive impact on providing local employment opportunities. The remaining nine sites proposed for employment use currently coincide with employment areas or existing businesses, including Site SEC1-7 which currently coincides with 'BHM Motorhome Hire Depot' and Site 52 which coincides with several businesses including 'Aspen Concepts', 'Totally Modular' and 'Kee Safety'. It is uncertain whether the proposed development at these sites would result in a net change in employment floorspace.
- C.14.1.3 Site 199 is proposed for mixed-use development with a proportion of the site proposed for employment. Site 199 is located on greenfield land and would be expected to result in a significant net gain in employment floorspace, leading to a major positive impact on providing local employment opportunities.
- C.14.1.4 34 sites proposed solely for residential use coincide with existing employment areas, and therefore, development at these sites could potentially result in a net loss of employment floorspace. The proposed development at 24 of these sites could potentially have a minor negative impact on employment floorspace provision due to the possible loss of small areas of employment land or small businesses, whereas the proposed development at 10 of these sites could potentially have a major negative impact due to the possible loss of a large area of employment land.
- C.14.1.5 37 sites are identified as reasonable alternatives for multiple uses (i.e. the sites could potentially be developed for residential, employment and/or GTTS use). The potential net change in employment floorspace is unknown and therefore it is uncertain whether these sites would be likely to have an impact on the provision of employment opportunities.
- C.14.1.6 It is uncertain whether the proposed housing development at Site 34 would impact employment opportunities. The site coincides with the 'YMCA' building and it is unknown whether there are any jobs associated with this.
- C.14.1.7 The remaining 31 sites proposed solely for residential development and the single GTTS site, are located on previously undeveloped land or vacant land and would not be expected to result in a net change in employment floorspace; therefore, the proposed development at these sites would be likely to have a negligible impact on the provision of employment opportunities.

## C.14.2 Pedestrian Access to Employment Opportunities

C.14.2.1 There are many employment opportunities currently within Sandwell, with 254 key employment locations identified. Most existing employment land is concentrated in the centre of the borough and close to the strategic road network. Accessibility modelling data has been provided to Lepus by SMBC, mapping key employment locations and areas within a sustainable travel time. According to the modelling data, almost the entirety of the borough is within a 30-minute walk to an employment location, however, a small area in the north east is likely to have more restricted access for pedestrians.

C.14.2.2 The majority of reasonable alternative sites with potential to deliver housing in Sandwell (104 sites) would be expected to have a positive impact on pedestrian access to employment due to being within this sustainable travel time to employment opportunities. Of the 104 sites within this travel time, 103 sites are located within a 20-minute walk to an employment location and could potentially have a major positive impact on pedestrian access to employment. The remaining one site would be expected to have a minor positive impact on pedestrian access to employment as it is within a 30-minute walk to an employment location.

C.14.2.3 Two sites are located outside this sustainable travel time; Site 34 is wholly located outside of this travel time, and the majority of Site SH43 is located outside this travel time. Therefore, the proposed development at these two sites could potentially have a minor negative impact on pedestrian access to employment opportunities, based on current infrastructure.

## C.14.3 Public Transport Access to Employment Opportunities

C.14.3.1 Accessibility modelling data indicates that the majority of the borough is located within a sustainable travel time via public transport to employment opportunities, identified as being within a 30-minute journey. All of the reasonable alternative sites with potential to deliver residential development would be expected to have a positive impact on sustainable access to employment opportunities. 102 sites are located within a 20-minute travel time via public transport, which would be expected to have a major positive impact on sustainable access to employment opportunities. Four sites are located within a 30-minute travel time via public transport and would be expected to have a minor positive impact on sustainable access to employment opportunities.

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

Site Reference	Site Use	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
SEC3-181	EMP	+/-	0	0
SEC4-1	EMP	+/-	0	0
SEC3-9	HSG/EMP	+/-	++	++
SEC3-99	EMP	+/-	0	0
SH1	HSG	0	++	++
SEC3-113	HSG/EMP	+/-	++	++
SEC3-46	EMP	+/-	0	0

Site Reference	Site Use	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
SEC3-175	HSG/EMP	+/-	++	++
SEC-36	HSG/EMP	+/-	++	++
SEC3-29	EMP	++	0	0
SEC3-148	HSG/EMP	+/-	++	++
SH2	HSG/EMP	+/-	++	++
SEC4-4	EMP	++	0	0
SEC3-191	HSG/EMP	+/-	++	++
SEC4-3	HSG/EMP	+/-	++	++
SEC3-133	HSG	--	++	++
SEC3-189	HSG/EMP	+/-	++	++
SEC3-22	HSG/EMP	+/-	++	++
SEC3-40	HSG/EMP	+/-	++	++
SEC1-4	EMP	++	0	0
SH3	HSG/EMP	+/-	++	++
SH4	HSG/EMP	+/-	++	++
SH5	HSG	-	++	++
SH6	HSG	--	++	++
SH7	HSG/GTTS	+/-	++	++
SH8	HSG	-	++	++
SH9	HSG	0	++	++
29	HSG	0	++	++
SH10	HSG	0	++	++
SH11	HSG	-	++	++
SH12	HSG	0	++	++
34	HSG	+/-	-	+
35	HSG/EMP	+/-	++	++
36	HSG	-	++	++
38	HSG	0	++	++
40	HSG	-	++	++
42	HSG	0	++	++
43	HSG	0	++	++
44	HSG	0	++	++
45	HSG/EMP	+/-	++	++
46	HSG	-	++	++
SH13	HSG	-	++	++
SH14	HSG	--	++	++
SH15	HSG	-	++	++
52	EMP	+/-	0	0
SH16	HSG	--	++	++
SH17	HSG/GTTS	+/-	++	++
SH18	HSG/EMP	+/-	++	++
56	HSG	0	++	++
SH19	HSG/EMP	+/-	++	++

Site Reference	Site Use	Employment Floorpace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
SH20	HSG/EMP/GTTS	+/-	++	++
SH21	HSG/EMP	+/-	++	++
SH22	HSG/EMP	+/-	++	++
SH23	HSG	-	++	++
63	HSG/EMP	+/-	++	++
SH24	HSG	-	++	++
SH25	HSG/EMP	+/-	++	++
SH26	HSG/EMP	+/-	++	++
SH27	HSG/EMP	+/-	++	++
SH28	HSG/EMP	+/-	++	++
SH29	HSG/EMP	+/-	++	++
71	HSG	-	++	++
74	EMP	+/-	0	0
SH30	HSG/EMP	+/-	++	++
SH31	HSG/EMP/GTTS	+/-	++	++
SH32	HSG/EMP/GTTS	+/-	++	++
SH33	HSG/EMP/GTTS	+/-	++	++
SH34	HSG	0	++	++
SH35	HSG	0	++	++
SH36	HSG/EMP/GTTS	+/-	++	++
SH37	HSG	0	++	++
SEC3-66	EMP	+/-	0	0
SH38	HSG/EMP	+/-	++	++
91	HSG/EMP	+/-	++	++
SH39	HSG	-	++	++
SH40	HSG	-	++	++
SH41	HSG	--	++	++
SH42	HSG	0	++	++
SEC1-3	EMP	++	0	0
110	HSG/EMP	+/-	++	++
118	HSG	0	++	++
120	HSG	0	+	++
132	HSG	0	++	++
137	HSG	0	++	++
140	HSG	0	++	++
142	HSG	0	++	++
SH43	HSG	0	-	+
SH44	HSG	0	++	++
SH45	HSG	0	++	++
SH46	HSG	0	++	++
SH47	HSG	-	++	++
171	HSG	-	++	++
SH48	HSG	0	++	++

Site Reference	Site Use	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
173	HSG	-	++	++
SH49	HSG	-	++	++
SH50	HSG	0	++	++
176	HSG	-	++	++
177	HSG	--	++	++
178	HSG	--	++	++
SH51	HSG	-	++	++
SH52	HSG	-	++	++
SH53	HSG	-	++	++
SH54	HSG	-	++	++
SH55	HSG	--	++	++
SH56	HSG	-	++	+
SH57	HSG	--	++	+
SH58	HSG	--	++	++
SG1	GTTS	0	++	++
188	HSG	0	++	++
189	HSG	0	++	++
SH59	HSG	0	++	++
191	HSG	0	++	++
SH61	HSG	-	++	++
SEC1-1	EMP	+/-	0	0
SEC1-8	EMP	++	0	0
SEC1-5	EMP	++	0	0
SEC1-6	EMP	++	0	0
SEC1-2	EMP	++	0	0
SEC1-7	EMP	+/-	0	0
199	Mixed-use	++	++	++
SH60	HSG/EMP	+/-	++	++

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

### C.15.1 Pedestrian Access to Primary School

C.15.1.1 There are 98 primary schools distributed throughout Sandwell. Accessibility modelling data has been provided to Lepus by SMBC, mapping the location of primary schools and areas within a sustainable travel time to these schools. The majority of borough is located within a 15-minute walk to a primary school, however, some areas are likely to have more restricted access, such as along the M5 corridor in the east.

C.15.1.2 The majority of the proposed housing sites are situated within a 15-minute walking distance to a primary school (103 sites). Of these 103 sites, 69 sites are within a 10-minute walking distance to primary school, and therefore, the proposed development at these 69 sites would be likely to have a major positive impact on pedestrian access to primary schools. The remaining 34 sites of these 103 are within 15-minute walking distance to primary school, and therefore, the proposed development at these 34 sites would be likely to have a minor positive impact on pedestrian access to primary schools.

C.15.1.3 However, Site SH17 is located outside of a 15-minute walk to a primary school, and therefore, the proposed development at this site could potentially have a minor negative impact on access to primary schools due to the likely increased reliance on less sustainable travel methods.

### C.15.2 Pedestrian Access to Secondary School

C.15.2.1 Accessibility modelling data has been provided to Lepus by SMBC, mapping the location of secondary schools and areas within a sustainable travel time to these schools. There are 20 secondary schools within Sandwell which are fairly evenly distributed across the borough, serving communities within the existing built-up areas but providing more limited access for areas which currently contain less dense development, particularly in the Green Belt to the north east.

C.15.2.2 The majority of proposed housing sites in Sandwell are located within a 25-minute walk to a secondary school. Therefore, the proposed development at these 88 sites would be expected to have a positive impact on sustainable access to education, as development at these locations would be likely to encourage pedestrian access to secondary schools. Of the 88 sites, 69 sites are located within a 20-minute walk to a secondary school and would be expected to have a major positive impact on sustainable access to education. The remaining 19 sites are located within a 25-minute walk to a secondary school and would be expected to have a minor positive impact on sustainable access to education.

C.15.2.3 However, 16 residential sites are situated in the areas of the borough outside of a 25-minute walk to a secondary school, and as such, the proposed development at these sites could potentially have a minor negative impact on sustainable access to education.

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

- C.15.3.1 Existing public transport access to secondary schools within Sandwell is widespread, according to accessibility modelling data, and would be likely to provide local residents with good access to schools in the local and wider area. The data indicates only localised pockets of the borough where public transport access to secondary schools is more limited.
- C.15.3.2 The majority of housing sites in Sandwell are located within a 25-minute public transport journey to a secondary school, and therefore, the proposed development at these 97 sites would be expected to have a positive impact on sustainable access to education, based on current infrastructure. Of the 97 sites, 89 of these are located within a 20-minute public transport journey to a secondary school, and therefore would be expected to have a major positive impact on sustainable access to education. The remaining eight sites are located within a 25-minute public transport journey to a secondary school, and therefore, would be expected to have a minor positive impact on sustainable access to education.
- C.15.3.3 Seven of the proposed housing sites (SEC3-113, SH8, SH14, SH28, SH35, SH36, and SH45) are located wholly or partially outside of this sustainable travel time to a secondary school, and therefore, the proposed development at these sites could potentially have a minor negative impact on new residents' access to education, based on current infrastructure.

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

Site Reference	Site Use	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
SEC3-181	EMP	0	0	0
SEC4-1	EMP	0	0	0
SEC3-9	HSG/EMP	++	++	++
SEC3-99	EMP	0	0	0
SH1	HSG	+	-	++
SEC3-113	HSG/EMP	+	++	-
SEC3-46	EMP	0	0	0
SEC3-175	HSG/EMP	++	-	+
SEC-36	HSG/EMP	+	-	++
SEC3-29	EMP	0	0	0
SEC3-148	HSG/EMP	++	-	++
SH2	HSG/EMP	+	++	++
SEC4-4	EMP	0	0	0
SEC3-191	HSG/EMP	++	+	+
SEC4-3	HSG/EMP	++	++	++
SEC3-133	HSG	++	-	++
SEC3-189	HSG/EMP	++	++	++
SEC3-22	HSG/EMP	++	++	++
SEC3-40	HSG/EMP	++	+	++
SEC1-4	EMP	0	0	0
SH3	HSG/EMP	++	++	++
SH4	HSG/EMP	+	-	++
SH5	HSG	++	++	++
SH6	HSG	++	++	++

Site Reference	Site Use	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
SH7	HSG/GTTS	+	-	++
SH8	HSG	++	++	-
SH9	HSG	+	+	++
29	HSG	++	++	++
SH10	HSG	+	+	++
SH11	HSG	++	+	++
SH12	HSG	++	++	++
34	HSG	++	++	++
35	HSG/EMP	+	++	++
36	HSG	++	+	++
38	HSG	++	++	++
40	HSG	++	++	++
42	HSG	+	++	++
43	HSG	+	-	++
44	HSG	+	++	++
45	HSG/EMP	+	++	++
46	HSG	++	++	++
SH13	HSG	+	-	++
SH14	HSG	++	++	-
SH15	HSG	++	-	++
52	EMP	0	0	0
SH16	HSG	+	-	++
SH17	HSG/GTTS	-	++	++
SH18	HSG/EMP	++	-	++
56	HSG	++	++	++
SH19	HSG/EMP	++	++	++
SH20	HSG/EMP/GTTS	++	++	++
SH21	HSG/EMP	+	++	++
SH22	HSG/EMP	++	++	++
SH23	HSG	++	+	++
63	HSG/EMP	++	+	++
SH24	HSG	+	+	++
SH25	HSG/EMP	++	+	++
SH26	HSG/EMP	+	++	++
SH27	HSG/EMP	+	++	++
SH28	HSG/EMP	++	++	-
SH29	HSG/EMP	++	++	++
71	HSG	++	++	+
74	EMP	0	0	0
SH30	HSG/EMP	++	++	++
SH31	HSG/EMP/GTTS	+	++	++
SH32	HSG/EMP/GTTS	++	++	++
SH33	HSG/EMP/GTTS	++	++	+
SH34	HSG	++	++	++

Site Reference	Site Use	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
SH35	HSG	+	+	-
SH36	HSG/EMP/GTTS	+	++	-
SH37	HSG	++	++	++
SEC3-66	EMP	0	0	0
SH38	HSG/EMP	++	++	++
91	HSG/EMP	+	++	++
SH39	HSG	++	++	++
SH40	HSG	++	++	++
SH41	HSG	++	++	++
SH42	HSG	++	++	++
SEC1-3	EMP	0	0	0
110	HSG/EMP	+	-	++
118	HSG	++	++	++
120	HSG	++	+	++
132	HSG	++	++	++
137	HSG	+	++	++
140	HSG	++	-	+
142	HSG	+	++	++
SH43	HSG	++	+	++
SH44	HSG	++	-	++
SH45	HSG	++	+	-
SH46	HSG	++	++	++
SH47	HSG	++	+	+
171	HSG	+	++	++
SH48	HSG	+	++	++
173	HSG	+	++	++
SH49	HSG	++	++	++
SH50	HSG	++	++	++
176	HSG	++	++	++
177	HSG	++	+	++
178	HSG	++	+	++
SH51	HSG	++	+	++
SH52	HSG	++	++	++
SH53	HSG	++	++	++
SH54	HSG	+	++	++
SH55	HSG	++	++	++
SH56	HSG	++	++	++
SH57	HSG	++	++	++
SH58	HSG	++	++	++
SG1	GTTS	+	+	++
188	HSG	++	++	+
189	HSG	+	++	++
SH59	HSG	++	++	+
191	HSG	++	++	++

Site Reference	Site Use	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
SH61	HSG	+	++	++
SEC1-1	EMP	0	0	0
SEC1-8	EMP	0	0	0
SEC1-5	EMP	0	0	0
SEC1-6	EMP	0	0	0
SEC1-2	EMP	0	0	0
SEC1-7	EMP	0	0	0
199	Mixed-use	+	-	++
SH60	HSG/EMP	++	++	++

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# Appendix D: Policy Assessments

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# D.1 Overview

## D.1.1 Introduction

D.1.1.1 This appendix provides an assessment of draft policies proposed by Sandwell Metropolitan Borough Council (SMBC) at the Regulation 18 'Draft Plan' stage of the preparation of the Sandwell Local Plan (SLP).

D.1.1.2 Many of the proposed SLP policies are derived from the ceased Black Country Plan (BCP). A total of 63 policies were set out in the draft BCP and were consulted on as part of the BCP process, before the decision was made to end work on the BCP in October 2022. A number of SLP policies have also been derived from the adopted Sandwell SAD.

D.1.1.3 SMBC have considered the extent to which each of the draft BCP policies and adopted SAD policies remain relevant and applicable to the SLP area, in light of consultation responses received during the BCP Regulation 18 consultation, and in the context of the latest national and local guidance and strategies.

D.1.1.4 The relevant existing policies have been updated and together with a number of new policies prepared for the SLP, has resulted in a total of 87 policies identified and presented within the Draft SLP. The Draft SLP also contains a proposed 'vision' and 13 associated objectives, which have been refined since the Issues and Options Consultation.

D.1.1.5 The assessments within this report are based on the policies, vision and objectives within the Draft Sandwell Local Plan 2025-2041 Regulation 18 Consultation document, version 56 provided to Lepus on 25<sup>th</sup> September 2023.

D.1.1.6 Each policy (as well as the SLP Vision and Objectives) appraised in this report has been assessed for its likely impacts on each SA Objective of the SA Framework (see **Appendix A**) in accordance with the methodology as set out in the SA Main Report.

D.1.1.7 For ease of reference the scoring system is summarised in **Table D.1.1** below.

*Table D.1.1: Presenting likely impacts*

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

Likely Impact	Description	Impact Symbol
Major Negative Impact	The proposed option prevents the achievement of the SA Objective to a significant extent.	--

D.1.1.8 Each appraisal in the following sections of this report includes an SA impact matrix that provides an indication of the nature and magnitude of effects. Assessment narratives follow the impact matrices for each policy, within which the findings of the appraisal and the rationale for the recorded impacts are described.

## D.1.2 Overview of Policy Assessments

D.1.2.1 The impact matrices for all draft policy assessments are presented in Table D.1.2 below. These impacts should be read in conjunction with the assessment text narratives which follow in the subsequent sections of this appendix.

D.1.2.2 Within these policy assessments, where relevant, some recommendations for enhancement or improvement of the draft policies have been suggested. Further detailed recommendations are presented in Table D.14.1.

Table D.1.2: Summary of policy assessments

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDS1	+	+	+	+	+	+	-	-	+	+	0	+	+	0
SDS2	+	+	+	+	0	++	+	0	+	+	+	+	++	+
SDS3	0	0	+	+/-	0	+	0	0	+	+	+	+	+	0
SDS4	++	++	0	+	+	0	+	0	+	0	+	+	0	0
SDS5	+	+	0	+	0	0	0	0	+	0	+	+	+	0
SDS6	+	+	0	0	0	+	0	0	0	0	0	+	0	0
SDS7	0	+	+	+	+	0	+	0	0	0	0	+	+	0
SNE1	0	+	++	+	+	0	+	0	0	0	0	+	0	0
SNE2	0	+	++	+	+	0	+	0	0	0	0	+	0	0
SNE3	0	+	+	+	+	+	+	0	0	0	0	+	0	0
SNE4	+	+	+	0	0	0	0	0	0	0	0	0	+	+
SNE5	+	++	++	0	+	0	+	0	0	0	0	+	0	0
SNE6	+	+	+	0	0	0	+	0	+	+	0	+	+	0
SHE1	++	+	0	0	0	0	0	0	0	0	0	0	0	0
SHE2	++	+	+	0	0	0	0	0	0	0	0	0	+	0
SHE3	+	+	0	0	0	0	0	0	0	0	0	0	0	0
SHE4	+	+	0	0	0	0	0	0	0	0	0	0	0	+
SCC1	+	+	+	++	+	+	+	0	+	0	0	+	0	0
SCC2	0	0	0	+	+	0	+	0	0	0	0	+	0	0
SCC3	0	0	+	+	+	0	+	0	0	0	0	0	0	0
SCC4	0	0	+	0	++	0	+	0	0	0	0	+	0	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SCC5	0	+	+	0	+	0	+	0	0	0	0	0	0	0
SCC6	0	0	0	+	0	0	+	0	0	0	0	0	0	0
SHW1	0	0	0	+	0	0	+	0	+	0	+	++	0	0
SHW2	0	0	0	+	0	0	+	0	+	0	+	++	0	0
SHW3	0	0	+	+	0	0	++	0	+	0	0	+	+	0
SHW4	0	+	+	+	+	0	+	0	+	0	+	++	0	0
SHW5	0	+	0	0	0	0	0	0	+	0	+	+	0	0
SHW6	0	+	+	0	0	0	0	0	0	0	+	+	0	0
SHO1	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-
SHO2	0	0	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-
SHO3	0	0	0	+	0	0	+	0	+	+	+	+	0	0
SHO4	0	0	0	0	0	0	0	0	0	+	+	0	0	0
SHO5	0	0	0	0	0	0	0	0	0	+	+	+	0	0
SHO6	0	0	0	0	0	0	0	0	0	+	+/-	0	0	0
SHO7	0	0	0	0	0	0	0	0	0	+	+	0	0	0
SHO8	0	0	0	0	0	0	0	0	+	+	+	+	0	0
SHO9	0	0	0	+	0	0	+	0	+	0	+	+	+	++
SHO10	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	+	+	+	+	+/-	+
SHO11	0	0	0	0	0	0	0	0	+	0	+	+	0	0
SEC1	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-
SEC2	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-
SEC3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-
SEC4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+	+/-
SEC5	0	0	0	0	0	0	0	0	+	0	+	+	+	+
SEC6	0	0	0	0	0	0	0	0	0	0	0	0	+	0
SCE1	+/-	+/-	+/-	+	+/-	+	+/-	+/-	+	+	+	+	+	+/-
SCE2	0	+	0	0	0	0	0	0	0	0	0	0	+	0
SCE3	0	0	0	0	0	0	0	0	+	+	+	+	+	+
SCE4	0	0	0	0	0	0	0	0	+	+	+	0	+	0
SCE5	0	0	0	+	0	0	+	0	+	0	+	+	+	0
SCE6	0	0	0	+	0	0	+	0	+	0	+	+	+	0
SWB1	0	+	0	+	+	+	0	0	+	+	+	+	+	+
SWB2	0	+	0	+	0	+	0	0	+	+	+	+	+	+
STR1	0	0	0	+	0	0	+	0	++	0	0	+	0	0
STR2	0	0	0	+	0	0	0	0	+	0	0	0	0	0
STR3	0	0	0	+	0	0	0	0	+	0	0	0	0	0
STR4	0	0	-	0	0	0	0	0	+	0	0	0	+	0
STR5	0	0	0	+	0	0	0	0	++	0	+	+	0	0
STR6	0	0	0	+	0	0	+	0	++	0	0	0	0	0
STR7	0	0	0	0	0	0	0	0	+	0	0	0	0	0
STR8	0	0	0	0	0	0	0	0	+	0	0	0	+	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
STR9	0	0	0	+	0	0	+	0	+	0	0	0	0	0
STR10	0	0	0	+	0	0	+	0	+	0	0	0	+	0
SID1	0	0	0	+	0	0	+	0	+	0	+	0	+	0
SID2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SID3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SWA1	0	0	0	0	0	0	0	++	0	0	0	0	0	0
SWA2	0	0	0	0	0	0	0	+	0	0	0	0	0	0
SWA3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0
SWA4	0	0	0	0	0	0	0	+	0	0	0	0	0	0
SWA5	0	0	0	0	0	+	0	++	0	0	0	0	0	0
SMI1	0	0	0	0	0	+	0	0	0	0	0	0	+	0
SMI2	0	0	0	0	0	+	0	0	0	0	0	0	0	0
SCO1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SCO2	0	0	0	0	0	0	+	0	0	0	0	0	0	0
SCO3	0	+	0	0	0	+	0	0	0	0	0	0	0	0
SDM1	0	+	+	+	+	0	+	0	+	0	+	+	0	0
SDM2	0	0	0	0	0	+	0	0	0	0	0	+	0	0
SDM3	0	+	0	+	0	+	0	0	+	0	0	0	0	0
SDM4	0	+	0	0	0	0	0	0	0	0	0	0	0	0
SDM5	+	+	0	0	0	0	0	0	0	0	0	0	+	0
SDM6	0	0	0	0	0	0	0	0	0	0	+	+	0	0
SDM7	0	0	0	0	0	0	0	+	0	0	0	0	+	0
SDM8	0	0	0	0	0	0	0	0	0	0	0	0	+/-	0
SDM9	0	0	0	0	0	0	0	0	0	0	+	+	0	0
SDM10	0	0	0	0	0	0	0	0	0	0	0	0	+	0

## D.2 Vision and Objectives

D.2.1.1 In the Regulation 18 (I) Issues and Options SA, two options for the SLP Vision and 11 draft Objectives for the SLP were assessed. Following consideration of the SA findings and comments received during the Issues and Options Consultation, SMBC have in the Draft SLP proposed a Vision for the Sandwell Local Plan to 2041, and 13 Objectives. The updated Vision and Objectives have therefore been assessed below.

### D.2.2 Sandwell Local Plan Vision

#### **Sandwell Local Plan Vision 2041**

In 2041, Sandwell is a thriving, growing and active Borough, leading the urban renaissance of the West Midlands conurbation.

Sandwell is at the forefront of tackling climate change, in its role as a hub for climate adaptation and mitigation technologies and industries. Its new buildings are clean and energy efficient in their design, materials and operations, its old buildings are adapted to deliver low and zero carbon outputs. It sets the standard in both public and private sectors for embedding climate change awareness and sensitivity in all its actions, outcomes and decisions.

Notwithstanding its urban character, Sandwell's residents enjoy access to country and town parks, open spaces, green networks and corridors and increasing numbers of pocket parks, landscaping schemes and tree cover, as part of their everyday activities and leisure time. Sandwell's natural environment is valued for its own sake as well as for its contribution to the health and wellbeing of people living, working, learning in and enjoying the borough.

Sandwell's historic environment is a source of pride for its communities and continues to reflect its industrial and architectural heritage, in restoration and renovation schemes and in the sensitive design of new buildings. Historic buildings in Sandwell are reused, repurposed and retrofitted to enable their retention and occupation for years to come.

Sandwell continues to deliver sustained and sustainable economic growth and investment opportunities from its highly accessible location at the heart of the country. It provides high-quality goods and services from its powerful industrial base and levels of employment, wages and economic activity are high and rising.

Sandwell's residents enjoy longer and healthier lives than in previous decades, thanks to the increase in open spaces, the provision of services and facilities designed to promote active recreation and leisure, the improvement of and increased accessibility to healthcare infrastructure and the promotion of healthy lifestyle choices. They have access to well-performing schools, higher and further education provision at all levels and to continued opportunities for skills development and training.

There is a wide range of housing available to Sandwell residents, designed to support sustainable living and capable of adaptation to suit all sections of the community. Affordable, social and council houses are available to those who need them. New developments are located within attractively landscaped areas, with access to district and low-cost energy and heating projects, sustainable drainage designed to improve the local environment as well as provide reliable protection against flooding and run-off and all necessary services and facilities within walking distance or a short bus ride away.

Sandwell's town centres thrive by day and by night, with an expanded range of retail, leisure and socialising opportunities as well as acting as the foci for new residential developments, community activities and social enterprises.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Vision	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SLP Vision	++	++	+	++	++	+	+	0	++	++	++	++	++	++

- D.2.2.1 The proposed Vision for Sandwell in 2041 sets out the aspiration to support growth and regeneration for the borough, meeting the needs of the local population and addressing key issues, whilst conserving the natural and historic environment.
- D.2.2.2 The SLP Vision seeks to develop Sandwell’s role as an industrial hub for the West Midlands by driving climate change adaptation and mitigation technologies, to ensure that the borough plays a key role in tackling climate change whilst striving for economic growth. Sustainable and energy efficient design and construction techniques, and exploration of alternative and low-carbon technologies would also be supported. A major positive impact could be achieved regarding climate change mitigation (SA Objective 4). Through encouraging sustainable economic growth and investment, alongside regeneration and revitalisation of Sandwell’s towns including retrofitting of historic buildings, a major positive impact on the economy (SA Objective 13) would also be likely.
- D.2.2.3 The SLP Vision encourages the delivery of new developments that are carefully planned to take the effects of climate change into account, including incorporation of sustainable drainage techniques, flood mitigation and adaptation measures, as well as access to district and low-cost energy and heating projects. Recognising the multi-functional benefits of green infrastructure (GI), the SLP Vision promotes the conservation and enhancement of parks, open spaces, green networks and tree coverage within Sandwell. GI can play a key role in helping urban areas adapt to the effects of climate change, for example through providing protection from extreme weather events, and helping to alleviate the ‘urban heat island’ effect. Together, these measures would be likely to lead to a major positive impact on climate change adaptation (SA Objective 5).
- D.2.2.4 Through encouraging the conservation and enhancement of GI and Sandwell’s natural environment, the SLP Vision would be likely to lead to a minor positive impact on biodiversity and natural resources (SA Objectives 3 and 6), through potentially helping to increase the coverage and connectivity of ecological networks and GI, supporting the ecosystem services they provide.
- D.2.2.5 Additionally, the emphasis on providing access to a variety of parks and open spaces for new developments would be likely to lead to positive effects on human health. Access to a range of open and green spaces is known to be beneficial for both mental and physical wellbeing, by providing areas for recreation, exercise and reflection. Well designed and attractive neighbourhoods which incorporate GI are likely to encourage people to live more active lifestyles. Furthermore, the Vision promotes the improvement of and increased accessibility to healthcare infrastructure, which would be likely to help address health inequalities. Overall, the SLP Vision could lead to a major positive impact on health (SA Objective 12).

- D.2.2.6 Pocket parks and other open spaces within urban areas can also provide valuable spaces for community involvement and help to encourage social cohesion. More cohesive and vibrant neighbourhoods would be likely to contribute towards improved quality of life and strengthen the sense of local identity. Alongside the proposed improvement of employment and training opportunities, as well as improved access to amenities, this would be likely to lead to a major positive impact on equality (SA Objective 11).
- D.2.2.7 Town centres are proposed to be the focus for the majority of new residential and community growth, where existing services are concentrated and there is most potential for new provision. The SLP Vision would help to ensure that residents, workers and visitors within the borough have access to a range of facilities to meet their needs as well as opportunities for leisure and entertainment. In addition to helping revitalise Sandwell's town centres and high streets, this would see benefits to transport and accessibility, through reducing the need to travel and promoting more sustainable travel including walkable neighbourhoods and improved public transport. A major positive impact on transport could be achieved (SA Objective 9), with potential for a minor positive impact on pollution (SA Objective 7) owing to the associated reduction in transport-related emissions.
- D.2.2.8 Through rejuvenating townscapes, promoting landscape schemes and increasing the quantity and quality of open spaces and GI, the SLP Vision would be likely to lead to an improvement in the local landscape and townscape character. In combination with the promotion of community facilities, the SLP Vision could potentially help to strengthen sense of place and local identity, resulting in a major positive impact on landscape overall (SA Objective 2).
- D.2.2.9 The SLP Vision supports the conservation and enhancement of cultural heritage assets and encourages their conservation and renewal where appropriate, recognising the importance of Sandwell's historic environment in providing a sense of place. Therefore, the SLP Vision would be likely to have major positive effects in relation to the cultural heritage (SA Objective 1) through sensitive design of new buildings, restoration and renovation schemes, and reusing and repurposing historic buildings in Sandwell.
- D.2.2.10 The Vision seeks to ensure the provision of a range of housing types to meet the diverse needs of the population, including accessible and adaptable homes, affordable homes, and social housing. As such, a major positive impact on housing provision would be likely (SA Objective 10).
- D.2.2.11 The Vision seeks to improve access to schools and training opportunities and improve educational attainment. Access to higher and further education provision is also highlighted. Together, these provisions would help to encourage more diversity in opportunities including for life-long learning and support the provision of an appropriately skilled workforce. A major positive impact on education would be likely (SA Objective 14).
- D.2.2.12 The Vision does not directly reference waste or recycling, and as such, a negligible impact is identified for SA Objective 8.

## D.2.3 Sandwell Local Plan Objectives

### **Sandwell Local Plan Objectives**

#### **Climate Change**

1. Ensure new development takes a proactive approach to climate change mitigation, adaptation and carbon reduction, and that development is resilient to climate change.
2. Deliver sustainable development in locations where people can access jobs and services, delivering wider positive social and economic outcomes and protecting and enhancing local built and natural environments.

#### **Enhancing our natural environment**

3. To protect and enhance Sandwell's natural environment, natural resources, biodiversity, wildlife corridors geological resources, countryside and landscapes, whilst ensuring that residents have good access to interlinked green infrastructure.

#### **Enhancing our historic environment**

4. Protect, sustain and enhance the quality of the historic built environment, ensuring the retention of distinctive and attractive places and beautiful buildings, including listed parks, scheduled monuments and their settings.
5. To manage and maintain the wider historic environment across Sandwell, including parks and gardens, areas of industrial heritage value, sites of geological and archaeological interest and locally listed buildings, structures and historic assets.

#### **Housing that meets all our needs**

6. Address Sandwell's identified and wide-ranging housing needs by supporting the provision of high-quality new homes, to include a wide mix of housing type and tenure, that: -
  - o are capable of being adapted to meet the future needs of occupiers;
  - o provide sufficient internal and external space; and
  - o promote and support climate change adaptation and mitigation through good design and in the materials and techniques used for their construction.
7. Ensure communities in Sandwell are safe and resilient and social cohesion is promoted and enhanced.

#### **Enabling a strong, stable and inclusive economy**

8. Support regeneration, business investment and job creation to maintain and grow a prosperous and resilient local and regional economy in ways that consider environmental and climate change factors.
9. To enable communities to share the benefits of economic growth through securing access to new job opportunities and enhanced skills and training programmes.

#### **Improving the Health and Wellbeing of residents and promoting social inclusion**

10. 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 and discouraging harmful behaviours.
11. Ensure new development and open spaces support health and wellbeing for all, reduce health inequalities and encourage active and healthy lifestyles.
12. 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.

#### **Good Design**

13. Require new development to deliver a high standard of design reflecting local character and distinctiveness and that creates greener and safer places that people feel proud to live and work in.

#### **Brownfield First**

14. Encourage the effective and prudent use of previously developed land and natural resources, including the efficient use of land and buildings and the use of sustainable and climate-aware

## Sandwell Local Plan Objectives

construction techniques within new developments, as well as providing for waste management and disposal.

### Enhancing the vitality of our centres

15. Support Sandwell’s towns and local centres as places for economic, residential and cultural activity with good access to services, in ways that protect their heritage, character and identity.

### Promoting sustainable transport and active travel

16. To prioritise sustainable and active travel and seek to improve transport infrastructure to ensure efficient and sustainable accessibility within an integrated network.  
 17. To manage waste as a resource and minimise the amount produced and sent to landfill.

### Meeting our resource and infrastructure needs

18. Ensure development is supported by essential infrastructure and services and promotes safe movement and more sustainable modes of travel through promoting greener travel networks for walking, cycling and public transport.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
SLP Objective	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
1	0	0	0	++	++	0	0	0	0	0	0	0	0	0
2	+	+	0	+	0	0	+	0	++	0	+	++	++	++
3	0	++	++	++	++	+	+	0	+	0	+	+	0	0
4	++	++	0	0	0	0	0	0	0	0	0	0	+	+
5	+	++	+	0	0	0	0	0	0	0	0	0	+	+
6	0	0	0	+	+	0	0	0	0	++	+	0	0	0
7	0	0	0	0	0	0	0	0	0	0	++	+	0	0
8	0	0	0	0	0	0	0	0	0	0	+	0	++	0
9	0	0	0	0	0	0	0	0	0	0	+	0	++	+
10	0	0	0	+	0	0	+	0	+	0	++	++	0	0
11	0	0	0	0	0	0	0	0	0	0	++	++	0	0
12	0	+	0	+	0	+	+	0	++	0	++	++	0	0
13	+	++	0	0	0	0	0	0	0	0	+	+	0	0
14	0	+	0	+	0	++	+	+	0	0	0	0	+	0

SLP Objective	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
15	+	+	0	0	0	0	0	0	+	+	+	+	++	+
16	0	0	0	+	0	0	+	0	++	0	0	+	0	0
17	0	0	0	0	0	0	+	+	0	0	0	0	0	0
18	0	0	0	+	0	+	+	+	++	0	+	+	+	+

D.2.3.1 SLP Objective 1 promotes the future proofing of new development to the effects of climate change and supports reducing GHGs. By embedding these principles into the SLP objectives, this demonstrates SMBC’s commitment to reducing Sandwell’s contributions towards the causes of climate change. A major positive impact on climate change mitigation and adaptation could be achieved (SA Objectives 4 and 5).

D.2.3.2 SLP Objective 2 seeks to locate development in areas with good accessibility to local services. This is likely to include healthcare facilities, employment opportunities and schools, with major positive impacts anticipated for health, the economy and education (SA Objectives 12, 13 and 14). Through directing growth to accessible locations, the SLP Objective would be likely to reduce the need to travel, resulting in a major positive impact on transport (SA Objective 9) and potentially leading to a minor positive impact on climate change mitigation and air pollution by reducing associated emissions (SA Objectives 4 and 7). By promoting good access for all, a minor positive impact would also be expected for equality (SA Objective 11). SLP Objective 2 also seeks to ensure the protection and enhancement of both the built and natural environment of the local area, with potential secondary minor positive benefits in relation to cultural heritage and landscape (SA Objectives 1 and 2).

D.2.3.3 SLP Objective 3 aims to conserve and enhance the natural environment of Sandwell, including designated habitats, landscapes and GI. By protecting and enhancing natural features including habitats and ecological networks, a major positive impact on landscape and biodiversity would be likely (SA Objectives 2 and 3) as well as a minor positive impact on natural resources (SA Objective 6). GI can provide a range of ecosystem services, including helping urban areas to adapt to climate change, for example through providing protection from extreme weather events, and helping to alleviate the ‘urban heat island’ effect. As such, conserving and enhancing GI would be expected to lead to a major positive impact on climate change mitigation and adaptation (SA Objectives 4 and 5). Supporting interlinked GI may also help to encourage active travel, reduce motorised transport and therefore reduce air pollution. SLP Objective 3 could therefore potentially have a minor positive impact on pollution and transport (SA Objectives 7 and 9), as well as in terms of health and equality through improving access to GI (SA Objectives 11 and 12).

- D.2.3.4 SLP Objective 4 recognises the importance of Sandwell’s heritage. A major positive impact on cultural heritage would be expected through the protection and enhancement of important historical sites including Listed Buildings and SMs (SA Objective 1). SLP Objective 4 also seeks to retain and enhance local distinctiveness and create an attractive public realm, which could lead to a major positive impact on landscape (SA Objective 2). This could also have a knock-on minor positive impact on the visitor economy, through conserving and enhancing cultural heritage assets and historic structures of interest (SA Objective 13). Furthermore, enhancing cultural heritage sites could promote education about the historic environment within Sandwell and result in a minor positive impact on education (SA Objective 14).
- D.2.3.5 SLP Objective 5 supports the conservation of the historic environment and will ensure its protection, therefore having a minor positive impact on cultural heritage (SA Objective 1). SLP Objective 5 specifically mentions the maintenance of parks and gardens, archaeological sites and locally listed heritage assets. The protection of these particular areas will also contribute to safeguarding the character of the landscape and local distinctiveness, so a major positive impact on landscape would be expected (SA Objective 2). Furthermore, by protecting heritage sites and landscapes that strengthen local distinctiveness, as well as sites of geological interest, opportunities may arise for educational activities and economic prosperities through the use of such sites, hence, we could expect a minor positive impact on geodiversity, economy and education (SA Objectives 3, 13 and 14).
- D.2.3.6 SLP Objective 6 supports sustainable high-quality housing development to meet the needs of the population, which is likely to result in a major positive impact on housing (SA Objective 10). The support for sustainable and adaptable homes would be likely to lead to a minor positive impact on climate change mitigation and adaption (SA Objectives 4 and 5). SLP Objective 6 states that a wide range of housing needs must be met therefore a minor positive impact on equality would be expected (SA Objective 11).
- D.2.3.7 SLP Objective 7 aims to strengthen Sandwell’s communities and improve social cohesion. This is likely to lead to a greater sense of identity for local residents and promote more vibrant communities where people from all backgrounds can feel valued and safe. Therefore, a major positive impact on equality (SA Objective 11) could be achieved, with a secondary minor positive impact on wellbeing (SA Objective 12).
- D.2.3.8 SLP Objective 8 supports economic growth within Sandwell, to increase the provision of jobs and boost the prosperity of the local economy. Through seeking to maintain a resilient economy and encourage new businesses and regeneration within the SLP area, a major positive impact on the economy would be likely (SA Objective 13). Through increasing the number and variety of jobs in the area, this SLP Objective would be likely to lead to a minor positive impact on access to employment opportunities, with benefits to equality (SA Objective 11).
- D.2.3.9 SLP Objective 9 supports equality, education and the economy. The SLP will aim to provide new job opportunities and training programmes as a result of economic growth. By sharing the benefits of economic growth, this would be likely to result in a minor positive impact on equality and education (SA Objectives 11 and 14). In doing so, these impacts

will help to further boost the economy, hence a major positive impact would be seen on SA Objective 13.

- D.2.3.10 SLP Objective 10 promotes healthy lifestyles and active travel, thereby supporting a shift away from private car use where possible. Providing a built environment that supports active travel would likely have a minor positive impact on transport (SA Objective 9), and potentially climate change mitigation and pollution (SA Objectives 4 and 7), as well as a major positive impact on health (SA Objective 12). This SLP Objective also seeks to improve social interaction and discourage harmful behaviours which would likely have a major positive impact on equality (SA Objective 11).
- D.2.3.11 SLP Objective 11 is centred around health. Through the encouragement of active lifestyles and ensuring open spaces are provided alongside development, there is likely to be improved sustainable access to outdoor space for exercise and leisure. By supporting health and wellbeing for all and reducing health inequalities, a reduction in social deprivation is likely. SLP Objective 11 will likely have a major positive impact on equality and health (SA Objectives 11 and 12).
- D.2.3.12 SLP Objective 12 promotes conserving and enhancing the built and natural environment, aiming to ensure that developments protect health, minimise air and noise pollution, promote low emission travel and provide safe streets. The focus on encouraging active and healthy lifestyles could potentially also lead to improvements to the active travel network. A major positive impact on transport, equality and health would be anticipated (SA Objectives 9, 11 and 12). Through promoting active and low emission travel, and seeking to minimise adverse effects of pollution, SLP Objective 12 could also lead to minor positive impacts on residential amenity and the landscape, climate change mitigation, natural resources and pollution (SA Objectives 2, 4, 6 and 7).
- D.2.3.13 SLP Objective 13 promotes high quality design for new development that is in keeping with the local character of the area. Good design that is planned carefully to consider its surroundings would be likely to strengthen local distinctiveness and sense of place. A major positive impact would be likely in terms of the local landscape and townscape character (SA Objective 2). A minor positive impact could also occur in relation to cultural heritage (SA Objective 1), where historic landscapes and buildings form a key part of the local character. Furthermore, through seeking to create a high standard of design with greener and safer neighbourhoods, SLP Objective 13 would also be expected to secure benefits in terms of equality and wellbeing of local residents (SA Objectives 11 and 12).
- D.2.3.14 SLP Objective 14 promotes an efficient use of land and seeks to ensure that the SLP focuses development on previously developed land where appropriate, in accordance with the NPPF. A major positive impact on natural resources (SA Objective 6) could be achieved. SLP Objective 14 is likely to also encourage appropriate re-use or intensification of under-utilised land, which may help to stimulate urban regeneration, with potential minor positive benefits to townscapes and the economy (SA Objectives 2 and 13). Benefits for pollution (SA Objective 7), waste (SA Objective 8) and climate change mitigation (SA Objective 4) could also be achieved, through the potential for remediation of contaminated brownfield land for development as well as the intention to support sustainable waste management and construction techniques.

- D.2.3.15 SLP Objective 15 seeks to develop the role of Sandwell's towns and centres as hubs of economic, residential and cultural activities, whilst ensuring the landscape and historic character and identity of the local area are protected. Investing in Sandwell's centres and supporting appropriate growth would be likely to help promote urban regeneration and improve the vibrancy of town centres, with a major positive impact on the local economy (SA Objective 13) and a minor positive impact on landscapes, townscapes and cultural heritage (SA Objectives 1 and 2). Through supporting residential growth in areas with good access to services, potentially including community facilities, healthcare and schools, SLP Objective 15 could also lead to a minor positive impact on transport, housing, equality, health and education (SA Objectives 9, 10, 11, 12 and 14).
- D.2.3.16 SLP Objective 16 prioritises sustainable travel and improved transport infrastructure. This should help to reduce the per capita carbon footprint of Sandwell and increase the efficiency of the transport network, therefore having a major positive impact on transport (SA Objective 9), and a minor positive impact on climate change mitigation (SA Objective 4). Supporting active travel is also likely to have a minor positive impact on health (SA Objective 12). As a consequence of improving transport infrastructure, it is likely air and noise pollution will slightly decrease, so a minor positive impact on pollution can be expected (SA Objective 7).
- D.2.3.17 SLP Objective 17 is likely to have a minor positive impact on waste (SA Objective 8) as it seeks to reduce the amount of waste sent to landfill. However, greater detail would be useful to explain how waste generation can be reduced and sustainably managed during both construction and occupation of new development. A minor positive impact can also be expected on pollution (SA Objective 7) since reducing waste sent to landfill will help to reduce soil pollution.
- D.2.3.18 SLP Objective 18 seeks to ensure that new development proposed through the SLP is supported by essential infrastructure and services, with a particular focus on transport infrastructure. The SLP Objective supports green travel networks which encourage walking, cycling and public transport, which would be likely to facilitate a modal shift away from private car use. A major positive impact on transport and accessibility would be likely (SA Objective 9), with a minor positive impact on climate change mitigation (SA Objective 4) and pollution (SA Objective 7) owing to the associated reduction in transport-related emissions including GHGs. By encouraging active travel, SLP Objective 18 could also lead to benefits in terms of health and wellbeing (SA Objective 12). By providing essential infrastructure, this is expected to ensure provision of appropriate connections to utilities such as water and sewerage, with a minor positive effect likely for natural resources and waste (SA Objectives 6 and 8). Benefits could also be secured in terms of access to social infrastructure such as community facilities, healthcare, jobs and schools, with minor positive impacts anticipated (SA Objectives 11, 12, 13 and 14).

## D.3 Development Strategy

### D.3.1 Policy SDS1 – Development Strategy

#### **Policy SDS1 – Development Strategy**

1. To support the attainment of the Sandwell SLP Vision, drive sustainable and strategic economic and housing growth and meet local aspirations, Sandwell, working with local communities, partners and key stakeholders, will make sure that decisions on planning proposals:
  - a. deliver at least 10,686 new net homes and create sustainable mixed communities including a range and choice of new homes supported by adequate infrastructure.
  - b. deliver at least 1,206ha of employment land (of which 29ha is currently vacant)
  - c. ensure that sufficient physical, social, and environmental infrastructure is delivered to meet identified requirements
  - d. support improvements to the health and wellbeing of Sandwell’s communities by requiring new development to address the following: -
    - i. increased access to green spaces;
    - ii. active and passive recreation;
    - iii. active travel;
    - iv. improved and accessible education and healthcare infrastructure;
    - v. opportunities for people to make healthier choices.
  - e. minimise and mitigate the likely effects of climate change, recognising the multifunctional benefits that open spaces, landscaping, trees, nature conservation habitats and both green and blue infrastructure can deliver in doing so;
  - f. create new public open spaces to serve new housing developments;
  - g. protect and improve parks, woodland and tree planting, open spaces, landscapes and habitats across the borough;
  - h. protect the openness, integrity and function of Sandwell’s designated green belt by resisting inappropriate development in it;
  - i. protect habitats and areas of ecological value;
  - j. conserve the historic and archaeological environment and protect areas with geological and landscape value;
  - k. promote the use of zero- and low-carbon designs, building techniques, materials and technologies in all new development.
2. The SLP seeks to ensure this growth is sustainable by requiring the following issues are addressed in planning proposals: -
  - a. delivering as much new development as possible on previously developed land and sites in the urban area;
  - b. allocating housing in locations with the highest levels of sustainable transport access to residential services (retail provision, schools, healthcare facilities, fresh food, employment etc.);
  - c. regenerating existing housing and employment areas and help them deliver: -

### Policy SDS1 – Development Strategy

- i. cleaner, more energy-efficient and more intensive areas of growth; and ii. improving the environmental, climate change, accessibility and socioeconomic capacity of existing residential and employment areas;
- d. allocating new employment land where sustainable access and good public transport links are available;
- e. taking advantage of existing and improved infrastructure capacity to maximise development on new sites;
- f. supporting and enhancing the sustainability of existing communities through the focussing of growth and regeneration into West Bromwich and other town centres and regeneration areas (Policy SDS2);

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDS1	+	+	+	+	+	+	-	-	+	+	0	+	+	0

D.3.1.1 Policy SDS1 sets out the overarching strategy for development in Sandwell for the plan period.

D.3.1.2 The construction, occupation and operation of 10,686 homes and 1,206ha of employment land as well as supporting infrastructure through this policy would be expected to exacerbate air pollution, including greenhouse gas (GHG) emissions and particulate matter (PM). Additionally, the increase in homes would expect an increase in waste production, by the nature of the development and the population increase. However, by directing development towards the Strategic Centre (West Bromwich) and the hierarchy of Town, District and Local Centres, Policy SDS1 would be likely to facilitate more sustainable communities, by locating residents in close proximity to services, facilities and public transport. This could potentially help to improve the sustainability of development (in terms of carbon footprint) in some locations through reducing the need to travel by private car. The policy recognises the influence of climate change on flood risk and includes measures to adapt, including *"the use of zero- and low-carbon designs, building techniques, materials and technologies in all new development"* and acknowledges the important role and *"multifunctional benefits that open spaces, landscaping, trees, nature conservation habitats and both green and blue infrastructure can deliver"*. Overall, the policy would therefore be expected to have a minor positive impact on climate change mitigation, climate change adaptation, transport, housing, and the economy (SA Objectives 4, 5, 9, 10 and 13) and a minor negative impact on pollution and waste (SA Objectives 7 and 8).

D.3.1.3 Policy SDS1 states that development will be directed towards town centres and therefore can provide greater access to local services, including healthcare facilities and the public

transport network. The policy can therefore be expected to have a minor positive impact on health (SA Objective 12).

D.3.1.4 Policy SDS1 seeks to deliver sustainable development through "*delivering as much new development as possible on previously developed land and sites in the urban area*". The reuse of previously developed land would be expected to promote an efficient use of land and have a minor positive impact on the natural resources of the borough (SA Objective 6).

D.3.1.5 The policy states that decisions in the planning process will "*protect habitats and areas of ecological value*" and also "*conserve the historic and archaeological environment and protect areas with geological and landscape value*". Additionally, the policy ensures that development within the Green Belt will be resisted, protecting the "*openness, integrity and function*" of the Green Belt. These measures will ensure that the landscape of the borough, historical assets and local biodiversity will be protected and where possible enhanced. The emphasis on regeneration could also help to revitalise centres and improve the character and quality of the public realm. Therefore, the policy could potentially have a minor positive impact on cultural heritage, landscape and biodiversity (SA Objectives 1, 2 and 3).

## D.3.2 Policy SDS2 – Regeneration in Sandwell

### Policy SDS2 – Regeneration in Sandwell

1. The Regeneration Areas identified on the Policies Map and the strategic centre of West Bromwich will be the focus for new development, regeneration, and public and private investment in the borough.
2. Proposals will be subject to relevant development plan policies and the form and location of regeneration will be guided by masterplans and /or design briefs, which will be prepared by the Council in partnership with developers, promoters and other stakeholders.

#### West Bromwich

- a. West Bromwich is a major destination for residents and visitors and will benefit from a step change in the quality of its public realm, including new green links, squares and parks.
- b. Residential and employment growth will be sought at a transformational scale to help create a vibrant and sustainable town centre with a diverse range of uses, including commercial, educational, cultural, recreational, leisure and community facilities.
- c. Sustainable and active travel modes will be the default choice for accessing and moving within the town.

#### Carter's Green

- d. Carter's Green will accommodate considerable new residential development on under-used land. The scale of growth will be complementary and subordinate to the transformation of West Bromwich.

#### Dudley Port

- e. The regeneration of Dudley Port will include employment development and the construction of new residential communities developed along Garden City principles.
- f. A new public transport hub will be developed around the interchange of the Midland Metro Extension and Dudley Port railway station.

## Policy SDS2 – Regeneration in Sandwell

### Smethwick

- g. The historic Smethwick to Birmingham canal corridor will accommodate new green neighbourhoods on re-purposed employment land and accessible active travel routes.
- h. Regeneration at Grove Lane will be focussed around the new Midland Metropolitan Hospital, and will include the development of new homes, employment, and education facilities.
- i. Industrial land at Rolfe Street will be regenerated to create a distinctive, well- designed residential community that respects the heritage of the area and its canal-side setting.

### Wednesbury to Tipton Metro Corridor

- j. Proposals for the regeneration of industrial land along the corridor of the Midland Metro Extension will be supported, including new employment development on vacant and underdeveloped land.
- k. Retail, residential, and mixed-use development will be encouraged in Wednesbury Town Centre, Great Bridge Town Centre and Owen Street District Centre in line with their position within the hierarchy of centres and the requirements of the relevant policies in the Centres chapter of the SLP.

### Development within Regeneration Areas

3. Excluding West Bromwich (Policy SWB2) the regeneration areas will provide:
- a. the principal locations for strategic employment areas;
  - b. high-quality employment areas to support the long-term success of Sandwell’s economy (Policy SEC)
  - c. the main clusters of local employment land providing for local jobs (Policies SEC3 and SEC4).
  - d. the principal locations for new industrial and logistics development – providing at least 600ha of developable employment land to meet growth needs;
  - e. a minimum of 3,414 new homes (of which 1,656 are in addition to previous allocations) of mixed type and tenure in sustainable locations well-supported by community services and local shops, set within and linked by comprehensive networks of green infrastructure with cycling and pedestrian routes;
  - f. investment in existing, new, and improved transportation infrastructure with a focus on public transport routes and hubs, to maximise their use by residents, workers and visitors;
  - g. strong links with surrounding communities and the wider network of centres;
  - h. enhanced green infrastructure, including enhancements to nature conservation sites and wildlife habitats, new and improved green spaces, and new urban greening features (Policy SDS7).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDS2	+	+	+	+	0	++	+	0	+	+	+	+	++	+

- D.3.2.1 Policy SDS2 identifies Regeneration Areas within Sandwell and sets out how specific areas will accommodate different types of development, infrastructure and investment. The policy outlines a minimum number of **X homes** to be built within the Regeneration Areas and includes measures throughout the policy that encourage the reuse of previously developed land or vacant land, for both residential and employment purposes. A minor positive impact on housing provision (SA Objective 10) would be likely.
- D.3.2.2 Furthermore, a major positive impact is anticipated in terms of natural resources (SA Objective 6) and a minor positive impact on landscape (SA Objective 2), owing to the primary focus on regeneration of existing urban areas and high-quality design. There may be opportunities for sensitive heritage-led regeneration such as the “*historic Smethwick to Birmingham canal corridor*”, with a potential minor positive impact on cultural heritage (SA Objective 1).
- D.3.2.3 The policy states that the defined Regeneration Areas will provide high-quality employment land and will be the principal location for new industrial/logistics development, with likely benefits in terms of economic growth and providing opportunities for developing a skilled workforce. A major positive impact on the economy (SA Objective 13) and a minor positive impact on education (SA Objective 14) would therefore be likely.
- D.3.2.4 For the Regeneration Areas collectively, the policy encourages investment in transport infrastructure, especially public transport. Directing development to these areas would help to ensure that residents have good access to services including community services, local shops and employment and educational opportunities by foot or public transport and could see less reliance on private car use. The strategic location of development would therefore encourage active lifestyles and could contribute to reducing the overall carbon footprint of the borough. Overall, the policy can expect to have a minor positive impact on climate change mitigation, pollution, transport and equality (SA Objectives 4, 7, 9 and 11).
- D.3.2.5 The policy also states that development proposals will incorporate GI and green neighbourhoods which could potentially have a minor positive impact on biodiversity (SA Objective 3). However, it is recommended that the policy provides further specification of the GI measures to strengthen the policy.

### D.3.3 Policy SDS3 – Towns and Local Areas

#### **Policy SDS3 – Towns and Local Areas**

1. Towns and local communities outside West Bromwich and the regeneration areas identified in Figure 3 will provide:
  - a. 1,046 new homes delivered through:
    - i. The allocation of previously identified housing sites or ones submitted as part of a Call for Sites exercise;
    - ii. the repurposing of a small number of brownfield employment sites and other previously developed and surplus land for new housing;
    - iii. small-scale residential development opportunities in highly sustainable locations;
    - iv. housing renewal areas;

### Policy SDS3 – Towns and Local Areas

- v. estimating the capacity of vacant retail floorspace
- b. Clusters of local employment land that provide land and premises to meet localised business needs.
- c. 606ha of additional employment land to meet employment needs;
- d. An integrated and (where possible) continuous network of green infrastructure and walking and cycling routes, as well as a network of centres, health, leisure, sports, recreation and community facilities;
- e. improved access and infrastructure links between regeneration projects, local areas and West Bromwich, to allow related positive outcomes to be integrated into existing and newer communities.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDS3	0	0	+	+/-	0	+	0	0	+	+	+	+	+	0

- D.3.3.1 Policy SDS3 requires land outside of the identified Regeneration Areas to provide 606ha of employment land that will meet employment needs and local business needs. The policy would therefore expect to increase job provision in the towns and local communities, and result in a minor positive impact on employment (SA Objective 13).
- D.3.3.2 The policy states that 1,046 will be delivered through the repurposing of brownfield employment sites and other brownfield sites, reducing the need for greenfield land for development. New growth would also be directed to housing renewal areas, which would help to upgrade the existing housing stock, with benefits to housing quality, wellbeing of residents and reducing land-take for new development. Therefore, it can be expected the policy would have a minor positive impact on natural resources, housing and equality (SA Objectives 6, 10 and 11).
- D.3.3.3 Although the proposed housing renewal areas may provide opportunities to integrate energy efficient designs and other carbon-reducing measures, if this involves demolishing and rebuilding homes it could also release embodied carbon, the implications of which should be considered carefully. The overall impact on climate change mitigation is uncertain (SA Objective 4).
- D.3.3.4 The policy will ensure that new development provides *"an integrated and (where possible) continuous network of green infrastructure and walking and cycling routes"*. In addition, the policy states that integration of local facilities for health and leisure would be implemented. The combination of GI, active modes of travel and local facilities would expect to result in benefits to public health and accessibility, as well as potentially improving ecological connectivity. Overall, the policy would be expected to have minor positive impacts on biodiversity, transport and health (SA Objectives 3, 9 and 12).

### D.3.4 Policy SDS4 – Achieving well-designed places

#### Policy SDS4 – Achieving well-designed places

1. Building designs will be sought that are appropriate to Sandwell and should be of a size, scale and type to integrate into their neighbourhood.
2. All development will be required to demonstrate a clear understanding of the local and wider context, character, heritage and local distinctiveness of its location and show how proposals make a positive contribution to place-making and environmental improvement.
3. The setting and significance of heritage assets should be conserved and enhanced where it exists and is likely to be impacted by new development (Policy SHE2).
4. Development proposals should employ innovative design and sustainable technologies in their schemes to help climate change mitigation and adaptation and the Council will support schemes and projects adopting a climate-sensitive approach (Policies SCC1 – SCC6).
5. To facilitate permeability and accessibility, transport proposals of a high design quality and utility will be sought. These should:
  - a. include connections to and between transport hubs;
  - b. promote active travel;
  - c. ensure that transport and travel infrastructure make a positive contribution to place-making; and
  - d. increase connectivity for all modes of travel.
6. Development should positively contribute to creating high quality, active, safe and accessible places. Design approaches that will help contribute to healthier communities and reduce health inequalities should be incorporated in developments.
7. To support the development of safe neighbourhoods, ensure quality of life and community cohesion are not undermined and minimise the fear of crime, the design of new development should create secure and accessible environments where opportunities for crime and disorder are reduced or designed out.
8. An integrated and well-connected multifunctional open space network will be pursued throughout Sandwell (linking to opportunities in the wider Black Country where possible), including through the design and layout of new developments.
9. A Design Code will be produced for Sandwell, reflecting local character and local design preferences and providing a framework for creating high-quality places.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDS4	++	++	0	+	+	0	+	0	+	0	+	+	0	0

D.3.4.1 Policy SDS4 seeks to ensure that all new developments within the Plan area are of high-quality design and have regard for the natural, built, and historic environment.

- D.3.4.2 This policy would be likely to encourage climate change resilience and help reduce carbon emissions associated with development, due to the promotion of energy efficient design and support for an innovative "*climate-sensitive*" approach. The use of modern and sustainable technologies would be likely to have minor positive impacts on climate change mitigation and adaptation (SA Objectives 4 and 5).
- D.3.4.3 Policy SDS4 seeks to ensure that the development contributes to creating "*high quality, active, safe and accessible places*" in a bid to reduce health inequalities, improve social cohesion and reduce the fear of crime within the borough. Therefore, the policy can expect to have a minor positive impact on equality (SA Objective 11).
- D.3.4.4 The policy requires that development facilitates transport of high-quality design that will contribute to greater accessibility. High quality transport design will include the promotion of active travel, increased connectivity of travel modes and transport hubs. In addition, the policy seeks to produce "*an integrated and well-connected multifunctional open space network*", which would help to facilitate active travel and provide open space for outdoor exercise and recreation. The measures outlined in the policy would encourage active transport and less reliance on private car use, having benefits to carbon emissions, air pollution, congestion, and public health. Overall, the policy would expect to have minor positive impacts on pollution, transport, and public health (SA Objectives 7, 9 and 12).
- D.3.4.5 The policy states that development must demonstrate "*a clear understanding of the local and wider context, character, heritage and local distinctiveness of its location*", and positively contribute towards high quality design and placemaking. Furthermore, the policy states that "*the setting and significance of heritage assets should be conserved and enhanced where it exists and is likely to be impacted by new development*". A major positive impact in relation to the historic character and local landscape would be expected (SA Objectives 1 and 2).

### D.3.5 Policy SDS5 – Cultural Facilities and the visitor economy

#### **Policy SDS5 – Cultural Facilities and the visitor economy**

##### **Development proposals**

1. Cultural, tourist and leisure facilities within Sandwell will be protected, enhanced and expanded (where appropriate) in partnership with key delivery partners and stakeholders.
2. Proposals for new development or uses that contribute to the attractiveness of Sandwell as a visitor destination (including for business tourism) will be supported in principle, subject to national guidance and the policy requirements set out elsewhere in this Plan.
3. Proposals for new cultural, tourist or leisure facilities or uses, or extensions to existing ones, should: -
  - a. be of a high-quality design,
  - b. be highly accessible and sustainable, being located within centres wherever possible;
  - c. not adversely impact on residential amenity or the operation of existing businesses,
  - d. be designed to be flexible, adaptable, and where possible be capable of alternative or community use.

## **Policy SDS5 – Cultural Facilities and the visitor economy**

4. Well-designed and accessible ancillary facilities in appropriate locations will be supported. Additional facilities within centres that support the visitor economy and business tourism sectors<sup>1</sup> will be encouraged and promoted.
5. An assessment should be undertaken (as part of the design of new developments likely to attract large numbers of people) to demonstrate and document how potential security and crime-related vulnerabilities have been identified, assessed and where necessary, addressed in a manner that is appropriate and proportionate.
6. Development that would lead to the loss of an existing cultural / tourism facility in Sandwell will be resisted unless: -
  - a. the intention is to replace it with a facility that will provide an improved cultural or tourist offer;
  - b.
  - c. 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.
  - d. An appropriate contribution is made to support and sustain an alternative local cultural, tourist or leisure facility.

### **The Visitor Economy**

7. The 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 Sandwell. This can be achieved by: -
  - a. enhancing / extending current attractions;
  - b. providing inclusive access, particularly within centres;
  - c. enhancing the visitor experience; and
  - d. delivering necessary infrastructure.
8. Links should be made to centres and those parts of Sandwell and beyond that are well-connected by public transport, considering the needs of business as well as leisure visitors, to encourage more sustainable local use of cultural and tourist attractions.
9. The canal network is also a significant visitor attraction within 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.
10. Physical and promotional links to visitor attractions close to Sandwell will be enhanced and encouraged, particularly in relation to Birmingham as a Global City and a business economy destination.
11. Proposals for heritage-related tourism will be supported where they provide positive and sustainable opportunities for social, educational and / or economic activity; heritage assets forming part of a tourist attraction will be protected from development or new or intensified activities that would adversely impact on their significance and setting (Policy SHE2).

### **Cultural facilities and events**

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<sup>1</sup> This will include the provision of hotels and other accommodation with strong links to key destinations and associated facilities.

### Policy SDS5 – Cultural Facilities and the visitor economy

12. Libraries across Sandwell together act as one of the borough’s main locations for the delivery of cultural events and activities (e.g. music, theatre, dance, poetry, literature). Their role as community venues should be maintained and supported as part of the wider cultural offer of the borough.
13. To ensure Sandwell can provide opportunities for cultural growth, the retention and protection of venues providing performance spaces, recording facilities and practice amenities will be sought. The provision of new venues and facilities in sustainable and accessible locations will also be welcomed and supported, particularly within town centres.
14. In cases where new development could potentially prejudice the successful ongoing operation of an adjacent cultural / performance venue, the “agents of change” principle will be applied<sup>2</sup>.
15. The promotion and protection of attractions and events that represent and celebrate the wide cultural and ethnic diversity across Sandwell will be encouraged, including spectator sports 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 Sandwell-wide basis in a range of suitable locations.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDS5	+	+	0	+	0	0	0	0	+	0	+	+	+	0

- D.3.5.1 This policy aims to provide for the protection, enhancement, promotion, and expansion of cultural, tourist and leisure facilities within the borough. Policy SDS5 would be likely to have a minor positive impact on the economy through the safeguarding and promotion of such sites and by enhancing the tourism potential of Sandwell (SA Objective 13).
- D.3.5.2 Alongside the delivery of highly accessible facilities and provision of local employment opportunities, various provisions within this policy would be expected to have benefits to the community and promote social inclusion. These include the promotion of *“opportunities for cultural growth, the retention and protection of venues”* and *“the protection of valuable cultural and religious buildings and the promotion of cultural, religious and community festivals on a Sandwell-wide basis”*. A minor positive impact on equality would therefore be expected (SA Objective 11).
- D.3.5.3 The policy includes measures that would improve the accessibility of the visitor facilities within the borough, enabled through delivering the necessary infrastructure to ensure links to centres that are well supported by public transport. The policy also identifies the importance of the canal network, where *“facilities adjoining and serving the canal network*

<sup>2</sup> Paragraph 187 of the NPPF (2023) 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.

*should be maintained and expanded to help provide a network of linked amenities and visitor hubs*". Encouraging the use of local attractions and facilitating accessibility to these attractions would encourage active travel and improve health of residents and can further reduce the reliance on private car use. Therefore, the policy can expect to have a minor positive impact on climate change mitigation, transport, and health (SA Objectives 4, 9 and 12).

D.3.5.4 The policy states that *"cultural, tourist and leisure facilities within Sandwell will be protected, enhanced and expanded"*. This would be likely to help ensure developments are of high-quality design and create attractive areas. In addition, this policy aims to ensure *"heritage assets forming part of a tourist attraction will be protected from development or new or intensified activities that would adversely impact on their significance and setting"*. This would be likely to have a minor positive impact on cultural heritage and landscape (SA Objectives 1 and 2).

### D.3.6 Policy SDS6 – Sandwell’s Green Belt

#### **Policy SDS6 – Sandwell’s Green Belt**

1. Sandwell Council will maintain a defensible green belt boundary<sup>3</sup> around the Sandwell green belt, to help promote urban renaissance, to maximise its role in helping to mitigate climate change impacts and to support easy access to the countryside for residents.
2. Sandwell green belt’s nature conservation, landscape, heritage and agricultural value will be protected and enhanced.
3. Opportunities will be taken to improve the value and recreational role of the green belt in Sandwell Valley:
  - a. through improving safe accessibility for all users;
  - b. by providing facilities for active and passive recreation (if this preserves the openness of the Green Belt and does not conflict with the purposes of including land within it<sup>4</sup>);
  - c. by protecting tranquil areas and locations with ecological and historic value.
4. Extensions to existing buildings, the re-use of buildings<sup>5</sup> or limited infilling / redevelopment / replacement of them within the footprint of an existing developed site within Sandwell’s Green Belt will be considered for approval provided:
  - a. extensions are not disproportionately over and above the size of the existing building(s) as originally constructed;
  - b. for replacement buildings, the new building is in the same use and not materially larger than the one it replaces;
  - c. the scale, materials and general design of the proposed development or redevelopment are in keeping with the character of the buildings and their surroundings and avoid greater impact and harm to the openness of the Green Belt; and
  - d. it does not lead to an increase in the developed proportion of the overall site.

<sup>3</sup> The boundary of the Sandwell Green Belt is shown on the Policies Map.

<sup>4</sup> Paragraph 149c (or any subsequent update) of the NPPF (2023).

<sup>5</sup> Provided they are of permanent and substantial construction

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDS6	+	+	0	0	0	+	0	0	0	0	0	+	0	0

D.3.6.1 The policy aims to maintain a strong Green Belt boundary that will *"promote urban renaissance"* alongside aiding climate change mitigation and providing accessibility to the open countryside for residents of the borough. The policy aligns its aims with the purposes of the Green Belt as defined by the NPPF<sup>6</sup>, *"the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence"*.

D.3.6.2 The policy states that *"Sandwell green belt's nature conservation, landscape, heritage and agricultural value will be protected and enhanced"*. In addition, the policy seeks to utilise opportunities for the improvement of the Green Belt's recreational role by improving accessibility, improving facilities for active and passive recreation, and protecting tranquil areas of ecological and historic value. The policy would therefore be likely to result in a minor positive impact on the conservation of heritage and landscape character (SA Objectives 1 and 2) and to human health and wellbeing in terms of improving opportunities for recreation and access to the countryside (SA Objective 12).

D.3.6.3 Policy SDS6 includes measures that promote the reuse of old buildings within the Green Belt, considered for development permitting that they follow the requirements of 4a, 4b, 4c and 4d of the policy. The policy promotes the efficient use of land and prevents the loss of undeveloped land for built form. Therefore, the policy would be expected to have a minor positive impact on natural resources (SA Objective 6).

### D.3.7 Policy SDS7 – Green and Blue Infrastructure in Sandwell

#### **Policy SDS7 – Green and Blue Infrastructure in Sandwell**

1. The Council will support a strategic approach to green and blue infrastructure by:
  - a. working with relevant partners to prepare, adopt and implement a strategic Green Infrastructure Strategy for the borough;
  - b. planning, designing and managing green infrastructure in an integrated way to achieve multiple benefits;
  - c. identifying key green infrastructure assets, their function and their potential function;
  - d. identifying opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.

<sup>6</sup> Department for Levelling Up, Housing and Communities (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework-2> [Date accessed: 27/06/23]

## Policy SDS7 – Green and Blue Infrastructure in Sandwell

2. Sandwell’s green and blue infrastructure networks, including open spaces, green spaces, nature conservation sites, habitats, rivers, canals, other waterways, trees and green features, should be enhanced wherever possible (see SNE1 – SNE6).
3. Development in Sandwell will be expected to maintain the existing network of green infrastructure across the borough.
4. Major developments will also be required to ensure green spaces and urban greening features (including tree planting, vegetation, gardens, green roofs and green walls, sustainable drainage systems, etc.) are planned, designed and managed in an integrated way to deliver multiple environmental benefits over the lifetime of the development (Policies SCC1 – SCC6).
5. Proposals that would result in the loss of existing green infrastructure will be resisted unless it can be demonstrated that new opportunities will be provided that mitigate or compensate for this loss and ensure that the ecosystem services of the area are retained (Policy SNE2).
6. Major developments will be expected to maximise opportunities for enhancing existing green spaces and waterways by incorporating appropriate urban greening to enhance the visual quality and ecological functions of the site.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDS7	0	+	+	+	+	0	+	0	0	0	0	+	+	0

D.3.7.1 Policy SDS7 outlines the requirements of developments to incorporate GI and blue infrastructure (BI) and how this will embed into the wider GI and BI network across the borough. The intention to prepare a GI Strategy for the borough is also set out in the policy.

D.3.7.2 The policy identifies that the various GI and BI assets throughout the borough *"should be enhanced wherever possible"* and that *"major developments will be expected to maximise opportunities for enhancing existing green spaces and waterways"*. Providing green spaces would help to enhance the appearance and character of the public realm and additionally provide health benefits through the provision of open and green spaces<sup>7</sup>. Therefore, the policy would expect to have a minor positive impact on landscape and public health and wellbeing (SA Objectives 2 and 12).

D.3.7.3 The GI and BI network within the borough include *"open spaces, green spaces, nature conservation sites, habitats, rivers, canals, other waterways, trees and green features"*; enhancement of these features would be expected to benefit the biodiversity of the borough and could also potentially enhance ecosystem services, including carbon storage,

<sup>7</sup> Houlden. V., Weich. S. and Jarvis. S. (2017) A cross-sectional analysis of green space prevalence and mental wellbeing in England

natural cooling, filtration of pollutants and reduce surface water run-off rates. The policy would expect to have a minor positive impact on biodiversity, climate change mitigation, adaptation and pollution (SA Objectives 3, 4, 5 and 7).

- D.3.7.4 Furthermore, the protection and creation of GI/BI provides the opportunity to improve the local economy through the enhancement of the local environment, increasing property values, attracting inward investment, and potentially supporting economic growth. A minor positive impact on the local economy (SA Objective 13) could therefore be achieved.

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## D.4 Sandwell’s Natural and Historic Environment

### D.4.1 Policy SNE1 – Nature Conservation

#### Policy SNE1 – Nature Conservation

1. 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, such as Cannock Chase Special Area of Conservation or Fens Pools Special Area of Conservation.
2. Development will not be 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.
3. Species that are legally protected, in decline, are rare within Sandwell / the Black Country or that are covered by national, regional, or local Biodiversity Action Plans will be protected when development occurs in accordance with Part I of the Wildlife and Countryside Act 1981.
4. Where, exceptionally, the strategic benefits of a development clearly outweigh the importance of a local nature conservation site (Sites of Local Importance for Nature Conservation), species, habitat or geological feature, damage must be minimised. Any remaining impacts, including any reduction in area, must be fully mitigated. A mitigation strategy must accompany relevant planning applications. Compensation will only be accepted in exceptional circumstances.
5. The movement of wildlife within Sandwell and into / out of adjoining areas, through both linear habitats (e.g. wildlife corridors) and the wider urban matrix (e.g. stepping-stone sites) should not be impeded by development. Developers must take account of the Local Nature Recovery Network Strategy (Policy SNE2) when preparing their schemes and should plan for the maintenance and where possible enhancement of such linkages.
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. Adequate information must be submitted with applications for proposals that may affect any designated site or important habitat, species, or geological feature, to ensure that the likely impacts of the proposal can be fully assessed. Where the necessary information is not made available, there will be a presumption against granting planning permission.
7. Over the plan period, Sandwell 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SNE1	0	+	++	+	+	0	+	0	0	0	0	+	0	0

D.4.1.1 Policy SNE1 aims to protect, conserve, and enhance the biodiversity assets within the borough, from internationally designated to locally protected sites. Alongside the requirements of the policy to improve the biodiversity assets within the borough, including the management and connectivity of these assets, the policy also outlines requirements for development proposals that could result in adverse impacts on biodiversity. The policy states that *"a mitigation strategy must accompany relevant planning applications"* and additionally *"adequate information"* is also required alongside planning applications to ensure impacts are fully assessed. The policy also requires developers to accommodate the Local Nature Recovery Strategy in preparation of their schemes, which should *"plan for the maintenance and where possible enhancement of such linkages"*. The policy would expect to have a major positive impact on biodiversity (SA Objective 3).

D.4.1.2 The biodiversity assets outlined in the policy, including designated sites and other wildlife habitats, often make up key characteristics of the surrounding landscape and through protection and enhancement of these assets it would be expected to benefit the local character and visual amenity. The protection of open spaces and the natural environment would likely improve the health and mental wellbeing of residents, who would be provided with improved access to nature and opportunities for physical activity. The policy would therefore be expected to have a minor positive impact on the local landscape and health of residents (SA Objectives 2 and 12).

D.4.1.3 The biodiversity assets that would be protected and enhanced by Policy SNE1 would contribute to ecosystem services. Such ecosystem services include carbon storage, flood risk reduction, filtering of air pollutants and nutrient cycling. Therefore, a minor positive impact on climate change mitigation, climate change adaptation and pollution would be expected (SA Objectives 4, 5 and 7).

## D.4.2 Policy SNE2 – Protection and Enhancement of Wildlife Habitats

### Policy SNE2 – Protection and Enhancement of Wildlife Habitats

#### Biodiversity Net Gain

- All development proposals in Sandwell shall deliver a minimum 10% net gain in biodiversity value when measured against baseline site information. Where achievable, a higher net gain may be agreed. Losses and gains will be calculated using the extant national Biodiversity Metric<sup>8</sup>.

<sup>8</sup> BNG is measured using the Biodiversity Metric 4.0 Calculation Tool (version correct as at September 2023). Natural England have published detailed guidance on how to use the metric.

## Policy SNE2 – Protection and Enhancement of Wildlife Habitats

2. Where site clearance or other activities have lowered the biodiversity value of an on-site habitat after 30 January 2020, an estimate of the biodiversity units on site prior to those activities will be used as its baseline for calculating the site’s initial BNG value. This estimate will be based on habitat surveys, aerial photos and / or other appropriate evidence of the condition of the site, applying the precautionary principle.
3. Biodiversity net gain must be provided in line with the following principles:
  - a. there will be a requirement for on-site habitat provision / enhancement wherever practicable, followed by improvements to sites within the local area, and then other sites elsewhere within Sandwell;
  - b. where off-site measures are needed to meet biodiversity net gain requirements, it is expected that the off-site habitat enhancement or creation will be located as close to the development site as possible;
  - c. the maintenance and enhancement of the ability of plants and animals (including pollinating insects) to move, migrate and genetically disperse across Sandwell and the wider Black Country must be supported;
  - d. the provision/enhancement of priority habitats identified at the national, regional, or local level, having regard to the scarcity of that habitat within Sandwell, will be expected.
4. Compensation in the form of national biodiversity credits will only be accepted as a fall-back if mitigation is not possible within the development site boundary, elsewhere in its immediate vicinity or in the wider Sandwell area.
5. Provision of on- or off-site compensation on other sites should not replace or adversely impact on existing alternative / valuable habitats in those locations; compensatory works on them should be established via a legal agreement or under way prior to the related development being undertaken.
6. Monitoring of BNG compensation measures will be required to ensure its successful delivery, with further compensation being required in the event of initial measures being ineffective. Ongoing management of any new or improved BNG habitats together with monitoring and reporting will need to be planned for and funded for 30 years by developers, using a conservation covenant or s106 agreement as necessary.
7. Sandwell Council has identified the following site(s) and recorded them on the national register as suitable for the provision of biodiversity units to developers unable to provide a minimum 10% net gain on their own sites (See Appendix A and evidence base):

Location	Potential Project types	Baseline Units	Potential Uplift Units (%)
Hill House Farm	Large areas of ‘modified grassland’ within the site that could be improved to ‘other neutral grassland’ of good condition. The current land use may have to be adapted to accommodate these changes (arable). There is potential for uplift in other habitats on site.	241.73	+255.87 (105.85)
Hill Farm Bridge Fields	Vary sward height and increase species diversity to improve the	181.24	65.90 (36.36)

### Policy SNE2 – Protection and Enhancement of Wildlife Habitats

	condition of the grasslands. Condition of the woodland can be improved through introduction of deadwood and management of habitat regeneration.		
Tibbington Open Space (The Cracker)	improvement Relatively large areas of woodland offer strong uplift potential. ‘Other neutral grassland’ habitats and the parkland habitat both provide uplift opportunities.	90.57	+32.91 (36.17)
Menzies Open Space	Woodland improvement, some grassland improvement  Areas of ‘other neutral grassland’ can provide uplift.  Site contains a pond (non-priority). There is potential to create more uplift by improving the condition of the pond from poor to good.	157.4	+42.28 (26.86)
Warrens Hall Park Strategic Open Space	Woodland improvement, some grassland improvement	211.70	+26.93 (12.72)
Tividale Park	Scrub Species and structural improvement, tree and woodland improvement	49.66	+10.39 (20.92)

**Developers do not have to buy units on these sites.**

#### Local Nature Recovery Network Strategy

8. All development should help 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, in accordance with section 3d above;
  - 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 - recognise that spaces are needed for nature and that these should be of sufficient size and quality and must be appropriately connected to other areas of green infrastructure, to address the objectives of the local Nature Recovery Network Strategy.
9. Priority locations for habitat creation and enhancement are as shown on the Sandwell NRN Map (Appendix A). Development sites within the identified zones will be expected to contribute towards the creation of appropriate habitat linkages and types to support those priority areas.

## Policy SNE2 – Protection and Enhancement of Wildlife Habitats

10. Development should be designed to protect and enhance existing habitats and ecological networks, including wildlife corridors and stepping stones. Development should minimise any potential disturbance to species and habitats, including from site lighting.
11. Exemptions to the need to provide biodiversity net gain on development sites will be as set out in the relevant legislation and national guidance.

### Local opportunities for habitats and wildlife

12. All development shall secure the eradication of invasive species within site boundaries, where opportunities arise to do so.
13. All major development proposals with an eaves height or roof commencement height of 5m and above are required to provide integrated nesting bricks / boxes for swifts, house martins, house sparrows, starlings, and/ or bats as appropriate, to help preserve endangered species and urban biodiversity in Sandwell.
14. All applicants, including those undertaking householder schemes and smaller-scale developments are asked to consider including additional enhancement opportunities for wildlife and conservation in their proposals; the Council will consider such contributions positively when determining planning applications.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SNE2	0	+	++	+	+	0	+	0	0	0	0	+	0	0

D.4.2.1 Biodiversity Net Gain (BNG) is a requirement of the Environment Act 2021<sup>9</sup>, with Schedules 14 and 15 requiring all development under the Town and County Planning Act<sup>10</sup> to deliver at least 10% BNG from an as yet, unconfirmed date<sup>11</sup>. Goal 1 of the Environmental Improvement Plan (EIP) promotes BNG to ensure thriving plants and wildlife and that development leaves habitats in a better state for wildlife than before<sup>12</sup>. The NPPF<sup>13</sup> requires Local Planning Authorities (LPAs) when making plans and determining planning

<sup>9</sup> The Environment Act 2021. Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents> [Date accessed: 05/05/23]

<sup>10</sup> The Town and County Planning Act 1990. Available at: <https://www.legislation.gov.uk/ukpga/1990/8/contents> [Date accessed: 05/05/23]

<sup>11</sup> Current estimated date November 2023.

<sup>12</sup> DEFRA (2023) Environmental Improvement Plan 2023: First Revision of the 25 Year Environment Plan Available at <https://www.gov.uk/government/publications/environmental-improvement-plan> [Date accessed: 21/07/23]

<sup>13</sup> Department for Levelling Up, Housing and Communities (2023). National Planning Policy Framework. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf) [Date accessed: 05/05/23]

applications to deliver BNG stating that they must “*secure measurable net gains for biodiversity*”.

- D.4.2.2 Policy SNE2 aligns with current statutory requirements and requires development to deliver a minimum 10% net gain in biodiversity value. Where uplift is not possible on-site, SMBC has identified sites and recorded these on the national register as suitable for the provision of off-site biodiversity units. This will help to secure BNG in line with the mitigation hierarchy and also ensure that off-site BNG aligns with SMBC’s priorities and will benefit the residents of Sandwell.
- D.4.2.3 The Environment Act 2021 made Local Nature Recovery Networks (LNRN) mandatory. These aim to target action and investment in nature locally and will cover the whole of England. Policy SNE2 requires development proposals to help deliver the LNRN and requires development “*to protect and enhance existing habitats and ecological networks, including wildlife corridors and stepping stones*”.
- D.4.2.4 Overall, a major positive impact on biodiversity would be anticipated as a result of the policy (SA Objective 3).
- D.4.2.5 BNG would be expected to contribute towards improved air quality due to the increased uptake of carbon dioxide and filtration of pollutants associated with road transport, which could potentially help to reduce residents’ exposure to air pollution. Furthermore, due to this enhanced carbon storage capacity, this policy could potentially help to mitigate anthropogenic climate change. A minor positive impact on the climate change mitigation and pollution objectives would therefore be expected (SA Objectives 4 and 7).
- D.4.2.6 Enhanced biodiversity and green cover across the borough would be likely to have positive impact on residents’ wellbeing through providing increased access to a diverse range of natural habitats, which is known to be beneficial for mental and physical health<sup>14</sup>. A minor positive impact on human health and wellbeing would therefore be expected (SA Objective 12).
- D.4.2.7 Furthermore, the enhancement of the green network could potentially provide opportunities to safeguard and improve the character and appearance of local landscapes and townscapes and create more pleasant outdoor spaces for both people and wildlife. This would be likely to result in a minor positive impact on the local landscape quality (SA Objective 2).

#### D.4.3 Policy SNE3 – Provision, retention and protection of trees, woodlands and hedgerows

Policy SNE3 – Provision, retention and protection of trees, woodlands and hedgerows

**Retention and protection of ancient woodland and veteran or ancient trees**

<sup>14</sup> Houlden. V., Weich. S. and Jarvis. S. (2017) A cross-sectional analysis of green space prevalence and mental wellbeing in England

## Policy SNE3 – Provision, retention and protection of trees, woodlands and hedgerows

1. Development that would result in the loss of or damage to ancient woodland and / or ancient or veteran trees will not be permitted.
2. Development adjacent to ancient woodland and / or ancient or veteran trees will be required to provide an appropriate landscaping buffer, with a minimum depth of 15m and a preferred depth of 50m.
3. Provision should 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.

### **Habitat Creation**

4. Opportunities for increasing tree cover across Sandwell through habitat creation and the enhancement of ecological networks, including connecting areas of ancient woodland, should be maximised in public and private sector development layouts and landscaping, in particular through biodiversity net gain and nature recovery network initiatives (see Policy SNE2)
5. Replacement trees must not be planted in locations where they would impact on sites identified / designated as ecologically important, unless this has been specifically agreed with the Council.

### **Shading and air quality issues**

6. New houses and other buildings must be carefully designed and situated to prevent an incompatible degree of shade<sup>15</sup> being cast on them by both existing and new trees, which might generate subsequent pressure for the trees to be removed.
7. 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 when choosing and positioning new street trees, and designing streets and buildings, to allow for street-level ventilation to occur and to avoid trapping pollution between ground level and tree canopies (Policy SHW3).

### **Canopy cover**

8. The planting of new, predominantly native, trees and woodlands will be sought<sup>16</sup> in appropriate locations, to increase the extent of canopy cover in Sandwell by around 6% by 2030, in line with the Council's Tree Strategy.
9. Tree planting on new development sites should make a minimum contribution of 20% canopy cover and a recommended contribution of 30% canopy cover across the site<sup>17</sup>, especially in areas where evidence demonstrates that current levels of canopy cover are lower than the local average.
10. Development proposals should use large-canopied species where possible<sup>18</sup>, as they provide a wider range of health, biodiversity and climate change mitigation and adaptation benefits because of their

<sup>15</sup> This will be in the context of the requirements outlined in policies elsewhere in this plan on the role of trees in mitigating climate change and providing appropriate levels of shade and cooling.

<sup>16</sup> Where possible and in most cases, replacement trees should be UK and Ireland sourced and grown, to help limit the spread of tree pests and diseases, while supporting regional nurseries when acquiring them.

<sup>17</sup> Emergency Tree Plan for the UK – The Woodland Trust 2020

<sup>18</sup> Taking into account the requirements of points 6 and 7 of this policy

## Policy SNE3 – Provision, retention and protection of trees, woodlands and hedgerows

larger surface area; they will also make a positive contribution to increasing overall canopy cover<sup>19</sup> within Sandwell, as set out in the Sandwell Tree Strategy.

### Trees and Design

11. Development proposals should be designed around the need to incorporate trees already present on sites, using sensitive and well-designed site layouts to maximise their retention. Existing mature and healthy trees<sup>20</sup>, trees that are ecologically important, and ancient / veteran trees should be retained and integrated into landscaping schemes, recognising the important contribution they make to the character and amenity<sup>21</sup> of a development site and to local biodiversity networks.
12. For every tree removed from a development site, a minimum of three replacement trees will be required to be planted, in accordance with the Council's aim to increase tree canopy cover across the district by 6% and to ensure that the minimum requirement of 10% biodiversity net gain is met and preferably exceeded.
13. The species, eventual size and amenity value of replacement trees must be commensurate with the size, stature, rarity, and / or public amenity of the tree(s) to be removed. Where trees to be replaced form a group of amenity value (rather than individual specimens), replacements 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. Where possible, they must be planted in a position that will mitigate the loss of visual amenity associated with the original group.
14. Where planning permission has been granted that involves the removal of trees, suitable replacement trees must be provided onsite. Where sufficient 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 SNE2
15. Where new trees are to be planted on a development site, the species of trees and their location within the site should be informed by a site-specific survey carried out by a qualified ecologist / arboriculturalist.
16. New trees on development sites should be planted in accordance with arboricultural best practice, including the use of suitably-sized planting pits<sup>22</sup>, supporting stakes, root barriers, underground guying, and appropriate protective fencing during the construction phase.

### Hedgerows

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

<sup>19</sup> The area of ground covered by trees when seen from above.

<sup>20</sup> Health and status as assessed in a report produced by an accredited arboriculturalist

<sup>21</sup> National planning guidance identifies trees worthy of retention on amenity grounds (through use of a TPO) as those that are visible in part or whole from a public place and / or those with individual, collective and wider impact (in terms of size, form, future potential, rarity, cultural / historic value, landscape contribution and / or contribution to a conservation area). Other factors such as value for nature conservation and climate change may also be considered.

<sup>22</sup> To allow for an appropriate volume of soil in which to develop a viable root system and to prevent future stress that might affect the trees' long-term health and lifespan

## Policy SNE3 – Provision, retention and protection of trees, woodlands and hedgerows

18. New hedgerows will be sought as part of site layouts and landscaping schemes.

19. Protection of existing hedgerows before and during development must be undertaken.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SNE3	0	+	+	+	+	+	+	0	0	0	0	+	0	0

D.4.3.1 Policy SNE3 aims to create, retain and protect trees, woodlands and hedgerows, including ancient trees, ancient woodlands and veteran trees across the Plan area. Where the loss of a tree is unavoidable, this policy requires the planting of at least three appropriate trees in replacement of every tree lost, ideally native species. The policy seeks to meet aims of increasing the canopy cover of the borough by 6% to contribute to BNG requirements. Ecological surveys will also be required to identify the ecological importance of hedgerows. This would be expected to help prevent the inappropriate loss of vegetation. Trees, woodlands and hedgerows support a vast array of important flora and fauna and can serve as useful connecting habitats to facilitate the movement of species. Therefore, this policy would be expected to result in a minor positive impact on biodiversity (SA Objective 3).

D.4.3.2 The retention and enhancement of trees and woodland supported under this policy would be likely to boost the natural carbon sink and air filtration ecosystem services provided by trees and vegetation. This could also potentially help to reduce residents' exposure to air pollution, for example through the filtration or buffering of emissions associated with road transport. Furthermore, due to the enhanced carbon storage capacity tree planting would provide, this policy could potentially contribute towards mitigating anthropogenic climate change. A minor positive impact on the climate change mitigation and pollution objectives would therefore be expected (SA Objectives 4 and 7). This could also help to improve the respiratory health of residents and provide opportunities for integrating green spaces amongst development for recreation. Access to a diverse range of natural habitats is also expected to benefit mental wellbeing. Therefore, a minor positive impact would also be expected in terms of public health (SA Objective 12).

D.4.3.3 Trees serve an important role in protecting soil from erosion as a result of rainfall and surface water runoff, due to the stabilisation provided by roots and interception of rainfall by foliage. Through conserving and enhancing tree coverage across the Plan area, this policy would therefore increase the area and connectivity of GI with benefits for climate change adaptation (SA Objective 5), and be likely to help preserve soils resulting in a minor positive impact on natural resources (SA Objective 6).

D.4.3.4 Furthermore, trees, woodlands and hedgerows can be a useful tool to help integrate new development into the existing landscape character, for example, in terms of protecting or

enhancing views, or providing visual interest. Therefore, this policy could potentially result in minor positive impact to the local landscape (SA Objective 2).

- D.4.3.5 It is recommended that this policy is expanded to ensure that the species of trees planted and their location within the development is informed by a site-specific survey carried out by a qualified ecologist/arboriculturalist.

#### D.4.4 Policy SNE4 – Geodiversity and the Black Country UNESCO Global Geopark

##### Policy SNE4 – Geodiversity and the Black Country UNESCO Global Geopark

1. Development proposals in Sandwell will not be supported where they would have significant adverse impact on Black Country UNESCO Global Geopark geosites, except:
  - a. where suitable mitigation and / or compensation is provided to address the adverse impacts of the proposed development;
  - or
  - b. where any residual harm following mitigation / compensation, along with any other harm, is clearly outweighed by the benefits of the development.
2. Development proposals in Sandwell should:
  - a. wherever possible, make a positive contribution to the protection and enhancement of geodiversity within the boundaries of the Black Country UNESCO Global Geopark and in relation to the geosites identified within it;
  - b. give locally significant geological sites<sup>23</sup> a level of protection commensurate with their importance;
  - c. consider, 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;
  - d. ensure geological sites of importance<sup>24</sup> are clearly identified where they are within or close to development proposals;
  - e. make it easy to access geoheritage features – including temporary exposures – for research and educational purposes;
  - f. enable access to records and samples as part of local and national geological record keeping.
3. Where necessary, conditions will be put in place on approvals for planning permission to ensure appropriate monitoring is undertaken and to make sure mitigation, compensation and offsetting is delivered effectively.

<sup>23</sup> Many of which are identified as Sites of Local Importance for Nature Conservation (SLINCs) or Sites of Importance for Nature Conservation (SINCs), 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.

<sup>24</sup> Statutory designations and sites of local importance such as SINCs and SLINCs with a geological component

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SNE4	+	+	+	0	0	0	0	0	0	0	0	0	+	+

D.4.4.1 Policy SNE4 would be expected to help protect and enhance geodiversity sites across the borough. The Black Country UNESCO Global Geopark is of particular importance. Development proposals which could potentially result in an adverse impact on geodiversity sites of international or national importance will be resisted. This policy would be likely to have a minor positive impact on local geodiversity (SA Objective 3). Sites of geological importance are often strongly linked to the surrounding local landscape and historic features, including the industrial heritage within Sandwell. By protecting local geodiversity, this policy would also be expected to have a minor positive impact on cultural heritage and the local landscape (SA Objectives 1 and 2).

D.4.4.2 The protection and enhancement of geologically important sites including the UNESCO Global Geopark would be likely to have benefits to tourism in the area, and therefore, have a minor positive impact on the local economy (SA Objective 13). Furthermore, sustainable tourism, outdoor learning and education are major themes of the Geopark<sup>25</sup>. Policy SNE4 states that development proposals in Sandwell should *"make it easy to access geoheritage features – including temporary exposures – for research and educational purposes"* which could potentially have a minor positive impact on education (SA Objective 14).

#### D.4.5 Policy SNE5 – The Rowley Hills

##### Policy SNE5 – The Rowley Hills

1. The strategic importance of the Rowley Hills to the character and amenity of Sandwell and the wider Black Country is derived from their prominent location, open appearance and importance for the natural environment and recreation, which will be defended from the incursion of built development or other inappropriate uses.
2. Development will not be permitted within the Rowley Hills Strategic Open Space that would impact on the following valued qualities, which include natural, cultural, perceptual and aesthetic aspects:
  - an open and undeveloped skyline;
  - expansive panoramic views into and out of the strategic open space;
  - wildlife habitats that support biodiversity;
  - ecological and geological designations;
  - areas of relative tranquillity;
  - the setting of designated heritage assets;
  - multi-functional green infrastructure assets;

<sup>25</sup> Black Country Geopark (2021) Black Country Geopark – Education, Events & Sustainable Tourism. Available at: <https://blackcountrygeopark.dudley.gov.uk/education/> [Date accessed: 21/07/23]

### Policy SNE5 – The Rowley Hills

- highly valued open spaces for informal recreation.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SNE5	+	++	++	0	+	0	+	0	0	0	0	+	0	0

D.4.5.1 Policy SNE5 aims to protect the Rowley Hills from inappropriate development that would lead to the loss of valued qualities that contribute towards the local landscape character. The policy ensures that development would not impact *"expansive panoramic views into or out of the strategic open space"* and additionally not permit development that would impact the open and undeveloped skyline. The policy would be expected to have a major positive impact on safeguarding and protecting the local landscape character and visual amenity of the area (SA Objective 2).

D.4.5.2 Policy SNE5 would also help to reduce noise pollution by preventing development that would impact *"areas of relative tranquillity"*. Therefore, a minor positive impact on noise pollution would be expected (SA Objective 7).

D.4.5.3 The policy includes measures that protect local wildlife and biodiversity, resisting development that would impact both ecological and geological designations and habitats that support local biodiversity. Furthermore, the policy includes measures that would prevent impacts upon *"multi-functional green infrastructure assets"* and *"high value open spaces"*. Overall, the policy would be expected to have a major positive impact on biodiversity (SA Objective 3), and a minor positive impact on protecting green infrastructure assets and the health and wellbeing of residents, increasing access to open space and improving climate change resilience (SA Objectives 5 and 12).

D.4.5.4 Policy SNE5 additionally includes measures that would ensure designated heritage assets are not impacted by proposed development including their settings. Therefore, the policy would expect to have a minor positive impact on the conservation of cultural heritage (SA Objective 1).

### D.4.6 Policy SNE6 – Canals

#### Policy SNE6 – Canals

- Sandwell’s canal network comprises the canals and their surrounding landscape corridors, designated and non-designated heritage assets, character, settings, views and interrelationships.
- All development proposals likely to affect the canal network must:

## Policy SNE6 – Canals

- a. demonstrate that they will not adversely affect the structural integrity of canal infrastructure<sup>26</sup> to avoid increased flood risk, land instability and / or harm to the usability of the canal (including its towpath) as a green-blue infrastructure asset;
  - 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 and its setting, 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 and protect water resource availability both in the canal and the wider environment.
  - g. reinstate and / or upgrade towpaths, including through the introduction of suitably designed and sized wayfinding information, and link them into high quality, wider, integrated 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. support and complement 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. protect and enhance the historical, geological, and ecological value of the canal network and its associated infrastructure;
  - d. relate positively to the adjacent waterway by promoting high quality design, including active frontages onto the canal and improving the public realm;
  - e. integrate sensitively with the canal and any associated canal-side features and, where the chance to do so arises, incorporate canal features into the new development;
  - f. explore opportunities associated with alternative or new uses for the canals and their towpaths, such as to help mitigate the effects of climate change or support the delivery of fibre networks and communications technology (see **Policy SID1, Policy SCC3**).
4. Development proposals must be supported by evidence that the above factors have been fully considered and properly incorporated into their design and layout.
5. Where proposed development overlays any disused canal features, the potential to record, preserve and restore such features must be fully explored unless canals have been removed in their entirety.
6. Development on sites that include sections of disused canals should protect the line of the canal through the detailed layout of the proposal.
7. 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.

<sup>26</sup> Including (but not limited to) waterway walls, embankments, cuttings, locks, culverts, weirs, aqueducts, tunnels and bridges

## Policy SNE6 – Canals

8. Proposals must safeguard the amenity of existing residential moorings when planning consent is sought on sites adjacent to them.

### Residential Canal Moorings

9. For residential moorings, planning consent will only be granted for proposals that include the provision of:

- a. all necessary boating facilities;
- b. appropriate access to cycling and walking routes;
- c. an adequate level of amenity for boaters, not unduly impacted upon by reason of noise, fumes or other nearby polluting activities.

10. 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SNE6	+	+	+	0	0	0	+	0	+	+	0	+	+	0

D.4.6.1 Policy SNE6 aims to protect and enhance the borough’s canal network. The policy also requires development proposals to seek to reinstate and/or upgrade towpaths and link them into high-quality, wider pedestrian and cycle networks. This would be expected to ensure the canal network remains functional across the Plan area, with minor positive impacts in regard to transport and accessibility (SA Objective 9). Furthermore, enhancing the canal towpath network for use by pedestrians and cyclists could potentially encourage outdoor exercise and active travel, resulting in a minor positive impact on physical and mental health (SA Objective 12).

D.4.6.2 Sandwell’s canal network forms an important biodiversity, amenity and cultural heritage asset. Policy SNE6 requires development proposals to protect and enhance the canals “*special historic, architectural, archaeological and cultural significance and its setting*”, “*nature conservation value including habitat creation and restoration*”, “*visual amenity, key views and its setting*” and “*water quality*”. These requirements would be likely to result in minor positive impacts in relation to cultural heritage, landscape, biodiversity and pollution (SA Objectives 1, 2, 3 and 7).

D.4.6.3 The policy states that where the opportunity exists, future development should aim to improve leisure, recreation and tourism activities associated with the canals. Additionally, the policy includes measures to improve connectivity to transport hubs, centres and employment sites. This would be likely to have a minor positive impact on the local economy (SA Objective 13).

D.4.6.4 This policy would support the development of residential moorings within the borough, which could potentially lead to a minor positive impact on the overall accommodation provision (SA Objective 10).

#### D.4.7 Policy SHE1 – Listed Buildings and Conservation Areas

##### Policy SHE1 – Listed Buildings and Conservation Areas

1. The impact of development proposals on the significance of Sandwell’s heritage assets and their settings will be considered in accordance with case law, legislation, and the National Planning Policy Framework.
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. All proposals for development that may affect a heritage asset or its setting must be accompanied by an Assessment of Significance that should form part of a Design and Access Statement and / or a Heritage Impact Assessment. It should set out clearly the significance of the heritage asset, including any contribution made by its setting. The proposals should demonstrate how they respond to the significance of the asset.
4. Sandwell Council will seek to preserve and enhance the settings of listed buildings by exercising appropriate control over the design of new development in their vicinity and the use of adjacent land; and, where appropriate, by the preservation of trees and landscape features.
5. Proposals for new build, alterations or extensions within Sandwell’s conservation areas must respect the local historic character and architectural styles. This will include considering building scale, grouping, materials and fenestration. Design and Access Statements should highlight the significant components of the conservation area in relation to the proposal and clearly demonstrate how these proposals preserve or enhance the character and appearance of the conservation area.
6. Proposals for enabling development that support securing a viable future use or improvement to a historic asset may be supported.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SHE1	++	+	0	0	0	0	0	0	0	0	0	0	0	0

D.4.7.1 This policy would be expected to help ensure that heritage assets are conserved in a manner appropriate to their significance, in line with national policy, and that the setting and special character of heritage assets are not adversely impacted by development.

D.4.7.2 Policy SHE1 outlines the requirements of development proposals to *"preserve and enhance local character"* and *"settings that are recognised as being of special historic, archaeological, architectural, landscape or townscape quality"*. Proposals for development that could potentially affect a heritage asset are required to be accompanied by an

Assessment of Significance that would be part of a Design and Access Statement and / or a Heritage Impact Assessment. The policy would be likely to have a major positive impact on cultural heritage (SA Objective 1). The protection and enhancement of heritage assets and their settings would be expected to positively impact the local character and would contribute to the surrounding local landscape / townscape in terms of local identity. It would therefore be expected to have a minor positive impact on landscape (SA Objective 2).

- D.4.7.3 It is recommended that the word “*conserve*” rather than “*preserve*” is used with regard to cultural heritage, reflecting the wording in the NPPF. The Council could also consider the potential to merge Policy SHE1 and SHE2 into a single policy to provide a clear position across all designated heritage assets and to avoid repetition.

#### D.4.8 Policy SHE2 – Development in the Historic Environment

##### Policy SHE2 – Development in the Historic Environment

1. New development in Sandwell that impacts on the historic environment should 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. proposals have been prepared with full reference to the Black Country Historic Landscape Characterisation Study (BCHLCS) (October 2019), the Historic Environment Record (HER), relevant conservation area appraisals and national and local policy.
2. Development proposals that could have an impact on the historic significance<sup>27</sup> of either designated heritage assets<sup>28</sup> or non-designated heritage assets<sup>29</sup> should be supported by evidence that their historic character and distinctiveness has been fully assessed and used to inform proposals.
3. Historic assets that contribute positively to the local character and distinctiveness of Sandwell’s specific townscapes should be retained and, wherever possible, enhanced and their settings respected.
4. The locally-specific urban grain, vernacular and other architectural and historic details that contribute to local character and distinctiveness should be used to inform the form, scale, appearance, details, and materials of new development.
5. All proposals should aim to sustain and reinforce special character and conserve the locally distinctive historic aspects of Sandwell, for example:
  - a. The surviving pre-industrial settlements of medieval origin such as Wednesbury and Oldbury;

<sup>27</sup> NPPF 2023 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.

<sup>28</sup> NPPF 2023 Annex 2 Designated heritage asset: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation

<sup>29</sup> NPPF 2023 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 SHE2 – Development in the Historic Environment

- b. Areas of Victorian and Edwardian higher-density development, which survive with a high degree of integrity, including terraced housing and its associated amenities, such as residential areas within West Bromwich Conservation Area;
- c. Areas of extensive lower density suburban development of the early and mid- 20th century, including public housing and private developments of semi- detached and detached housing;
- d. Public open spaces, including Victorian and Edwardian municipal parks, often created upon land retaining elements of relict industrial landscape features such as Windmill End;
- e. The canal network and its associated infrastructure, surviving canal-side pre- 1939 buildings and structures, and archaeological evidence of the development of canal-side industries and former canal routes;
- f. Buildings, structures and archaeological remains of the traditional industries of Sandwell, including metal trades such as chain-making and extractive industries such as quarrying such as on the Rowley Hills;
- g. The Rowley Hills (Turners Hill) and other largely undeveloped high prominences and views to and from these locations.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SHE2	++	+	+	0	0	0	0	0	0	0	0	0	+	0

D.4.8.1 Policy SHE2 would be expected to ensure heritage assets, both designated and non-designated, are protected throughout the borough and that proposals should *"aim to sustain and reinforce special character and conserve the locally distinctive historic aspects of Sandwell"*. The policy identifies examples of areas and particular assets that offer opportunities to reinforce the special character and identity of Sandwell. The identified assets are to be *"retained and, wherever possible, enhanced and their settings respected"*. This policy would be expected to help ensure that heritage assets are conserved in a manner appropriate to their significance, in line with national policy, and would ensure developments have regard to the Historic Landscape Characterisation (HLC). Overall, a major positive impact on cultural heritage would be likely (SA Objective 1).

D.4.8.2 The heritage assets identified contribute to the local landscape character of Sandwell. Furthermore, the policy seeks to ensure that the *"urban grain, vernacular and other architectural and historic details"* are considered, with new development reflecting an appropriate form, scale, appearance, and building materials to ensure that the landscape / townscape character is conserved and enhanced. Through protection and enhancement of these assets it would be expected that the policy would have a minor positive impact on the local landscape (SA Objective 2).

D.4.8.3 Through ensuring the conservation and enhancement of historic assets including the canal network and open spaces such as the Rowley Hills, Policy SHE2 could also result in a minor positive impact on biodiversity and geodiversity (SA Objective 3).

D.4.8.4 Furthermore, the conservation and enhancement of heritage assets and historic townscapes can have benefits to the economy including through encouraging tourism and attracting investment<sup>30</sup>. The policy could potentially result in a minor positive impact on the economy (SA Objective 13).

#### D.4.9 Policy SHE3 – Locally Listed Buildings

##### Policy SHE3 – Locally Listed Buildings

1. Proposals for alteration, extension and change of use to locally listed buildings or structures should clearly demonstrate that they will positively contribute towards the architectural or historical significance of the heritage asset.
2. Demolition of locally listed buildings will be resisted unless it can be demonstrated that no viable use can be found for the building or that the proposed development will have a substantial public benefit.
3. When demolition of a locally-listed building is unavoidable as part of a wider development, the Council will require an appropriate level of building recording prior to demolition taking place through the imposition of planning conditions. The approved recording shall be incorporated within the Historic Environment Record (HER).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SHE3	+	+	0	0	0	0	0	0	0	0	0	0	0	0

D.4.9.1 Policy SHE3 sets out the requirements for development proposals in regard to locally listed buildings within the borough and how proposals should be treated when they threaten the appearance or use of a locally listed building.

D.4.9.2 The policy would help to avoid the loss of locally listed buildings, unless there are demonstrable public benefits outweighing the loss, and ensure that any development proposals affecting locally listed buildings are only permitted where they will “*positively contribute towards the architectural or historical significance*”. These provisions could help to conserve and enhance the townscape character and cultural heritage features, resulting in a minor positive impact on SA Objectives 1 and 2.

<sup>30</sup> Historic England (2020) Heritage and the Economy 2020. Available at: <https://historicengland.org.uk/research/heritage-counts/heritage-and-economy/> [Date accessed: 21/07/23]

## D.4.10 Policy SHE4 – Archaeology

### Policy SHE4 – Archaeology

1. Development should safeguard both designated and non-designated archaeological assets and the character and setting of areas of acknowledged significance.
2. In considering proposals for development, Sandwell Council will seek to ensure that designated archaeological assets are preserved in situ, avoiding loss or harm to their significance, and their settings are also preserved and enhanced, to fully understand and utilise their archaeological, recreational and educational value.
3. Development proposals that are likely to have a significant adverse impact on designated archaeological assets and their settings that cannot be avoided, or where the asset cannot be preserved in situ, will be resisted.
4. Non-designated archaeological assets must be preserved wherever possible. Where it would be unreasonable to withhold planning permission for the development of such sites, provision will be made through agreements and conditions of planning permissions for an appropriate level of archaeological evaluation and recording to be undertaken, prior to impact on or loss of the asset. Evaluations / recordings will be included within Sandwell’s Historic Environment Record.
5. For sites with known archaeological potential, Sandwell Council may require developers to provide archaeological assessments and / or field evaluation to support their proposals. This information will be used to assess the archaeological implications of the development and to identify requirements for archaeological preservation or investigation.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SHE4	+	+	0	0	0	0	0	0	0	0	0	0	0	+

D.4.10.1 Policy SHE4 sets out the requirements for development proposals in regard to heritage assets within the borough and specific requirements in relation to the archaeological nature of these assets.

D.4.10.2 Archaeological assets, both designated and non-designated, will be safeguarded under the policy and it will ensure that *"their settings are also preserved and enhanced, to fully understand and utilise their archaeological, recreational and educational value"*. Additionally, the policy identifies measures to protect sites of known archaeological potential, requiring an archaeological assessment and / or field evaluation to be included within development proposals. The heritage assets would be likely to contribute to the local landscape of the area and may be important in contributing to local identity and the sense of place. Therefore, a minor positive impact on cultural heritage, landscape, and education would be expected (SA Objectives 1, 2, and 14).

## D.5 Climate Change

### D.5.1 Policy SCC1 – Increasing efficiency and resilience

#### Policy SCC1 – 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.
2. 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. new buildings will be orientated to maximise opportunities for both natural heating and ventilation and to reduce exposure to wind and other elements (Policy SDS4; Policy SDM1);
  - b. development proposals 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 (Policy STR6);
  - c. use of trees and other planting in landscaping schemes will be required throughout Sandwell, 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 (Policy SNE3);
  - 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 (Policy SCC4);
  - f. development should make provision for sustainable drainage infrastructure, which should be built into landscaping schemes / open space provision as appropriate (Policy SCC5);
  - g. development will be required to incorporate mitigation and resilience measures designed to reduce the risk of river, surface and other potential water flooding (Policy SCC4);
  - h. 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;
  - i. 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SCC1	+	+	+	++	+	+	+	0	+	0	0	+	0	0

- D.5.1.1 Policy SCC1 aims to ensure that development proposals seek opportunities for adaptation to, and mitigation of, climate change. This would help to promote sustainable development throughout the Plan area and help to protect the environment.
- D.5.1.2 This policy supports the development of energy efficient technologies associated with historic assets as long as the development *"will not cause demonstrable harm to the historic fabric, character, setting or appearance of the asset"*. Therefore, a minor positive impact on cultural heritage would be anticipated (SA Objective 1).
- D.5.1.3 The policy requires development proposals to *"protect and support biodiversity networks"*, to incorporate *"landscaping schemes"* and to be designed *"using a mix of native tree species and plants where appropriate"*. This policy could potentially help to protect and enhance, and therefore have a minor positive impact in relation to, biodiversity and landscape character (SA Objectives 2 and 3).
- D.5.1.4 In addition to increased green cover, the policy states that *"all development will need to minimise the impact of surface water runoff through the design of proposed drainage systems, including where possible grey water recycling and rainwater collection, and the use of permeable surfaces"*. These requirements will provide mitigation for potential surface water flood events. Therefore, a minor positive impact on climate change adaptation would be expected (SA Objective 5). In addition, these requirements will benefit water efficiency, and have a minor positive impact on natural resources (SA Objective 6).
- D.5.1.5 Enhanced green cover alongside amenity areas, buildings and streets could potentially help to promote natural air filtration, and as such, reduce residents' exposure to transport-associated air pollution. Furthermore, providing a more attractive local area could potentially encourage walkable neighbourhoods and facilitate outdoor exercise. Policy SCC1 also requires development proposals to consider accessibility via *"a range of sustainable and low carbon transport modes as alternatives to private car use"*. This would be likely to reduce reliance on private car use, reducing local GHG emissions, as well as improving access via walking and cycling to encourage the uptake of active travel. This policy states that new development should incorporate natural heating and ventilation, wherever possible. This would be expected to ensure that living conditions are of a high quality. Overall, a minor positive impact on local air quality, accessibility and human health would be expected (SA Objectives 7, 9 and 12).
- D.5.1.6 The incorporation of green cover, minimisation of flood risk, use of greywater recycling and promotion of natural heating systems would be expected to help reduce the Plan area's contributions to the causes of climate change. By requiring adaptation and mitigation measures to ensure that development proposals are resilient in the face of climate change, this policy would be expected to have a major positive impact on climate change mitigation (SA Objective 4).

## D.5.2 Policy SCC2 – Energy Infrastructure

### Policy SCC2 – Energy Infrastructure

#### **Decentralised energy networks and district heating provision**

## Policy SCC2 – Energy Infrastructure

1. Any development including ten homes or more, or non-residential floorspace of 1,000 sq m or more must include opportunities for decentralised energy provision within the site, unless it can be demonstrated that the development is not suitable, feasible or viable for district heat or decentralised energy networks.
2. Where there is existing decentralised energy provision available close to the site, the development will be expected to link into it, or should be designed to accommodate a subsequent connection<sup>31</sup> if a source has not yet become operational.
3. Where developers can demonstrate to the satisfaction of the Council 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 (Policy SCC6).
4. Proposals intended to deliver decentralised networks and related infrastructure will need to prevent or minimise any adverse impacts on the historic environment by ensuring that they protect the significance of heritage assets, including their setting.

### **Onsite energy provision**

5. 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.
6. 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. feasibility of built-in renewable energy generation (Policy SCC6); and
  - k. implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector.

### **Heating / hot water systems**

<sup>31</sup> Where a decentralised energy source is extant or will become operational during the construction of the development, and a proposed linkage has been agreed, suitable means of access / connection should be provided along roads / footpaths as a minimum form of infrastructure.

### Policy SCC2 – Energy Infrastructure

7. Heat sources for a district heating system should be chosen to minimise likely emissions and to make best use of any local decentralised networks, in preference to other solutions.
8. Where a district 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 NOx<sup>32</sup> gas boiler.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SCC2	0	0	0	+	+	0	+	0	0	0	0	+	0	0

D.5.2.1 Policy SCC2 aims to encourage the use of decentralised energy sources within development proposals and, where appropriate, the use of communal heating systems to reduce GHG emissions. More efficient energy infrastructure will lead to a decrease in the amount of energy needed, and consequently, a decrease in GHG emissions released through the generation of energy. Policy SCC2 would therefore be likely to have a minor positive impact in relation to climate change mitigation (SA Objective 4). By identifying and improving heating and cooling networks and considering future requirements, this policy could also potentially result in a minor positive impact on climate change adaptation (SA Objective 5).

D.5.2.2 In addition, through improved energy efficiency, this policy would be likely to result in health benefits. This is due to a reduction in GHG emissions, which can cause poor air quality and impact human health, primarily due to particulate matter pollution. Therefore, this policy would have a minor positive impact in regard to pollution and human health (SA Objectives 7 and 12).

### D.5.3 Policy SCC3 – Managing Heat Risk

#### Policy SCC3 – Managing Heat Risk

1. Development proposals<sup>33</sup> should minimise both internal heat gain and the impacts of urban heat islands<sup>34</sup> by using appropriate design, layout, orientation and materials.
2. Opportunities to benefit from the proximity of existing heat sinks such as canals and other bodies of water should be explored and incorporated into proposals where available.
3. 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:

<sup>32</sup> Ultra-low NOx boiler Standard specified in the Black Country Air Quality Supplementary Planning Document.

<sup>33</sup> Excluding domestic extensions.

<sup>34</sup> Caused by extensive built-up areas absorbing and retaining heat.

### Policy SCC3 – Managing Heat Risk

- a. minimise internal heat generation through energy-efficient design;
- b. reduce the amount of heat entering a building through orientation, shading, albedo<sup>35</sup>, fenestration, insulation and the provision of green roofs and walls (Policies SDS4 and SDM1);
- c. manage heat within a building through exposed internal thermal mass<sup>36</sup> and high ceilings;
- d. provide passive ventilation;
- e. provide mechanical ventilation;
- f. provide active cooling systems<sup>37</sup>.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SCC3	0	0	+	+	+	0	+	0	0	0	0	0	0	0

D.5.3.1 Efficient design and building of development proposals can help to reduce the risk of heat gain and the urban heat island effect (UHI). UHI refers to an urban area which is significantly warmer than the surrounding rural areas, caused primarily by human activity. This could potentially be an issue within Sandwell due to the predominantly urban area, tall buildings and large population, coupled with the implications of climate change and more frequent heatwaves. The policy states that "*energy-efficient design*", "*passive ventilation*" and "*active cooling systems*" will be required within developments. This would be expected to help reduce heat gain and the UHI effect, reduce the amount of energy needed to cool environments and reduce heat lost to the environment. This policy would therefore be likely to have minor positive impacts in relation to climate change mitigation, climate change adaptation and pollution (SA Objectives 4, 5 and 7).

D.5.3.2 Furthermore, Policy SCC3 encourages "*provision of green roofs and walls*" which could potentially help to support wildlife networks and opportunities for habitat creation amongst the urban areas. Therefore, this policy could result in a minor positive impact on biodiversity (SA Objective 3).

<sup>35</sup> The reflectivity of a surface. A high albedo surface reflects the sun's heat back into the atmosphere; low albedo surfaces absorb it. Pale-coloured surfaces have a high albedo and can help to minimise heat gain.

<sup>36</sup> 'Thermal mass' is a material's capacity to absorb, store and release heat.

<sup>37</sup> Systems using energy to provide cooling. They circulate a coolant (gas, fluid) to transfer heat from one place to another.

## D.5.4 Policy SCC4 – Flood Risk

### Policy SCC4 – Flood Risk

1. Sandwell Council will seek to minimise the probability and consequences of flooding from all sources by adopting a strong risk-based approach to site allocations and the granting of planning permission, in line with the National Planning Policy Framework.
2. The sequential test<sup>38</sup> will:
  - a. be applied to all developments to ensure that development takes place in areas with the lowest flood risk, in line with NPPF requirements;
  - b. take account of the most up-to-date information available on river flooding and all other sources of flooding, making use of the information provided in the **2020 Strategic Flood Risk Assessment (SFRA) updated in 2021** and any future updates; and
  - 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 proposal is for:
  - a. a strategic allocation and the test has already been carried out by the LPA; or
  - b. a change of use (except to a more vulnerable use); or
  - c. a minor development (householder development, small non-residential extensions with a footprint of less than 250m<sup>2</sup>); or
  - d. a development in Flood Zone 1, unless there are other flooding issues in the area of the development (i.e. surface water, ground water, sewer flooding). The SFRA can be used to identify where there are flooding issues from sources others than rivers.
4. Developers should provide evidence to the Council 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:
  - a. Flood Zone 3
    - i. 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;
    - ii. Where the site is in Flood Zone 3a (High Probability), new homes can only be permitted subject to the Exception Test.
  - b. Flood Zone 2
    - i. Where the site is in Flood Zone 2 (Medium Probability), most development can be permitted, subject to a site-specific flood risk assessment;
    - ii. Highly vulnerable developments, such as caravans, mobile homes and park homes with permanent residential use can be permitted, subject to the Exception Test;
  - c. Flood Zone 1

<sup>38</sup> NPPF (2023), paragraph 162

## Policy SCC4 – Flood Risk

- i. 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 site-specific flood risk assessment should accompany a planning application.
6. To pass the Exception Test, developments will need to:
  - a. Demonstrate that wider sustainability benefits to the community outweigh flood risk. Matters such as biodiversity, green infrastructure, historic environment, climate change adaptation, flood risk, green energy, pollution, health and transport should be considered;
  - b. prove that the development will be safe from flooding for its lifetime, taking account of the vulnerability of its users;
  - c. prove that the development can be achieved without increasing flood risk elsewhere, and, where possible, will result in a reduced flood risk overall.
7. 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.
8. Surface water drainage strategies are also required for all major developments. These should consider all sources of flooding to ensure that future development is resilient to flood risk and does not increase flood risk elsewhere.

### **Groundwater Source Protection Zones**

9. No development will be permitted within a groundwater Source Protection Zone that would physically disturb an aquifer. A risk assessment demonstrating there would be no adverse effect on water resources will be required prior to the grant of planning permission.

### **Watercourses and flood mitigation**

10. 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; reference should be made to the latest River Basin Management Plans<sup>39</sup>.
11. 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.

<sup>39</sup> <https://www.gov.uk/guidance/river-basin-management-plans-updated-2022>

### Policy SCC4 – Flood Risk

12. Development should not take place over culverted watercourses and a suitable easement should be provided from the outside edge of the culvert.
13. 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.
14. 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 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.
15. 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: -
  - a. provision of additional storage on site e.g. through oversized SuDS, natural flood management techniques, green infrastructure and green-blue corridors; and / or
  - b. by providing a partnership funding contribution towards wider community schemes (both within and beyond the Black Country, in shared catchments with Southern Staffordshire and Birmingham).
16. Consultation on site-specific requirements should be undertaken with the Council, the Environment Agency and Severn Trent Water (where this is a sewer flooding issue) at the earliest opportunity.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SCC4	0	0	+	0	++	0	+	0	0	0	0	+	0	0

D.5.4.1 Policy SCC5 seeks to manage the risk of flooding throughout the Plan area and ensure that measures are in place within new developments to promote resilience to flooding.

D.5.4.2 The policy sets out criteria requiring development proposals to carry out a Flood Risk Assessment and Surface Water Drainage Strategy. The Sequential Test will be applied to all development proposals to ensure that development takes place in areas with the lowest flood risk. This, and other requirements as set out in the policy, would be expected to

ensure that all future development proposals would not place new residents at risk of flooding or exacerbate flood risk in areas surrounding the development. The policy states that all development proposals should incorporate Sustainable Drainage Systems (SuDS) to help reduce the risk of surface water flooding and seek to provide wider flood risk betterment. Overall, a major positive impact on climate change adaptation would be anticipated (SA Objective 5).

D.5.4.3 Flooding can pose a number of risks to human health and wellbeing, including physical and mental trauma, disease and disruption to power and water supplies<sup>40</sup>. Providing new development which is flood resilient and results in flood risk betterment in surrounding areas would therefore be expected to have a minor positive impact on human health (SA Objective 12).

D.5.4.4 Surface water run-off can lead to flooding and a decrease in water quality. The incorporation of SuDS into developments would be expected to benefit water quality, biodiversity and amenity interest through the integration into the wider green and blue infrastructure networks and promoting natural management of flood water. Under the policy, developments should, where possible, naturalise urban watercourses and open up underground culverts *"to provide biodiversity net gain as well as amenity improvements"*. This would be likely to benefit biodiversity and provide opportunities for habitat connectivity and the filtration of pollutants. Therefore, Policy SCC5 would be likely to have a minor positive impact on biodiversity and pollution (SA Objectives 3 and 7).

## D.5.5 Policy SCC5 – Sustainable drainage and surface water management

### Policy SCC5 – Sustainable drainage and surface water management

1. All new developments in Sandwell should incorporate Sustainable Drainage Systems (SuDS); 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 or other reasons, the developer must submit evidence demonstrating what the constraints are and how the development will accommodate runoff rates that are as close as possible to greenfield rates.
4. For all minor developments, a minimum reduction of 30% over pre-development runoff rates will be required. Under no circumstances will post-development runoff rates that are greater than pre-development runoff rates be permitted. Surface water run-off should be managed as close to its source as possible.
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.

<sup>40</sup> Public Health England (2014) Flooding and the public's health: looking beyond the short-term. Available at: <https://publichealthmatters.blog.gov.uk/2014/01/06/flooding-and-the-publics-health-looking-beyond-the-short-term/>  
[Date accessed: 21/07/23]

### Policy SCC5 – Sustainable drainage and surface water management

These should consider all sources of flooding to ensure that future development is resilient to flood risk and does not increase flood risk elsewhere and should look to provide wider betterment.

6. A hydrogeological risk assessment is required where infiltration SuDS is proposed for anything other than clean roof drainage in a Source Protection Zone 1<sup>41</sup>.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SCC5	0	+	+	0	+	0	+	0	0	0	0	0	0	0

D.5.5.1 Policy SCC5 sets out guidelines for future development in Sandwell with respect to Sustainable Drainage and Surface Water Management.

D.5.5.2 The policy requires developments to incorporate SuDS designed in line with the **Black Country Local Standards for SuDS** which would be anticipated to help reduce the risk of surface water flooding. The policy further states that “*surface water drainage strategies are required for all major developments, regardless of their size and the flood zone and catchment they are in*”. This policy would be expected to have a minor positive impact on climate change adaptation (SA Objective 5).

D.5.5.3 The policy states that “*Preference will be given to systems that contribute to the conservation and enhancement of biodiversity and green infrastructure in the wider area*”. In line with PPG, SMBC should seek to ensure that opportunities are sought for SuDS to provide benefits to water quantity, water quality, biodiversity and amenity<sup>42</sup>. As such, there is potential for the policy to lead to a minor positive impact on landscape, biodiversity and pollution (SA Objectives 2, 3 and 7).

### D.5.6 Policy SCC6 – Renewable and Low Carbon Energy and BREEAM Standards

#### Policy SCC6 – Renewable and Low Carbon Energy and BREEAM Standards

##### Renewable and Low Carbon Energy generation

1. Proposals involving the development of renewable or low carbon energy sources will be permitted where the proposal: -
  - a. accords with local and national guidance;
  - b. would not significantly harm the natural or built environment;

<sup>41</sup> Source Protection Zones are designed to control activities close to water supplies intended for human consumption. These water sources include wells, boreholes and springs, all of which are used for public drinking. Zone 1, defined as the inner zone, is the most sensitive part of an area within a zone.

<sup>42</sup> DLUHC and MHCLG (2022) Flood risk and coastal change: Sustainable drainage systems. Available at: <https://www.gov.uk/guidance/flood-risk-and-coastal-change#para55> [Date accessed: 26/07/23]

## Policy SCC6 – Renewable and Low Carbon Energy and BREEAM Standards

- c. maintains and safeguards the historic environment and heritage assets, including their setting; and
- d. will not have a significant adverse effect on the amenities of those living or working nearby<sup>43</sup>.

### Low carbon and renewable requirements for development

2. Small developments creating between one and nine homes or non-residential floorspace of less than 1,000 sqm gross (whether new build or conversion) must incorporate generation of energy from renewable or low carbon sources sufficient to off-set at least 10% of the estimated residual energy demand<sup>44</sup> of the development on completion.
3. Major developments creating ten or more homes or non-residential floorspace of 1,000 sqm gross or more (whether new build or conversion) must incorporate the 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 where available or proposed. An energy assessment must be submitted with the planning application to demonstrate that these requirements have been met.
5. The potential for inland waterways to promote low carbon technologies is recognised; in appropriate locations adjacent to Sandwell’s canal network, proposals to heat and cool new properties using water source heat pumps will be welcomed and supported.
6. 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

7. 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):

Size	Standard	Year
1,000-5,000 sqm gross:	BREEAM Very Good	up to 2029*
	BREEAM Excellent	2029-2039*
>5,000 sqm gross:	BREEAM Excellent	

\* Year refers to date planning permission is granted

<sup>43</sup> E.g. by generating adverse visual, noise, odour, air pollution or other effects

<sup>44</sup> Residual energy demand means that the estimated energy demand for the operational development after allowance has been made for the full range of energy efficiency measures required under Building Regulations (at the time of construction).

## Policy SCC6 – Renewable and Low Carbon Energy and BREEAM Standards

8. 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SCC6	0	0	0	+	0	0	+	0	0	0	0	0	0	0

- D.5.6.1 The promotion of on-site renewable or low carbon technologies incorporated within new development in the borough will help to decrease reliance on energy that is generated from unsustainable sources, such as fossil fuels. A reduction in the use of fossil fuels would help to reduce the volume of GHGs that are emitted into the atmosphere. This in turn would reduce Sandwell’s contribution towards the causes of climate change. Policy SCC6 requires all non-residential development of 1,000 sqm gross or more to be in accordance with the BREEAM New Construction Technical Standards<sup>45</sup>. The policy states that development proposals should in particular achieve full credits for category Wat 01 (water efficiency).
- D.5.6.2 This policy would be likely to have a minor positive impact on climate change mitigation by helping to ensure development proposals are more energy efficient and seek opportunities to utilise renewable and low carbon energy sources (SA Objective 4).
- D.5.6.3 Although this policy would help to ensure that major development within the Plan area meets the carbon neutrality target and that 20% of energy used is from renewable sources, only a 10% renewable energy target is set for development between one and nine dwellings. This policy could potentially be further expanded to help to ensure future development within the borough aims to reach higher energy efficient targets from renewable and low carbon technologies.
- D.5.6.4 The promotion of alternative renewable and low carbon technologies would be likely to result in reduced emission of pollutants. This would be expected to have a minor positive impact on pollution (SA Objective 7).
- D.5.6.5 Furthermore, by ensuring that development proposals “*would not significantly harm the natural, historic or built environment or have a significant adverse effect on the amenity of those living or working nearby*” the policy would be expected to reduce the potential for adverse impacts on cultural heritage, landscape, biodiversity and human health.

<sup>45</sup> BREEAM (2018) New Construction Technical Standards. Available at: <https://www.breeam.com/discover/technical-standards/newconstruction/> [Date accessed: 21/07/23]

Therefore, negligible impacts would be likely against these objectives (SA Objectives 1, 2, 3 and 12).

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## D.6 Health and Wellbeing in Sandwell

### D.6.1 Policy SHW1 – Health Impact Assessments

#### Policy SHW1 – Health Impact Assessments

1. Sandwell Council will require the following forms of development to provide an assessment of its potential impacts on the health and wellbeing of adjacent communities, residents and businesses, and to mitigate any potential negative impacts, maximise potential positive impacts and help reduce health inequalities;
  - a. housing developments of over 10 dwellings;
  - b. non-residential developments of 1,000m<sup>2</sup> or more floorspace.
  - c. major new waste handling / processing development;
  - d. any development that would have an adverse impact on locations with currently poor air quality;
  - e. any other development that the Council considers has the potential to impact on public health.Such development will only be permitted where it is demonstrated that it will not, in isolation or in conjunction with other planned, committed or completed development, contribute to a negative impact on the health of the borough's population.
2. To ensure that new developments have a positive impact on the health and wellbeing of new and existing residents the Council will require an HIA of development proposals to a level of detail appropriate to its scale and nature;
  - a. For developments of 100 or more dwellings, or non-residential development that extends to 5,000m<sup>2</sup> or more in area, a full Health Impact Assessment will be required;
  - b. For developments of between 20 to 100 dwellings or non-residential development that extends from 1,000 - 5,000m<sup>2</sup> in area, the Health Impact Assessment will take the form of an extended screening or rapid Health Impact Assessment;
  - c. For developments of 10 – 19 dwellings, or other developments that the Council considers may have a potential impact on public health, either a Design and Access Statement, Planning Statement or an extended screening or rapid Health Impact Assessment should be provided.
3. Sandwell Council will support vibrant centres and local facilities, which offer services and retail outlets that promote choice, and which enable and encourage healthy choices. This will include managing the location, concentration of and operation (including opening hours) of businesses that contain uses running contrary to these aims, including:
  - a. hot food takeaways (sui generis), or hybrid uses incorporating such uses (Policy SDM6)
  - b. betting shops and amusement arcades (Policy SDM8);
  - c. shisha cafes / lounges, where the balance of uses is such that the use of the premises is predominantly for shisha smoking.
4. Where the development of a new shop is acceptable in principle under other policies, planning permission will only be granted where a condition can be imposed that prevents the subsequent establishment of a stand-alone off-licence without the need to apply for planning permission where there is evidence of existing alcohol drinking establishments contributing to existing negative health and wellbeing impacts and patterns of anti-social behaviour.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SHW1	0	0	0	+	0	0	+	0	+	0	+	++	0	0

D.6.1.1 Policy SHW1 sets out the requirement for development proposals within the borough to undertake a Health Impact Assessment (HIA), dependent on the scale and nature of the proposal. This would help to ensure that opportunities for promoting healthy lifestyles are maximised. This would be likely to result in benefits such as creating engaging public spaces that facilitate social interaction and encourage walking and cycling. Additionally, the policy sets out requirements to support healthy food choices and vibrant local centres. Overall, the policy would be expected to have a major positive impact on the health and wellbeing of local residents (SA Objective 12).

D.6.1.2 By requiring some developments to submit an HIA, this policy would help to ensure development proposals do not have direct adverse impacts on: residents’ physical or mental health; social, economic and environmental living conditions; demand for or access to health and social care services; or an individual’s ability to improve their own health and wellbeing. Therefore, this policy would also be likely to have minor positive impact in relation to equality (SA Objective 11).

D.6.1.3 In addition, Policy SHW1 could potentially have a minor positive impact on transport and accessibility within the Plan area by promoting walking and cycling over the use of private vehicles, and as such, encouraging people to engage in higher levels of daily physical activity (SA Objective 9). This could also result in consequent benefits in terms of reducing the emission of road transport-associated pollutants which can be harmful to health, potentially leading to minor positive impacts regarding climate change mitigation and pollution (SA Objectives 4 and 7).

## D.6.2 Policy SHW2 – Healthcare Infrastructure

### Policy SHW2 – 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 SCE3 and SCE4. Proposals located outside centres must be justified in terms of relevant policies such as Policy SCE6, where applicable;
  - c. wherever possible, located to address accessibility gaps in terms of the standards set out in Policy SHO3 particularly where a significant amount of new housing is proposed;
  - d. where possible, co-located with a mix of compatible community services on a single site.

## Policy SHW2 – Healthcare Infrastructure

2. Existing primary and secondary healthcare infrastructure and services will be protected, unless it has been demonstrated that the loss or partial loss of a facility or site arises from a wider public service transformation plan that requires investment in modern, fit for purpose infrastructure and facilities. New or improved healthcare facilities and services will be provided in accordance with requirements agreed between Sandwell Council and local health organisations.
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, any contribution will be used to support offsite provision of healthcare infrastructure and / or related services.
6. The effects of the obligations on the financial viability of development may be a relevant consideration.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SHW2	0	0	0	+	0	0	+	0	+	0	+	++	0	0

D.6.2.1 Policy SHW2 seeks to ensure that all new healthcare facilities are well designed and accessible, with a particular focus on ensuring facilities are accessible by public transport. The policy also aims to protect existing healthcare facilities, and details how larger residential developments of ten or more homes should be assessed against the capacity of surrounding facilities and new facilities should be *"located to address accessibility gaps"*. These factors would be expected to help ensure all new residents have good access to healthcare facilities, and as such, a major positive on health would be expected (SA Objective 12).

D.6.2.2 By identifying and addressing accessibility gaps, this policy would also be expected to promote equal access to healthcare and could potentially help to reduce health inequalities; therefore, a minor positive impact on equality would be expected (SA Objective 11).

D.6.2.3 This policy seeks to ensure that all healthcare developments are located in areas with good public transport access for residents, and that where possible, healthcare facilities are co-located alongside other community services to serve nearby residential development. This policy could potentially reduce the need to travel and reduce the volume of visitors arriving

at facilities via private car, with subsequent benefits in terms of reducing local congestion and transport-associated emissions. Therefore, due to the focus on sustainable transport and accessibility, this policy could potentially have a minor positive impact on climate change mitigation, pollution and transport (SA Objectives 4, 7 and 9).

### D.6.3 Policy SHW3 – Air Quality

#### Policy SHW3 – Air Quality

##### **Strategic Approach**

1. The SLP will support a diverse approach to addressing the issue of poor air quality across the borough, including:
  - a. requiring development and other land use proposals to promote the integration of cycling, walking, public transport and electric charging points as part of their transport provision;
  - b. promoting and supporting (including through continued joint working with adjacent Black Country authorities and others) a modal shift from private motorised vehicles to the use of clean, fast and accessible public transport alternatives such as rail, the Metro and bus transport networks, cycling and walking;
  - c. including a range of measures relating to energy generation at developments as set out in the hierarchy identified in Policy SCC2 Energy Infrastructure, such as the installation of renewables-based systems, or the use of ultra-low emission NOx boilers;
  - d. requiring the provision and protection of green open spaces and significant additional tree cover (Policies SDS7 and SNE3);
  - e. ensuring the sustainable location of new residential and employment development to minimise commute times; and
  - f. 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.
2. New development must be at least air quality neutral following any required mitigation. 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.

### Policy SHW3 – Air Quality

5. Whenever development is proposed in locations where air quality does not or 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 to meet relevant 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<sup>46</sup> of pollutants to air on the scheme must also be addressed;
  - 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.

#### Emissions from Construction Sites

7. For all types of development, the control of emissions from construction sites will be agreed with the local authority.

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SHW3	0	0	+	+	0	0	++	0	+	0	0	+	+	0

D.6.3.1 Air pollution is a significant concern internationally and locally. Sandwell is wholly designated as an Air Quality Management Area (AQMA) alongside the surrounding authorities within the Black Country. Without careful planning, introducing new development within an AQMA would make it more difficult to meet national air quality objectives within the AQMA, whilst also exposing new residents to existing poor air quality.

<sup>46</sup> Pollution that originates from one place

- D.6.3.2 Policy SHW3 requires development proposals to promote the use of pedestrian and cycle routes, access to rail, the Metro and bus transport networks, plus provide electric car charging points. These measures would be expected to support a modal shift to the use of public transport and more sustainable travel options, rather than private vehicles. In terms of air quality, electric vehicles are an effective alternative to petrol or diesel-powered vehicles as they emit fewer, or zero, air pollutants. By discouraging the use of the private car, this policy would be expected to help reduce transport-associated emissions and have a positive impact on local air quality.
- D.6.3.3 Where a development proposal is situated in a location that does not currently meet national objectives, the policy requires an appropriate Air Quality Assessment (AQA) to be carried out to demonstrate that the proposed development will meet air quality objectives once the development is completed. Overall, Policy SHW3 would be expected to have a major positive impact on air pollution (SA Objective 7).
- D.6.3.4 The requirements set out in Policy SHW3 could potentially help to minimise the Plan area's contributions to climate change by offering alternative, lower emission and more sustainable means of transport. A minor positive impact would therefore also be expected for climate change mitigation (SA Objective 4).
- D.6.3.5 As well as contributing towards the improvement of local air quality, encouraging the provision of sustainable transport methods and electric car charging points would be expected to have a minor positive impact on transport and accessibility (SA Objective 9).
- D.6.3.6 Policy SHW3 aims to encourage active travel by integrating pedestrian and cycle routes into development proposals. In addition, the policy aims to increase the provision of green and open spaces across the borough. This would be likely to facilitate healthy lifestyles, through promoting outdoor exercise and benefiting mental wellbeing of residents. Overall, this policy would be likely to have a minor positive impact in regard to human health (SA Objective 12).
- D.6.3.7 Some habitats are sensitive to air pollution in the form of atmospheric nitrogen deposition. This policy would help to prevent deterioration of air quality and thereby help to protect sensitive habitats from elevated rates of atmospheric nitrogen deposition. Therefore, this policy could potentially have a minor positive impact on biodiversity (SA Objective 3).
- D.6.3.8 In addition, this policy requires development proposals to be situated in a sustainable location to minimise commuter distance and time. This would be likely to situate residents in close proximity to a range of job opportunities, and therefore, have a minor positive impact on the local economy (SA Objective 13).

#### D.6.4 Policy SHW4 – Open Space and Recreation

##### Policy SHW4 – Open Space and Recreation

- 1. All new housing sites providing over ten units will be expected to contribute towards the provision of unrestricted open space, in line with the standards set out in Appendix K. Where such provision on-site would make a site unviable or where there is no physical capacity to**

## Policy SHW4 – Open Space and Recreation

**include it, the Council will in exceptional circumstances accept a commuted sum for nearby off-site provision in lieu or for the improvement of existing facilities within walking distance.**

- 2. On new housing sites of 2ha or over, Sandwell Council will seek the provision of new unrestricted open space at a minimum ratio of 3.63 hectares of space per 1,000 population. This open space will be provided on site.**
3. The Council will seek to ensure that at least one hectare of unrestricted open space is provided within walking distance (0.4 km) of all the Borough's residents and proposals that help it meet this aim will be welcomed.
4. Sandwell Council will support proposals<sup>47</sup> that:
  - a. deliver against up-to-date local open space and recreation standards for the borough, in terms of quantity, quality and access;
  - b. address the ecological and environmental priorities set out in the Black Country Nature Recovery Network Strategy;
  - c. make more efficient use of open spaces in the urban area by:
    - i. creating more multifunctional open spaces;
    - ii. protecting the existing open space network for recreation and biodiversity and taking opportunities to strengthen and expand it
    - iii. significantly expanding community use of open space and recreation facilities provided at places of education;
    - iv. making creative use of land exchanges and disposing of surplus assets to generate resources for investment;
    - v. increasing access to open space and recreation facilities for all, including people with disabilities and other target groups with limited access at present; and
    - vi. where a place, site or facility has a cross-boundary catchment, identifying the most appropriate location to maximise community access and use of new facilities.
5. Aspects of development that would increase the overall value of the open space and recreation network in Sandwell will be supported, especially in areas of proven deficiency against adopted quantity, quality and accessibility standards.
6. Proposals should maintain and / or enhance the quantity, quality and accessibility of open space and address any shortfalls in provision, when measured against adopted local standards. Where practicable, new open space should be provided on-site and relate well to other green infrastructure features.
7. Development that would result in the loss of land allocated as open space and used for recreation in Sandwell will be refused unless it can be demonstrated that
  - a. there is a robust and overriding matter of public interest at stake; and
  - b. a sufficient quantity of alternative open space can be provided in the vicinity, of the same or higher quality than what was lost; or
  - c. if open space of sufficient quantity and quality cannot be delivered in the immediate vicinity, a financial contribution in lieu of on-site provision will be made available and compensatory gains

<sup>47</sup> involving both current activities and facilities and where there are plans for new open spaces and recreation sites / uses

## Policy SHW4 – Open Space and Recreation

in quality / accessibility secured on other open spaces or facilities that are of value to the local area.

8. Development proposals should focus on supporting / delivering the following functions of open space in Sandwell:
- a. improving the image and environmental quality of the borough;
  - b. protecting and enhancing the significance of heritage assets and their settings;
  - c. enhancing visual amenity;
  - d. providing buffer zones between incompatible uses;
  - e. mitigating the effects of climate change, through flood risk betterment, installing SuDS, reducing potential urban heat island effects and providing opportunities for additional landscaping and tree planting;
  - f. preserving and enhancing environmental and habitat diversity and preventing the fragmentation of ecological networks;
  - g. extending, increasing access to and enhancing the ecological value of multifunctional green spaces and networks;
  - h. supporting outdoor sport and physical activity, including through footpath and cycle network infrastructure, and providing areas for informal recreation and children’s play;
  - i. providing opportunities for people to grow their own food on allotments and encouraging urban horticulture.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SHW4	0	+	+	+	+	0	+	0	+	0	+	++	0	0

D.6.4.1 Policy SHW4 seeks to ensure that open space and recreation facilities throughout the Plan area will be protected, managed and enhanced, in order to provide safe and accessible community facilities for existing and future residents. Open space has multiple benefits within an area. This includes physical and mental health benefits associated with residents’ access to a diverse range of natural habitats, alongside the facilitation of outdoor recreation.

D.6.4.2 Access to sports, recreation and leisure facilities is essential for residents to be able to pursue healthy and active lifestyles. This policy supports the development of new sports, recreation and leisure facilities within the Plan area. This policy would be expected to improve current facilities, contribute to the development of new facilities and ensure residents have good access to outdoor space. Therefore, this policy would be expected to have a major positive impact on the health and wellbeing of residents (SA Objective 12). This policy also encourages the development of footpath and cycle networks, with benefits to local accessibility (SA Objective 9).

- D.6.4.3 Furthermore, through *“increasing access to open space and recreation facilities for all, including people with disabilities and other target groups with limited access at present”* this policy would be expected to help fill gaps in accessibility for vulnerable or disadvantaged groups, providing more equitable access to these important facilities. Therefore, a minor positive impact on equality would be expected (SA Objective 11).
- D.6.4.4 Open space can be beneficial to the local biodiversity network by providing an increased number of natural habitats and providing the opportunity to create green links within urban areas. Policy SHW4 sets out particular support for proposals which *“address the ecological and environmental priorities set out in the Black Country Nature Recovery Network Strategy”*. This could also benefit the local landscape by creating attractive open spaces within the area. This policy aims to improve visual amenity and contribute towards the preservation and enhancement of the natural and built environment. As a result, it would be expected that Policy SHW4 would have a minor positive impact on the local landscape and biodiversity (SA Objectives 2 and 3).
- D.6.4.5 Potential new or enhanced open spaces, and associated GI, would be expected to contribute towards improved air quality due to the increased uptake of carbon dioxide. Due to this enhanced carbon storage capacity, this policy could potentially contribute towards the mitigation anthropogenic climate change. GI could also potentially provide natural filtration to reduce residents’ exposure to air pollution, for example from emissions associated with road transport. Furthermore, this policy encourages active travel, which would be expected to reduce the reliance on private car use. A minor positive impact on climate change mitigation and pollution would therefore be expected (SA Objectives 4 and 7). Enhanced open space and GI could also potentially help to reduce water runoff rates, and as such, have a minor positive impact by reducing the risk of flooding (SA Objective 5).

## D.6.5 Policy SHW5 – Playing Fields and Sports Facilities

### Policy SHW5 – Playing Fields and Sports Facilities

1. Existing playing fields and built sports facilities must be retained unless:
  - a. an assessment has been undertaken that has clearly shown the playing fields or built sports facilities to be surplus to requirements (for existing or alternative sports provision) at the local and sub-regional level; or
  - b. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable and accessible location; or
  - c. the development is for alternative sports provision, the benefits of which clearly outweigh the loss of the current or former use; or
  - d. The proposed development affects only land incapable of forming part of a playing pitch and would not prejudice the use of any playing pitch or remaining areas of playing field on the site.
2. New build sports facilities should be:
  - a. in accordance with local needs identified in the current Playing Pitch and Outdoor Sports Strategy, to ensure provision of appropriate facilities in a suitable location to meet that need;
  - b. well-designed, including through the provision of high quality landscaping and public realm enhancements, and well-related to neighbourhood services and amenities; and

### Policy SHW5 – Playing Fields and Sports Facilities

- c. well-linked to public transport infrastructure and footpath and cycleway networks and directed to a centre appropriate in role and scale to the proposed development and its intended catchment area. Proposals located outside centres must be justified in terms of relevant national policy.
- 3. Where assessments demonstrate that a housing development would increase the need for playing pitches or built sports facilities to a level where significant new or improved facilities are required to meet demand, proportionate planning obligations or Community Infrastructure Levy will be used to acquire or create sufficient provision, where it is financially viable and appropriate to do so, and long-term management arrangements can be secured and funded.
- 4. 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.
- 5. The wider community use of school playing fields, other school facilities, such as sports halls, and private facilities will be encouraged, especially in areas where public provision is deficient.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SHW5	0	+	0	0	0	0	0	0	+	0	+	+	0	0

D.6.5.1 Policy SHW5 seeks to ensure that playing fields and sports facilities throughout the Plan area will be protected, managed, and enhanced, in order to provide safe and accessible community facilities for existing and future residents.

D.6.5.2 Providing good access to sports facilities would allow residents to pursue active and healthy lifestyles. The policy states that “*facilities will be encouraged, especially in areas where public provision is deficient*”, and would ensure that new facilities will be “*well linked to public transport infrastructure and footpath and cycleway networks*” which can be expected to encourage active modes of transport. Therefore, a minor positive impact on active travel, equal access to leisure and sport facilities and the health of residents would be expected (SA Objectives 9, 11, and 12).

D.6.5.3 The policy states that new facilities will be well-designed and will provide “*high-quality landscaping and public realm enhancements*”. A minor positive impact on landscape could therefore be achieved (SA Objective 2).

### D.6.6 Policy SHW6 – Allotments

#### Policy SHW6 – Allotments

- 1. The provision and promotion of allotments and community gardens in Sandwell will be supported by the Council. This will be achieved by: -

### Policy SHW6 – Allotments

- a. retaining existing allotments and resisting their loss unless in accordance with allocations identified in this plan;
  - b. working with partners and local communities to identify sites with potential for local food growing;
  - c. supporting projects that promote community gardening, farming and orchards.
2. If allotments are to be redeveloped, compensatory measures will be required for the loss, either through provision of new allotments on an open space of equivalent value nearby, or through a commensurate contribution to the enhancement of existing allotment provision in the vicinity.
  3. Proposals for community agriculture will be supported where appropriate.
  4. Development proposals that are located next to, or which may have an impact on, existing allotments will be expected to avoid or mitigate adverse impacts on them by employing the agent of change principle.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SHW6	0	+	+	0	0	0	0	0	0	0	+	+	0	0

- D.6.6.1 Policy SHW6 aims to protect and support the allotments and community gardens within the borough.
- D.6.6.2 The policy will help to maintain and strengthen local distinctiveness and sense of place by “*retaining existing allotments*” and “*supporting projects that promote community gardening, farming and orchards*”. Allotments could contribute towards the local character, leading to a minor positive impact on landscape (SA Objective 2).
- D.6.6.3 Allotment provision would assist in providing habitats for local wildlife amongst the urban areas. Under the policy, allotments would be positively managed and therefore a minor positive impact on local biodiversity would be expected (SA Objective 3).
- D.6.6.4 Allotments provide health benefits to residents, being an open space equivalent that can provide a peaceful, aesthetically pleasing environment. Additionally, the allotments can provide shared space for community activities that can improve social cohesion. The policy would therefore be likely to have a minor positive impact on equality and health (SA Objectives 11 and 12).

## D.7 Sandwell’s Housing

### D.7.1 Policy SHO1 – Delivering Sustainable Housing Growth

#### Policy SHO1 – Delivering Sustainable Housing Growth

1. Sufficient land will be provided to deliver at least 10,686 net new homes over the period 2023-2041.
2. The key sources of housing land supply are summarised in Table 5, which also sets out the minimum housing target for each of the Plan phases: 2023- 30, 2030-35 and 2035-41 and are also illustrated in the Housing Spatial Diagram. Housing allocations are set out in Appendix B.

Table 5 – Housing Land Supply – sources

Source of Supply	Type of Supply	2022-2027	2027-2032	2032-2037	2037-2041	Total
	Sites Under Construction	1098	40	0	0	1138
Current Supply as of April 2022	Sites with Planning Permission or Prior Approval ▲	1636	509	92	190	2427
	Sites with Other Commitments (as set out in 2022 SHLAA) ◆	18	229	49	0	295
	Gypsy and Traveller Pitches	10	0	0	0	10
Housing Allocations	Occupied Employment Land †	0	1088	361	196	1645
	Other	0	311	571	483	1365
<b>Total Identified Sites</b>		<b>2762</b>	<b>2177</b>	<b>1073</b>	<b>869</b>	<b>6881</b>
<b>Total Windfall Allowance</b>	Small sites (<10 homes / 0.25ha)	<b>0</b>	<b>671</b>	<b>665</b>	<b>532</b>	<b>1868</b>
<b>Total Density Uplift</b>		<b>0</b>	<b>50</b>	<b>12</b>	<b>0</b>	<b>62</b>
Additional Site Capacity in Regeneration Areas (RA)	Dudley Port and Tipton RA	0	52	0	0	52
	Smethwick RA	0	135	124	0	259
	Wednesbury	0	0	0	0	0
	West Bromwich and Carters Green RA	0	482	482	382	1345
<b>Total capacity in Regeneration Areas</b>		<b>0</b>	<b>669</b>	<b>606</b>	<b>382</b>	<b>1656</b>

3. Most of the requirement will be met through sites with existing planning permission and sites allocated for housing by this Plan. Additional housing supply will also be secured on windfall sites throughout the urban area. The estimated net effect of housing renewal up to 2041 will be reviewed annually and used in the calculation of housing land supply.

### Policy SHO1 – Delivering Sustainable Housing Growth

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 across the wider site. Masterplans and other planning documents<sup>48</sup> will be produced, where appropriate, to provide detailed guidance on the development of allocations.
5. Ancillary uses appropriate for residential areas, such as health facilities, community facilities and local shops, may be acceptable where there is a gap in service provision and where they can be integrated successfully into the residential environment. Other uses will not be acceptable on these sites.
6. A minimum of 10% biodiversity net gain is required for each site in accordance with Policy SNE2.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SHO1	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-

D.7.1.1 Policy SHO1 would be expected to deliver a high quantum of residential development of 10,686 net new homes over the plan period in Sandwell. However, this policy would not be expected to fully meet the identified housing needs of the SMBC. Overall, a minor positive impact on housing provision would be expected (SA Objective 10).

D.7.1.2 Policy SHO1 could potentially have a minor positive impact on biodiversity (SA Objective 3) in the long term, as the minimum 10% BNG requirement will help to ensure that the number and diversity of species in the area increases. This would need careful management and monitoring to ensure that BNG is successful.

D.7.1.3 An uncertain impact has been identified on the remaining SA objectives as the extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics. These are assessed in the SA process through the assessment of reasonable alternatives, as documented in this SA report and supporting appendices (see **Appendix C**).

### D.7.2 Policy SHO2 – Windfall developments

#### Policy SHO2 – Windfall developments

1. Proposals for residential development on sites not specifically allocated for residential use (windfall developments) will be permitted where the site is previously developed land and in accordance with other local plan policies.

<sup>48</sup> E.g. design codes, development frameworks and supplementary plans

## Policy SHO2 – Windfall developments

2. Proposals for residential development on unallocated greenfield land will only be considered where:
  - a. the site is not protected as community open space; or
  - b. the site is Council-owned land that is deemed surplus to requirements; or
  - c. the development of the site will bring an under-used piece of land back into beneficial use and will not harm the environmental, ecological or historic value of the site and the wider area, in accordance with other relevant policies in the SLP.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SHO2	0	0	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-

D.7.2.1 Policy SHO2 prevents the use of unallocated greenfield land for development except for under specific circumstances. Therefore, a minor positive impact on the conservation of natural resources would be expected (SA Objective 6).

D.7.2.2 The support for residential development on windfall sites could help to increase housing provision, contributing towards the identified housing need, and resulting in a minor positive impact on SA Objective 10.

D.7.2.3 The policy states that windfall sites will be considered where they “*will not harm environmental, ecological or historic value of the site and the wider area*”. Through reducing the potential for adverse effects, a negligible impact on cultural heritage, landscape, and biodiversity would be likely (SA Objectives 1, 2, and 3).

D.7.2.4 The impact of Policy SHO2 on all the other SA objectives is uncertain. Without understanding the number, scale and nature of potential windfall developments, it is difficult to identify the overall impacts on relevant objectives.

### D.7.3 Policy SHO3 – Housing Density, Type and Accessibility

#### Policy SHO3 – 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 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 6;
  - 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. The council will aim to provide an overall mix of house types over the plan period, tailored to best meet local needs and will support development that creates mixed, sustainable and inclusive communities.

### Policy SHO3 – Housing Density, Type and Accessibility

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.

3. 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 SHE2:
  - a. 100 dwellings per hectare where Table 6 accessibility standards for very high- density housing are met and the site is located within West Bromwich
  - b. 45 dwellings per hectare where Table 6 accessibility standards for high density housing are met;
  - c. 40 dwellings per hectare where Table 6 accessibility standards for moderate density housing are met.
4. Table 6 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 will be set out in Sandwell’s Design Code.

**Table 6 – Minimum Housing Densities and Accessibility**

Density (homes per hectare net)	Very High: 100 + Only appropriate within West Bromwich	High: 45 +	Moderate: 40 +
Indicative proportion of flats	100%	>15%	0 – 15%
Indicative amount of housing suited to families	low	medium	high
<b>Accessibility (by either walking or public transport, unless stated)</b>			
Employment - Strategic Centre or other employment area	20 mins	20 mins	30 mins
Health – Primary Care e.g. GP Surgery or Health Centre	10 mins	10 mins	15 mins
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

5. Any development that fails to make efficient use of land, by providing a disproportionate amount of large, 4+ bedroom homes when compared with local housing need, will be refused in accordance with the requirements of this policy.
6. Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SHO3	0	0	0	+	0	0	+	0	+	+	+	+	0	0

D.7.3.1 An appropriate mix of housing is required across the Plan area to help to ensure that the varied needs of current and future residents are met. In particular, this may include an increased number of smaller homes which would be likely to help provide appropriate accommodation for the elderly and first-time buyers entering the market.

D.7.3.2 Policy SHO3 aims to ensure that residential developments contribute towards the local housing need, supporting the current and future requirements of the population in terms of housing type and size, as well as ensuring new residents have good access to sustainable transport options. The policy sets out criteria for accessibility standards and appropriate densities of housing within each zone, which would be expected to ensure housing is provided in sustainable locations which results in a reduced need to travel, encourages local shopping and promotes social inclusion in the community. This would be likely to have a minor positive impact on local accessibility, housing provision and equality (SA Objectives 9, 10 and 11).

D.7.3.3 Due to the requirement to ensure that the density and type of housing development is informed by the level of accessibility via sustainable transport, this policy could potentially help to reduce emission of road transport associated GHGs and air pollutants. Therefore, a minor positive impact would be anticipated on climate change mitigation and pollution (SA Objectives 4 and 7).

D.7.3.4 By providing a suitable mix of housing types and tenure, this policy would be expected to meet the varying needs of residents, and as such, have a minor positive impact on health and wellbeing (SA Objective 12).

#### D.7.4 Policy SHO4 – Affordable Housing

##### Policy SHO4 – 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. Smaller sites, which could reasonably be expected to form part of a larger site in the future, will also need to take this policy into account. The minimum proportion of affordable housing that should be provided, subject to viability, is 25%.
3. 25% of the affordable homes required to meet part 2a - c of this Policy will be First Homes tenure, as defined in national guidance.

### Policy SHO4 – Affordable Housing

4. Beyond the tenure requirements set out in parts 2 and 3 of this policy, 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.
5. Where providing 25% affordable homes cannot be achieved, the maximum proportion of affordable housing will be required that does not undermine the development’s viability (Policy SHO6).
6. The affordable housing created will remain affordable in perpetuity.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SHO4	0	0	0	0	0	0	0	0	0	+	+	0	0	0

D.7.4.1 Policy SHO4 would help to ensure that, throughout the Plan area, SMBC delivers an appropriate mix of affordable housing that meets the varied needs of current and future residents. This policy sets out the requirements for 25% affordable housing to be delivered within developments of ten dwellings or more, to ensure that suitable residential development is provided to meet the social and economic needs of the population.

D.7.4.2 Overall, Policy SHO4 would be anticipated to result in minor positive impacts in relation to housing and equality (SA Objectives 10 and 11).

D.7.4.3 The policy wording could be strengthened to ensure that all new developments contribute towards the provision of affordable homes and that the number/proportion will be determined through site-specific considerations including viability evidence. Policy SHO4 could usefully cross-reference to (or incorporate the wording from) Policy SHO6 to ensure that where providing 25% affordable homes is not possible, the maximum proportion of affordable housing is required that does not undermine the development's viability. The policy should include wording to ensure that the affordable housing provided will remain affordable in perpetuity.

### D.7.5 Policy SHO5 – Delivering Wheelchair Accessible and Self / Custom Build Housing

#### Policy SHO5 – Delivering Wheelchair Accessible and Self / Custom Build Housing

##### National Accessibility and Wheelchair Housing Standards

1. All new homes will be required to meet M4(2) (Category 2: Accessible and adaptable dwellings) requirement in Building Regulations<sup>49</sup>.

<sup>49</sup> Or any subsequent national equivalent standard

## Policy SHO5 – Delivering Wheelchair Accessible and Self / Custom Build Housing

2. Developments of ten homes or more should provide a proportion of accessible and adaptable or wheelchair user housing, where this is financially viable. The minimum proportion that should be provided is:
  - a. an additional 15% of homes to meet the optional Building Regulations Requirement M4(3): Wheelchair User Dwellings<sup>50</sup>.
3. 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 multistorey development; or
  - d. the amount of M4(3) housing is limited by the number of homes that can be provided where the local authority is likely to be responsible for allocating or nominating a person to live in that home.

### Self-Build and Custom Build Plots

4. On developments of 100 homes or more, where there is currently a demand for self-build and custom build plots (defined as the number of entries added to the self-build and custom build register in the most recent base period 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 demand if lower.
5. All plots set aside for self-build or custom build housing (secured via a legal agreement or planning condition) must include:
  - a. legal access onto a public highway;
  - b. water, foul drainage, broadband connection, and electricity supply available at the plot boundary;
  - c. sufficient space to build without compromising neighbouring properties and their amenity and the amenity of future occupiers; and
  - d. an agreed design code or plot passport for the plots.
6. If plots remain unsold after six months, after a thorough and proportionate marketing exercise that includes making details available to people on the custom and self-build register, the requirement to make the plot available for self-build or custom build will fall away.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SHO5	0	0	0	0	0	0	0	0	0	+	+	+	0	0

<sup>50</sup> Or any subsequent national equivalent standard

- D.7.5.1 Policy SH05 seeks to ensure an appropriate mix of accessible homes are delivered across the Plan area, as well as the opportunity for self-build homes. The policy also sets out requirements for developments where the criteria for accessible and self-build homes on site are not viable.
- D.7.5.2 Future residential development needs to consider accessibility requirements for the elderly and those with specific needs. Policy SH05 would be likely to help ensure residential developments allow for the safe and convenient access for all residents, including older people and wheelchair users.
- D.7.5.3 This policy also seeks to meet the needs of those wishing to build their own homes. The policy aims to secure a 5% of major developments of 100 or more units to be available for self-build housing. This would help to ensure that new housing delivered across the Plan area can accommodate the diverse requirements of residents within the SMBC.
- D.7.5.4 Overall, Policy SH05 would be anticipated to result in minor positive impacts in relation to housing, equality and human health (SA Objectives 10, 11 and 12).

#### D.7.6 Policy SH06 – Financial Viability Assessment for Housing

##### Policy SH06 – Financial Viability Assessment for Housing

1. A planning application that compiles up-to-date policies within this plan will be assumed to be viable and should seek to provide any relevant planning contributions necessary to make it acceptable in planning terms. The onus will be on the applicant to demonstrate that the provision of planning contributions would adversely affect the financial viability of the development proposals.
2. 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.
3. 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.
4. On sites where applying the affordable housing or accessibility and wheelchair user requirements set out in Policies SH04 and SH05 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SHO6	0	0	0	0	0	0	0	0	0	+	+/-	0	0	0

D.7.6.1 Policy SHO6 aims to ensure that a mix of good-quality, affordable housing will be provided, subject to the findings of financial viability assessments. The policy states that where accessibility requirements make a development financially unviable, *"the maximum proportion of such housing will be sought that will not undermine the viability of the development"*.

D.7.6.2 By ensuring developments are appraised and meet local authority guidelines before they go ahead, a minor positive impact on housing provision (SA Objective 10) should result.

D.7.6.3 However, the policy provision means that fewer affordable / adaptable homes could be delivered compared to the identified needs. The impact of Policy SHO6 on equality is uncertain as it is dependent on financial circumstances.

#### D.7.7 Policy SHO7 – Protecting Family Housing (Use Class C3)

##### Policy SHO7 – Protecting Family Housing (Use Class C3)

1. To address the shortage of homes throughout the borough that are suitable and attractive to families and to encourage the provision of sustainable, inclusive and mixed communities, there will be a presumption against the loss of dwelling houses (Use Class C3) for family occupation through either sub-division, conversion to Use Class C4<sup>51</sup>, conversion to other non-residential uses or demolition and redevelopment, unless:
  - a. the property / properties is / are located within a site allocation and the corresponding development principles indicate that an alternative use or mix of housing will be more appropriate;
  - b. the proposed development fulfils other regeneration aspirations of the Council;
  - c. evidence of local housing need and demand indicates that an alternative mix of housing is appropriate;
  - d. alternative provision will help meet other housing priorities of the Council, such as provision for elderly persons (including bungalows);
  - e. an applicant can demonstrate that the property / properties is / are no longer suitable for family occupation, in which case, replacement with a new Class C3 dwelling house(s), suitable for family occupation will be the preferred approach, unless one of the criteria set out above can be satisfied.

<sup>51</sup> Or subsequent / equivalent iterations

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SHO7	0	0	0	0	0	0	0	0	0	+	+	0	0	0

D.7.7.1 Policy SHO7 seeks to respond to the local context and identified needs, ensuring housing suitable for families is protected. By encouraging dwellings that provide "*sustainable, inclusive and mixed communities*", Policy SHO7 will aid the provision of affordable, environmentally sound and good quality housing for all, therefore, having a minor positive impact on housing and equality (SA Objectives 10 and 11).

### D.7.8 Policy SHO8 – Houses in Multiple Occupation

#### Policy SHO8 – Houses in Multiple Occupation

- Proposals for the creation of a House in Multiple Occupation (HMO), including the conversion of buildings or sub-division of dwellings, will only be permitted if this would not result in over 10% of the number of residential properties<sup>52</sup> within a 100- metre radius of the application site, measured from the centre point of the property (referred to in this policy as the "relevant area") operating as HMOs and if the proposals would meet the additional criteria set out in this policy.
- The methodology for establishing the quantum of HMOs in a relevant area is set out in the table below:

**Table 8 - methodology for calculating concentration of HMOs within a relevant area**

<sup>52</sup> See paragraph 7.57

## Policy SHO8 – Houses in Multiple Occupation

### **Methodology / Evidence:**

**The Council will calculate the number of HMOs in the relevant area for each individual planning application by using the following approach:**

**i. Identifying the current distribution of residential properties in the relevant area -**

**For the purposes of assessing applications for HMO development, dwelling houses and HMOS that are located within blocks of flats or subdivided properties are counted as one property. Residential institutions, care homes, hostels and purpose-built student accommodation and other specialist housing types are also counted as one property per block. This will ensure that calculations of HMO concentration are not skewed.**

**ii. Calculating the number of HMOs in the relevant area -**

**Current HMO numbers will be identified from the following sources:**

- **Properties licensed as a HMO**
- **Properties with C4 or Sui Generis HMO planning consent or issued with a Certificate of Lawful Development**
- **Council tax records – student exemptions for council tax excluding purpose-built student accommodation and private flats**

**iii. Calculating the concentration of HMOs in the relevant area -**

**The concentration of HMOs surrounding the application site is calculated as a percentage of the total estimated number of existing HMO units against the total number of residential properties. It is accepted that although the HMO sources listed above provide the most robust approach to identifying the numbers and locations of HMOs in an area, it will not identify all HMOs.**

3. Once the current level of HMO provision has been established in a relevant area, the following criteria will be applied to the proposal:

a. the development would not:

- i. result in the loss of C3 family-sized dwellings in areas where there is a proven demand for such accommodation (see Policy SHO7);
- ii. result in a C3 family dwelling house being sandwiched<sup>53</sup> between two HMOs or other non-family residential uses<sup>54</sup>;
- iii. lead to a continuous frontage of three or more HMOs or non-family residential uses.

<sup>53</sup> See justification for more detailed explanation

<sup>54</sup> For the purposes of this policy a non-family residential use is defined as a HMO, student accommodation, residential accommodation within C1 and C2 Use and self-contained flats

## Policy SHO8 – Houses in Multiple Occupation

- b. the development is unlikely to be detrimental to the amenities of the occupiers of adjoining or neighbouring properties by way of noise, overlooking, general disturbance, or impact on visual amenity;
  - c. the development would not have a significant adverse impact on the character or appearance of the area, or of the historic or natural environment;
  - d. the development would not give rise to unacceptable adverse cumulative impacts on amenity, character, appearance, security, crime, anti-social behaviour or the fear of crime<sup>55</sup>;
  - e. in areas at risk of a 1 in 100-year plus flood event, finished ground floor levels are at least 60cm above the 1 in 100-year plus flood level;
  - f. provision for off- and on- streetcar 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;
  - g. the site is in an area that has good access by walking and public transport to residential services, as set out in Policy SHO3;
  - h. the development provides a satisfactory standard of living accommodation 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;
4. The construction or conversion of the building / dwelling intended to form the HMO should be undertaken to provide adequate personal living space and residential facilities<sup>56</sup>, including: -
    - a. bedrooms of at least 7.5 sq.m. (single) and 11.5 sq.m. (double);
    - b. communal living space comprising lounge, kitchen and dining space either as distinct rooms or in an open plan format;
    - c. washing facilities;
    - d. adequate provision for the storage and disposal of refuse and recycling;
    - e. outdoor amenity space for sitting out, play and drying clothes and external storage space, including cycle storage<sup>57</sup>.
  5. Where an HMO has been established in breach of the need for planning permission, retrospective consent will only be granted in exceptional circumstances.
  6. Proposals for the intensification or expansion of an existing HMO should comply with the criteria above, having regard to the size and character of the property.

<sup>55</sup> It is recommended that pre-application and planning application advice is sought for HMO proposals from the West Midlands Police Design Out Crime Offices

<sup>56</sup> Some national planning guidance is available, covering licensing and mandatory minimum room sizes [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/925269/HMOs\\_and\\_residential\\_property\\_licensing\\_reforms\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/925269/HMOs_and_residential_property_licensing_reforms_guidance.pdf)

<sup>57</sup> This would normally be calculated to match the same amenity provision for an apartment block (10m<sup>2</sup> per person)

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SHO8	0	0	0	0	0	0	0	0	+	+	+	+	0	0

D.7.8.1 A dwelling is classed as a house in multiple occupation (HMO) if at least three tenants live there and share a toilet, bathroom or kitchen. Policy SHO8 supports the development of HMOs, providing the proposal is in accordance with the criteria set out in the policy. This would be likely to provide a range of housing options to residents of Sandwell, and therefore, a minor positive impact on housing and equality would be expected (SA Objectives 10 and 11).

D.7.8.2 This policy seeks to ensure development proposals are located in an area which has "good access by walking and public transport to residential services". This would be expected to have a minor positive impact on transport and accessibility and could potentially encourage outdoor exercise and active travel, with benefits to human health and wellbeing (SA Objectives 9 and 12).

D.7.8.3 In addition, the policy seeks to ensure the development of any HMOs would not significantly impact cultural heritage, landscape or biodiversity features, resulting in a likely overall negligible impact on SA Objectives 1, 2 and 3.

### D.7.9 Policy SHO9 – Education Facilities

#### Policy SHO9 – Education Facilities

1. New nursery, school and further and higher education facilities should be:
  - a. Well-designed, to the relevant local / national standards / guidance in place, and should 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 the home to school travel distances;
  - c. Wherever possible, located to address accessibility gaps in terms of the standards set out in Policy SHO3, particularly where a significant amount of new housing is proposed.
2. New and improved education facilities will be secured through a range of funding measures:-
  - a. 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 in a timely manner, where this is financially viable.
  - b. Contributions will be secured retrospectively where forward funding of improvements is necessary to meet immediate needs.

## Policy SHO9 – Education Facilities

- c. For sites where there is likely to be a requirement for on-site provision of new schools this is set out in Appendix B.
3. 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.
  4. On sites where the education facility requirement is proven not to be viable, the maximum proportion of funding will be sought that will not undermine the viability of the development, subject to securing other planning obligations necessary for the development to gain planning permission. A financial viability assessment will be required to be submitted, meeting the requirements set out in Policy SHO6.
  5. New and redeveloped education facilities should include provision for wider community use of sports and other facilities where this would be in accordance with evidence of need, secured through a suitably worded community use agreement
  6. The existing network of education facilities will be protected and proposals that seek to enhance this network will be supported. 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 Sandwell.
  7. Proposals involving the loss, in part or the whole of an education facility will be permitted only where adequate alternative provision is available to meet the needs of the community served by the facility.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SHO9	0	0	0	+	0	0	+	0	+	0	+	+	+	++

D.7.9.1 Policy SHO9 seeks to support the development or expansion of education facilities secured through a range of funding measures, including planning obligations or through the Community Infrastructure Levy (CIL). New facilities would be required to be in accordance with the criteria set out in the policy. The policy also aims to protect and enhance existing facilities. This policy would therefore be expected to have a major positive impact on education (SA Objective 14).

D.7.9.2 Improved access to education would also be likely to have benefits to the local economy, by ensuring a greater proportion of residents have skills desirable in many employment sectors. The policy seeks to address accessibility gaps and ensure all residents have good access to educational facilities via public transport. Therefore, this policy would be likely to have a minor positive impact on transport and accessibility, equality and the local economy (SA Objectives 9, 11 and 13).

D.7.9.3 The policy also states that new education facilities should be *"well-served by public transport infrastructure, walking, and cycling facilities, particularly in centres, and located to minimise the number and length of journeys needed in relation to the home to school travel distances"*. This could potentially result in a minor positive impact on climate change

mitigation and pollution, by reducing reliance on travel via car and consequently reducing emission of GHGs and harmful pollutants (SA Objectives 4 and 7).

- D.7.9.4 In addition, this policy seeks to ensure that “*new and redeveloped education facilities should include maximum provision for community use of sports and other facilities*”. This would be expected to have a minor positive impact on the health of local residents (SA Objective 12).

## D.7.10 Policy SHO10 – Accommodation for Gypsies, Travellers and Travelling Showpeople

### Policy SHO10 – Accommodation for Gypsies, Travellers and Travelling Showpeople

#### **Safeguarding Existing Supply**

1. Existing Gypsy and Traveller and Travelling Showpeople sites (shown on the policies map) will be protected unless it can be demonstrated that they are no longer required or suitable alternative provision can be made.

#### **Meeting Future Need**

2. New Gypsy and Traveller permanent pitches will be provided to meet identified need up to 2031 as set out in Table 7, in accordance with the Black Country Gypsy and Traveller Accommodation Assessment (GTAA) 2022.
3. Accommodation needs for Gypsies and Travellers and Travelling Showpeople over the Plan period will be met through sites with outstanding planning permission, allocated sites and other sites granted planning permission during the Plan period in accordance with the criteria set out below. The council will pursue funding and / or management arrangements for new sites, where necessary.
4. Proposals for permanent Gypsy and Traveller pitches and Travelling Showpeople 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 SHO3, Table 6;
  - c. The site should be located and designed to facilitate integration with neighbouring communities;
  - d. The site should be suitable to allow for the planned number of pitches, an amenity block, a play area, access roads, parking and an area set aside for work purposes where appropriate, including, in the case of Travelling Showpeople, 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).
  - f. A minimum 10% biodiversity net gain is demonstrated in accordance with Policy SNE2.
5. The location, design and facilities provided on new sites will be determined in consultation with local Gypsies and Travellers and Travelling Showpeople and will also consider / reflect any available national guidance.

## Policy SHO10 – Accommodation for Gypsies, Travellers and Travelling Showpeople

6. Proposals should be well designed and laid out in accordance with Secured by Design principles as set out in SDM1. It is recommended that pre-application advice is sought from the West Midlands Police Design Out Crime Officers.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SHO10	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	+	+	+	+	+/-	+

- D.7.10.1 In accordance with the planning policy for traveller sites<sup>58</sup>, Gypsies and Travellers are defined as *"persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such"*.
- D.7.10.2 Travelling Showpeople are defined as *"members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above"*<sup>59</sup>.
- D.7.10.3 This policy would be expected to meet the identified pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit accommodation needs as set out in the Gypsy and Traveller Accommodation Assessment (GTAA). Therefore, this policy would be likely to have a minor positive impact on housing (SA Objective 10).
- D.7.10.4 The policy would also be expected to have a minor positive impact on equality, as the provision of pitches and plots will help to ensure that a diverse range of residents in Sandwell have access to appropriate accommodation to suit their needs (SA Objective 11).
- D.7.10.5 The criteria set out in Policy SHO10 requires all development proposals for Gypsy, Traveller and Travelling Showpeople pitches and plots to have good access in accordance with **Policy SLP\***, integrate with neighbouring communities, include play areas and access roads, and have adequate access to on site services including water supply, power, drainage, sewage and waste disposal. These requirements would be expected to result in minor positive impacts in regard to transport and accessibility, equality, health and education (SA Objectives 9, 11, 12 and 14).

<sup>58</sup> MHCLG (2015) Planning policy for traveller sites. Available at: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites> [Date accessed: 21/07/23]

<sup>59</sup> Ibid

D.7.10.6 Policy SHO10 could potentially have a minor positive impact on biodiversity (SA Objective 3) in the long term, as the minimum 10% BNG requirement will help to ensure that the number and diversity of species in the area increases. This would need careful management and monitoring to ensure that BNG is successful.

D.7.10.7 An uncertain impact has been identified on the remaining SA objectives as the extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics. Gypsy, Traveller and Travelling Showpeople sites are assessed in the SA process through the assessment of reasonable alternatives, as documented in this SA report and supporting appendix (see **Appendix C**).

### D.7.11 Policy SHO11 – Housing for people with specific needs

#### Policy SHO11 – Housing for people with specific needs

1. Proposals for specific forms of housing including children’s homes, care homes, nursing homes, extra care facilities, or any other identified need, will be considered in relation to the following criteria:
  - a. compatibility with adjacent uses;
  - b. the suitability of the site and building;
  - c. the potential for undue noise and general disturbance to surrounding residents;
  - d. the character and quality of the resulting environment;
  - e. the impact on parking provision and highway safety;
  - f. accessibility by a choice of means of transport; and
  - g. proximity to facilities.
2. Supporting information will be required in the form of a planning statement which, as a minimum, must set out the day-to-day activities associated with the use, staffing numbers and visitor numbers. Additional information such as a transport statement or noise statement may be required depending circumstances.

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
SHO11	0	0	0	0	0	0	0	0	+	0	+	+	0	0

D.7.11.1 Policy SHO11 outlines the requirements for development proposals for specific forms of housing for people with specific needs. The policy would increase equal opportunities in the area and would be expected to have a minor positive impact on equality (SA Objective 11). A minor positive impact on health could also be achieved, through helping to ensure that people in need of care are provided with suitable accommodation to meet their needs (SA Objective 12).

- D.7.11.2 The policy states that the proposed development of specific forms of housing would require "*accessibility by a choice of means of transport*"; and could therefore expect to have a minor positive impact on access to sustainable transport methods (SA Objective 9).
- D.7.11.3 The policy additionally states that the proposals would need to consider "*the character and quality of the resulting environment*" and the "*suitability of the site and building*". Therefore, the policy could help to reduce the potential for adverse effects on the surrounding landscape, resulting in a negligible impact (SA Objective 2).

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## D.8 Sandwell’s Economy

### D.8.1 Policy SEC1 – Providing for Economic Growth and Jobs

#### Policy SEC1 – Providing for Economic Growth and Jobs

1. The Sandwell Local Plan will seek the delivery of at least 1,206ha of employment land (of which 29ha is currently vacant) within the borough<sup>60</sup> between 2020 and 2041, 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.
2. Additional employment development will be brought forward on other sites throughout Sandwell, 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 those sites currently occupied for employment purposes. These sites will be safeguarded for industrial employment uses<sup>61</sup>
4. Within the existing employment areas subject to Policies SEC2, SEC3 and SEC4, the Council will support, with public intervention as necessary, the regeneration and renewal of such areas, including their environmental enhancement and incorporation of sustainable measures to mitigate climate change impacts. Industrial developments will need to demonstrate how they have been designed to maximise resistance and resilience to climate change, as set out in Policy SCC1.
5. To enable Sandwell’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, new and resident companies should be encouraged to adopt a circular economy approach and related infrastructure.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SEC1	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-

D.8.1.1 The SLP allocates 1,206ha of employment land for the period between 2020 – 2041. Further land is provided on other sites which have planning permission for employment development. A minor positive impact on the economy is likely as the policy would deliver a significant quantum of employment land, however, this would not meet the full identified needs for Sandwell (SA Objective 13).

D.8.1.2 The policy encourages the adoption of a circular economy approach and states that “*Industrial developments will need to demonstrate how they have been designed to*

<sup>60</sup> In Use Classes E(g)(ii), E(g)(iii), B2, and B8

<sup>61</sup> In Use Classes E(g)(ii), E(g)(iii), B2, and B8

*maximise resistance and resilience to climate change*". The policy would therefore expect to have a minor positive impact on promoting sustainable construction principles (SA Objective 4).

D.8.1.3 An uncertain impact has been identified on the remaining SA Objectives as the extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics. These are assessed in the SA process through the assessment of reasonable alternatives, as documented in this SA report (see **Appendix C**).

## D.8.2 Policy SEC2 – Strategic Employment Areas

### Policy SEC2 – 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 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 relating to appropriate uses as necessary.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SEC2	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-

D.8.2.1 Policy SEC2 seeks to allocate Strategic Employment Areas within Sandwell, which correspond to areas of highest market demand and are characterised by "*clusters of high technology growth*". This would be likely to have benefits to the local economy, as employment land would be located in desirable areas and would provide technology to enable businesses to thrive. A minor positive impact on the economy would be expected (SA Objective 13).

D.8.2.2 The policy states that Strategic Employment Areas will be characterised by "*excellent accessibility*", which would be expected to ensure residents have good access to

employment opportunities and surrounding services via sustainable transport modes. Therefore, a minor positive impact in relation to transport and accessibility would be likely (SA Objective 9).

D.8.2.3 Without further knowledge regarding the nature, scale and type of development that may come forward within the Strategic Employment Areas in accordance with this policy, an uncertain impact has been identified for the remaining SA Objectives.

### D.8.3 Policy SEC3 – Local Employment Areas

Policy SEC3 – 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; <ol style="list-style-type: none"> <li>Industry and warehousing<sup>62</sup> (E(g)(ii), E(g)(iii)), B2 and B8 use)</li> <li>Motor trade activities, including car showrooms and vehicle repair</li> <li>Haulage and transfer depots</li> <li>Trade, wholesale retailing and builders’ merchants</li> <li>Scrap metal, timber and construction premises and yards</li> <li>Waste collection, transfer and recycling uses</li> </ol>
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: <ol style="list-style-type: none"> <li>be shown to strongly support, maintain or enhance the business and employment function of the area; and</li> <li>meet sequential and other national or local policy tests (particularly Policies SCE5 and SCE6) relating to appropriate uses, as necessary.</li> </ol>

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SEC3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-

D.8.3.1 Policy SEC3 seeks to allocate Local Employment Areas in Sandwell to support the provision of industrial, logistics and commercial activities, which would be likely to result in benefits for the local economy and provision of local employment opportunities. This policy would therefore be likely to have a minor positive impact on the economy (SA Objective 13).

<sup>62</sup> (E(g)(ii), E(g)(iii)), B2 and B8 use)

D.8.3.2 Policy SEC3 also seeks to safeguard areas for "waste collection, transfer and recycling uses". This policy would therefore be expected to have a minor positive impact on waste, by supporting the efficient management and disposal of waste (SA Objective 8).

D.8.3.3 Without further knowledge regarding the nature, scale and type of development that may come forward within the Local Employment Areas in accordance with this policy, an uncertain impact has been identified for the remaining SA Objectives.

#### D.8.4 Policy SEC4 – Other Employment Sites

Policy SEC4 – Other Employment Sites	
1.	In employment areas that are not designated as either Strategic Employment Areas or Local Employment Areas on the Policies Map, but which comprise land / sites that are currently in use (or if currently vacant, were last used) for employment purposes, development will be supported for: <ol style="list-style-type: none"> <li>new industrial employment uses or extensions to existing industrial employment uses, or</li> <li>housing or other non-ancillary non-industrial employment uses.</li> </ol>
2.	Development or uses under 1(b) will only be supported where there is robust evidence that: <ol style="list-style-type: none"> <li>if the site is vacant, that it has been marketed for employment use for a period of at least 12 months, including by site notice and through the internet or as may be agreed by the local planning authority;</li> <li>if the site is occupied or part occupied, that successful engagement has been undertaken with the occupiers to secure their relocation</li> <li>if the site forms part of a larger areas occupied or last occupied for employment, that residential or any other use will not be adversely affected by the continuing operation of employment uses in the remainder of the area;</li> <li>the site could be brought forward for housing in a comprehensive manner and would not lead to piecemeal development;</li> <li>residential development would not adversely affect the ongoing operation of existing or proposed employment uses on the site or nearby; and</li> <li>the site is suitable for housing or other non-ancillary non-employment uses in accordance with local or national policies relating to these uses.</li> </ol>

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SEC4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+	+/-

D.8.4.1 The policy supports "new industrial employment uses or extensions to existing industrial employment uses" which would be likely to increase the provision of employment floorspace across the SMBC, outside of the identified Strategic and Local Employment

Areas. A minor positive impact on employment opportunities and the economy would be expected (SA Objective 13).

D.8.4.2 This policy would also support the redevelopment of some employment sites to housing or other non-employment uses, where the employment site is no longer required for employment purposes. Therefore, this could potentially result in a minor positive impact on local housing provision (SA Objective 10).

D.8.4.3 At present, the location of the 'other employment sites' is unknown. It is therefore uncertain what impact Policy SEC4 would have on the remaining SA Objectives.

### D.8.5 Policy SEC5 – Improving Access to the Labour Market

#### Policy SEC5 – 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 Sandwell, particularly those in the most deprived areas of the borough and other 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 of means of transport, including walking, cycling and public transport (see Policy STR1);
  - 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 planning applications for new employment-generating development Sandwell will negotiate with applicants on financial or other contributions, to be secured through planning obligations or the CIL Charging Schedule.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SEC5	0	0	0	0	0	0	0	0	+	0	+	+	+	+

D.8.5.1 Policy SEC5 supports proposals for new employment development, so long as the employment opportunities are accessible, in particular for disadvantaged people and residents in the most deprived areas of Sandwell. The development of new employment sites would be expected to have a minor positive impact on the economy (SA Objective 13), whilst ensuring the associated employment opportunities are available for all residents

within the Plan area would have a minor positive impact in relation to equality (SA Objective 11).

D.8.5.2 Policy SEC5 will also be likely to have a minor positive impact on transport (SA Objective 9) by enhancing “the accessibility of the development to residents by a choice of means of transport, including walking, cycling and public transport”.

D.8.5.3 The policy seeks to ensure that provision is made “to assist those with physical or mental health disabilities to access employment opportunities”. The provision of improved accessible employment opportunities across the Plan area would be expected to have a minor positive impact on health and wellbeing (SA Objective 12).

D.8.5.4 Furthermore, this policy would be likely to have benefits to education, by ensuring a diverse range of residents have access to training opportunities to increase their skills and employability. Therefore, a minor positive impact on education would be likely (SA Objective 14).

### D.8.6 Policy SEC6 – Relationship between Industry and Sensitive Uses

#### Policy SEC6 – Relationship between Industry and Sensitive Uses

1. Proposals for new industrial development that is likely to have an adverse effect<sup>63</sup> on neighbouring uses will not be permitted, unless the adverse effects can be reduced to an acceptable level, by means of a buffer<sup>64</sup> or other robust mitigation measures.
2. Equally, new proposals that may adversely affect, or be adversely affected by, existing industry operating in appropriate locations will not be permitted unless the adverse effects can be reduced to an acceptable level. Where this is to be achieved by means of a buffer, the new development will be required to provide and maintain the buffer.
3. Where existing industry operates within residential areas the Council will seek to ensure that any harmful effects are mitigated. If necessary, the Council will consider the enforcement of appropriate regulations or other means to reduce the problem.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SEC6	0	0	0	0	0	0	0	0	0	0	0	0	+	0

D.8.6.1 Policy SEC6 seeks to ensure that any development of new industrial sites does not majorly disrupt neighbouring land uses, using buffers where appropriate. Increasing industrial

<sup>63</sup> E.g. excessive traffic, pollution (air, noise, fumes, water, soil), disturbance, visual amenity etc.

<sup>64</sup> An appropriate buffer may take a variety of forms such as open space, a landscaped area, a wall or other physical barrier.

sites should create more jobs across the SMBC which could potentially result in a minor positive impact on local economy (SA Objective 13).

- D.8.6.2 Through seeking to avoid or minimise the potential for adverse effects, the policy would help to prevent adverse impacts across environmental / amenity topics. A negligible impact has been identified across the remaining SA Objectives. However, the policy could be improved through including reference to the types of adverse effect covered to ensure clarity, for example whether this should include visual impacts, traffic generation, pollution (air, noise, water, soil), disturbance etc.

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## D.9 Sandwell's Centres

### D.9.1 Policy SCE1 – Sandwell's Centres

#### Policy SCE1 – Sandwell's Centres

1. The priority for Sandwell's centres is to ensure they remain focused on serving the needs of their communities, through delivering a well-balanced diversity of commercial, business and service functions. This includes retail provision and an increasing mix of leisure, office, residential and other appropriate, complementary uses that are accessible by a variety of sustainable means of transport. This will enable centres to make a key contribution to regeneration, tackling climate change, fostering healthy communities, and creating pleasant, safe public spaces to increase social interaction and cohesion.
2. Sandwell's centres comprise a hierarchy, set out in Table 10. 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 that are in-centre<sup>65</sup> are subject to specific policy requirements, as set out in Table 10, Policies SCE4 and SCE5, centre insets and Policies SWB1 and SWB2 (West Bromwich).
4. Proposals for centre uses that are not in-centre<sup>66</sup> must meet the sequential test and other relevant requirements, such as impact tests as set out in Table 10 and Policy SCE6), as well as any specific policies in the town centre insets.
5. Future growth and allocations in Sandwell, particularly housing and employment development identified in Policies SDS1, SHO1 and SEC1, should have their service needs met by, and contribute to the regeneration of, the existing network of centres.
6. A land use approach will be adopted to encourage regeneration and to meet the challenges facing Sandwell's centres, particularly as little retail capacity has been identified to support additional floorspace, through supporting:
  - a. diversifying and repurposing of centres enhanced by appropriate complementary uses, particularly residential, education, health and community uses and supporting the evening economy;
  - b. the consolidation and reconfiguration of vacant floorspace into a mix of uses, especially the use of upper floors, and / or extensions to existing floorspace, with any new development being well-integrated with existing provision;
  - c. enhancing the 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

<sup>65</sup> Within the relevant boundaries or Primary Shopping Areas of defined centres

<sup>66</sup> Not within the relevant boundaries / Primary Shopping Areas of a defined centre but are in edge-of-centre or out-of-centre locations

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SCE1	+/-	+/-	+/-	+	+/-	+	+/-	+/-	+	+	+	+	+	+/-

D.9.1.1 Policy SCE1 aims to ensure centres within Sandwell provide residents with services and facilities that meet the local needs in regard to retail, leisure, commercial, residential, community and civil services.

D.9.1.2 The hierarchy of centres as set out under this policy would be likely to ensure a range of facilities are provided at these locations which are appropriate to meet the local need. This would be expected to have benefits to the local community by ensuring all residents have access to essential services, and the local economy through encouraging economic regeneration. Therefore, Policy SCE1 would be likely to have minor positive impacts in relation to equality and the economy (SA Objectives 11 and 13). The policy would also support residential development in centres, where appropriate, which could lead to a minor positive impact on housing provision (SA Objective 10).

D.9.1.3 The policy seeks to ensure development proposals within centres facilitate "healthy communities" and are "accessible by a variety of sustainable means of transport", in particular public transport, walking and cycling. This policy would be likely to encourage residents to live healthy lifestyles by supporting active travel. Residents would also be encouraged to use public transport, which would subsequently reduce the number of cars on the road network, with likely benefits for carbon emissions, congestion and air quality (SA Objectives 4, 9 and 12).

D.9.1.4 The policy encourages regeneration and states that "the consolidation and reconfiguration of vacant floorspace" will be supported under this policy. This would be likely to have a minor positive impact in relation to natural resources, by encouraging the efficient use of previously developed land and reducing the quantity of greenfield land that would be lost to development (SA Objective 6).

D.9.1.5 The support for regeneration under Policy SCE1 may provide opportunities to improve the local townscape character. However, the type, scale and quantity of development that may be directed to each of the identified centres under this policy is not known as this policy sets out the strategic context, priorities and approach to the borough's centres. Therefore, the overall impact of the policy on the remaining SA objectives is uncertain (SA Objectives 1, 2, 3, 5, 7, 8 and 14).

## D.9.2 Policy SCE2 – Non-Retail Uses in Town Centres

### Policy SCE2 – Non-E Class Uses in Town Centres

#### Primary Shopping Areas and Retail Frontages

1. The Retail Core / Primary Shopping Areas within the centres of Sandwell are defined on the Policies Map.

## Policy SCE2 – Non-E Class Uses in Town Centres

2. To ensure that uses defined by Use Class E (commercial, business and services<sup>67</sup>) remain the predominant uses within the defined retail core / primary shopping areas, new development, including that with residential use above ground floor, will be permitted where:
  - a. the proposal is for commercial Class E use at ground floor level (or ground floor plus higher storeys); or
  - b. the proposal is for other town centre uses falling outside of Class E that would support the overall vitality and viability of the centre and fall within sui generis uses, to include the following:
    - i. public houses, wine bars, or drinking establishments;
    - ii. hot food takeaways (subject to the provisions of the relevant SLP policies);
    - iii. live music venues.
3. Changes of use of ground floor premises that require planning consent in Retail Core / Primary Shopping Areas will be assessed on whether the proposed use:
  - a. retains an active frontage and maintains or enhances the vitality, attractiveness, and viability of the primary shopping frontage and the wider commercial area;
  - b. is complementary to the shopping / commercial function of the area and provides a direct service to the public;
  - c. is for a temporary period to occupy temporarily vacant units such as for occupiers testing new business concepts, a pop-up store, or for use for events which would support the vitality and viability of the town centre;
  - d. does not result in an over-concentration of sui generis uses within one area, and contributes to an appropriate mix and diverse offer;
  - e. does not conflict with other Sandwell Local Plan policy objectives and requirements (e.g. Policy SDM6, Policy SDM8).

### Other Shopping Areas and Retail Frontages

4. In centres with no defined retail core or primary shopping area, proposals for non- 'E' Class uses will be resisted where they do not contribute to the vitality and viability of the centre, or where they would undermine its primary commercial, business and services functions.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SCE2	0	+	0	0	0	0	0	0	0	0	0	0	+	0

<sup>67</sup> <https://www.planningportal.co.uk/permission/common-projects/change-of-use/use-classes>

- D.9.2.1 Policy SCE2 outlines measures in place to retain the predominance of retail uses (Class E)<sup>68</sup> within defined Retail Core / Primary Shopping Areas.
- D.9.2.2 The policy includes measures that would ensure that non-E Class uses are resisted where they are found incapable of being able to *"contribute to the vitality and viability of the centre, or where they would undermine its primary commercial, business and services functions"*. These measures would expect to protect the vitality and viability of the retail areas and additionally protect jobs in the area. Therefore, Policy SCE2 would be expected to have a minor positive impact on the economy (SA Objective 13).
- D.9.2.3 Through ensuring that any proposals to change ground floor uses within these areas *"retains an active frontage and maintains or enhances the vitality, attractiveness, and viability"* of the local area, there is potential for the policy to result in a minor positive impact on the townscape (SA Objective 2).

### D.9.3 Policy SCE3 – Town Centres (tier-two centres)

#### Policy SCE3 – Town Centres (tier-two centres)

1. Proposals for appropriate uses will be supported within Town Centres (-tier-two centres (in-centre locations being defined in Policy SCE1, parts 3 and 4), 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 Town Centres to serve the needs of development identified in the SLP, particularly for residential and employment allocations (Policy SCE1)
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 (Policy SCE1 parts 3 and 4) must meet the relevant requirements set out in Policy SCE6 – such as accessibility, impact and sequential tests and flexibility.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SCE3	0	0	0	0	0	0	0	0	+	+	+	+	+	+

<sup>68</sup> ibid

D.9.3.1 Policy SCE3 supports the development of “*retail, office, leisure, residential, community, health, education and cultural facilities*” with the defined Town Centres. This would be expected to ensure there is adequate supply of employment opportunities within these areas. In addition, this policy would be likely to support a diverse range of retail, services and facilities within town centres, including healthcare and education, ensuring good accessibility for existing local residents and promoting community cohesion. The policy could potentially direct some residential development to these town centres, further ensuring that new residents would also have good access to services and boosting the local economy. This would be expected to have minor positive impacts in relation to accessibility, housing, equality, health, the economy and education (SA Objectives 9, 10, 11, 12, 13 and 14).

#### D.9.4 Policy SCE4 – District and Local Centres (tier-three centres)

##### Policy SCE4 – District and Local Centres (tier-three centres)

1. Proposals for appropriate uses (paragraph 9.68) will be supported within tier-three centres (in-centre locations being defined in paragraph 9.66) 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 Sandwell Local Plan, particularly residential and employment allocations (Policy CEN1). 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.
3. Proposals in edge-of-centre (directly adjoining a centre boundary) and / or out-of- centre locations must meet the relevant requirements as set out in Policies SCE1 Table 10, SCE5 and SCE6.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SCE4	0	0	0	0	0	0	0	0	+	+	+	0	+	0

D.9.4.1 Policy SCE4 supports development within defined District or Local Centres that would serve communities, including food stores and day-to-day services, complementing the higher tier centres. This could potentially help to encourage social interaction and community cohesion and help to meet the needs of the community within the local area, reducing the need to travel. This would be likely to have a minor positive impact in relation to local accessibility and equality (SA Objectives 9 and 11).

D.9.4.2 By supporting appropriate residential and employment development within district and local centres and providing job opportunities, this policy would also be likely to have a minor positive impact on housing and the local economy (SA Objectives 10 and 13).

## D.9.5 Policy SCE5 – Provision of Small-Scale Local Facilities not in centres

### Policy SCE5 – Provision of Small-Scale Local Facilities not in centres

1. Small-scale (up to 280m<sup>2</sup> gross) proposals for centre uses and complementary uses that are subject to planning control 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.
  - 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; this will be evidenced by the proposal being within convenient, safe walking distance of the community it will serve.
2. Development involving the loss of a local facility, particularly a convenience shop, pharmacy, community facility or post office, will be resisted where this would result in an increase in the number of people living more than a convenient, safe walking distance from alternative provision.
3. Where planning consents are granted, effective planning conditions and / or planning obligations will be required to support the regeneration strategy and minimise impacts (Policy SDS2).
4. Proposals where total floorspace exceeds 280m<sup>2</sup> (gross) will also have to meet the requirements of Policy SCE6.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SCE5	0	0	0	+	0	0	+	0	+	0	+	+	+	0

D.9.5.1 Policy SCE5 supports the development of small-scale centre uses outside of the defined centres to meet the needs of community, where proposals meet a number of criteria outlined in the policy. These small development proposals would be expected to have benefits to the local economy and the local population by encouraging community cohesion, social inclusion and ensuring residents have good access to essential services in close proximity to their homes. The policy also seeks to retain existing services such as a “*convenience shop, pharmacy, community facility or post office*”. Therefore, a minor positive impact in regard to equality and the economy would be expected (SA Objectives 11 and 13).

D.9.5.2 The policy also seeks to ensure proposals are located “*within convenient, safe walking distance for new or improved facilities*” for residents. The policy would be likely to ensure good access to local facilities, whilst encouraging active travel and reducing reliance on private cars, with subsequent benefits to local air quality. This would be likely to have a minor positive impact on climate change mitigation, pollution, transport, and health (SA Objectives 4, 7, 9 and 12).

## D.9.6 Policy SCE6 – Edge of Centre and Out of Centre Development

### Policy SCE6 – Edge of Centre and Out of Centre Development

1. There is a clear presumption in favour of focusing appropriate uses in centres.

#### Sequential Test

2. All edge-of-centre and out-of-centre proposals (as defined in paragraph 9.66) for centre uses (paragraph 9.68) 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 should demonstrate that they will support both social inclusion and cohesion, and the need to sustain strategic transport links.
4. Edge-of-centre proposals will need to demonstrate that they will be well-integrated with existing in-centre provision, for example through the availability of safe and well-located pedestrian access across major roads that would otherwise bisect a centre.
5. When assessing sequentially preferable locations, proposals will need to demonstrate flexibility in their operational requirements, particularly in terms of their format and the types of goods being sold.

#### Impact Tests

6. 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 280m<sup>2</sup> (gross (Policy SCE1, Table 10)).
7. Impact tests should be proportionate to the nature and scale of proposals.
8. Proposals should be informed by the latest available robust evidence.
9. 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 SDS2).
10. Proposals that include unit sizes under 280m<sup>2</sup> (gross) will also have to meet the requirements of (Policy SCE5).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SCE6	0	0	0	+	0	0	+	0	+	0	+	+	+	0

D.9.6.1 Policy SCE6 sets out criteria for the development of edge-of-centre and out-of-centre proposals for centre uses. This could potentially have benefits to the local economy, by encouraging development in centres which are highly sustainable locations. A minor positive impact on the economy would be expected (SA Objective 13).

D.9.6.2 This policy encourages development in centres which are highly sustainable locations. All development proposals under this policy would be required to be assessed for accessibility via public transport, walking and cycling. This would be expected to ensure all residents and visitors have safe access to these facilities. By supporting access via walking and cycling, this policy could potentially encourage active travel and facilitate healthy lifestyles.

If there is adequate access via public transport, there could potentially be a reduction in car use, with benefits to climate change, air pollution and congestion. Therefore, as the policy prioritises development in centres and assuming the assessments outlined in the policy would ensure sustainable access to out-of-centre developments is prioritised, this policy would be likely to have minor positive impacts in relation to climate change mitigation, air pollution, transport, and health (SA Objectives 4, 7, 9 and 12).

- D.9.6.3 The policy also requires proposals to “*demonstrate that they will support both social inclusion and cohesion*”, which would be likely to result in a minor positive impact on equality (SA Objective 11).

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## D.10 West Bromwich

### D.10.1 Policy SWB1 – West Bromwich Town Centre

#### Policy SWB1 – West Bromwich Town Centre

1. The strategic priorities for West Bromwich are
  - a. to reinvigorate the town centre;
  - b. to unlock land to aid regeneration;
  - c. to support good quality jobs;
  - d. to stimulate Covid-19 recovery;
  - e. to promote the highest standards of sustainable urban design.
2. This will be achieved by:
  - a. delivering a significant number of new homes in and around the centre (Policy SWB2) to support the creation of a vibrant, active and sustainable town centre;
  - b. creating a Metro gateway and new town square and promoting a step change in the quality of local places / the public realm;
  - c. delivering mixed use, leisure, commercial and ancillary office growth in sustainable core locations;
  - d. repurposing vacant premises and sites in the centre to deliver community, education and healthcare provision;
  - e. undertaking site assembly and redevelopment to provide land suitable for new markets, education facilities and high-quality housing;
  - f. regenerating the Town Hall Quarter to establish a fully restored cultural and evening / night-time offer in the town centre;
  - g. creating sustainable travel networks across the centre and into surrounding locations;
  - h. providing a green link from the Metro through the heart of the town centre to connect the town centre to Dartmouth Park and Sandwell Valley, including cycling and walking routes across the town centre through to Sandwell Valley;
  - i. providing landscaping, green links, squares, parks and parklets, sustainable travel networks and additional green infrastructure throughout the centre.
3. Opportunities for future development in and around West Bromwich will be supported where they help deliver the aims and objectives set out above.
4. Areas such as The Lyng may be suitable for high quality, well-designed mixed-use development and investment; should such sites become available through land assembly or allocation during the timescale of the SLP, the Council will support the production of masterplans that demonstrate how sustainable new development could be brought forward in those areas.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SWB1	0	+	0	+	+	+	0	0	+	+	+	+	+	+

D.10.1.1 Policy SWB1 sets out the strategic priorities for West Bromwich Town Centre and outlines measures that will be carried out to meet these priorities. The policy states that regeneration will be achieved by *"repurposing vacant premises and sites in the centre to deliver community, education and healthcare provision"*. Utilising vacant premises would protect greenfield land and ensure sustainable development remains a core element within the town centre’s strategic priorities. Furthermore, the town centre will be provided with *"landscaping, green links, squares, parks and parklets, sustainable travel networks and additional green infrastructure"*. The provision of increased green space and increased access to sustainable travel methods would encourage active lifestyles and potentially reduce reliance on private car use. Furthermore, the proposed landscaping and increased green cover would be expected to benefit the local townscape character. Overall, the policy would be expected to have a minor positive impact on the local landscape character, climate change mitigation, green infrastructure provision, the borough’s greenfield land, residents’ access to sustainable transport, and health and wellbeing (SA Objectives 2, 4, 5, 6, 9, and 12).

D.10.1.2 The policy sets out how the housing need of the area will be met, where *"a significant number of new homes in and around the centre (Policy SWB2) to support the creation of a vibrant, active and sustainable town centre"* will be required. Furthermore, Policy SWB1 states that measures will include *"regenerating the Town Hall Quarter to establish a fully restored cultural and evening / night-time offer in the town centre"* and additionally *"redevelopment to provide land suitable for new markets, education facilities and high-quality housing"*. Overall, the policy would be likely to have a minor positive impact on the local housing supply, access to affordable homes, the local economy and educational facilities (SA Objectives 10, 11, 13, and 14).

## D.10.2 Policy SWB2 – Development in West Bromwich

### Policy SWB2 – Development in West Bromwich

1. It is a priority for West Bromwich to serve identified housing and employment growth aspirations (Policy SDS1, Policy SDS2). The diversification of West Bromwich to provide a re-purposed, well-balanced mix of appropriate uses will be supported, in particular:
  - a. Residential provision will be maximised, to increase and strengthen communities, with indicative housing capacity identified by the West Bromwich Masterplan and West Bromwich Inset, providing a minimum of 1,345 new homes by 2041 (this figure includes provision in Carter’s Green).

## Policy SWB2 – Development in West Bromwich

- b. Most new homes will be built at very high densities (Policy SHO3, Table 5) and as part of mixed-use developments where suitable, with additional residential use helping to attract investment and promoting the vitality of the centre.
  - c. Complementary uses, particularly community, leisure, health and education use (Policy SDS5, Policy SDM9).
2. Large-scale proposals to serve wider catchment areas should be focussed in West Bromwich 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 serving the wider catchment; this should be focused on re-purposing vacant floorspace and re-using existing sites within the centre in the first instance.

### 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 the centre, encourage linked trips and enhance the evening economy and visitor experience

### Office

5. Office provision will be supported, as West Bromwich is an important location for such employment. Future demand will be market-led; suitable sites are identified in the Masterplan.
6. Proposals in edge-of-centre and / or out-of-centre locations must meet the relevant requirements set out in Policy SCE6.

### Sustainability

7. West Bromwich is a highly sustainable focus for service provision; it is a priority to ensure high quality public realm and standards of design are delivered and supported through environmental policies to deliver the aims and objectives in the Masterplan.

### Accessibility

8. Proposals for commercial and business development that involve more than 500m2 (gross) of floorspace within the primary shopping areas of the centre and well- linked edge-of-centre locations should provide a travel plan.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SWB2	0	+	0	+	0	+	0	0	+	+	+	+	+	+

D.10.2.1 The policy aims to support the diversification of West Bromwich as Sandwell’s Strategic Centre to provide residents with a well-balanced provision of local facilities and uses.

- D.10.2.2 The policy identifies the importance of maximising residential provision to meet the borough-wide targets, ensuring that any large-scale proposals are located within West Bromwich to provide improved access to and uptake of sustainable means of transport. Locating large-scale developments within proximity of public transport networks would encourage active travel and could reduce reliance on private cars, reducing congestion within the area. Therefore, the policy could potentially have a minor positive impact on climate change mitigation and transport (SA Objectives 4 and 9) as well as the provision of housing (SA Objective 10). These measures, in addition to the policy provision to ensure car parking demand and traffic are considered, could help to reduce adverse effects associated with air pollution, leading to an overall negligible effect on SA Objective 7.
- D.10.2.3 Policy SCE3 supports leisure uses that aim to *"diversify the centre, encourage linked trips and enhance the evening economy and visitor experience"*. Additionally, the policy includes measures to support the provision of office space, where future demand would be *"market led"*. The specifications of the policy would be likely to provide improved employment opportunities and retail developments to boost the local economy as well as human health and equality, by helping to ensure all residents have good access to a range of services and facilities, including education, leisure and healthcare, by providing community uses within centres. Overall, the measures within the policy would expect to have a minor positive impact on equality, health, the local economy and education (SA Objectives 11, 12, 13 and 14).
- D.10.2.4 The policy states that *"it is a priority to ensure high quality public realm and standards of design are delivered"*, which would help to ensure new development conserves and enhances the local landscape and townscape character, potentially resulting in a minor positive impact on SA Objective 2.
- D.10.2.5 The policy states that there will be a focus on *"re-purposing vacant floorspace and re-using existing sites within the centre"*. These measures would help to protect undeveloped land from new development and encourage an efficient use of land, with a likely minor positive impact on natural resources (SA Objective 6).

# D.11 Transport

## D.11.1 Policy STR1 – Priorities for the Development of the Transport Network

### Policy STR1 – 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, prioritising walking, cycling and public transport to influence travel choices. 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 SLP currently include the following:
  - a. Motorways:  
M5 Improvements (Junctions 1 and 2)
  - b. Rail:  
Midlands Rail Hub
  - c. Rapid Transit  
Wednesbury – Brierley Hill  
A34 Walsall Road Sprint Corridor  
Walsall – Stourbridge corridor tram-train extensions
  - d. Key road corridors including the following (but not limited to): A4123 Corridor Upgrade  
A461 Black Country Corridor  
A457/B4135 Oldbury, Smethwick to Birmingham Corridor  
A4034 Blackheath and Oldbury Corridor
  - e. Interchanges  
Dudley Port Integrated Transport Hub

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
STR1	0	0	0	+	0	0	+	0	++	0	0	+	0	0

D.11.1.1 Policy STR1 outlines SMBC’s priorities for the transport network during the Plan period, covering a wide range of transport modes including the strategic road network, rail, rapid transit and interchanges. The transport projects identified within this policy would all be expected to contribute towards improving the delivery of sustainable transport options,

improving the integration of different modes of transport, reducing issues with congestion and improving traffic flows. Overall, a major positive impact on transport would be expected (SA Objective 9).

D.11.1.2 The policy states that “*all new developments must provide adequate access for all modes of travel, including walking, cycling and public transport*” in accordance with the identified accessibility standards. The promotion of active travel and public transport improvements within key transport corridors would be likely to encourage the uptake of sustainable transport and could potentially help to reduce reliance on travel via car. A modal shift away from private car use towards public transport and active travel would be expected to result in a reduction in transport-associated emission of GHGs and other air pollutants. Therefore, Policy STR1 could potentially result in a minor positive impact on climate change mitigation and pollution (SA Objectives 4 and 7).

D.11.1.3 Furthermore, by encouraging the uptake of active travel and ensuring development is accessible via walking and cycling, Policy STR1 could potentially improve the physical and mental wellbeing of residents. Ensuring that road safety and pedestrian access are considered when designing new development would be likely to encourage more people to choose these forms of travel, encouraging physical exercise and social interaction. A minor positive impact on health would be anticipated (SA Objective 12).

#### D.11.2 Policy STR2 – Safeguarding the Development of the Key Route Network (KRN)

##### Policy STR2 – Safeguarding the Development of the Key Route Network (KRN)

1. Sandwell will, in conjunction with Transport for West Midlands (TfWM) and other neighbouring local highway authorities, identify capital improvements and management strategies to ensure the KRN meets its strategic functions.
2. Land needed for the implementation of improvements to the KRN will be safeguarded 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.
4. When working with neighbouring authorities, sub-national transport bodies, infrastructure providers and statutory bodies, there will be a focus on reducing the impact of private car use on the KRN and delivering a net-zero transport system.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
STR2	0	0	0	+	0	0	0	0	+	0	0	0	0	0

- D.11.2.1 New development within Sandwell as proposed within the SLP would be expected to result in an increased number of vehicles on the local road network, adding more pressure to road infrastructure and travel corridors. An increased volume of traffic on the road can have implications for a variety of issues such as congestion, road safety and air quality as well as resulting in longer journey times. Policy STR2 seeks to ensure that the Key Route Network (KRN) is effectively managed in order to support the level of growth proposed in the SLP over the Plan period.
- D.11.2.2 The policy states that suitable mitigation measures will be identified and put in place, to ensure that any potential adverse impacts on the road network are avoided. Furthermore, the policy would help to ensure that transport connectivity is improved, through requiring liaison with Transport for West Midlands or other relevant authorities. Policy STR2 could potentially encourage coordination and streamlining of transport systems including public transport such as rapid transit and bus routes. Overall, a minor positive impact on transport would be anticipated (SA Objective 9).
- D.11.2.3 Since Policy STR2 will seek to "focus on reducing the impact of private car use on the KRN and delivering a net-zero transport system", there may be potential for a minor positive impact on climate change mitigation (SA Objective 4).

### D.11.3 Policy STR3 – Managing Transport Impacts of New Development

#### Policy STR3 – 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 shared transport.
2. These proposals should be in accordance with an agreed Transport Assessment, where deemed necessary by the Local Highway Authority, and include the implementation of measures to promote and improve such sustainable transport infrastructure and facilities through agreed Travel Plans and similar measures.
3. Sustainable transport modes must be made more convenient for the majority of journeys than car usage in order to promote genuine modal shift. They should be supported by the necessary management and regulatory measures if deemed necessary by the Local Highway Authority. Planning conditions and /or legal agreements may be required to ensure the implementation of agreed measures.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
STR3	0	0	0	+	0	0	0	0	+	0	0	0	0	0

D.11.3.1 Policy STR3 would help to ensure that new development is not permitted where there is potential for significant adverse effects on transport “*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 shared transport*”. The policy emphasises that sustainable travel options should be more convenient to site end users than private cars, which would be likely to increase their uptake. Overall, a minor positive impact on transport and climate change mitigation would be anticipated (SA Objectives 4 and 9).

#### D.11.4 Policy STR4 – The Efficient Movement of Freight & Logistics

##### Policy STR4 – The Efficient Movement of Freight & Logistics

1. The movement of freight by sustainable modes of transport such as rail and waterways will be encouraged. Road-based freight will be encouraged to use the Key Route Network whenever practicable.
2. Junction improvements and routeing strategies will be focussed on those parts of the highway network evidenced as being of particular importance for freight access to employment sites and the motorway network.
3. Proposals that generate significant freight movements will be directed to sites with satisfactory access to the Key Route Network.
4. Existing and disused railway lines 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.
6. Consideration will be given to the movement of freight, goods and other courier services on Sandwell’s roads when determining location of new development.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
STR4	0	0	-	0	0	0	0	0	+	0	0	0	+	0

D.11.4.1 Policy STR4 sets out guidelines for the movement of freight, and the prioritisation of sustainable modes of transport where possible. Road transport is a major source of air pollution and GHG emissions in the UK<sup>69</sup>. Transporting freight via rail and waterways

<sup>69</sup> ONS (2019) Road transport and air emissions. Available at: <https://www.ons.gov.uk/economy/environmentalaccounts/articles/roadtransportandairemissions/2019-09-16> [Date accessed: 21/07/23]

would be expected to result in lower emissions and higher energy efficiency compared to road transport using heavy goods vehicles (HGVs)<sup>70</sup>.

- D.11.4.2 By encouraging the movement of freight via rail and waterways, Policy STR4 could potentially help to relieve road congestion issues and result in more sustainable freight transport across the Plan area. Therefore, a minor positive impact on transport would be expected (SA Objective 9).
- D.11.4.3 Furthermore, this policy could potentially result in more cost-effective and efficient movement of freight, which would help to improve economic productivity. As such, this policy could potentially result in a minor positive impact on the economy (SA Objective 13).
- D.11.4.4 The policy states that “*existing and disused railway lines will be safeguarded for rail-related uses*” and seeks to encourage the use of waterways for freight transport. In Sandwell, canals and disused railway lines form part of the ecological network in an otherwise heavily urbanised area, for example, the ‘Ridgeacre Branch Canal’ Site of Importance for Nature Conservation (SINC), ‘Snow Hill to Wolverhampton Railway’ Site of Local Importance for Nature Conservation (SLINC) and the ‘Princes End Disused Railway’ SLINC. The conversion of these routes back into regular use for freight transport could potentially result in a minor negative impact on biodiversity through the increased disturbance of important wildlife corridors (SA Objective 3).

#### D.11.5 Policy STR5 – Creating Coherent Networks for Cycling and Walking

##### Policy STR5 – Creating Coherent Networks for Cycling and Walking

1. By working in partnership with Transport for West Midlands and neighbouring local authorities, Sandwell will ensure that it can create and maintain a comprehensive cycle network based on the four tiers of the West Midlands cycle network, including the use of common cycle infrastructure design standards such as LTN1/20 and Manual for Streets 2 or such future relevant guidance as may be appropriate.
2. Creating an environment that encourages active travel requires new developments to link to existing walking and cycling networks. The links should be coherent, safe, direct, comfortable, attractive, and not impeded by other infrastructure including that provided for other forms of transport and digital / communication infrastructure.
3. Where possible, existing links including the canal network should be enhanced and the networks extended to serve new developments.
4. New developments should have good walking and cycling links to public transport nodes and interchanges.
5. Where possible, a compact and legible urban realm with easy to reach destinations on foot and by cycle should be delivered, including appropriate signage and wayfinding.

<sup>70</sup> Government Office for Science (2019) Understanding the UK freight transport system. Available at: <https://www.gov.uk/government/publications/future-of-mobility-the-uk-freight-transport-system> [Date accessed: 21/07/23]

### Policy STR5 – Creating Coherent Networks for Cycling and Walking

6. 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.
7. The number of cycle parking spaces required in new developments and in public realm schemes will be determined by local parking standards set out in Appendix L.
8. Sandwell Council will work with Transport for West Midlands and neighbouring local authorities on expanding the West Midlands Cycle Hire scheme and location and provision of cycle hire infrastructure will be integral when determining new development.
9. The design of cycle infrastructure should be in accordance with the principles and standards contained in the Department for Transport’s Local Transport Note 1/20 (LTN1/20): Cycle Infrastructure Design.
10. Where feasible, to improve the local environment for pedestrians and cyclists, measures to manage traffic should be considered, which may include measures such as modal filters, reducing traffic speeds, road space reallocation, and implementing parking management policies.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
STR5	0	0	0	+	0	0	0	0	++	0	+	+	0	0

- D.11.5.1 Policy STR5 seeks to ensure that walking and cycling infrastructure networks are developed and maintained across the borough to encourage sustainable travel choices.
- D.11.5.2 The policy requires the development of cycle and walking links which are *"coherent, safe, direct, comfortable, attractive, and not impeded by other infrastructure including that provided for other forms of transport"* and states that *"cycle parking facilities should be provided at all new developments and should be in convenient locations with good natural surveillance"*. These factors would be likely to encourage more people to consider cycling and walking as alternative forms of travel, reducing reliance on private car use. Therefore, a major positive impact on transport would be expected (SA Objective 9). This would also be expected to contribute towards a reduction in GHG emissions, and as such, a minor positive impact has been identified for climate change mitigation (SA Objective 4).
- D.11.5.3 Furthermore, through facilitating active travel, this policy could potentially encourage outdoor exercise and result in benefits to mental and physical wellbeing. A minor positive impact on health would be likely (SA Objective 12).
- D.11.5.4 Policy STR5 seeks to ensure that walking and cycling networks are safe, and bicycle storage is in *"convenient locations with good natural surveillance"*, which could help to reduce crime and the fear of crime. Therefore, this could potentially result in a minor positive impact on equality (SA Objective 11).

## D.11.6 Policy STR6 – Influencing the Demand for Travel and Travel Choices

### Policy STR6 – Influencing the Demand for Travel and Travel Choices

1. Sandwell is 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 Sandwell are:
  - a. identifying appropriate strategic 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 Regional Traffic Control Centre and further joint working;
  - c. implementing demand management measures to restrain car usage and managing car parking demand, thereby encouraging behaviour change and increasing travel by sustainable modes of transport;
  - d. providing better accessibility to shared transport services such as demand responsive transport services and mobility hubs, reducing the need to travel long distances by car or helping people to travel by more sustainable modes of transport;
  - e. maximising access to high speed broadband /digital infrastructure will be required to enable smarter working for those that are able to do so, thus further reducing the need to travel.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
STR6	0	0	0	+	0	0	+	0	++	0	0	0	0	0

D.11.6.1 Policy STR6 promotes the holistic management of traffic across the borough and wider area and seeks to encourage a modal shift towards more sustainable travel options, in accordance with the Traffic Management Act 2004 (TMA). The aim of the TMA is to “*tackle congestion and disruption on the road network ... [and] places a duty on local authorities to make sure traffic moves freely and quickly*”<sup>71</sup>.

D.11.6.2 Through requiring the identification of strategic park and ride sites and improving access to transport hubs, this policy would be expected to encourage the development of better-connected public transport systems and deliver more widespread changes to the transport network. The promotion of public transport and development of additional strategic and local sites for delivery, coupled with the policy provisions to ensure “*demand management measures to restrain car usage and managing car parking*” would be likely to reduce reliance on private car use and consequently reduce the emission of GHGs and other air pollutants. Moreover, maximising high speed broadband connections and encouraging smarter working will further reduce the need to travel. Overall, a major positive impact in

<sup>71</sup> Department for Transport (2022) Traffic management Act 2004 overview. Available at: <https://www.gov.uk/government/collections/traffic-management-act-2004-overview> [Date accessed: 21/07/23]

relation transport (SA Objective 9) and a minor positive impact to climate change mitigation and pollution (SA Objectives 4 and 7) would be expected.

### D.11.7 Policy STR7 – Network Management

#### Policy STR7 – Network Management

1. Depending on the location of new development, the deployment of advanced and smart technologies that allow the public to plan their journeys more effectively may be appropriate, for example providing real time travel information and satellite navigation systems, Variable Message Signs (VMS) along congested parts of the network and digital sensors /cameras to monitor traffic and collect data on traffic patterns for future planning.
2. All new developments that impact the existing highway network, or which result in a new asset to be adopted by the Local Highway Authority, may be subject to fees and obligations for the maintenance of the highway network as part of a relevant legal agreement

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
STR7	0	0	0	0	0	0	0	0	+	0	0	0	0	0

D.11.7.1 Policy STR7 sets out the potential to introduce technologies to allow the effective planning of journeys, which could help to improve the overall management of the transport network and reduce congestion. A minor positive impact on transport (SA Objective 9) could be achieved, however this would be dependent on effective implementation and monitoring.

### D.11.8 Policy STR8 – Parking Management

#### Policy STR8 – Parking Management

1. The priorities for traffic management in Sandwell include the sustainable delivery and management of parking in centres and beyond, through use of some or all 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 the guidance and standards contained at Appendix L;

### Policy STR8 – Parking Management

- 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.
- e. Providing more convenient, secure, and accessible cycle parking will be a critical part of increasing cycling in Sandwell and making it a natural first choice for journeys. Considering different users and types of cycle parking will be an essential part of this and new developments should consider this in accordance with guidance set out in Appendix L.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
STR8	0	0	0	0	0	0	0	0	+	0	0	0	+	0

D.11.8.1 Policy STR8 sets out the approach to parking management in Sandwell, including the type, location and standards for parking in or near to town centres. By regulating the types of parking available in different locations, and ensuring these standards are applied consistently across the Plan area, this policy would be expected to encourage people to choose more sustainable travel modes where possible. The policy also aims to ensure that the efficiency of traffic flows in and around town centres is improved. Overall, a minor positive impact on transport would be anticipated (SA Objective 9).

D.11.8.2 The policy seeks to ensure that the type of parking is appropriate to the location, for example ensuring that “*long stay parking is removed near to town centres, to support parking for leisure and retail customers*”. Furthermore, the policy states that the control of parking should not be used “*as a tool for competition between centres*”. Therefore, this could potentially help to support local shops and businesses and result in a minor positive impact on the economy (SA Objective 13).

### D.11.9 Policy STR9 – Planning for Low Emission Vehicles

#### Policy STR9 – 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 Council will facilitate the introduction of charging points in public locations.
  - c. Working with partners to explore support for alternative low emission vehicle technologies, such as hydrogen fuel cells, across a range of modes; private cars, buses and/or small passenger and fleet vehicles

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
STR9	0	0	0	+	0	0	+	0	+	0	0	0	0	0

D.11.9.1 Policy STR9 promotes development proposals which would support low emission vehicles (LEV). The term LEV can be used to refer to motorised vehicles which emit lower levels of emissions than traditional petrol- or diesel-powered cars or use low carbon technologies, including pure electric vehicles and plug-in hybrid vehicles<sup>72</sup>.

D.11.9.2 This policy would help to encourage the use of LEVs within Sandwell, by ensuring the appropriate infrastructure such as electric vehicle charging points are incorporated within new developments and appropriate public locations. The policy also encourages the exploration of alternative low emission vehicle technologies. Overall, this would be expected to result in a minor positive impact on sustainable transport (SA Objective 9). Furthermore, encouraging the use of LEVs could potentially help to reduce the emission of GHGs and other air pollutants, resulting in a minor positive impact on climate change mitigation and pollution (SA Objectives 4 and 7).

#### D.11.10 Policy STR10 – Transport Innovation & Digital Connectivity

##### Policy STR10 – Transport Innovation & Digital Connectivity

1. Opportunities for integrating 5G connectivity within the transport network should be explored when development proposals, masterplanning and major housing and employment schemes are being promoted, to improve transport services and ensure there is 5G connectivity throughout Sandwell. This should include the provision of 5G connectivity as part of new development proposals, which will encourage more people to connect remotely, reducing the need to travel (see Policy SID1).
2. Sandwell will ensure the integration of 'smart infrastructure' where possible as part of new development proposals. In transport terms, examples of smart infrastructure include: -
  - a. smart parking sensors, which provide live parking capacity data;
  - b. traffic signals that can respond to levels of congestion and prioritise sustainable transport modes; and
  - c. transport volume monitoring sensors, which can provide information on the use of different modes, journey time or tracking data.

<sup>72</sup> SMMT (2020) Ultra Low Emission Vehicles (ULEVs). Available at: <https://www.smmt.co.uk/industry-topics/technology-innovation/ultra-low-emission-vehicles-ulevs/> [Date accessed: 21/07/23]

## Policy STR10 – Transport Innovation & Digital Connectivity

3. Working in partnership with Transport for West Midlands and neighbouring Local Authorities, Sandwell will facilitate Mobility as a Service<sup>73</sup> and will ensure this is integrated into any new infrastructure where applicable.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
STR10	0	0	0	+	0	0	+	0	+	0	0	0	+	0

D.11.10.1 Policy STR10 promotes the provision of 5G connectivity, including within new homes and businesses and integrated within the transport network, which would encourage remote working and reduce the need to travel. A minor positive impact on the economy could therefore be achieved (SA Objective 13).

D.11.10.2 The integration of 'smart infrastructure' as outlined within the policy could help to reduce congestion, potentially helping to reduce the emission of GHGs and other air pollutants. Overall, if implementation and monitoring prove successful, this would be expected to result in a minor positive impact on sustainable transport, pollution and climate change mitigation (SA Objectives 4, 7 and 9).

<sup>73</sup> Digital transport service platforms that enable users to access, pay for, and get real-time information on, a range of public and private transport options.

## D.12 Infrastructure and Delivery

### D.12.1 Policy SID1 – Promotion of Fibre to the Premises and 5G Networks

#### Policy SID1 – 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.
2. 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

3. Any proposals for infrastructure to support the delivery of 5G networks will be supported in principle, subject to meeting the following criteria and the requirements of other local policies and national guidance:
  - a. Proposals should be sensitively sited and designed to minimise impacts on the environment, amenity, and character of the surrounding area.
  - b. Proposals should not have an adverse impact on areas of ecological interest or areas of landscape importance, and should protect and, where possible, enhance the significance of heritage assets and their setting (Policies SNE2 and SHE2).
  - c. 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.
  - d. The potential to use canal towpaths to accommodate 5G or other network infrastructure and cabling should be explored, where this would not adversely affect areas of ecological or historic interest (Policy SNE6).
4. Operators proposing 5G network infrastructure are strongly recommended to enter into early discussions with the Council.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SID1	0	0	0	+	0	0	+	0	+	0	+	0	+	0

D.12.1.1 Policy SID1 supports the provision of Fibre to the Premise (FTTP), for residential developments of ten or more dwellings or over 1,000m<sup>2</sup> of non-residential uses, and 5G networks in principle. The promotion of such infrastructure would be likely to help ensure that development proposals can meet the needs of current and future populations.

- D.12.1.2 With the development of FTTP and 5G within the borough under this policy, residents would be likely to have greater access to essential services from home and the workplace. This would provide increased opportunities to work from home and access to a wider range of employment opportunities, resulting in a minor positive impact on the local community and economy (SA Objective 13). By ensuring all development of ten or more homes incorporates FTTP, this policy would be likely to ensure the majority of new residents across the Plan area have access to this service, and the benefits this brings in terms of employment opportunities and digital inclusion, with a likely minor positive impact on equality (SA Objective 11).
- D.12.1.3 In addition, with improved access to online facilities and home working, this policy could potentially help to reduce reliance on private car use such as for commuting to workplaces, and in turn, reduce local congestion. This would be expected to have a minor positive impact on climate change mitigation, air pollution and transport, due to reduced emissions and congestion associated with less traffic (SA Objectives 4, 7, and 9).
- D.12.1.4 The policy seeks to minimise adverse effects on the surrounding environment in terms of amenity, landscape, character and ecology. As such, negligible impacts would be likely for SA Objectives 1, 2 and 3.

## D.12.2 Policy SID2 – Mobile Network Infrastructure

### Policy SID2 – Mobile Network Infrastructure

1. To ensure that the installation of masts is in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) applications for all prior approval and full planning applications must:
  - a. provide self-certification to the effect that a mobile phone base station when operational will meet the ICNRP guidelines; and
  - b. provide a statement for each site indicating its location, the height of the antenna, the frequency and modulation characteristics and details of power output and where a mobile phone base station is added to an external mast or site, confirmation that the cumulative exposure will not exceed the ICNRP guidelines.
2. Infrastructure should be located where it will have the least adverse impact on local landscapes, biodiversity and heritage assets wherever possible. Where unavoidable impacts arise in sensitive locations, they should be considered fully and avoided or mitigated accordingly.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SID2	0	0	0	0	0	0	0	0	0	0	0	0	0	0

D.12.2.1 Policy SID2 sets out the requirements of mobile network infrastructure in regard to public health. The policy requires development proposals to meet the guidelines set by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). This could help to reduce the potential for adverse effects in terms of human health, with a negligible impact identified under SA Objective 12.

D.12.2.2 Policy SID2 states that *"infrastructure should be located where it will have the least adverse impact on local landscapes, biodiversity and heritage assets wherever possible"* and would therefore expect to have a negligible impact on cultural heritage, landscape and local biodiversity (SA Objectives 1, 2, and 3).

### D.12.3 Policy SID3 – Digital Infrastructure / Equipment

#### Policy SID3 – Digital Infrastructure / Equipment

1. The siting and design (including materials) of digital infrastructure / equipment, which includes (but is not limited to) telephone kiosks and digital interactive finger posts, will be carefully controlled to ensure: -
  - a. they do not detract from the visual amenities of the street scene;
  - b. they avoid harmful impacts on public amenity or unacceptable street clutter in the public realm;
  - c. they avoid harm to the significance of heritage assets or their settings and support local distinctiveness.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SID3	0	0	0	0	0	0	0	0	0	0	0	0	0	0

D.12.3.1 Policy SID3 sets out the requirements of the design and location of digital infrastructure to ensure that harm is avoided to visual amenity, *"heritage assets or their settings"*, and *"the public realm"*. The policy would protect the local landscape character and the heritage assets and settings that contribute to the creation of local distinctiveness and identity, and would be expected to have a negligible impact on cultural heritage and the local landscape (SA Objectives 1 and 2).

# D.13 Waste and Minerals

## D.13.1 Policy SWA1 – Waste Infrastructure Future Requirements

### Policy SWA1 – 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. Waste operators will be expected to demonstrate that the greenhouse gas emissions from the operations involved and associated transport of waste from source to processing facility have been minimised, in line with national and local targets for the transition to a net zero carbon economy.
3. 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 Sandwell 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 Sandwell, 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 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 Sandwell, to ensure a co-operative cross boundary approach to waste management is maintained.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SWA1	0	0	0	0	0	0	0	++	0	0	0	0	0	0

D.13.1.1 Policy SWA1 sets out the strategy for waste management within Sandwell, seeking to reduce the generation of waste and associated pollution, promote re-use and recycling of

waste in line with the waste hierarchy, and ensure sufficient capacity in the waste management system.

D.13.1.2 Policy SWA1 supports the “*minimisation of waste production and the re-use and recovery of waste materials*” and encourages development proposals to manage waste through the waste hierarchy, “*ensuring that sufficient capacity is located within Sandwell to accommodate forecast waste arisings of all types during the Plan period and reducing the reliance on other authority areas*”. The policy promotes the re-use and recycling of materials. Overall, the policy would be expected to help reduce the volume of waste generated in the borough and improve the management and disposal of waste. Therefore, a major positive impact on waste would be expected (SA Objective 8).

D.13.1.3 The policy also seeks to ensure “*new waste management facilities are located and designed to avoid unacceptable adverse impacts on the environment, human health and well-being, wildlife, heritage assets and amenity*”. These criteria would be likely to help avoid adverse impacts in relation to human health, biodiversity and cultural heritage; therefore, negligible impacts would be likely against these objectives (SA Objectives 1, 3 and 12).

## D.13.2 Policy SWA2 – Waste Sites

### Policy SWA2 – Waste Sites

#### Protecting Waste Sites

1. Sandwell 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 17, 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 Sandwell.
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 / 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.

### Policy SWA2 – Waste Sites

- 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SWA2	0	0	0	0	0	0	0	+	0	0	0	0	0	0

D.13.2.1 The aim of Policy SWA2 is to safeguard and retain capacity of the existing waste facilities in Sandwell. The policy also states that “*proposals for housing and other potentially sensitive uses will not be permitted near to or adjacent to an existing waste management site where there is potential for conflict between the uses*”. The policy would be likely to help ensure appropriate waste management continues in the borough and that capacity at these facilities does not decrease. Overall, a minor positive impact on waste would be expected (SA Objective 8).

### D.13.3 Policy SWA3 – Preferred Areas for New Waste Facilities

#### Policy SWA3 – Preferred Areas for New Waste Facilities

- The preferred locations for waste management facilities are the Local Employment Areas shown on the Sandwell Policies Map, Waste Key Diagram.
- All proposals for new waste management facilities should demonstrate how they will contribute to Strategic Objective 17 and the strategic objectives of Policy SWA1, 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.
- All applications for waste development will be expected to comply with the requirements in Policy SWA4.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SWA3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0

D.13.3.1 Policy SWA3 identifies preferred locations for new waste management infrastructure in Sandwell. The provision of waste management facilities would be likely to have a major

positive impact on waste, by ensuring there are adequate facilities and capacity within the borough to effectively manage waste (SA Objective 8).

D.13.3.2 At present, the scale and potential capacity of the proposed waste management facilities is unknown. Seeking to manage Sandwell's waste rather than exporting to surrounding areas could potentially result in some benefits associated with reduced need to transport waste, although the extent / likelihood of these benefits is unknown at present. Overall, the likely impact in relation to environmental objectives is uncertain (SA Objectives 1, 2, 3, 4, 5, 6, 7 and 9).

D.13.3.3 The provision of waste management facilities would not be expected to impact housing, equality, health, economy or education (SA Objectives 10, 11, 12, 13 and 14).

#### D.13.4 Policy SWA4 – Locational Considerations for New Waste Facilities

##### Policy SWA4 – Locational Considerations for New Waste Facilities

###### **Key Locational Considerations for All Waste Management Proposals**

1. Proposals should demonstrate how they will contribute to Strategic Objective 17 and the strategic objectives of Policy SWA1, 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<sup>74</sup> should be focused in local employment areas and will be required to meet the following criteria:
  - a. evidence the need for the facility;
  - b. all waste processes and operations must be contained, processed and managed within buildings unless there are acceptable operational reasons why these processes cannot be contained in buildings;
  - c. proposals must accord with all other policies in relation to the protection of the environment and public amenity, or demonstrate that other material considerations outweigh any policy conflicts;
  - d. consideration will be given to the potential impacts of waste management proposals on: -
    - i. minimising adverse visual impacts;
    - ii. potential detrimental effects on the environment and public health;
    - 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.

<sup>74</sup> Waste development covers the use of any land or buildings for the storage, treatment, processing, transfer, bulking-up, recycling, recovery, or final deposit of any substance classified as 'waste'.

## Policy SWA4 – Locational Considerations for New Waste Facilities

- 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<sup>75</sup> should include a supporting statement that clearly describes the key characteristics of the development. It should also explain how the development aligns with Strategic Objective 17 and the General Principles and Preferred Methods of managing waste in Policy SWA1. 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SWA4	0	0	0	0	0	0	0	+	0	0	0	0	0	0

D.13.4.1 Policy SWA4 sets out criteria to which new waste management facilities should be in accordance with. Waste management facilities will only be supported where there is an identified need for the facility. This would be likely to help fill any gaps in the borough

<sup>75</sup> 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.

and meet the locally identified waste management needs. A minor positive impact on waste would therefore be expected (SA Objective 8).

D.13.4.2 The policy states that consideration will be given to *"visual impacts"*, *"detrimental effects on the environment and public health"*, *"noise, excessive traffic and vibration"* and *"water quality and resources and flood risk management"* when allocating waste management facilities. These criteria would be expected to help prevent adverse impacts, and therefore, negligible impacts have been identified in relation to landscape, biodiversity, human health, transport, flood risk and pollution (SA Objectives 2, 3, 5, 7, 9 and 12).

D.13.4.3 Policy SWA4 states *"proposals must accord with all other policies in relation to the protection of the environment and public amenity"*. However, it is uncertain what policies this is referring to. It is recommended that this statement is expanded, and further detail provided.

### D.13.5 Policy SWA5 – Resource Management and New Development

#### Policy SWA5 – Resource Management and New Development

##### Waste Management in new developments

1. All new developments should;
  - a. address waste as a resource;
  - b. minimise waste as far as possible
  - c. design sites with resource and waste management in mind;
  - d. manage unavoidable waste in a sustainable and responsible manner; and
  - e. maximise use of materials with low environmental impacts.
2. Where a proposal includes uses likely to generate significant amounts of waste, these should be managed either on-site or in as close a proximity as possible to the source of the waste.
3. Resource and waste management requirements should be reflected in the design and layout of new development schemes. Wherever possible building, engineering and landscaping projects should use alternatives to primary aggregates, such as secondary and recycled materials, renewable and locally sourced products and materials with low environmental impacts. Consideration should also be given to how waste will be managed within the development once it is in use.
4. Where redevelopment of existing buildings or structures and / or remediation of derelict land is proposed, construction, demolition and excavation wastes (CD&EW) should be managed on-site where feasible and as much material as possible should be recovered and re-used for engineering or building either on-site or elsewhere.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SWA5	0	0	0	0	0	+	0	++	0	0	0	0	0	0

- D.13.5.1 Policy SWA5 sets out criteria for the sustainable management of waste and resources associated with new developments, during both construction and occupation.
- D.13.5.2 The policy requires all new developments to “*minimise waste as far as possible*” and seeks to maximise the use of “*secondary and recycled materials, renewable and locally sourced products and materials with low environmental impacts*” wherever possible. This policy would be expected to promote sustainable and efficient waste management and use of materials across all new development in Sandwell and limit the generation of waste as much as is feasible. Furthermore, Policy SWA5 seeks to ensure that development design takes into account the need for waste management, when occupied. Overall, a major positive impact on waste would be expected (SA Objective 8).
- D.13.5.3 Additionally, through encouraging the efficient use of resources and reducing the need for extraction of primary aggregates, Policy SWA5 would be expected to result in a minor positive impact on natural resources (SA Objective 6).
- D.13.5.4 Policy SWA5 also seeks to ensure that environmental impacts as a result of resource management and new development are minimised. The policy encourages the use of materials with low environmental impacts and the management of waste either on-site or as close as possible to the source. These factors would be expected to minimise the potential for, and scale of, adverse impacts on the environment by reducing the distances travelled by waste management vehicles such as HGVs. Therefore, negligible impacts have been identified for landscape, biodiversity, pollution and transport (SA Objectives 2, 3, 7 and 9).

#### D.13.6 Policy SMI1 – Minerals Safeguarding

##### Policy SMI1 – Minerals Safeguarding

1. Mineral deposits that are identified as being, or may become of, economic importance will be safeguarded from unnecessary sterilisation.
2. 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.  
**Secondary and Recycled Aggregates**
3. At the end of 2017 the Sandwell was estimated to be producing around 330,000 tonnes of secondary and recycled aggregates per annum at permitted production sites. As a minimum, Sandwell will aim to maintain its share of this level of production throughout the plan period. In support of this, permitted secondary and recycled aggregate sites expected to continue in production up to 2041 will be safeguarded.
4. The location of all permitted mineral infrastructure sites in Sandwell, are identified on the Policy Map and these sites are also listed below. 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SMI1	0	0	0	0	0	+	0	0	0	0	0	0	+	0

D.13.6.1 Although Sandwell itself does not contain any Mineral Safeguarding Areas at present, Policy SMI1 sets out requirements for any mineral deposits identified as being or becoming of economic importance to be "*safeguarded from unnecessary sterilisation*". Therefore, the policy would be expected to protect mineral resources and have a minor positive impact on natural resources (SA Objective 6).

D.13.6.2 This policy would be expected to have a minor positive impact on the local economy, by supporting local construction and industrial businesses (SA Objective 13).

### D.13.7 Policy SMI2 – Managing the Effects of Mineral Development

#### Policy SMI2 – Managing the Effects of Mineral Development

##### General Requirements for Minerals Developments

1. When working ceases, all plant and equipment should be removed, and sites should be restored as soon as possible.
2. 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 adopted development plan – or otherwise demonstrate that other material considerations outweigh any policy conflict.
3. Subject to other policies within the Plan, planning permission will be granted for built development within the Consideration Zones around Coneygre Mine and Blackham Mine, where the applicant is able to demonstrate that a collapse in the mine would not prejudice public safety or compromise the structural integrity of the proposed structures.
4. 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

5. 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;

### Policy SMI2 – Managing the Effects of Mineral Development

- e. harm to water quality and resources and flood risk management;
- f. ground conditions and land stability;
- g. land use conflict – proposals should demonstrate compatibility with the uses already present within the surrounding area;
- h. impacts on the highway, transport, and drainage network;
- i. where necessary, mitigation measures should be identified to reduce any adverse effects to an acceptable level.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SMI2	0	0	0	0	0	+	0	0	0	0	0	0	0	0

- D.13.7.1 Policy SMI2 sets out criteria by which development proposals for minerals working and infrastructure would be expected to comply. All development proposals will need to contribute to the extraction of minerals as set out in Policy SMI1. A minor positive impact on natural resources would therefore be expected (SA Objective 6).
- D.13.7.2 Under this policy, mineral extraction sites would be required to be restored as soon as possible once work ceases. This would be likely to help prevent adverse impacts on landscape and biodiversity, and therefore, negligible impacts have been identified (SA Objectives 2 and 3). Positive effects could be achieved in the longer term.
- D.13.7.3 Policy SMI2 seeks to *"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"*. This would be expected to have benefits to transport and local congestion, as well as reducing transport-related air pollution and carbon emissions. Nevertheless, the transportation of minerals would be expected to lead to a high number of HGVs on nearby roads. Overall, a negligible impact on climate change mitigation, pollution and transport would be likely (SA Objectives 4, 7 and 9).
- D.13.7.4 Development proposals for minerals extraction will be assessed for their effect on public health under this policy. This would be expected to help prevent development resulting in adverse impacts on human health, including inappropriate noise pollution and vibrations. Overall, a negligible impact on health would be likely (SA Objective 12).
- D.13.7.5 The policy also seeks to assess development proposals for their effects on *"historic (including archaeological) environments"* and would be likely to prevent adverse impacts on the historic environment. Therefore, a negligible impact on cultural heritage would be expected (SA Objective 1).

- D.13.7.6 Policy SMI2 will assess development proposals in terms of "*harm to water quality and resources and flood risk management*". This would be likely to help ensure proposals under this policy do not exacerbate local flood risk, and therefore, a negligible impact would be expected (SA Objective 5).

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# D.14 Development Constraints and Industrial Legacy

## D.14.1 Policy SCO1 – Hazardous Installations and Substances

### Policy SCO1 – Hazardous Installations and Substances

1. The Council will seek the reduction or removal of the hazardous component of notified installations. Where any existing or proposed industrial development presents a significant potential hazard to the health and safety of employees, or to people living and working in the surrounding area, the Council will seek either a reduction in the risk or its elimination.
2. The Council will use its powers under the Planning (Hazardous Substances) Act 1990 (or any subsequent legislative powers that supersede this Act) to revoke or modify a hazardous substances consent where either the consent has not been relied upon for five years or where all potential claimants for compensation indicate that they will not seek compensation.
3. The Council will oppose the expansion of existing hazardous installations unless it can be demonstrated that consent will not: -
  - a. increase the population at risk or the level of risk itself; or
  - b. adversely impact on the potential for development and / or redevelopment of adjoining land.
4. The Council will consult the Health and Safety Executive, the Environment Agency and other relevant bodies on all applications for hazardous substances consent and planning permission in the consultation zones around hazardous premises as may be notified from time to time to the Council by the Health and Safety Executive.
5. The Council will not grant either planning permission or hazardous substances consent for new development that when operational will: -
  - a. result in a significant increase to the risk or consequences of a major incident; and / or
  - b. adversely impact on the potential for development / redevelopment of adjoining land.

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SCO1	0	0	0	0	0	0	0	0	0	0	0	0	0	0

D.14.1.1 Policy SCO1 sets out criteria by which development proposals will be expected to comply regarding installations and substances that could be harmful to health, including those which are toxic, explosive, inflammable, highly reactive and hazardous. This would be expected to help prevent development resulting in adverse impacts on human health, as the policy seeks to reduce or remove “*the hazardous component of notified installations*”.

Overall, a negligible impact on health (SA Objective 12), as well as all other SA Objectives, would be expected.

## D.14.2 Policy SCO2 – Pollution Control

### Policy SCO2 – Pollution Control

1. Development proposals that are likely to cause or increase pollution or expose their occupants, users or adjacent residents to new or increased pollution will only be permitted where it can be demonstrated that sufficient mitigation measures are available and will be used to minimise harmful impacts to a level that protects the health and amenity of people and the environment. Measures that seek to eliminate existing pollution sources or reduce existing levels of pollution will be supported.
2. Development proposals must not, either individually or cumulatively, contribute to or produce poor air quality, odour nuisance and / or unacceptable levels of emissions from commercial and industrial premises that could cause detriment to local amenity. Proposals should be designed to reduce the exposure of occupants and users of the development to poor air quality and mitigate the effects of all relevant pollution sources<sup>76</sup>. The Council will seek to improve air quality across the borough (Policy SHW3). Proposals that include measures to improve air quality will be supported.
3. Development proposals that incorporate artificial lighting must have regard to the siting, design and luminance of external lighting sources, and the relationship between light spill and the design of the scheme, to avoid adversely affecting local amenity and nature conservation<sup>77</sup>. Measures should be employed to ensure external lighting is only used when required.
4. Development proposals must not give rise to noise and vibration at such levels that they are likely to adversely impact health and quality of life, both during the construction of development and following its completion.
5. Development proposals that are sensitive to noise should not be located within an area of existing high levels of noise unless it has been demonstrated that noise impacts can be satisfactorily mitigated by the design and layout of the scheme, and / or the incorporation of insulation, including acoustic glazing.
6. The 'agent of change' principle set out in the National Planning Policy Framework will be applied when determining applications for planning permission.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SCO2	0	0	0	0	0	0	+	0	0	0	0	0	0	0

D.14.2.1 Policy SCO2 sets out criteria by which development proposals will be expected to comply regarding air, noise and light pollution. This would be expected to help prevent

<sup>76</sup> Further guidance in relation to air quality is provided by policy SLP18

<sup>77</sup> See also Policy SNE\* - habitats

development resulting in adverse impacts on human health, including inappropriate noise and light pollution, resulting in a negligible impact on SA Objective 10. The policy also requires new development to avoid exacerbating poor air quality and other pollutants, both individually and cumulatively, and states that “*proposals that include measures to improve air quality will be supported*”. Overall, a minor positive impact on pollution could be achieved (SA Objective 7), however the policy would benefit from stronger wording to seek an improvement in air quality and remediation of other pollutants.

### D.14.3 Policy SCO3 – Land contamination and instability

Policy SCO3 – Land contamination and instability	
1.	Planning permission will be granted for development on: - <ol style="list-style-type: none"> <li>land that is unstable;</li> <li>land that is contaminated or suspected of being contaminated due to its historic use or geology; or</li> <li>land that will potentially become contaminated as a result of the development;</li> </ol> subject to the submission of satisfactory information relating to ground conditions and the presence of ground gas, and full details of the assessment and remedial measures that will be used to deal with instability and contaminants.
2.	The assessment must demonstrate that: - <ol style="list-style-type: none"> <li>there will be no significant harm, or any risk of significant harm, to the health and wellbeing of people and the environment;</li> <li>there will be no current likelihood, or future risk, that watercourses and groundwater will become contaminated; and</li> <li>any necessary remedial action is undertaken to safeguard users of the land or neighbouring land both during the construction of development and following occupation.</li> </ol>
3.	The Council will support the reclamation and remediation of derelict, despoiled, degraded and contaminated land as part of the ongoing regeneration of the borough.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SCO3	0	+	0	0	0	+	0	0	0	0	0	0	0	0

D.14.3.1 The aim of Policy SCO3 is to ensure any development on unstable or contaminated land is structurally sound and poses no danger to human health. SMBC will support the reuse of degraded landscapes and regeneration of the borough, including “*derelict, despoiled, degraded or contaminated land*”, therefore having a minor positive impact on landscape and natural resources (SA Objectives 2 and 6).

- D.14.3.2 By seeking to avoid harm to health and wellbeing of people and the environment, including the water environment, the policy would be likely to result in negligible impacts on pollution and health (SA Objectives 7 and 12).

DRAFT

# D.15 Development Management

## D.15.1 Policy SDM1 – Design Quality

### Policy SDM1 – Design Quality

1. Developments must be designed to high standards and should create a strong sense of place and reflect Sandwell’s unique character. They must address as appropriate:
  - a. the topography, townscapes and landscapes of Sandwell;
  - b. the need to maintain strategic gaps and views, including to and from the Rowley Hills;
  - c. the built and natural settings of development;
  - d. the need to ensure that domestic extensions should generally be subservient and proportionate to the existing dwelling and should be in keeping with their surroundings by virtue of their scale, architecture and materials.
  - e. the treatment of ‘gateway’ opportunities where they occur in key locations;
  - f. Sandwell’s industrial and domestic architecture;
  - g. the need to ensure development has no harmful impacts on key environmental and historic assets, townscapes and locations and that wherever possible it contributes to the conservation and enhancement of environmental and historic assets and their settings;
  - h. the presence of canals in Sandwell’s urban environments and the opportunities they offer for design, accessibility, the environment and technology;
  - i. the matter of land instability where this is an issue in relation to specific development proposals.
2. Development proposals must demonstrate that the following have been addressed in design and access statements that reflect their Sandwell-specific context: -
  - a. the ten characteristics of the National Design Guide<sup>78</sup>, to provide a high-quality network of streets, buildings and spaces;
  - b. the principles of Manual for Streets<sup>79</sup>, to ensure urban streets and spaces provide a high quality public realm and an attractive, safe and permeable movement network;
  - c. use of the Building for a Healthy Life<sup>80</sup> criteria (or subsequent iterations) and Sandwell's local housing design codes, masterplans and guidance for new housing developments, to achieve high design standards, good place-making and sustainable development;
  - d. crime prevention measures, Secured by Design and Park Mark principles and the requirements of Part Q of the Building Regulations 2010 or any successor legislation;
  - e. the agent of change<sup>81</sup> principle, in relation to existing uses adjacent to proposed development sites.

<sup>78</sup> <https://www.gov.uk/government/publications/national-design-guide>

<sup>79</sup> Current and future iterations - <https://www.ciht.org.uk/knowledge-resource-centre/resources/revising-manual-for-streets/>

<sup>80</sup> <https://www.udg.org.uk/publications/othermanuals/building-healthy-life>

<sup>81</sup> Paragraph 187 of the NPPF (2023) 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

### Policy SDM1 – Design Quality

3. Major development proposals should contribute to the greening of Sandwell by:
  - a. including urban greening<sup>82</sup> as a fundamental element of site and building design;
  - b. incorporating measures such as high-quality landscaping and tree planting<sup>83</sup>, other soft landscaping, green roofs, green walls and sustainable drainage and conserving existing green spaces and natural resources;
  - c. optimising the use of multi-functional green infrastructure (including water features, green roofs and planting) for urban cooling, local flood risk management and to provide access to outdoor space and shading.
4. Development must not cause an adverse 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; and / or
  - i. wind, where the proposals involve the development of tall buildings.
5. To improve the quality and perception of the public realm in Sandwell, the Council will encourage the promotion of public art, subject to appropriate public consultation and in accordance with other relevant policies. Where new development changes or creates public spaces, the Council will welcome the provision of public art as part of the proposal.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDM1	0	+	+	+	+	0	+	0	+	0	+	+	0	0

D.15.1.1 Policy SDM1 sets out design requirements to ensure that developments *"create a strong sense of place and reflect Sandwell's unique character"*. The policy also refers to a range of guidance documents that must be adhered to, including the National Design Guide,

worship, pubs, music venues and sports clubs). Unreasonable restrictions should not be placed on existing businesses because of development permitted after they were established.

<sup>82</sup> e.g. landscaping, provision of formal / informal open space, habitat creation and improvement, tree planting, certain forms of infrastructure such as types of SuDS etc. in urban locations

<sup>83</sup> Including street trees where appropriate and in accordance with other policies of the SLP

Manual for Streets and Building for Life, as well as considering local guidance and design codes for Sandwell. Good design can enhance the quality of life for residents, strengthen the sense of place, improve the attractiveness of a location and create safer places to live and work.

- D.15.1.2 Development under Policy SDM1 must ensure that the design of the development is *"in keeping with their surroundings by virtue of their scale, architecture and materials"* and conserves important views and other locally distinctive features. Additionally, the policy states that development should ensure it has *"no harmful impacts on key environmental and historic assets, townscapes and locations"* and *"wherever possible it contributes to the conservation and enhancement of environmental and historic assets and their settings"*. The policy would therefore be expected to have a minor positive impact on the landscape and cultural heritage (SA Objectives 1 and 2).
- D.15.1.3 The policy includes measures that promote the 'greening' of Sandwell. The policy states that major development proposals within Sandwell should include *"high-quality landscaping and tree planting, other soft landscaping, green roofs, green walls and sustainable drainage and conserving existing green spaces and natural resources"*. Optimising multi-functional GI would help to support wildlife networks and opportunities for habitat creation amongst the urban areas. Additionally, greening and GI could also increase cooling, filtration of pollutants and reduce surface water-run off rates. The policy would therefore be expected to have a minor positive impact on biodiversity, climate change mitigation, climate change adaptation and pollution (SA Objectives 3, 4, 5, and 7).
- D.15.1.4 The policy identifies the importance of accessibility within the borough and states that the design of urban streets and spaces should provide a *"high quality public realm and an attractive, safe and permeable movement network"*. The measures to increase accessibility would be expected to enable the use of public transport within the borough and encourage active travel. The policy also includes measures to ensure development proposals should not cause adverse impacts on the safety and privacy of residents, and would be likely to contribute towards a reduction in crime and the fear of crime, helping to create safe and cohesive communities. The policy would therefore expect to have a minor positive impact on transport, accessibility, equality and public safety (SA Objectives 9, 11 and 12).

## D.15.2 Policy SDM2 – Development and Design Standards

### Policy SDM2 – Development and Design Standards

#### **Nationally Described Space Standards**

1. New residential development (including the conversion of buildings) will be required to meet the Nationally Described Space Standards (NDSS)<sup>84</sup>, except where it can be clearly evidenced that the implementation of the NDSS would cause harm to the significance of a heritage asset<sup>85</sup>.

<sup>84</sup> <https://www.gov.uk/guidance/housing-optional-technical-standards#internal-space-standards>

<sup>85</sup> More specialised types of housing provision will be required to meet the relevant space standards for their typology

## Policy SDM2 – Development and Design Standards

2. Where NDSS are not used, development<sup>86</sup> should reflect National Design Guide principle H1<sup>87</sup> in delivering functional, healthy, and sustainable homes and buildings, particularly in relation to creating healthy, comfortable and safe internal and external environments.

### Water efficiency in new dwellings

3. New residential development (including conversions from non-residential properties) and houses in multiple occupation will be required to meet the lower water efficiency standard of 110 litres per person per day, as set out in Part G2 of current Building Regulations or as identified in any successor legislation.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDM2	0	0	0	0	0	+	0	0	0	0	0	+	0	0

D.15.2.1 Policy SDM2 sets out the requirements of development proposals to incorporate specific design standards that are nationally recognised. The Nationally Described Space Standards<sup>88</sup> help to ensure that all development satisfies the requirement for internal space, in particular, ensuring more affordable homes still provide residents with enough internal space. In general, the greater the internal space within a property, the better the standard of living for residents. Therefore, a minor positive impact on health and wellbeing can be expected (SA Objective 12).

D.15.2.2 The policy requires residential development to be in keeping with the optional water efficiency standards from Part G2 of the current Building Regulations, where residents are to have an average water usage of "110 litres per person per day". The policy would be expected to have a minor positive impact on water resources (SA Objective 6).

## D.15.3 Policy SDM3 – Tall Buildings and Gateway Sites

### Policy SDM3 – Tall Buildings and Gateway Sites

#### Tall buildings

1. The proposed heights for buildings should reflect other design and policy requirements, including the need to have regard to the existing or emerging character and context of the area.

<sup>86</sup> Excluding prior notification / permitted development where new dwellings are being created – NDSS will apply in all such cases

<sup>87</sup> Or any succeeding guidance or legislation on design standards.

<sup>88</sup> Ministry of Housing, Communities and Local Government (2015) Technical housing standards – nationally described space standards. Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/524531/160519\\_Nationally\\_Described\\_Space\\_Standard\\_Final\\_Web\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf) [Date accessed: 27/07/23]

## Policy SDM3 – Tall Buildings and Gateway Sites

2. The height and location of tall buildings in relation to other existing and proposed buildings / structures should be clearly identified in masterplans and / or design and access statements, which should also set out a clear rationale for the development of tall buildings.
3. Landscape and Visual Impact Assessments will be necessary to enable the visual impact of tall buildings to be assessed from near and distant viewpoints. Accurate visual representations of the submitted scheme should be provided from key viewpoints agreed with Sandwell Council. Information on local microclimate impacts should also be submitted, as a separate assessment or as part of the Design and Access Statement.
4. For development proposals that include taller buildings, applicants must submit design appraisals with alternative options to demonstrate whether similar densities can be achieved using more traditional and human- scaled typologies including terraced housing, maisonettes, and courtyard apartments.
5. The planning application and its supporting information must demonstrate that:
  - a. There is sufficient access to public transport for occupants/users of the building;
  - b. There is access to local services and facilities, depending on the number and type of residents expected;
  - c. the proposal will not have an unacceptable adverse impact on local character, including heritage assets;
  - d. the design considers topography;
  - e. the proposal will not create unacceptable adverse environmental impacts, including flood risk, creation of a wind tunnel, loss or lack of daylight / sunlight;
  - f. the design is of high architectural quality; and
  - g. the proposal will integrate into its surroundings at all levels, particularly at street level and skyline.

### Gateway Sites

6. When assessing proposals and applications for planning permission on gateway sites<sup>89</sup> the Council will apply the following principles:
  - a. Key landmark buildings, structures and features will be preserved and improved;
  - b. The topography of the area will be emphasised in the design and location of new buildings or features;
  - c. New development should be of architectural merit and use high-grade materials.
  - d. Proposals should include hard and soft landscaping, including trees, water and public art;
  - e. Where possible and appropriate, redundant street furniture, associated clutter and advertisements should be removed.

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<sup>89</sup> Sites and other development opportunities that stand at major road- or rail-linked points of access into Sandwell, or on the outskirts of West Bromwich and other main town centres.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDM3	0	+	0	+	0	+	0	0	+	0	0	0	0	0

- D.15.3.1 Policy SDM3 sets out the requirements for development proposals regarding tall buildings and gateway sites, specifically the design and location of proposals.
- D.15.3.2 The development of tall buildings can significantly alter the image, character and identity of towns and cities<sup>90</sup>. In appropriate locations the development of tall buildings can have a positive contribution to the urban landscape; however, if not in the right place, by virtue of the size of the building, taller developments could potentially harm key aspects of the landscape and historic environment that are valued.
- D.15.3.3 The policy states that when assessing gateway site applications, the consideration of how “*key landmark buildings, structures and features will be preserved and improved*” will be applied. Tall buildings likewise would also be required to “*have regard to the existing or emerging character and context of the area*”. Through careful design, and ensuring designs are informed by a Landscape and Visual Impact Assessment (LVIA)/Landscape Visual Appraisal (LVA), the policy could potentially have a minor positive impact on the safeguarding and enhancement of the local character (SA Objective 2) and negligible impact on cultural heritage through ensuring “*the proposal will not have an unacceptable adverse impact on local character, including heritage assets*” (SA Objective 1).
- D.15.3.4 Tall building development proposals must ensure that they demonstrate “*sufficient access to public transport for occupants/users of the building*” and “*access to local services and facilities*”. The policy would provide access to public transport networks and encourage their usage by residents, this could also reduce the reliance on private car use by residents and reduce congestion in the area. The policy would therefore expect to have a minor positive impact on climate change mitigation and transport (SA Objective 4 and 9).
- D.15.3.5 Supporting tall buildings would lead to higher density development, reducing overall land take and making efficient use of land. As such, a minor positive impact on natural resources would be expected (SA Objective 6).

#### D.15.4 Policy SDM4 – Advertisements

##### Policy SDM4 – Advertisements

1. Proposals for advertisements will not be given consent where they would have an unacceptable impact on amenity or public safety.

<sup>90</sup> Historic England (2015) Tall Buildings: Historic England Advice Note 4. Available at: <https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/heag037-tall-buildings/> [Date Accessed: 05/02/21]

## Policy SDM4 – Advertisements

2. An advertisement will be considered to have an unacceptable impact on amenity where it would:
  - a. create or reinforce a negative visual impact in its immediate neighbourhood;
  - b. detract from the character or setting of any feature of historic, architectural or cultural interest;
  - c. generate a negative impact on the living conditions of nearby residents by reason of its siting or illumination.
3. Advertisement proposals of all types will be considered harmful to public and road safety where they would:
  - a. obscure views into an area, reducing natural surveillance;
  - b. create an unwelcoming sense of enclosure;
  - c. obscure safety cameras;
  - d. unsafely reduce natural or street lighting;
  - e. create visual distraction that would be harmful to the attention of drivers or the ready interpretation of road signs, traffic signals and / or visibility at junctions (see sections 6 – 8 below for details).

### **Poster Panels and Hoardings**

4. Applications for poster panels will be considered in light of local amenity and public safety. Regard should be given to the scale of buildings and the character of the location in which they are to be sited, together with any potential impact on highway safety.
5. In general, advertisement hoardings will not be appropriate in wholly residential areas. Poster advertising may be appropriate in predominantly shopping and business parts of Conservation Areas and Areas of Townscape Value, though care will be needed in how they are accommodated.

### **Illuminated and Moving Advertisements**

6. The intensity of the illumination of an advertising unit and display should be set at a suitable level of luminance at night for its size and location and the panel must be fitted with a light sensor designed to adjust the brightness when changes in ambient light levels occur.
7. For moving / electronic advertising, the minimum display time for each advertisement shall be 10 seconds. There must be no moving images, animation, video or full motion images or any images that resemble road signs, traffic lights or traffic signs of any kind before, during or after the display of any advertisement
8. The interval between the display of each moving advertisement shall be 0.1 seconds or less and the complete display screen shall change without visual effects (including fading, swiping or other animated transition methods) between each advertisement.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDM4	0	+	0	0	0	0	0	0	0	0	0	0	0	0

- D.15.4.1 Policy SDM4 sets out the requirements for the appropriate design and location of advertisements to prevent adverse impacts on the surrounding landscape and health and safety of local residents.
- D.15.4.2 The policy states that advertisements will need to have regard to the “*scale of the buildings and the character of the location in which they are to be sited*”. The policy would be likely to have a minor positive impact on the protection of the local landscape character and conserving local identity (SA Objective 2).
- D.15.4.3 Advertisement proposals will be considered in regard to “*local amenity and public safety*” and includes measures that prevent impacts on highway safety. The policy would therefore expect to have a negligible impact on the health and safety of residents within the borough (SA Objective 12).
- D.15.4.4 The policy states that advertisement proposals that “*detract from the character or setting of any feature of historic, architectural or cultural interest*” will be unacceptable. These measures would be expected to have a negligible impact on the cultural heritage within the borough, by seeking to reduce potential for harm to heritage assets (SA Objective 1).

### D.15.5 Policy SDM5 – Shop Fronts and Roller Shutters

#### Policy SDM5 – Shop Fronts and Roller Shutters

##### Roller Shutters

1. Planning permission is required for the installation of all permanent roller shutters. All applications for the installation of roller shutters will be assessed using the following criteria: -
  - a. Encouragement will be given to the integration of roller shutters as part of development proposals for new shop fronts, through the planning application process and pre-application discussion.
  - b. The applicant must satisfy the local planning authority that the type of security shutter they are proposing is the most appropriate.
  - c. Roller shutters should, wherever possible, not project across the pilasters of the shop front, or obscure any architectural detail. The submitted plans should indicate this.
  - d. Roller shutter boxes should, where ever possible, be hidden within the structure of the building or behind shop fascias, so as not to affect the character and architecture of the building.
  - e. Metal roller shutters should be perforated and be colour powder coated or painted
  - f. Details of materials should be submitted with the planning application.

## Policy SDM5 – Shop Fronts and Roller Shutters

- g. No more than 50% of the shutters should be solid.
- h. Roller shutters that are totally solid will not be acceptable.

### Shop Front Design

2. All planning applications for the installation of shop fronts will be assessed against the following criteria: -
- a. All shop fronts should be designed to fit in with the scale and architectural character of the building in which they are to be contained.
  - b. All shop fronts should remain within their existing structural openings and be fully framed with fascia signs. Shop fronts and fascias must also be recessed behind pilasters.
  - c. Adjacent shop fronts should be separated by a pilaster, matching the building. However, original pilasters should be retained where they exist.
  - d. Original features, such as iron columns, ornamental brackets or carved stonework, should be preserved or restored.
  - e. Canopies should be retractable and sited below the fascia.
  - f. To ensure a high standard of shop front design, all applications for planning permission will require the submission of a detailed elevation of the proposed shop front in relation to the building within which it is to be contained, as well as adjacent shop fronts.
  - g. Retention of facades above shop fronts that are of good quality, or which have special, architectural or historic interest, should be encouraged.
  - h. Whilst the appearance of a building should not become promised, consideration should be given to natural surveillance, safety and security when designing new shop fronts.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDM5	+	+	0	0	0	0	0	0	0	0	0	0	+	0

- D.15.5.1 Policy SDM5 provides requirements for planning proposals involving shop fronts and roller shutters in relation to their design, installation and location.
- D.15.5.2 Through supporting the safe operation of businesses and appropriate use of security fixtures, the policy could potentially lead to a minor positive impact on the local economy (SA Objective 13).
- D.15.5.3 Policy SDM5 requires the design of shop fronts to *"fit in with the scale and architectural character of the building in which they are to be contained"* and states that *"original features, such as iron columns, ornamental brackets or carved stonework, should be preserved or restored"*. Therefore, the policy would help to conserve, and potentially enhance, the character and appearance of buildings and historic features which could potentially lead to a minor positive impact on cultural heritage and landscape (SA Objectives 1 and 2).

## D.15.6 Policy SDM6 – Hot Food Takeaways

### Policy SDM6 – Hot Food Takeaways

#### Vitality and Viability

1. A percentage limit for the appropriate number of hot food takeaways (HFT) in centres, including HFT permissions, and vacant units with an HFT as their lawful use (Strategic, Town, District and Local) is as follows:
  - a. In centres with 40 units or more – no more than 7% of frontages should be occupied by HFTs.
  - b. In centres with less than 40 units – no more than 12% of the frontages should be occupied by HFTs.

#### Clustering of hot food takeaways in centres.

2. No more than two hot food takeaway outlets should be located next to each other. Any application for a further hot food takeaway use that would exceed this limit will not be permitted.
3. Where two HFTs are located next to each other, they should be separated by at least two non-HFT units from any similar uses.

#### Exclusion Zones

4. An exclusion zone will be implemented near to secondary schools and higher education establishments; no new hot food takeaway developments will be permitted where they are within 400 metres of a secondary school or college site (as measured in a direct line from the school entrance(s) used by pupils / students).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDM6	0	0	0	0	0	0	0	0	0	0	+	+	0	0

D.15.6.1 Policy SDM6 aims to counteract the over-concentration of hot food takeaways and provide a healthy balance of food choices across the borough. In addition to limits on the number of hot food takeaways (HFTs) within centres, an exclusion zone is implemented under the policy to place HFTs away from secondary schools and higher education establishments. The policy states that HFT developments will not be permitted *"where they are within 400 metres of a secondary school or college site"*.

D.15.6.2 Reducing access to HFTs can help to promote healthier food choices and reduce inequalities for those living in areas that would otherwise be located in areas densely populated by unhealthy food choices. By ensuring takeaway vendors are situated a suitable distance from schools, this could also help to encourage healthier choices for children and combat childhood obesity issues. Therefore, the policy can be expected to have a minor positive impact on equality and health (SA Objective 11 and 12).

## D.15.7 Policy SDM7 – Management of Hot Food Takeaways

### Policy SDM7 – Management of Hot Food Takeaways

#### **Measures to protect the amenity of surrounding residential occupiers**

1. No new hot food takeaways (HFT) will be permitted where they are directly adjacent to residential property at ground floor level. This does not apply to first / second floor flats above or diagonally above a proposed HFT.
2. Where there is an existing residential unit above a HFT, which is not connected with its operation, private residential amenity should not be prejudiced. Specific care will need to be given to odour extraction, noise insulation, private accessibility and public convenience. Appropriate mitigation measures will include control over hours of opening hours. Where appropriate provisions cannot be included then such uses will not be supported, even within designated centres.

#### **Local environmental issues**

3. All HFTs will require appropriate fume extraction equipment to be installed, retained and maintained to reduce / remove potential nuisance from odours. Extraction systems should be effective in dispersing odours from hot food takeaways, whilst satisfying the council's design policies, especially in areas of historic character.

#### **Disposal of waste products and litter**

4. Appropriate fat traps will be required on drains to prevent fats from reaching the water system. Suitable grease traps also must be installed on all drains to prevent blockages and the subsequent flooding of property.
5. Appropriate storage areas must be specified for food waste bins and packaging waste and included in any new proposal.
6. The bins to be provided must be a suitable size and should be stored in a location so as not to cause a nuisance to neighbouring residential or commercial properties, including with regard to odours and accessibility.
7. Commercial bin stores must be contained within the site. Where this is not possible, secure storage structures should be provided to prevent animal attack and to reduce odours.

#### **Nuisance and Anti-Social Behaviour**

8. Proposals for any new HFT that could potentially cause nuisance or antisocial behaviour will only be granted permission subject to stringent planning conditions, to address matters such as (but not limited to): -
  - a. opening hours;
  - b. parking restrictions;
  - c. highway safety;
  - d. the installation of or contributions towards monitoring technology such as CCTV.

In some cases, they may be limited to a personal permission and / or a temporary consent.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDM7	0	0	0	0	0	0	0	+	0	0	0	0	+	0

D.15.7.1 Policy SDM7 sets out the requirements for the management of HFTs in relation to the issues that could arise on residents, the environment and waste.

D.15.7.2 Strict regulation on "odour extraction, opening hours, parking restrictions and safety measures" outlined within the policy will help to avoid adverse impacts on pollution, transport, and health, resulting in negligible effects overall for SA Objectives 7, 9 and 12.

D.15.7.3 By ensuring appropriate drainage systems, food storage and waste disposal units are in place, a minor positive impact on waste could be expected (SA Objective 8).

D.15.7.4 Allowing new HFTs in the area that comply with the regulations set out in Policy SDM7 would potentially create more jobs, which would have a minor positive impact on the economy (SA Objective 13).

#### D.15.8 Policy SDM8 – Gambling activities and alternative financial services

##### Policy SDM8 – Gambling activities and alternative financial services

1. Planning permission for a payday loan shop, pawnbroker's, amusement arcade or betting shop within a retail centre will not be granted if to do so would cause an unacceptable grouping of uses that would have a negative impact on the character and vitality of the centre.
2. A negative impact on the character of the centre is likely to occur when the following thresholds<sup>91</sup> are exceeded:
  - a. Within a town centre: more than 5% of the number of ground floor units being in a gambling or arcade use.
  - b. Within a district or local centre, or local shopping centre / parade: more than 10% of the number of ground floor units being a gambling or arcade use.
  - c. In all locations: two or more uses immediately adjacent to each other.
  - d. In all locations: less than two units in other uses between gambling or arcade uses.
3. In calculating the existing or proposed percentage of units, payday loan shops, pawnbrokers, betting shops and arcade uses will be counted together.
4. When applying the thresholds set out above:
  - a. Only ground floor units will be counted; and
  - b. When rounding percentages, percentages should be rounded down.

<sup>91</sup> Taken from the Knowsley Town Centre Uses SPD 2022

### Policy SDM8 – Gambling activities and alternative financial services

5. Proposals will be considered against the potential detrimental impact on the amenity of neighbouring uses, through increased noise and disturbance. They will also be required to provide an active frontage, through a permanent shop front and window display.
6. In determining any planning application for all pay day loan shops, pawnbrokers, and gambling uses the Council will consider any issues concerning community safety, crime, and disorder and will, where necessary, seek advice from the police and other safety organisations.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDM8	0	0	0	0	0	0	0	0	0	0	0	0	+/-	0

D.15.8.1 An increase in gambling or other financial services has the potential to increase noise pollution, anti-social behaviour and encourage unhealthy mental and physical habits. However, Policy SDM8 aims to prevent “*issues concerning community safety, crime, and disorder*” during the assessment of planning applications. Overall, Policy SDM8 will likely have a negligible impact on pollution, equality, and health (SA Objectives 7, 11 and 12).

D.15.8.2 The impact on the economy (SA Objective 13) is uncertain. Although an increase in gambling activities and financial services could provide employment opportunities and positively impact the local economy, there is potential for residents to acquire unhealthy habits which may cause them to lose their jobs or deter them from seeking employment.

### D.15.9 Policy SDM9 – Community Facilities

#### Policy SDM9 – Community Facilities

1. In considering proposals for new community facilities, examples of which include but are not limited to: -
  - banqueting suites and entertainment venues;
  - places of worship and / or religious instruction;
  - leisure and recreational activities;
  - larger-scale non-employment uses e.g. nurseries, wholesale catering, animal day care;
  - community centres;
 or the conversion or extension of existing community facilities, the following criteria will be considered:
  - a. Any proposal for a community facility or use that involves the loss of premises and sites identified as falling within either strategic or local employment areas<sup>92</sup> will be refused.
  - b. Proposals for new community facilities on land or premises identified under Policy SEC4, which are either currently or formerly in employment use, will be resisted; applicants

<sup>92</sup> See **Policies SLP\*** in the Employment chapter of the SLP

### Policy SDM9 – Community Facilities

- wishing to reuse such buildings or sites will need to meet the criteria set out in that policy and be able to demonstrate why the site is no longer suitable for employment use now or in the future.
- c. Encouragement will be given to locating community facilities and uses on sites with main road frontages at the fringes of commercial areas, and particularly in town, district or local centres.
  - d. If the building(s) to be used shares a party wall with any sensitive use (particularly residential) it is unlikely that planning permission will be granted. Exceptions to this are likely to occur only when there is clear evidence submitted to the Council that the use will not adversely affect the occupiers of adjoining properties.
2. Where noise from the proposed new activities is likely to affect neighbouring properties, consideration will be given to attaching conditions to any planning permission granted, which would reduce or eliminate such problems. These may include:
    - a. installation and retention of suitable sound insulation;
    - b. restricting the use of parts of the building, or the type of uses proposed;
    - c. restricting the hours of use of all or parts of the building.
  3. Consideration will be given to the need for the provision of car parking in association with the development. This will include an assessment of: -
    - a. the proximity and availability of public transport facilities;
    - b. whether most people walk to a particular place of worship or religious instruction;
    - c. the use of the centre for wider community purposes and for special events drawing large numbers of participants;
    - d. the availability of other car parking in the vicinity;
    - e. the adverse effects of on-street parking on adjacent occupiers, the environment of the neighbourhood, and whether it would create potential hazards to pedestrians and other road users.
  4. Consideration may also be given to the granting of planning permission for a limited period where concerns relating to an application are insufficient to warrant refusal.
  5. The provision of additional community facilities will be encouraged, including those serving cultural and other social needs.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDM9	0	0	0	0	0	0	0	0	0	0	+	+	0	0

D.15.9.1 Policy SDM9 sets out support for new community facilities within centres, provided a set of criteria are met.

- D.15.9.2 The policy would be likely to ensure that any new community facilities have a negligible impact on pollution by requiring suitable sound insulation to be installed and “*restricting the hours of use of all or parts of the building*”.
- D.15.9.3 Policy SDM9 seeks to ensure any new community facilities are in easy to access areas, noting “*sites with main road frontages at the fringes of commercial areas, and particularly in town, district or local centres*” as suitable locations. Policy SDM9 also considers: how people are likely to commute to such facilities; availability of public transport; and the availability of, and adverse effects on car parking. Therefore, a negligible impact would be expected on pollution and transport (SA Objectives 7 and 9).
- D.15.9.4 New community facilities will provide a safe space for residents of Sandwell and encourage social activities. This should encourage comradery amongst residents and provide activities to help entertain younger residents. This has the potential to reduce crime and social deprivation and to have a minor positive impact on equality (SA Objective 11). Community facilities may also be used for leisure and recreational activities, some of which are likely to have a minor positive impact on physical health (SA Objective 12).

#### D.15.10 Policy SDM10 – Telecommunications

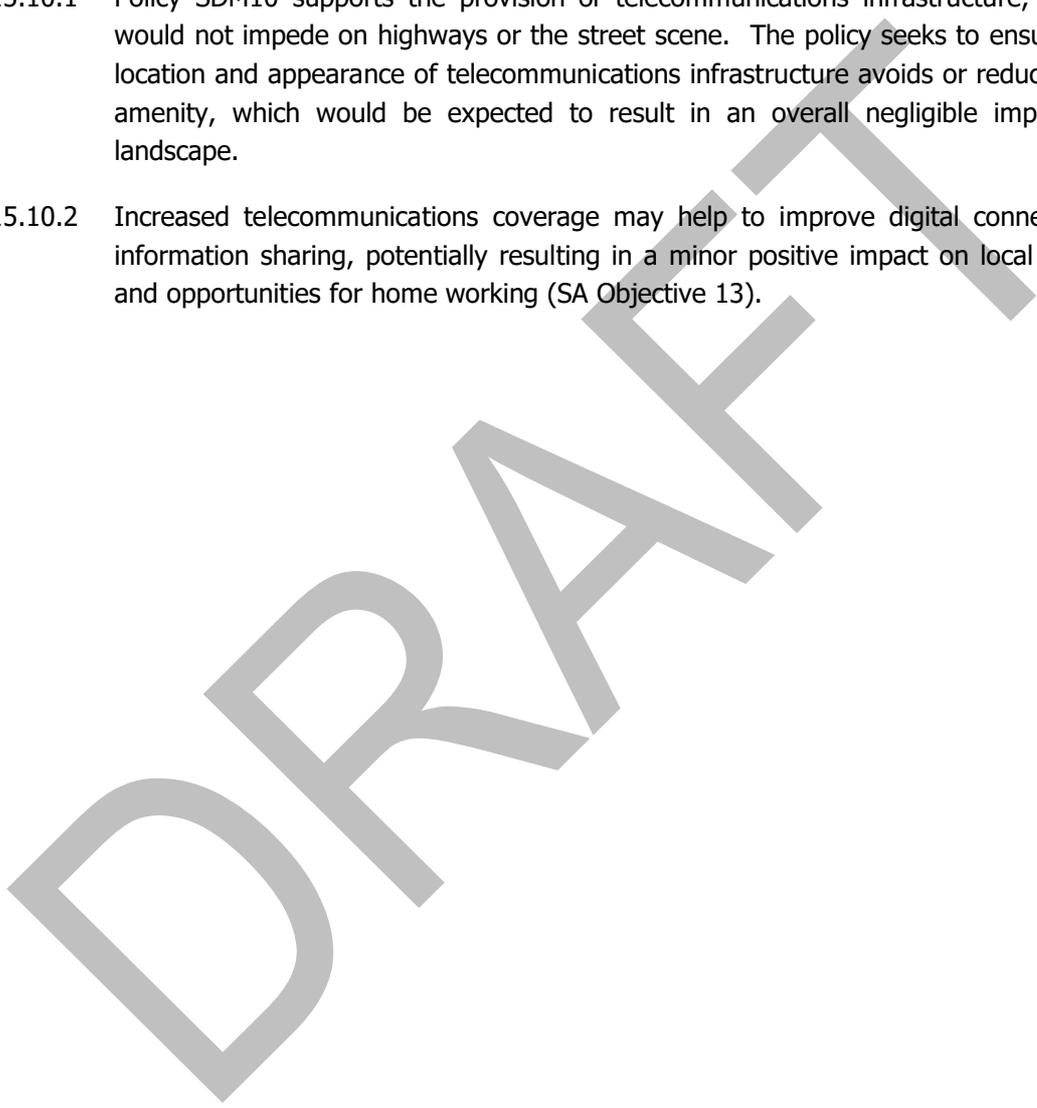
##### Policy SDM10 – Telecommunications

1. In considering proposals for telecommunication development for which planning permission is required, or to which the prior approval procedure is applicable, the following criteria will apply:
  - a. The siting and external appearance of apparatus including any location or landscaping requirements have been designed to minimise the impact of such apparatus on amenity, while respecting operational efficiency.
  - b. Antenna have, so far as is practicable, been sited either to minimise the effect on, or to complement or beneficially add to the external appearance of the building on which they are installed.
  - c. Applicants must demonstrate that they have explored all possibilities for sharing masts, or for siting masts on existing buildings or structures.
  - d. The development would not impact on scheduled highway improvement works.
2. Microcell installations will be expected where agreements exist with the relevant highway authority to utilise existing street furniture, not add to the clutter of the street scene, impede pedestrian flows or contribute to highway safety issues.
3. The use of Article 4 directions removing permitted development rights for telecommunication development will be considered where there is a serious risk to amenity.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDM10	0	0	0	0	0	0	0	0	0	0	0	0	+	0

D.15.10.1 Policy SDM10 supports the provision of telecommunications infrastructure, where this would not impede on highways or the street scene. The policy seeks to ensure that the location and appearance of telecommunications infrastructure avoids or reduces harm to amenity, which would be expected to result in an overall negligible impact on the landscape.

D.15.10.2 Increased telecommunications coverage may help to improve digital connectivity and information sharing, potentially resulting in a minor positive impact on local businesses and opportunities for home working (SA Objective 13).





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