

Sustainability Appraisal of the Sandwell Local Plan 2024-2041

Regulation 19 SA Report

Volume 2 of 3: Regulation 19 SA Report

FINAL

September 2024



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Sustainability Appraisal of the Sandwell Local Plan 2024-2041

Volume 2 of 3: Regulation 19 SA Report

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Acronyms & abbreviations

A&E	Accident and Emergency
AHHLV	Areas of High Historic Landscape Value
AHHTV	Areas of High Historic Townscape Value
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
APA	Archeological Priority Area
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
BCCS	Black Country Core Strategy
BCP	Black Country Plan
BEAR	Black Country Employment Area Review
BI	Blue Infrastructure
BMV	Best and Most Versatile
BNG	Biodiversity Net Gain
BREEAM	Building Research Establishment Environmental Assessment Method
CEA	Cumulative Effects Assessment
CO₂	Carbon Dioxide
DEFRA	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
DLHHV	Designed Landscape of High Historic Value
DLUHC	Department for Levelling Up, Housing and Communities
DMRB	Design Manual for Roads and Bridges
EDNA	Economic Development Needs Assessment
EU	European Union
FEMA	Functional Economic Market Area
GHG	Greenhouse Gas
GI	Green Infrastructure
GIS	Geographic Information Systems
GP	General Practitioner
GTAA	Gypsy and Traveller Accommodation Assessment
GTTS	Gypsies, Travellers and Travelling Showpeople
HEAD	Historic Environment Area Designation
HER	Historic Environment Record
HLC	Historic Landscape Characterisation
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
IMD	Indices of Multiple Deprivation
IRZ	Impact Risk Zone
km	Kilometre
LNR	Local Nature Reserve
LNRS	Local Nature Recovery Strategy

LSOA	Lower Super Output Area
MHCLG	Ministry of Housing, Communities and Local Government
NCA	National Character Area
NERC	Natural Environment and Rural Communities
NHS	National Health Service
NNR	National Nature Reserve
NO₂	Nitrogen Dioxide
NPPF	National Planning Policy Framework
PINS	Planning Inspectorate
PPG	Planning Practice Guidance
PPP	Policies, Plans and Programmes
PRoW	Public Rights of Way
RBMP	River Basin Management Plan
RPG	Registered Park and Garden
RTPI	Royal Town Planning Institute
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SAD	Site Allocation Document
SAMMM	Strategic Access Management and Monitoring Measures
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SLP	Sandwell Local Plan
SM	Scheduled Monument
SMBC	Sandwell Metropolitan District Council
SPA	Special Protection Area
SPD	Supplementary Planning Document
SPZ	Source Protection Zone
SSSI	Sites of Special Scientific Interest
SuDS	Sustainable Drainage System
UHI	Urban Heat Island
WCS	Water Cycle Study
WwTW	Wastewater Treatment Works
ZOI	Zone of Influence

1 Introduction

1.1 Purpose of this report

1.1.1 Lepus Consulting Ltd (Lepus) has been instructed by Sandwell Metropolitan Borough Council (SMBC) to undertake a Sustainability Appraisal (SA) process, incorporating the requirements of Strategic Environmental Assessment (SEA), for the Sandwell Local Plan (SLP) 2024-2041.

1.1.2 This Regulation 19 SA Report has been prepared to present full details of the SA process to date and inform SMBC's preparation of the SLP. There are four key purposes of the SA process at this stage of the plan making process are shown in **Figure 1.1**.

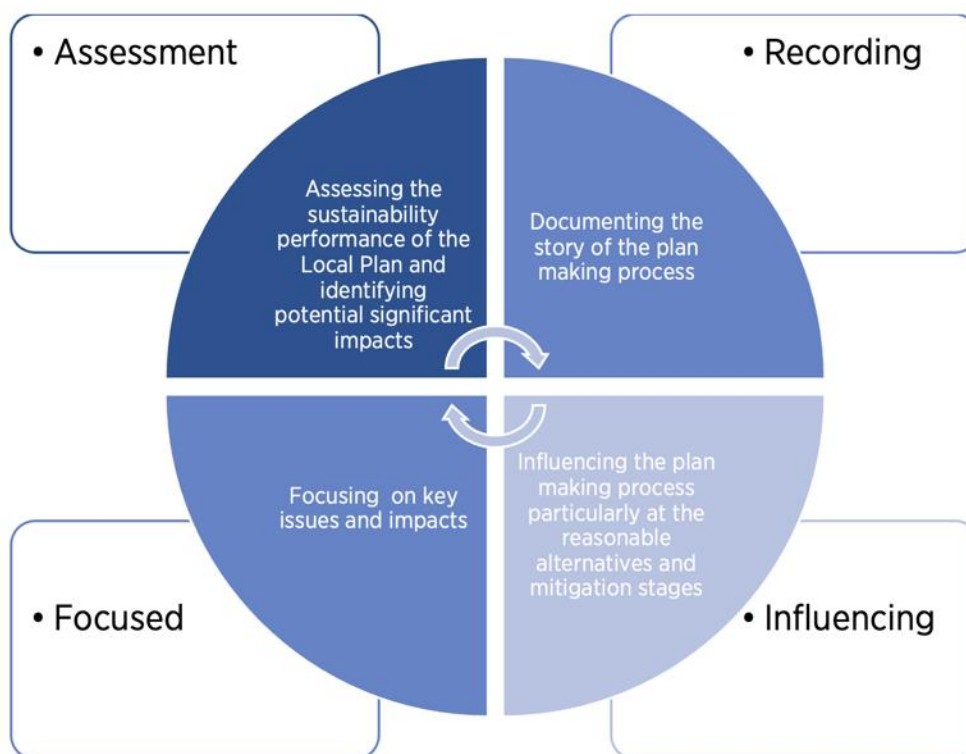


Figure 1.1: Key purposes of the SA process

1.1.3 This SA report is one of a series of reports that have been prepared to document the iterative SA process. Such an approach enables the Council to demonstrate that it has identified, described and evaluated reasonable alternatives during the making of the Local Plan. **Chapter 2** provides further details of the SA process to date.

1.2 Sustainability Appraisal

1.2.1 A sustainability appraisal (SA) is a systematic process that must be carried out during the preparation of local plans and spatial development strategies¹. 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.

1.2.2 This process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. SA should be applied as an iterative process informing the development of the plan.

1.3 Strategic Environmental Assessment

1.3.1 Strategic Environmental Assessment (SEA) seeks to ensure that environmental considerations are part of the process of preparing certain plans and programmes. Its purpose 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. SEA considers only the environmental effects of a plan, whereas sustainability appraisal considers the plan's wider economic and social effects in addition to its potential environmental impacts².

1.3.2 The SEA procedure can be summarised as follows: an environmental report is prepared in which the likely significant effects on the environment and the reasonable alternatives of the proposed plan or programme are identified. The public and the relevant environmental authorities are informed and consulted on the draft plan or programme and the environmental report prepared.

1.4 Integrated approach to SA and SEA

1.4.1 The SEA Directive applies to a wide range of public plans and programmes, including land use plans (see Article 3(2)) of the SEA Directive³). The Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations, SI no. 1633⁴).

¹ DLUHC and MHCLG (2021). Government guidance on plan making. Available at: <https://www.gov.uk/guidance/plan-making> [Date accessed: 20/05/24]

² DLUHC and MHCLG (2020) Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 20/05/24]

³ Directive 2001/42/EC of the European Parliament of the Council of 27 June 2001 (SEA Directive). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042> [Date accessed: 20/05/24]

⁴ The Environmental Assessment of Plans and Programmes Regulations (2004). Available at: <http://www.legislation.gov.uk/ukSI/2004/1633/contents/made> [Date accessed: 20/05/24]

1.4.2 SEA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making. The SEA Directive and SEA Regulations necessitate an environmental report in which the likely significant effects on the environment are identified for local plan proposals and reasonable alternatives.

1.4.3 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is required by S19 (5) of the Planning and Compulsory Purchase Act 2004 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.

1.5 Legislative context

1.5.1 When submitting their local plan to the Secretary of State, section 19(5) of the Planning and Compulsory Purchase Act⁵ requires that local planning authorities (LPAs) must have prepared and be able to submit an SA at the same time.

1.5.2 The Environmental Assessment of Plans and Programmes Regulations⁶ (SEA Regulations) require that Strategic Environmental Assessments (SEA) be prepared for a wide range of plans and programmes, including Local Plans.

1.5.3 Planning Practice Guidance (PPG) advocates that the SA process should integrate the requirements of the SEA Regulations. On this basis, this SA report incorporates the requirements of the SEA regulations.

1.5.4 PPG on SEA and SA⁷ states: "*Sustainability appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations'). Sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues*".

1.6 How to read and understand the R19 SA Report

1.6.1 This report should be read alongside the Regulation 19 Publication Version of the Sandwell Local Plan. The various appendices provide essential contextual information to the main body of the report. The contents of this SA Report are as follows:

- **VOLUME 1: Non-Technical Summary** provides a summary of the Regulation 19 SA.
- **VOLUME 2: Main SA Report** (this document) contains the following chapters:
 - **Chapter 1** presents an introduction to this report.
 - **Chapter 2** sets out information about the SLP and the SA process to date.

⁵ Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 20/05/24]

⁶ The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 20/05/24]

⁷ MHCLG (2020) Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 20/05/24]

- **Chapter 3** presents the evolution of the environment without the SLP.
- **Chapter 4** sets out the SA methodology.
- **Chapter 5** presents details of the reasonable alternatives considered throughout the SA process.
- **Chapter 6** presents details on the preferred approach.
- **Chapters 7 to 15** set out the likely significant effects on the environment, per SEA topic.
- **Chapter 16** presents the cumulative effects assessment.
- **Chapter 17** sets out a range of monitoring recommendations for the SLP.
- **Chapter 18** summarises ways in which the SA has influenced the SLP throughout the plan making process, including through recommendations made in the SA.
- **Chapter 19** outlines the conclusions, residual effects and next steps.
- **VOLUME 3: Appendices** provides further contextual information as follows:
 - **Appendix A** presents a review of other relevant policies, plans and programmes (PPPs).
 - **Appendix B** presents the SA Framework.
 - **Appendix C** presents the consultation responses received during each stage of the SA process from statutory consultees.
 - **Appendix D** provides additional context to **Chapter 4** of the main Regulation 19 SA Report regarding the topic specific methodologies and assumptions used to assess policies, proposals, and reasonable alternatives.
 - **Appendix E** presents the pre-mitigation assessment of 120 reasonable alternative sites.
 - **Appendix F** presents the assessment of SLP policies.
 - **Appendix G** considers the mitigating influence of SLP policies and presents the post-mitigation assessment of 120 reasonable alternative sites.
 - **Appendix H** sets out SMBC's outline reasons for selecting and rejecting each of the reasonable alternative sites assessed in the SA process.

2 About the Plan and the sequencing of the SA process

2.1 Geography of the Plan area

- 2.1.1 Sandwell is a metropolitan borough covering approximately 8,556ha, with a population of 341,900 according to the Census (2021)⁸. 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.
- 2.1.2 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 2.1**.
- 2.1.3 The strategic centre of Sandwell is West Bromwich, with several other main towns and centres including Bearwood, Blackheath, Cape Hill, Cradley Heath, Great Bridge, Oldbury and Wednesbury, alongside smaller towns and settlements. Sandwell's towns are well connected through a network of strategic transport routes, with links to other regional and national centres via the M5/M6 and rail corridors.
- 2.1.4 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 Sandwell's only area of Green Belt land.

⁸ 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: 20/05/24]

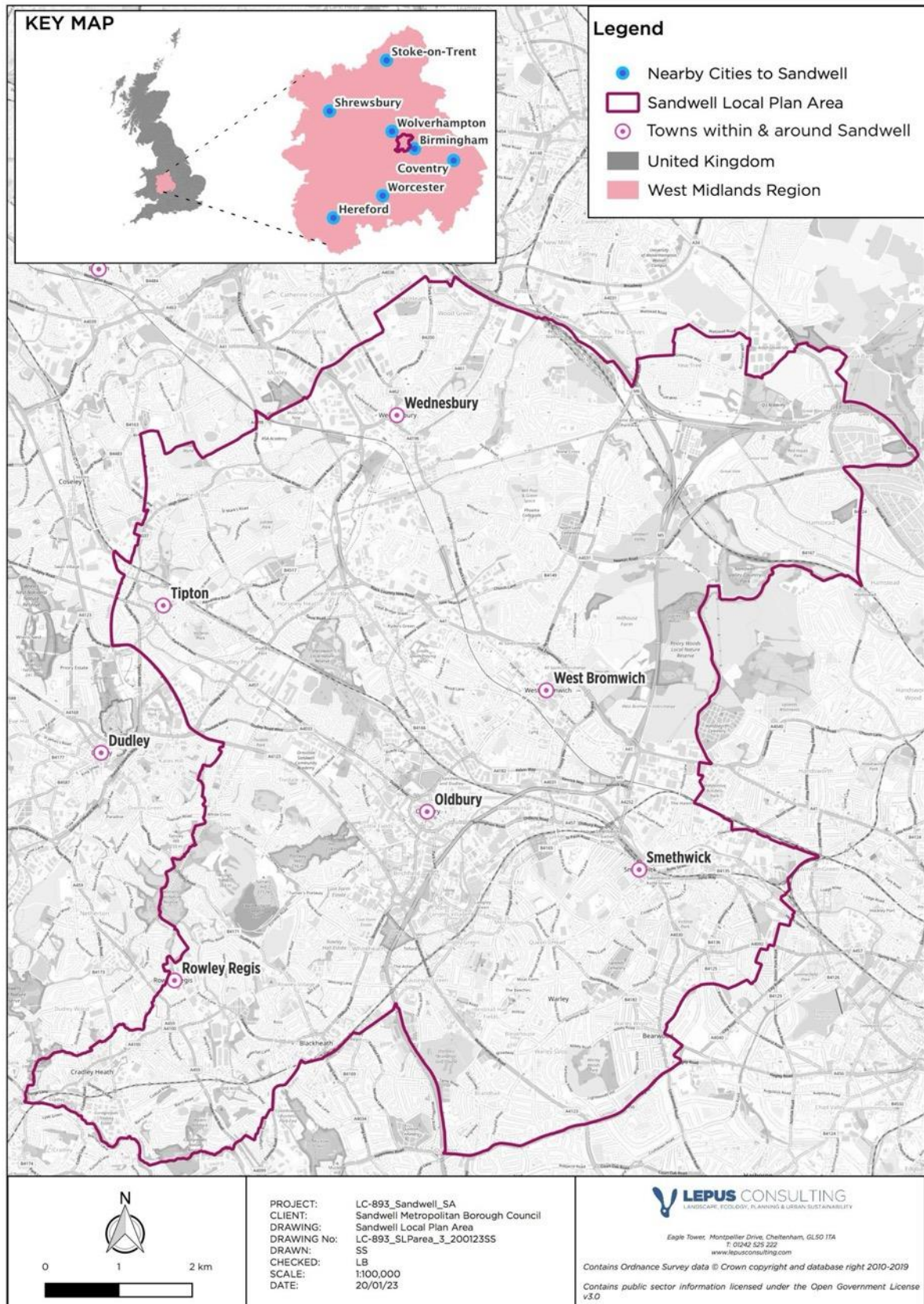


Figure 2.1: Map of the Sandwell Local Plan area

2.2 The Sandwell Local Plan

- 2.2.1 The Sandwell Local Plan (SLP) will include the overall strategy for development in Sandwell Metropolitan Borough for the Plan period 2022 to 2041, including a vision for Sandwell in 2041 and underpinning strategic objectives, and an overall spatial strategy supported by site allocations and policies to guide land use and development within the borough.
- 2.2.2 The SLP vision and objectives were drafted by SMBC, employing the principles of the extant Council Vision and the direction of travel set out within the Black Country Plan (BCP). The vision and objectives were both subject to public consultation and comments made during this period have been taken into account. In addition, the SLP SA and subsequent comments have also been considered and have been used to make the reflect sustainability issues, such as the circular economy, within the vision.
- 2.2.3 The vision and objectives as presented in the Regulation 19 version of the SLP have been evaluated alongside the planning policies, and presented within **Appendix F**.
- 2.2.4 The SLP objectives are summarised in **Figure 2.2**.

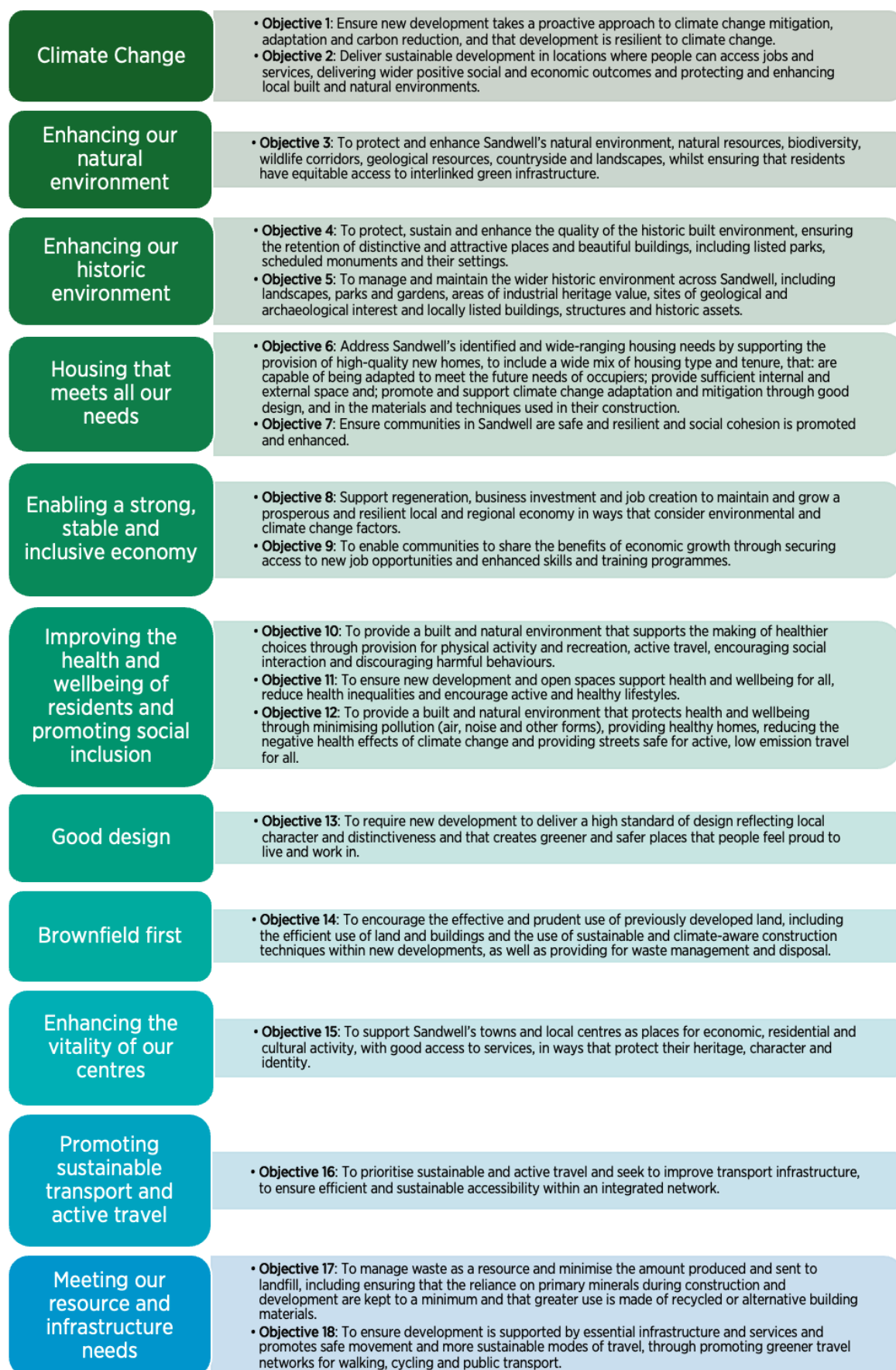


Figure 2.2: The strategic objectives of the SLP

- 2.2.5 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 carries 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 2023⁹ and the following Draft Plan consultation in late 2023¹⁰.
- 2.2.6 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.
- 2.2.7 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 BCCS¹¹, Sandwell Site Allocation and Delivery Development Plan Document (SAD)¹², and various other Area Action Plans which cover the period from 2006 to 2026.

2.3 Duty to Cooperate

- 2.3.1 The Duty to Cooperate (DtC) was created in the Localism Act 2011¹³ 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.
- 2.3.2 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.
- 2.3.3 A DtC Statement will be prepared, which will demonstrate how SMBC has fulfilled this duty through the plan-making process. Statements of Common Ground will be agreed with relevant authorities and bodies on key DtC issues.

⁹ 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 [Date accessed: 20/05/24]

¹⁰ Sandwell Metropolitan Borough Council (2023) Draft Sandwell Local Plan Consultation. Available at: <https://www.sandwell.gov.uk/planning/sandwell-local-plan> [Date accessed: 28/06/24]

¹¹ Black Country Authorities (2011) Black Country Core Strategy. Available at: <https://blackcountryplan.dudley.gov.uk/t1/p2/> [Date accessed: 20/05/24]

¹² 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 [Date accessed: 20/05/24]

¹³ Localism Act 2011. Available at: <https://www.legislation.gov.uk/ukpga/2011/20/contents> [Date accessed: 20/05/24]

2.3.4 It should be noted that emerging reforms to planning policy set out in the Levelling Up and Regeneration Act 2023¹⁴ include the intention to repeal the DtC and replace this with a more flexible 'alignment test'¹⁵. However, at the time of writing, the current DtC requirement applies, and the new government has indicated potential strengthening of this requirement¹⁶.

2.4 Sustainability Appraisal alongside the SLP stages: Iteration

2.4.1 **Figure 2.3** provides a summary of the main plan making stages and includes SA outputs that were prepared at each stage.

2.4.2 The preparation of a Scoping Report was the first phase of the SA process. The scoping process set the criteria for assessment (including the SA Objectives) and established the baseline data and other information, including a review of relevant policies, programmes and plans (PPPs). The scoping process involved an overview of key issues, highlighting areas of potential conflict. The output of the scoping phase was the SA Scoping Report prepared by Lepus Consulting in 2023¹⁷.

2.4.3 Between February and March 2023, the content of the SA Scoping Report was consulted on with Historic England, Natural England, the Environment Agency and other relevant bodies. No specific comments were received regarding the SA Scoping Report.

2.4.4 The Regulation 18 (I) Issues and Options SA Report (January 2023)¹⁸ identified options for the Vision and 11 draft Objectives for the SLP. The SA Report also set out a range of recommendations for SMBC to consider as the SLP is developed and refined, including recommendations to improve the SLP Vision and Objectives, as well as consideration of the identification, description and evaluation of reasonable alternatives which is an important aspect of this Regulation 18 (I) SA Report.

¹⁴ Levelling Up and Regeneration Act 2023. Available at: <https://www.legislation.gov.uk/ukpga/2023/55/enacted> [Date accessed: 07/08/24]

¹⁵ UK Parliament (2024) Research Briefing: Debate on reform of the planning system. Available at: <https://commonslibrary.parliament.uk/research-briefings/cdp-2024-0052/> [Date accessed: 07/08/24]

¹⁶ MHCLG (2024) Proposed reforms to the National Planning Policy Framework and other changes to the planning system. Available at: <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system> [Date accessed: 07/08/24]

¹⁷ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan: Scoping Report. Available at: <https://www.sandwell.gov.uk/downloads/file/896/sandwell-local-plan-issues-and-options-sustainability-appraisal-scoping-report> [Date accessed: 21/05/24]

¹⁸ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Issues and Options, January 2023. Available at: <https://www.sandwell.gov.uk/downloads/file/893/sandwell-local-plan-issues-and-options-sustainability-appraisal> [Date accessed: 21/05/24]

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- 2.4.5 The Regulation 18 (II) Draft Plan SA report (October 2023)¹⁹ set out the appraisal of four spatial growth options alongside six housing growth options, four employment growth options, and three options for Gypsy and Traveller growth. These spatial options constitute reasonable alternatives for the distribution of new housing growth in the Plan area. Additionally, the Regulation 18 (II) SA included an assessment of 18 draft objectives for the SLP, 87 draft policies and 120 reasonable alternative sites. The SA report also set out the Council's preliminary reasons for selecting and rejecting reasonable alternative sites.
- 2.4.6 Reasonable alternatives are discussed further within **Chapter 5**.

¹⁹ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Draft Plan, October 2023. Available at: <https://sandwell.oc2.uk/document/9> [Date accessed: 21/05/24]

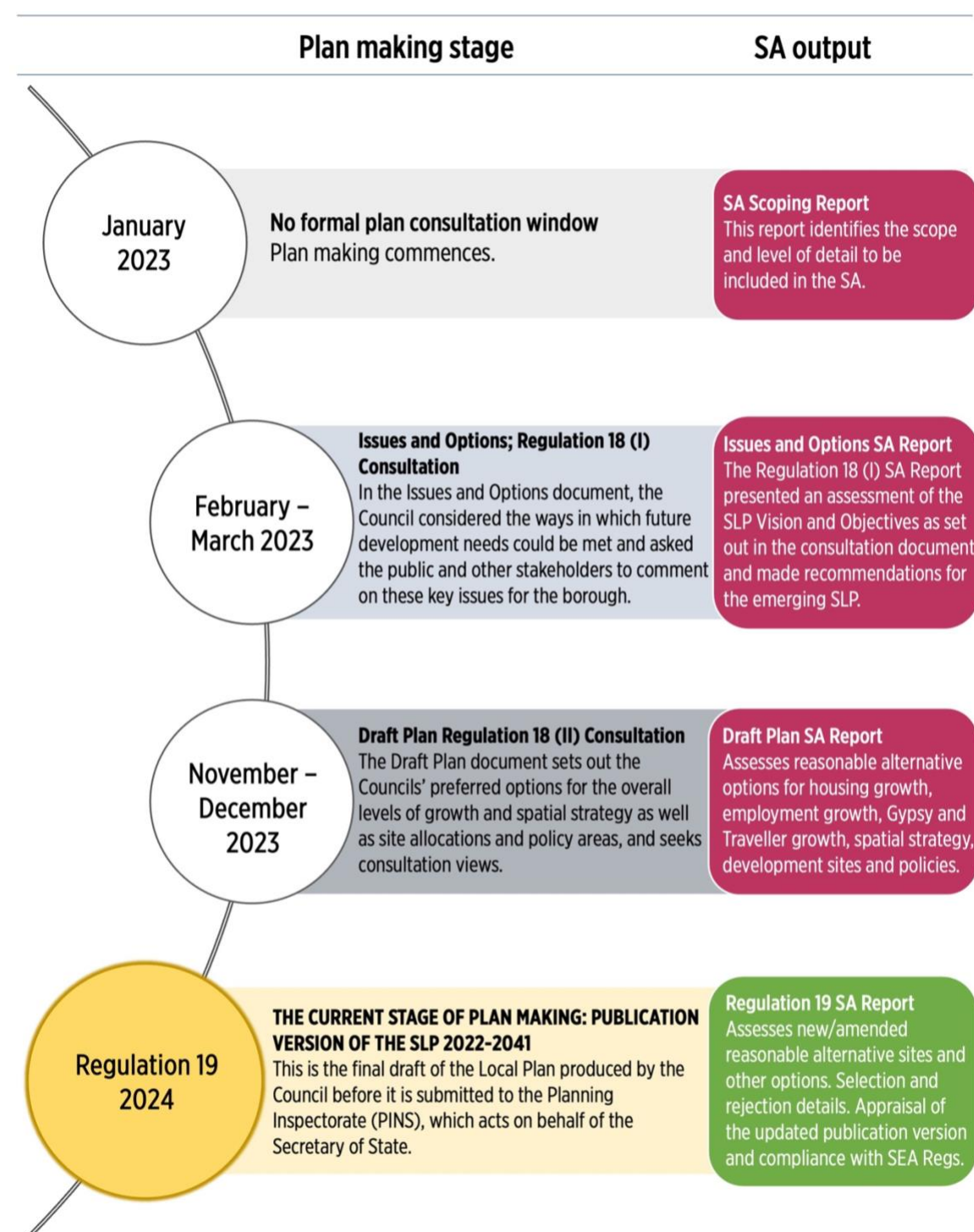


Figure 2.3: Stages in the plan making process accompanied by SA outputs

2.5 Meeting the requirements of the SEA Regulations

2.5.1 There are certain requirements that this report must satisfy in order for it to qualify as an 'environmental report', as set out in the SEA Regulations. These requirements, and where in the report they have been met, are presented in **Figure 2.4**.



Figure 2.4: SEA checklist

3 Evolution of the environment without the Plan

3.1 Overview

3.1.1 The SEA Regulations requires the Environmental Report to present *"information on the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme"*.

3.1.2 In the absence of the SLP, no new plan-led development would occur within the Plan area over and above that which is currently proposed in the adopted Core Strategy and SAD. In this scenario, an appeal-led system would predominate. The nature and scale of development that may come forward under an appeal-led system would be uncertain. In a 'no plan' scenario, other plans and policies would continue to be a material consideration in planning decisions and legislative protection would continue to be in place.

3.1.3 **Table 3.1** considers the likely evolution of the baseline within Sandwell in the absence of the SLP. This takes into account information gathered at the Scoping stage and more up-to-date data and statistics.

Table 3.1: Likely evolution without the Plan

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

Theme	Likely evolution without the Plan
Climatic factors	<ul style="list-style-type: none"> • Climatic and anthropogenic-induced climate change are increasing concerns nationally and globally. Without a clear strategy to reduce emissions across all sectors at the local level, Sandwell’s contributions towards the causes of climate change may be exacerbated, particularly policies and strategies to facilitate and encourage a modal shift away from private car use. • In absence of a clear growth strategy implemented through the SLP, a less sustainable development pattern could result within Sandwell which could potentially result in an increased need to travel, with associated increases in GHG emissions. • Technological advances, which may include renewable energies, electric vehicles, and efficient electricity supplies, would be expected to occur over time in the UK energy market. However, there may be less opportunity to seek aspirational targets regarding improving energy efficiency within developments in association with meeting the target of carbon neutrality by 2050, in the absence of the SLP. • The risk of flooding will be likely to increase over time due to the changing climate, increasing the occurrence of extreme weather events. Although national policies and legislation will continue to restrict uses within flood zones, without the SLP there may be less control over the location of growth which could limit the effectiveness of strategic GI networks and natural water management functions.
Cultural heritage	<ul style="list-style-type: none"> • National and local guidance seeks to protect designated assets and their settings such as Listed Buildings, Conservation Areas, Scheduled Monuments, and Registered Parks and Gardens, which would continue with or without the SLP. • The Heritage at Risk Register will continue to be managed by Historic England who will continue to work with stakeholders to protect these assets, although there could be less opportunity to focus on regeneration and investment without the SLP. • It is uncertain if connectivity with places, local distinctiveness and culture would be emphasised and protected in the absence of the plan, as it is anticipated that the SLP will require a Heritage Statement or Archaeological Desk-Based Assessment to be prepared to accompany future planning applications, where appropriate.
Human health	<ul style="list-style-type: none"> • Sandwell’s population is expected to continue to increase, which is likely to place greater pressure on the capacity of key services and amenities, including health and leisure facilities and housing. • The life expectancy of men and women is anticipated to rise over time, in line with national trends, leading to a greater proportion of older residents with specific needs for housing and services. It may be more difficult to ensure these needs are met in absence of the plan. • Without a clear plan-led development strategy, it is uncertain if existing public green spaces and open spaces would be maintained or enhanced to encourage residents to live healthy and active lifestyles. Existing open spaces may be under greater pressure from windfall development without the SLP.
Landscape	<ul style="list-style-type: none"> • The West Midlands Green Belt will continue to benefit from legislative protection. • In the absence of Plan-led development, there may be less opportunity to promote the conservation and enhancement of the local landscape / townscape character. There could potentially be a rise in the quantity of new development which discords with the local character by altering the style and scale of development, depending on the nature of any future changes to national regulations, such as the proposed revisions to the NPPF and potential implementation of mandatory design codes promoted in the Levelling Up and Regeneration Act.
Population and material assets	<ul style="list-style-type: none"> • The borough’s population is forecast to increase by 30,300 between 2016 and 2030²⁰, leading to the potential for secondary effects. Without plan-led development, there may be less scope to manage and implement sufficient health,

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

Theme	Likely evolution without the Plan
	<p>education, social and transport infrastructure to meet local needs and address inequalities.</p> <ul style="list-style-type: none"> • It is uncertain if future housing provision would satisfy local needs in terms of type, cost and location. There is likely to be a continued increase in the cost of buying or renting housing, although the rate of increase may reduce compared to previous years, in line with national trends. It is uncertain whether affordable housing needs would be met. • Without the influence of the SLP, there would be less planning control over the location of housing with potential for new housing being allowed in unsustainable locations and/or without necessary supporting infrastructure. • Without plan-led development it is likely that housing shortages will be exacerbated. This could lead to existing residents who wish to form new households living in overcrowded conditions or being forced to move outside the area, and potential new residents being unable to move in. • Without a clear plan-led strategy to focus the limited amount of investment into centres and to defend against further investment in out-of-centre locations, the vitality of Sandwell’s centres may decline. This could lead to a less sustainable development pattern resulting in an increased need to travel, with associated increases in GHG emissions and potentially exacerbating issues with social exclusion and access to key services. • The overall number of jobs and businesses operating within Sandwell may continue to increase; however, there may be less planning control over the location of employment land and there may be limited job availability in some sectors if land is not allocated through the SLP. • There is likely to be an increase in the proportion of the road transport fleet which are electric or hybrid vehicles, in line with national trends. Over time, there is likely to be a rise in car ownership in general. • The Local Transport Plan will still be implemented, which would be likely to have a positive impact on Sandwell’s road network, seeking to relieve congestion and improve provision of public transport across the plan area. Although, in absence of the SLP there may be reduced scope to implement and monitor effective policies and strategies which can facilitate alternative transport modes and encourage behavioural changes.
Soil	<ul style="list-style-type: none"> • Soil is a non-renewable resource that would be likely to continue to be lost. Rates of soil erosion and loss of soil fertility will be likely to continue to rise due to the impacts of agriculture and climate change.
Water	<ul style="list-style-type: none"> • Water abstraction, consumption and treatment in the local area will continue to be managed by the Environment Agency and water companies through the Humber and Severn RBMPs, WRMP and CAMS in line with the Water Framework Directive. However, without plan-led development, there could potentially be new developments that result in over-capacity issues at wastewater treatment works (either cumulatively or individually). • In the absence of plan-led development, the efficiency and sustainability of water consumption may be unlikely to improve as the local population grows and increases water demand, depending on the nature of any future changes to national regulations, such as the Building Regulations and any emerging policy / regulations relating to water neutrality.

4 Methodology

4.1 Scope of the Sustainability Appraisal

4.1.1 The purpose of the SA Scoping Report is to establish the scope of the sustainability appraisal. It includes information about:

- Relevant plans, programmes and their environmental objectives which may have a bearing on the SA of the SLP (see **Appendix A** for further information);
- Baseline information;
- Environmental issues and problems; and
- The SA Framework (see **Appendix B**).

4.1.2 The SA Scoping Report for the Local Plan was prepared by Lepus in 2023²¹. The Scoping Report was subject to a five-week period of consultation between February and March 2023 with the statutory consultees (Natural England, Historic England and the Environment Agency). No specific comments were received from the statutory consultees regarding the SA Scoping Report; however, responses received at other consultation stages are discussed further in **Appendix C**.

4.1.3 The appraisal uses objective geographic information relating to environmental receptors, the SA Framework and established standards (where available) to help make the assessment decisions transparent and robust.

4.1.4 The SA Framework is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the SEA Regulations²². The SA Objectives and the SEA Topics to which they relate are set out in **Table 4.1**.

4.1.5 Each SA Objective is considered when appraising SLP site allocations, policies and reasonable alternatives. 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.

²¹ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan: Scoping Report. Available at: <https://www.sandwell.gov.uk/downloads/file/896/sandwell-local-plan-issues-and-options-sustainability-appraisal-scoping-report> [Date accessed: 21/05/24]

²² 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).*”

Table 4.1: Summary of the SA Objectives

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

4.2 Best practice guidance

4.2.1 Government policy recommends that both SA and SEA are undertaken under a single SA 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 environment²³.
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive²⁴.
- Department for Levelling Up, Housing and Communities (DLUHC) (2023) National Planning Policy Framework (NPPF)²⁵.
- DLUHC and Ministry of Housing, Communities & Local Government (MHCLG) (2023) Planning Practice Guidance (PPG)²⁶.
- Royal Town Planning Institute (RTPI) (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans²⁷.

4.3 Appraisal process

4.3.1 The purpose of this document is to provide an appraisal of the SLP including reasonable alternatives in line with Regulation 12 of the SEA Regulations²⁸ which states that:

4.3.2 *"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".*

4.3.3 This document also provides information in relation to the likely characteristics of effects, as per the SEA Regulations (see **Box 4.1**).

²³ European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at:

http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Date accessed: 07/08/24]

²⁴ 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 [Date accessed: 07/08/24]

²⁵ DLUHC (2023) National Planning Policy Framework, December 2023. Available at:

<https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 07/08/24]

²⁶ DLUHC & MHCLG (2023) Planning practice guidance. Available at:

<https://www.gov.uk/government/collections/planning-practice-guidance> [Date accessed: 07/08/24]

²⁷ RTPI (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans.

Available at: <https://www.rtpi.org.uk/research/2018/january/strategic-environmental-assessment-seasa-for-land-use-plans/> [Date accessed: 07/08/24]

²⁸ 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: 07/08/24]

Box 4.1: Schedule 1 of the SEA Regulations²⁹

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 out 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.

4.4 Impact assessment and determination of significance

4.4.1 Significance of effect is a combination of the sensitivity of receptors and the magnitude of anticipated impacts. 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.

Sensitivity

4.4.2 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.

²⁹ 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: 07/08/24]

4.4.3 A guide to the range of scales used in determining sensitivity is presented in **Table 4.2**. For most receptors, sensitivity increases with geographic scale.

Table 4.2: *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.

Magnitude

4.4.4 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 4.3**).

Table 4.3: *Impact magnitude*

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

4.5 Significant effects

4.5.1 A single value from **Table 4.4** 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.

4.5.2 The assessment of impacts and subsequent evaluation of significant effects is in accordance with Schedule 2 (6) of the SEA Regulations³⁰, where feasible, which states that the effects should include: "*secondary, cumulative, synergistic, short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects*".

Table 4.4: Guide to scoring significant effects

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

³⁰ 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: 05/03/24]

- 4.5.3 When selecting a single value to best represent the sustainability performance, and to understand the significance of effects of a spatial option in terms of the relevant SA Objective, the precautionary principle³¹ 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 B**) 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.
- 4.5.4 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).
- 4.5.5 Significance of effect has been categorised as minor or major. **Table 4.4** sets out the significance matrix and explains the terms used. 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.
- 4.5.6 Each reasonable alternative 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 4.4**. Likely impacts are not intended to be summed.
- 4.5.7 It is important to note that the assessment scores presented in **Table 4.4** are high level indicators. The assessment narrative text should always read alongside the significance scores.
- ## 4.6 SEA topic methodologies and assumptions
- 4.6.1 A number of topic specific methodologies and assumptions have been applied to the appraisal process for specific SA Objectives (see **Appendix D**). These should be borne in mind when considering the assessment findings.
- ## 4.7 Limitations of predicting effects
- 4.7.1 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.
- 4.7.2 The assessments in this report are based on the best available information, including that provided to Lepus by the Council and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.

³¹The 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”.

- 4.7.3 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.
- 4.7.4 The assessment of development proposals is limited in terms of available data resources. For example, up to date ecological surveys and/or landscape and visual impact assessments have not been available. 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.
- 4.7.5 All data used is secondary data obtained from the Council or freely available on the internet.

5 Reasonable alternatives

5.1 Context

5.1.1 Regulation 12 of the SEA Regulations³² states that: *"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"*.

5.1.2 PPG³³ states that: *"Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made"*.

5.1.3 The Council has therefore demonstrated how they have identified, described and evaluated reasonable alternatives as part of the plan making process within this SA Report (which includes the requirements of an SEA Environmental Report). The following sections of this chapter document the process of identifying and evaluating different types of reasonable alternative, when and where the Council considered reasonable alternatives, and how the SA influenced the preparation of the SLP.

5.2 Different types of reasonable alternatives

5.2.1 It is possible to derive reasonable alternatives for different aspects of a local plan. There is no prescribed formula or procedure about which aspects of a local plan require reasonable alternatives.

5.2.2 In the case of the SLP, all reasonable alternatives have been identified and described by SMBC as the Plan makers. Reasonable alternatives have been identified through consultation and engagement with stakeholders, including through the formal consultation periods, as well as a number of exhibitions, member workshops, and outreach via social media³⁴.

³² 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: 23/05/24]

³³ MHCLG (2020) Planning Practice Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 23/05/24]

³⁴ SMBC (2022) Statement of Community Involvement 2022. Available at: <https://www.sandwell.gov.uk/downloads/file/776/statement-of-community-involvement-sci-> [Date accessed: 23/05/24]

- 5.2.3 Further consideration of reasonable alternatives has been undertaken throughout the drafting process of the Plan, for example by issuing a Call for Sites. The Council also reassessed and reconsidered the role of previously identified / allocated sites in terms of their suitability for either housing, employment or other uses. In addition, consultation responses from stakeholders and other interested parties helped to refine the site allocation process and the 'fine tuning' of these sites, including for additional or alternative use to be made of a site or infrastructure provision.
- 5.2.4 A range of reasonable alternatives have been considered throughout the plan making process, including for the following different attributes of the SLP:
- **Housing Growth Options x6** (see the Regulation 18(II) SA, 2023);
 - **Employment Growth Options x4** (see the Regulation 18(II) SA, 2023);
 - **Gypsy and Traveller Growth Options x3** (see the Regulation 18(II) SA, 2023);
 - **Spatial Growth Options x4** (see the Regulation 18(II) SA, 2023);
 - **Development Sites x124** (120 within the Regulation 18(II) SA, 2023; and four additional sites as part of this consultation (see **Appendix E**)).
- 5.2.5 **Figure 5.1** summarises the reasonable alternatives considered throughout the plan making process, and at which chronological stage of the SA process these alternatives have been identified, described and evaluated.

Quick guide to reasonable alternatives

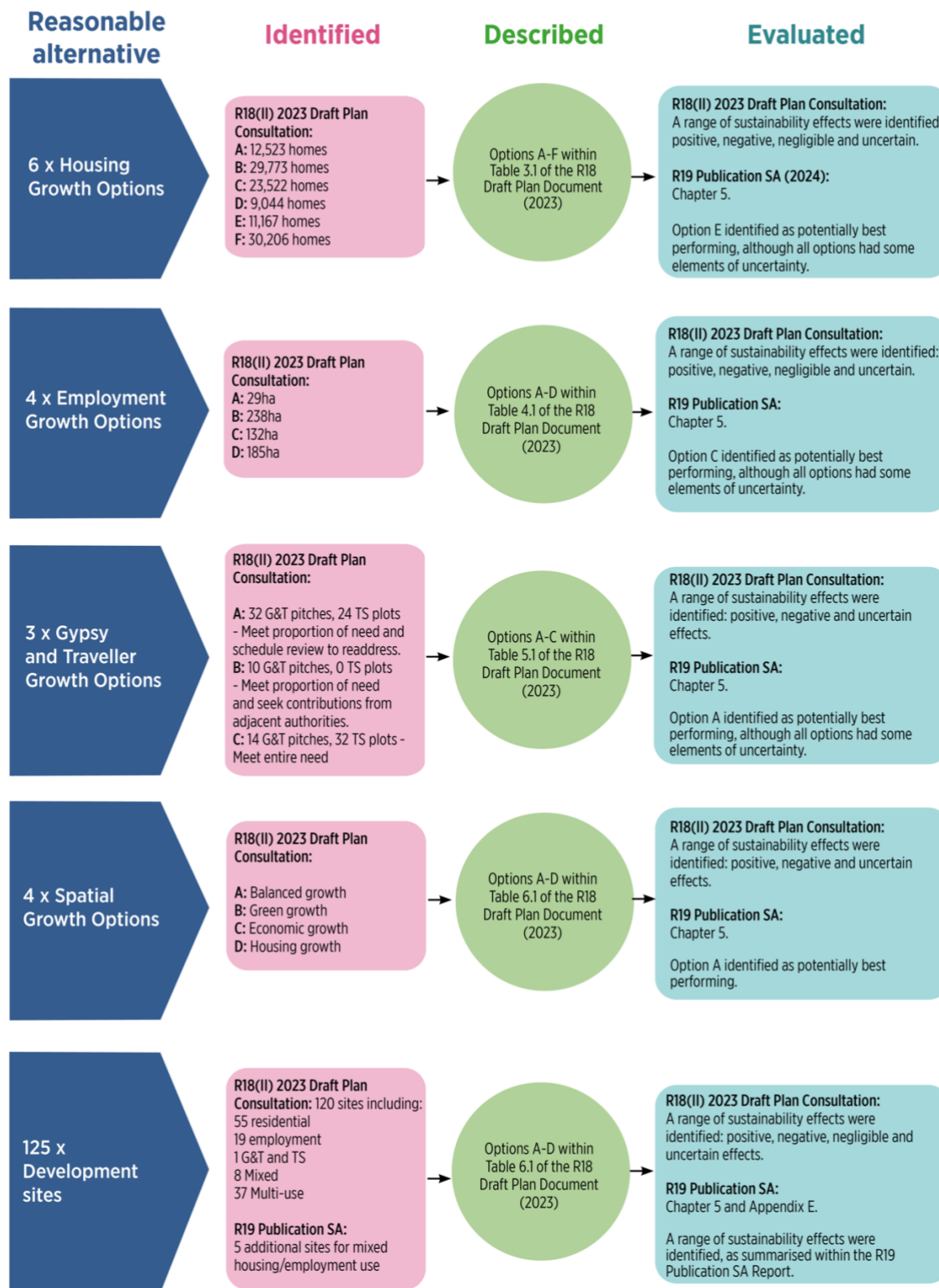


Figure 5.1: The identification, description and evaluation of reasonable alternatives considered throughout the plan making process

5.3 Housing growth options (2023)

5.3.1 Six high level options for the overall quantity of housing growth to be delivered through the SLP were assessed within the Draft Plan SA Report³⁵ (Regulation 18(II), 2023). These options include numbers based on different sources to provide an illustration of how the SLP could address the borough’s housing need in a realistic manner.

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

Table 5.1: Housing growth options identified by SMBC (see Regulation 18 (II) Draft Plan SA Report 2023)

Option	Description
A	Meet a proportion of housing need across plan period (2022-2041) based on average annual levels of delivery for last 10 years (do nothing). <ul style="list-style-type: none"> • 12,523 dwellings between 2022-2041 • A minimum average yearly requirement of 659 dwellings throughout the plan period
B	Meet entire housing need identified through Standard Method across plan period (2022-2041); based on 2014 household projections (using 2022 affordability ratio). <ul style="list-style-type: none"> • 29,773 dwellings between 2022-2041 • A minimum average yearly requirement of 1,567 dwellings throughout the plan period
C	Meet entire housing need identified through Standard Method across plan period (2022-2041); based on 2021 census figures (based on increase in households of 7.2% ³⁶). <ul style="list-style-type: none"> • 23,522 dwellings between 2022-2041 • A minimum average yearly requirement of 1,238 dwellings throughout the plan period
D	Meet proportion of local housing need based on supply and small windfalls identified in current SHLAA (2022) and seek contributions from adjacent authorities based on current offers and apportioned using travel to work data (DtC). <ul style="list-style-type: none"> • 9,044 dwellings between 2022-2041 • A minimum average yearly requirement of 476 dwellings throughout the plan period
E	Meet proportion of local housing need based on supply and small windfalls identified in current SHLAA (2022) plus aspirational growth in the Regeneration Areas and Centres and seek contributions from adjacent authorities based on current offers and apportioned using travel to work data (DtC). <ul style="list-style-type: none"> • 11,167 dwellings between 2022-2041 • A minimum average yearly requirement of 588 dwellings throughout the plan period
F	Meet housing need (Standard Method 2014 and 2022 affordability ratio) and contribute 2,000 houses to wider HMA needs. <ul style="list-style-type: none"> • 30,206 dwellings between 2022-2041 • A minimum average yearly requirement of 1,590 dwellings throughout the plan period

5.3.3 **Table 5.2** summarises the SA findings. The assessments are presented in full within the Regulation 18(II) Draft Plan SA (2023)³⁷.

³⁵ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Draft Plan, October 2023. Available at: <https://sandwell.oc2.uk/document/9> [Date accessed: 21/05/24]

³⁶ 2021 Census showed number of households in Sandwell increased by 7.2% since 2011

³⁷ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Draft Plan, October 2023. Available at: <https://sandwell.oc2.uk/document/9> [Date accessed: 21/05/24]

Table 5.2: Summary SA findings for assessment of housing growth options A-F

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

5.3.4 As discussed in the Regulation 18 (II) Draft Plan SA Report, the high-level assessment of housing growth is limited due to the lack of specific information regarding location, density or design of housing, resulting in uncertain impacts being identified for various SA Objectives. Therefore, 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 understanding of the baseline at the time of their assessment.

5.3.5 Options D and E have been identified as the best performing options for housing growth against the majority of objectives. SA Objectives 4 (Climate Change Mitigation), 5 (Climate Change Adaptation), 7 (Pollution) and 8 (Waste) are likely to have the smallest level of impact under Option D. Option E would deliver a slightly larger housing number than Option D, and also seeks to focus new development within the Regeneration Areas and Centres, which is likely to lead to a more efficient use of land and more benefits in terms of rejuvenating Sandwell’s centres and ensuring a greater proportion of new residents are located within a sustainable distance of services and facilities. As a result, under SA Objectives 1 (Cultural Heritage), 2 (Landscape), 3 (Biodiversity) and 6 (Natural Resources) Option E has been identified as the best performing.

5.3.6 SA Objectives 9 (Transport and Accessibility), 12 (Health) and 14 (Education, Skills and Training) are likely to result in more positive impacts under Options A, D and E, since these three options deliver the smallest quantum of growth, c.9,500 – 12,500. All options perform similarly against SA Objective 13 (Economy) as the options considered in this assessment focus on housing growth only, and all options are likely to provide good access to employment opportunities within Sandwell.

- 5.3.7 Option F is identified as the best performing against SA Objective 10 (Housing) given this option would exceed the identified housing need and benefit the wider HMA. Options B, C and F would meet Sandwell's housing need and as such would be most likely to deliver benefits in terms of addressing inequalities (SA Objective 11). However, SA Objectives 2 (Landscape), 3 (Biodiversity), 4 (Climate Change Mitigation), 5 (Climate Change Adaptation), 6 (Natural Resources), 7 (Pollution) and 8 (Waste) are likely to carry more negative impacts under Options B, C and F, as these would all deliver c. 23,500 – 30,000 homes.
- 5.3.8 Options B, C and F may however not be achievable without significant increases in density, use of undeveloped land and/or significant export of growth, given that there is an existing supply of only 11,194 homes in Sandwell.
- 5.3.9 On balance, Option E is identified as the best performing option, assuming that a large proportion of growth under this option would be on previously developed land and within the existing centres, with the benefits in terms of regeneration meaning this option slightly out-performs Option D, although neither option would deliver sufficient housing to satisfy the identified need.

Comment from Council:

The options providing higher levels of housing are unlikely to be deliverable in Sandwell, given the various constraints and adverse ground conditions that affect much of the land within the borough. Given the importance of balancing housing growth with environmental and climate change aspirations, while at the same time achieving the delivery of housing that will help meet the needs of Sandwell's residents, an option allowing for the delivery of a realistic and sustainable quantum of housing, that includes elements of aspirational housing and will also help deliver the plan's wider aims and ambitions around regeneration, growth and supporting the economy.

On this basis, we feel that **Option E** will provide the most sustainable and deliverable minimum target for new housing across the plan period.

- 5.3.10 It should be noted that although Option E has been selected, the housing quanta associated with Option E has now changed from 11,167 dwellings from 2022-2041 to 10,434 dwellings from 2024-2041. The change in housing number is based on the Plan period changing from 2022-2041 to 2024-2041, as well as the latest evidence regarding the supply of residential land in Sandwell.

5.4 Employment growth options (2023)

- 5.4.1 Four options for employment growth were assessed within the Draft Plan SA Report³⁸ (Regulation 18(II), 2018), as shown in **Table 5.3**.

³⁸ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Draft Plan, October 2023. Available at: <https://sandwell.oc2.uk/document/9> [Date accessed: 21/05/24]

5.4.2 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. The EDNA (2022)³⁹ and 2023 update⁴⁰ identified an estimated demand of 185ha of employment land in the district for the Plan period, although neighbouring authorities may have a role to play in helping to satisfy the employment shortfall through the Duty to Co-operate.

Table 5.3: Employment growth options identified by SMBC (see the R18 (II) Draft SA Report, 2023)

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

5.4.3 **Table 5.4** summarises the SA findings. The assessments are presented in full within the Regulation 18(II) Draft Plan SA (2023)⁴¹.

Table 5.4: SA performance of the employment growth options (see the R18 (II) Draft Plan SA Report, 2023)

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

³⁹ WECD (2022) Economic Development Needs Assessment 2022-2040 for the Black Country Authorities. Available at: <https://www.sandwell.gov.uk/downloads/file/1542/black-country-economic-development-needs-assessment-edna-2022> [Date accessed: 23/05/24]

⁴⁰ WECD (2023) Economic Land Needs Assessment 2020-2041 for the Black Country Authorities, August 2023. Available at: <https://www.sandwell.gov.uk/downloads/file/1546/black-country-authorities-employment-land-needs-assessment-2020-2041-august-2023-> [Date accessed: 23/05/24]

⁴¹ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Draft Plan, October 2023. Available at: <https://sandwell.oc2.uk/document/9> [Date accessed: 21/05/24]

- 5.4.4 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by SMBC, as well as expert judgement.
- 5.4.5 There is uncertainty regarding the exact impacts that each employment growth option 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 single best performing option is difficult.
- 5.4.6 Option B proposes the highest amount of employment land (238ha), and as such performs best against economic objectives, but performs less well against environmental objectives as it would be likely to require the greatest extent of previously undeveloped land. Conversely, Option A performs best against environmental objectives owing to its focus on existing vacant employment land but less well against economic objectives as it would not fulfil Sandwell's identified employment land need.
- 5.4.7 Option C would provide for the lowest estimate of need according to the EDNA (132ha), and Option D would provide for the mid-range estimate of need (185ha). As such, both options C and D would lead to similar impacts in terms of balancing employment land delivery with reducing potential for adverse effects associated with higher growth targets, although Option C is likely to perform marginally better than Option D for SA Objectives 1 (Cultural Heritage), 2 (Landscape), 3 (Biodiversity), 4 (Climate change mitigation), 5 (Climate change adaptation), 6 (Natural resources), 7 (Pollution), 8 (Waste) and 12 (Health) due to the lower quantum of land being developed for employment purposes.
- 5.4.8 Overall, Option C could be considered as the best performing against all the objectives collectively as it provides enough land to meet the lower estimate of need, performs well against the economic objectives, and although having negative impacts against the environmental objectives, would likely have less of an impact than Option B.

Comment from Council:

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. Option C would be deliverable. Option D is also considered to be appropriate and deliverable; it will provide for additional growth but without the potential environmental impacts of Option B.

Given the Council's aspirations for the continued growth and strengthening of economic activity in Sandwell, while Option C would be deliverable, it identified the lowest level of potential employment land provision. There remains strong demand for employment land and buildings in Sandwell and as such the Council sought to identify a more aspirational target; while land supply remains an issue for both employment land and housing, Sandwell Council did not want to include a lower target as it did not reflect either demand or the Council's ambition.

Option D was considered to be the most reasonable alternative approach given the undersupply of employment land available to the Council, while still providing for an aspirational level of growth when sites become available. It demonstrates the Council's appetite for delivering more than the bare minimum of employment land while maintaining a realistic approach.

5.5 Gypsy, Traveller and Travelling Showpeople growth options

5.5.1 The Black Country Gypsy and Traveller Accommodation Assessment (GTAA)⁴² 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.

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

Table 5.5: Gypsy, Traveller and Travelling Showpeople growth options identified by SMBC (see the R18 (II) Draft SA Report, 2023)

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

5.5.3 **Table 5.6** summarises the likely impacts of each GTTS growth option in relation to the 14 SA Objectives. The assessments are presented in full in the Regulation 18 (II) SA Draft Plan⁴³.

Table 5.6: SA performance of the Gypsy, Traveller and Travelling Showpeople growth options (see the R18 (II) Draft Plan SA Report, 2023)

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

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

⁴² RRR Consultancy (2022) Black Country Gypsy and Traveller Accommodation Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/1558/black-country-gtaa-april-2022-> [Date accessed: 23/05/24]

⁴³ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Draft Plan, October 2023. Available at: <https://sandwell.oc2.uk/document/9> [Date accessed: 21/05/24]

- 5.5.5 It is 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 according to performance against specific SA Objectives.
- 5.5.6 Option B is likely to have the smallest impact against the environmentally focused SA Objectives although negative impacts have still been identified; this is due to Option B having the least number of proposed pitches/plots. However, a minor negative effect has been identified for Option B for the SA Objective 10 (Housing) as it would only partially meet the Gypsy and Traveller need and provides no Travelling Showperson plots.
- 5.5.7 Option C alone would fulfil all identified needs of the community since it provides all the required pitches and plots, and as such would have a major positive impact on SA Objective 10 (housing), however since it proposes the highest amount of growth it also would be likely to have the greatest potential for adverse effects.
- 5.5.8 Consequently, Option A could be identified as best performing overall as it provides for a proportion of both the Gypsy and Traveller and Travelling Showperson needs but also has lower potential for adverse impacts across the other SA Objectives than Option C. However, it should be acknowledged that since Option A proposes to "*schedule an early review of the SLP to readdress need across later stages*", there is some uncertainty regarding the longer-term effects.

Comment from Council:

Option B remains the most realistic option – it delivers the required five-year supply and in the absence of any local demand for additional Travelling Showpeople plots, will have least impact.

Given the relatively small percentage of gypsies and travellers within Sandwell's population, setting a higher target (Options A, C) did not appear to be necessary at this stage, particularly considering the potential for additional adverse impacts both options represented compared to Option B. In addition, the relatively robust level of provision in adjacent areas means that the need for additional pitches at this stage is not as acute a demand as it might otherwise be.

The Council have had no requests for Travelling Showpeople plots and if this did occur, sites would be chosen on their merits. The delivery of sufficient pitches to cover the required supply period is realistic and the site chosen is well-located adjacent to an existing site, where it might be anticipated that infrastructure, services and facilities were already in place.

5.6 Spatial growth options

- 5.6.1 Four spatial growth options were assessed within the Draft Plan SA Report⁴⁴ (Regulation 18(II), 2018), as shown in **Table 5.7**. These options consider how the overall number of homes and area of employment land (and other types of land use where applicable) could be strategically distributed, thus helping to meet some of the strategic aims of the emerging SLP.

⁴⁴ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Draft Plan, October 2023. Available at: <https://sandwell.oc2.uk/document/9> [Date accessed: 21/05/24]

5.6.2 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.

Table 5.7: Spatial growth options identified by SMBC (see the R18 (II) Draft SA Report, 2023)

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

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

5.6.3 Each option has been assessed using the SA Framework and summary findings are presented in **Table 5.8**. The assessments are presented in full in the Regulation 18 (II) SA Draft Plan⁴⁵.

Table 5.8: SA performance of the Spatial growth options (see the R18 (II) Draft Plan SA Report, 2023)

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
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	-	-	+/-	+	+	-	-	-	+	+	+/-	-	-	++

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

5.6.5 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.

⁴⁵ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Draft Plan, October 2023. Available at: <https://sandwell.oc2.uk/document/9> [Date accessed: 21/05/24]

- 5.6.6 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.

Comment from Council:

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.

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 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.

- 5.6.7 The Balanced Green Growth spatial strategy has been identified by SMBC drawing on the spatial growth options assessed in the SA process and presented in Policy SDS1, which has been discussed further in **Chapter 6** and evaluated in **Appendix F**.

5.7 Reasonable alternative development sites

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

- 5.7.2 The Black Country Call for Sites request first opened in July 2017 and re-opened from 9th July – 20th August 2020⁴⁶. Since then, SMBC have carried out annual SHLAAs of sites within which have the potential to accommodate new housing development, factoring in the latest available evidence. Other sources of supply considered for the SLP include sites with planning permission, existing allocations from adopted plans, and sites which have been identified as surplus for example those identified in Open Space strategies.

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

- Ancient Hedgerows
- Ancient Woodland/Veteran Tree
- Common Land
- Flood Zone 3

⁴⁶ Black Country Plan: Call for Sites. Available at <https://blackcountryplan.dudley.gov.uk/t2/p3/> [Date accessed: 07/08/24]

- Green Belt
- Health and Safety Executive (HSE) Zone 1 (for residential)
- Local Nature Reserve (LNR)
- Operational Burial Grounds
- Registered Park & Garden (RPG)
- Scheduled Monument (SM)
- Site of Importance for Nature Conservation (SINC)
- Site of Special Scientific Interest (SSSI) / Special Area of Conservation (SAC)
- Strategic Open Space
- Sites were also filtered out where the landowner has expressed unwillingness, or sites with one or more significant planning constraints which cannot be mitigated.

5.7.4 Through undertaking this filtering process, a total of 124 reasonable alternative development sites have been identified by SMBC and considered throughout the SA process.

5.7.5 The Regulation 18 (II) SA Report (2023)⁴⁷ included an assessment of 120 reasonable alternative sites identified by the Council, comprising:

- 55 residential-led sites
- 19 employment-led sites;
- One Gypsy, Traveller and Travelling Showperson site;
- Eight sites for mixed use; and
- 37 sites for multiple uses.

5.7.6 The Regulation 19 SA Report (this report) includes an assessment of four additional reasonable alternative sites proposed for housing use, identified by the Council since the previous stage (see **Appendix E** of **Volume 3**). In addition to these four sites, the Council has provided updated information for the use of 36 reasonable alternative sites assessed at the Regulation 18 (II) stage, and boundary changes for four sites including SH16, SEC3-133, SM7 and SM8.

5.7.7 A total of 124 sites have therefore been assessed across the SA process as follows:

- 84 residential-led sites;
- 28 employment-led sites;
- One Gypsy, Traveller and Travelling Showperson site;
- Eight sites for mixed use; and
- Two sites for multiple use.

5.7.8 The SA identified a range of positive and adverse potential impacts of the reasonable alternative sites on the objectives within the SA Framework.

⁴⁷ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Draft Plan, October 2023. Available at: <https://sandwell.oc2.uk/document/9> [Date accessed: 21/05/24]

- 5.7.9 Negative impacts were mainly identified in relation to issues associated with air quality due to the proximity of reasonable alternative sites to the borough's major roads and the location of all development within Sandwell AQMA; the likely impact on the borough's carbon footprint associated with the construction and occupation of new development; loss of undeveloped land and/or land with potential environmental value; proposed development within areas of surface water flood risk; potential adverse effects on Sites of Local Importance for Nature Conservation (SLINCs) especially where development sites coincide or are located adjacent to these designations; and sites located in deprived areas with potential to exacerbate inequalities without careful planning.
- 5.7.10 Positive impacts were identified in relation to the provision of new housing and employment floorspace which would contribute towards meeting the identified needs; benefits to health and accessibility as many reasonable alternative sites are located within sustainable distance to NHS hospitals, GP surgeries and public green spaces; sustainable accessibility to schools and public transport including railway and bus services; and the majority of sites being located within Flood Zone 1 where fluvial flood risk is low.
- 5.7.11 All reasonable alternative development sites have been assessed before and after mitigation. The main purpose of this exercise is to avoid any risk of 'green wash': a process whereby immediate application of policy prescription can give the impression that no adverse effects will arise, without knowing the extent of adverse effect that existed in the first place. This process helps achieve transparency in the appraisal process and follows established best practice (RTPI Guidance, 2018⁴⁸) of presenting assessment results before and after mitigation has been applied. Evaluating policies in the SA enables scrutiny of how effective the policies are as mitigation tools.
- 5.7.12 All reasonable alternative sites have been assessed pre-mitigation in terms of potential impacts on each SA Objective, the results of which are presented in their entirety in **Appendix E**.
- 5.7.13 Scores should be read in conjunction with the detailed text narrative provided for each site in the relevant SA report. These tables are intended as an overview of the assessments to provide a useful indicator of sustainability performance associated with each site.
- 5.7.14 Mitigation, using the emerging SLP policies (see **Appendix F** for the SA evaluation of policies), has been applied to the SA results for each reasonable alternative site and presented in **Appendix G**.
- 5.7.15 Following the application of policy mitigation, it was identified that many of the adverse effects will likely be reduced or mitigated, including:
- Alterations to the character/setting of heritage assets;
 - Threats to locally distinctive or sensitive landscapes;
 - Threats to biodiversity sites, priority habitats and ecological networks;
 - Reduction in GHG emissions;
 - Risk of fluvial and surface water flooding;

⁴⁸ RTPI (2018) Strategic Environmental Assessment: Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/research/2018/january/strategic-environmental-assessment-seasa-for-land-use-plans/> [Date accessed: 23/05/24]

- Loss of land with environmental value;
- Exposure to and exacerbation of poor air quality;
- Risk of contamination of groundwater Source Protection Zones and watercourses;
- Access to transport networks and local services;
- Location of residents in deprived areas;
- Access to healthcare facilities;
- Access to greenspace;
- Loss of an access to employment; and
- Access to education opportunities.

5.8 Selection and rejection of sites

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

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

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

6 The preferred approach

6.1 SLP policies

6.1.1 Following comments received during the Regulation 18 consultations and recommendations set out in the SA reports, SMBC have revisited the policies of the SLP. There are a total of 88 proposed policies within the SLP.

6.1.2 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.

6.1.3 The 88 SLP policies are listed below in **Table 6.1** and have been assessed in **Appendix F** alongside the proposed vision and strategic objectives of the SLP.

Table 6.1: Sandwell Local Plan policies

Policy reference	Policy name
Framework Policies	
SDS1	Spatial Strategy for Sandwell
SDS2	Increasing efficiency and resilience
SDS3	Regeneration in Sandwell
SDS4	Towns and Local Areas
SDS5	Achieving well-designed places
SDS6	Cultural facilities and the visitor economy
SDS7	Sandwell's Green Belt
SDS8	Green and blue infrastructure in Sandwell
Sandwell's Natural and Historic Environment	
SNE1	Nature conservation
SNE2	Protection and enhancement of wildlife habitats
SNE3	Provision, retention and protection of trees, woodlands and hedgerows
SNE4	Geodiversity and the Black Country UNESCO Global Geopark
SNE5	The Rowley Hills
SNE6	Canals
SHE1	Listed buildings and conservation areas
SHE2	Development in the historic environment
SHE3	Locally listed buildings
SHE4	Archaeology
Climate Change	
SCC1	Energy infrastructure
SCC2	Reducing operational carbon for new build non-residential development
SCC3	Climate-adapted design and construction
SCC4	Embodied carbon and waste
SCC5	Flood risk

Policy reference	Policy name
SCC6	Sustainable drainage
	Health and Wellbeing in Sandwell
SHW1	Health Impact Assessments
SHW2	Healthcare infrastructure
SHW3	Air quality
SHW4	Open space and recreation
SHW5	Playing fields and sports facilities
SHW6	Allotments
	Sandwell's Housing
SHO1	Delivering sustainable housing growth
SHO2	Windfall developments
SHO3	Housing density, type and accessibility
SHO4	Affordable housing
SHO5	Delivering accessible and self/custom build housing
SHO6	Protecting family housing (Use Class C3)
SHO7	Houses in multiple occupation
SHO8	Education facilities
SHO9	Accommodation for Gypsies, Travellers and Travelling Showpeople
SHO10	Housing for people with specific needs
	Sandwell's Economy
SEC1	Providing for economic growth and jobs
SEC2	Strategic Employment Areas
SEC3	Local Employment Areas
SEC4	Other Employment Sites
SEC5	Improving access to the labour market
SEC6	Relationship between industry and sensitive uses
	Sandwell's Centres
SCE1	Sandwell's Centres
SCE2	Non-E Class Uses in town centres
SCE3	Town Centres (Tier-Two centres)
SCE4	District and Local Centres (Tier-Three centres)
SCE5	Provision of small-scale local facilities not in centres
SCE6	Edge of centre and out of centre development
	West Bromwich
SWB1	West Bromwich Town Centre
SWB2	Development in West Bromwich
	Transport
STR1	Priorities for the development of the transport network
STR2	Safeguarding the development of the Key Route Network (KRN)
STR3	Managing transport impacts of new development
STR4	The efficient movement of freight and logistics
STR5	Creating coherent networks for cycling and walking
STR6	Influencing the demand for travel and travel choices
STR7	Network management

Policy reference	Policy name
STR8	Parking management
STR9	Planning for low emission vehicles
STR10	Transport innovation and digital connectivity
	Infrastructure and Delivery
SID1	Infrastructure provision and viability assessments
SID2	Digital infrastructure
SID3	5G network infrastructure
SID4	Communications infrastructure/equipment
	Waste and Minerals
SWA1	Waste infrastructure future requirements
SWA2	Waste sites
SWA3	Preferred areas for new waste facilities
SWA4	Locational considerations for new waste facilities
SWA5	Resource management and new development
SMI1	Minerals safeguarding
SMI2	Managing the effects of mineral development
	Development Constraints and Industrial Legacy
SCO1	Hazardous installations and substances
SCO2	Pollution control
SCO3	Land contamination and instability
	Development Management
SDM1	Design quality
SDM2	Development and design standards
SDM3	Tall buildings and gateway sites
SDM4	Advertisements
SDM5	Shop fronts and roller shutters
SDM6	Hot food takeaways
SDM7	Management of hot food takeaways
SDM8	Gambling activities and alternative financial services
SDM9	Community facilities
SDM10	Telecommunications

- 6.1.4 A summary of the SA assessment of policies is presented in **Table 6.2**, with the full evaluation presented in **Appendix F**.
- 6.1.5 The assessment of the SLP vision and the 18 SLP objectives has identified negligible, minor positive and majority positive effects. The vision and objectives set a positive framework for the SLP as a whole.
- 6.1.6 For the majority of SLP 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.

- 6.1.7 A greater range of sustainability effects is identified for policies that have potential to introduce new development, for example, the housing and economy policies. Policy SDS1 sets out the broad direction for growth. As such, minor negative impacts have been identified for SA Objectives 7 (Pollution) and 8 (Waste), owing to the potential for the large amount of proposed development to lead to increases in pollution and waste.
- 6.1.8 Uncertain impacts have been identified for certain SA Objectives as a result of some of the policies in the housing and economy policies. The range in potential impacts for these policies owes to the fact that large developments could have significant adverse effects, however, the 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.
- 6.1.9 Additionally, the majority of economic policies and several housing policies do not set out details regarding the location, scale and nature of development. Therefore, there is some uncertainty against several SA Objectives whether the proposed development would lead to positive or adverse effects overall.

Table 6.2: 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	+	+	+	+	+	+	-	-	+	+	+	+	+	+
SDS2	+	+	+	++	+	+	+	0	+	0	0	+	0	0
SDS3	+	+	+	+	0	++	+	0	+	+	+	+	++	+
SDS4	0	0	+	+/-	0	+	0	0	+	+	+	+	+	0
SDS5	++	++	0	+	+	0	+	0	+	0	+	+	0	0
SDS6	+	+	0	+	0	0	0	0	+	0	+	+	+	0
SDS7	+	+	0	0	0	+	0	0	0	0	0	+	0	0
SDS8	+	+	+	+	+	0	+	0	0	0	0	+	+	0
SNE1	0	+	++	+	+	0	+	0	0	0	0	+	0	0
SNE2	0	+	++	+	+	0	+	0	0	0	0	+	0	0
SNE3	0	+	+	+	+	+	+	0	0	0	0	+	0	0
SNE4	+	+	+	0	0	0	0	0	0	0	0	0	+	+
SNE5	+	++	++	0	+	0	+	0	0	0	0	+	0	0
SNE6	+	+	+	0	+	0	+	0	+	+	+	+	+	0
SHE1	++	+	0	0	0	0	0	0	0	0	0	0	0	0
SHE2	++	+	+	0	0	0	0	0	0	0	0	0	+	0
SHE3	+	+	0	0	0	0	0	0	0	0	0	0	0	0
SHE4	+	+	0	0	0	0	0	0	0	0	0	0	0	+
SCC1	0	0	0	++	+	0	++	+	0	0	+	+	+	0
SCC2	0	0	0	++	+	0	++	+	0	0	0	+	+	0
SCC3	0	0	+	+	++	+	+	0	0	0	0	+	0	0
SCC4	0	0	0	++	0	0	+	++	0	0	0	0	+	0
SCC5	0	0	+	0	++	+	+	0	0	0	0	+	0	0

	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
SCC6	0	+	+	0	+	0	+	0	0	0	0	0	0	0
SHW1	0	0	0	+	0	0	+	0	+	0	+	++	0	0
SHW2	0	0	0	+	0	0	+	0	+	0	+	++	0	0
SHW3	0	0	+	+	0	0	++	0	+	0	0	+	+	0
SHW4	0	+	+	+	+	0	+	0	+	0	+	++	0	0
SHW5	0	+	0	0	0	0	0	0	+	0	+	+	0	0
SHW6	0	+	+	0	0	0	0	0	0	0	+	+	0	0
SHO1	+/-	+/-	+	0	-	-	-	-	+	+	+	+	0	+
SHO2	0	0	0	+/-	+/-	+	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-
SHO3	0	0	0	+	0	0	+	0	+	+	+	+	0	0
SHO4	0	0	0	0	0	0	0	0	0	+	+	0	0	0
SHO5	0	0	0	0	0	0	0	0	0	+	+	+	0	0
SHO6	0	0	0	0	0	0	0	0	0	+	+	0	0	0
SHO7	0	0	0	0	0	0	0	0	+	+	+	+	0	0
SHO8	0	0	0	+	0	0	+	0	+	0	+	+	+	++
SHO9	0	0	+	-	0	0	-	0	+	+	+	+	0	+
SH010	0	0	0	0	0	0	0	0	+	0	+	+	0	0
SEC1	+/-	+/-	+	+	-	-	-	+	+	0	+	0	+	+
SEC2	+/-	0	0	+/-	0	0	+/-	+/-	+	0	+	0	+	0
SEC3	+/-	0	0	+/-	0	0	+/-	+	+	0	+	0	+	0
SEC4	+/-	+/-	0	+/-	+/-	0	+/-	+/-	+	+	+	0	+	0
SEC5	0	0	0	0	0	0	0	0	+	0	+	+	+	+
SEC6	0	0	0	0	0	0	0	0	0	0	0	0	+	0
SCE1	+/-	+/-	+/-	+	+/-	+	+/-	+/-	+	+	+	+	+	+/-
SCE2	0	+	0	0	0	0	0	0	0	0	+	0	+	0
SCE3	0	0	0	0	0	0	0	0	+	+	+	+	+	+
SCE4	0	0	0	0	0	0	0	0	+	+	+	0	+	0
SCE5	0	0	0	+	0	0	+	0	+	0	+	+	+	0
SCE6	0	0	0	+	0	0	+	0	+	0	+	+	+	0
SWB1	0	+	0	+	+	+	0	0	+	+	+	+	+	+
SWB2	0	+	0	+	0	+	0	0	+	+	+	+	+	+
STR1	0	0	0	+	0	0	+	0	++	0	0	+	0	0
STR2	0	0	0	+	0	0	0	0	+	0	0	0	0	0
STR3	0	0	0	+	0	0	0	0	+	0	0	0	0	0
STR4	0	0	-	0	0	0	0	0	+	0	0	0	+	0
STR5	0	0	0	+	0	0	+	0	++	0	+	+	0	0
STR6	0	0	0	+	0	0	+	0	++	0	0	0	0	0
STR7	0	0	0	0	0	0	0	0	+	0	0	0	0	0
STR8	0	0	0	0	0	0	0	0	+	0	0	0	+	0
STR9	0	0	0	+	0	0	+	0	+	0	0	0	0	0
STR10	0	0	0	+	0	0	+	0	+	0	0	0	+	0

	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
SID1	0	0	+	+	+	0	+	+	+	+	+/-	+	+	+
SID2	0	0	0	+	0	0	+	0	+	0	+	0	+	+
SID3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SID4	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SWA1	0	0	0	0	0	0	0	++	0	0	0	0	0	0
SWA2	0	0	0	0	0	0	0	+	0	0	0	0	0	0
SWA3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0
SWA4	0	0	0	0	0	0	0	+	0	0	0	0	0	0
SWA5	0	0	0	0	0	+	0	++	0	0	0	0	0	0
SMI1	0	0	0	0	0	+	0	0	0	0	0	0	+	0
SMI2	0	0	0	0	0	+	0	0	0	0	0	0	0	0
SCO1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SCO2	0	0	0	0	0	0	+	0	0	0	0	0	0	0
SCO3	0	+	0	0	0	+	0	0	0	0	0	0	0	0
SDM1	+	+	+	+	+	0	+	0	+	0	+	+	0	0
SDM2	0	0	0	0	0	+	0	0	0	0	0	+	0	0
SDM3	0	+	0	+	0	+	0	0	+	0	0	0	0	0
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

6.2 SLP site allocations

6.2.1 Following the assessment of reasonable alternatives in the SA, and consideration of other evidence base documents, SMBC have allocated a total of 97 development sites including:

- 60 residential-led sites;
- 28 employment-led sites;
- One Gypsy, Traveller and Travelling Showperson site; and
- Eight sites for mixed use.

6.2.2 The post-mitigation SA assessments for the 97 sites chosen for allocation by SMBC are summarised in **Table 6.4**. As explained in **section 5.7**, the full post-mitigation assessments for all reasonable alternative sites, including the allocated sites, can be found in **Appendix G**.

Table 6.3: Summary of post-mitigation site assessments for allocated sites (extracted from Appendix G)

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Site ref	Cultural Heritage	Landscape	Biodiversity, Flora & Fauna	Climate Change Mitigation	Climate Change Adaptation	Natural Resources	Pollution	Waste	Transport & Accessibility	Housing	Equality	Health & Wellbeing	Economy	Education
SEC3-181	0	+	0	+/-	+	+	-	+/-	++	0	0	++	0	0
SEC4-1	0	0	0	+/-	+	-	-	+/-	++	0	0	0	0	0
SEC3-9	0	+	-	+/-	+	+	-	+/-	++	0	0	++	0	0
SEC3-99	+	+	-	+/-	+	+	-	+/-	++	0	0	++	0	0
SH1	0	+	0	0	+	+	-	0	++	+	0	0	++	++
SEC3-113	0	+	0	+/-	+	+	-	+/-	++	0	0	++	0	0
SEC3-46	0	0	-	+/-	+	-	-	+/-	++	0	0	0	0	0
SEC3-175	0	+	0	+/-	+	+	-	+/-	++	0	0	++	0	0
SEC3-36	0	+	0	+/-	+	+	-	+/-	++	0	0	++	0	0
SEC3-29	0	0	0	+/-	+	-	-	+/-	+	0	0	+	++	0
SEC3-148	0	+	0	+/-	+	+	-	+/-	++	0	0	++	0	0
SH2	0	0	0	0	0	-	-	0	++	+	0	++	++	++
SEC4-4	0	0	0	+/-	+	-	-	+/-	+	0	0	0	++	0
SEC3-191	0	0	0	+/-	+	-	-	+/-	++	0	0	++	0	0
SEC4-3	0	+	0	+/-	+	+	-	+/-	++	0	0	++	0	0
SEC3-133	0	0	-	+/-	+	-	-	+/-	++	0	0	0	0	0
SEC3-189	0	0	0	+/-	+	-	-	+/-	+	0	0	0	0	0
SEC3-22	0	0	-	+/-	+	-	-	+/-	++	0	0	++	0	0
SEC3-40	0	0	0	+/-	+	-	-	+/-	++	0	0	++	0	0
SEC1-4	0	0	0	+/-	+	-	-	+/-	++	0	0	++	++	0
SH4	0	0	0	0	+	-	-	0	++	+	0	++	++	++
SH5	0	0	-	0	0	-	-	0	++	+	0	++	++	++
SH6	0	0	0	-	+	-	-	-	++	++	0	++	++	++
SH7	+	0	-	0	+	-	-	0	++	+	0	++	++	++
SH8	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SH9	0	0	-	0	+	-	-	0	+	+	0	++	++	++
SH62	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SH10	0	0	0	0	+	-	-	0	++	+	0	++	++	++
SH11	0	0	0	0	+	-	-	0	++	++	0	++	++	++
SH13	0	+	0	0	+	+	-	0	++	++	0	++	++	++
SH14	+	+	0	0	+	+	-	0	++	+	0	++	++	++
SH15	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SEC3-79	0	+	-	+/-	+	+	-	+/-	++	0	0	0	0	0
SH16	+	0	-	-	0	-	-	-	++	++	0	++	++	++
SH17	0	+	-	0	+	+	-	0	++	+	0	0	++	++
SH18	0	0	-	-	+	-	-	-	++	++	0	++	++	++
SEC3-193	0	0	-	0	+	-	-	0	+	+	0	0	++	0
SH19	0	0	-	0	+	-	-	0	++	+	0	++	++	++
SH20	0	0	0	0	+	-	-	0	++	+	0	++	++	++
SH21	0	+	-	0	+	+	-	0	++	++	0	++	++	++

Site ref	SA1 Cultural Heritage	SA2 Landscape	SA3 Biodiversity, Flora & Fauna	SA4 Climate Change Mitigation	SA5 Climate Change Adaptation	SA6 Natural Resources	SA7 Pollution	SA8 Waste	SA9 Transport & Accessibility	SA10 Housing	SA11 Equality	SA12 Health & Wellbeing	SA13 Economy	SA14 Education
SH22	0	0	0	0	+	-	-	0	++	+	0	0	++	++
SH23	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SH24	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SH25	0	+	-	-	+	+	-	-	++	++	0	0	++	++
SH26	0	0	0	0	+	-	-	0	+	+	0	++	++	++
SH27	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SH28	0	+	-	0	0	+	-	0	++	+	0	++	++	++
SH29	0	+	0	0	+	+	-	0	++	+	0	+	++	++
SH30	0	+	-	0	+	+	-	0	++	+	0	++	++	++
SH31	0	0	0	0	+	-	-	0	+	+	0	++	++	++
SH32	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SH33	+	0	0	0	+	-	-	0	++	+	0	++	++	++
SH34	+	0	0	-	+	-	-	-	++	++	0	++	++	++
SH35	0	0	-	-	0	-	-	-	++	++	0	++	++	+
SH36	0	0	-	0	0	-	-	0	++	+	0	++	++	++
SH37	0	0	-	-	+	-	-	-	+	++	0	++	++	++
SEC3-66	+	0	-	+/-	+	-	-	+/-	+	0	0	0	0	0
SH38	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SM1	+	+	0	-	+	+	-	-	++	++	0	++	++	++
SH40	0	+	0	0	+	+	-	0	++	+	0	0	++	++
SH41	0	0	0	-	+	-	-	-	++	++	0	++	++	++
SH42	0	+	0	0	+	+	-	0	++	+	0	+	++	++
SEC1-3	0	0	0	+/-	+	-	-	+/-	++	0	0	+	++	0
SH43	0	0	-	0	+	-	-	0	++	+	0	++	+	++
SH44	0	0	0	0	+	-	-	0	++	+	0	++	++	++
SH47	0	0	0	0	+	-	-	0	++	+	0	++	++	++
SM3	0	+	0	-	+	+	-	-	++	++	0	++	++	++
SH49	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SM4	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SH50	0	+	0	0	+	+	-	0	++	++	0	++	++	++
SH51	0	0	0	0	+	-	-	0	++	+	0	++	++	++
SM5	0	0	0	0	+	-	-	0	++	+	0	++	++	++
SM6	0	+	0	-	+	+	-	-	++	++	0	++	++	++
SM7	0	+	0	-	+	+	-	-	++	++	0	++	++	++
SH52	0	0	0	0	+	-	-	0	++	+	0	++	++	++
SM8	0	+	0	-	+	+	-	-	++	++	0	++	++	++
SH53	0	+	0	0	+	+	-	-	++	+	0	0	++	++
SH54	0	0	0	0	+	-	-	0	++	++	0	0	++	++
SH55	0	0	0	-	+	-	-	-	++	++	0	0	++	++
SH56	0	+	0	0	+	+	-	0	++	+	0	0	++	++
SH57	0	+	0	0	+	+	-	0	++	+	0	0	++	++

Site ref	SA1 Cultural Heritage	SA2 Landscape	SA3 Biodiversity, Flora & Fauna	SA4 Climate Change Mitigation	SA5 Climate Change Adaptation	SA6 Natural Resources	SA7 Pollution	SA8 Waste	SA9 Transport & Accessibility	SA10 Housing	SA11 Equality	SA12 Health & Wellbeing	SA13 Economy	SA14 Education
SH58	0	0	0	-	+	-	-	-	++	++	0	0	++	++
SG1	0	0	0	+/-	+	-	-	+/-	++	+	0	0	++	++
SH59	0	0	-	0	0	-	-	0	++	+	0	++	++	++
SH61	0	+	0	0	+	+	-	0	++	+	0	0	++	++
SEC1-1	0	+	0	+/-	+	+	-	+/-	++	0	0	++	0	0
SEC1-8	0	0	0	+/-	+	-	-	+/-	++	0	0	++	++	0
SEC1-5	0	0	0	+/-	+	-	-	+/-	++	0	0	++	++	0
SEC1-6	0	+	0	+/-	0	+	-	+/-	++	0	0	++	++	0
SEC1-2	0	0	0	+/-	+	-	-	+/-	++	0	0	++	++	0
SEC1-7	0	0	-	+/-	0	-	-	+/-	++	0	0	++	0	0
SM2	0	0	0	-	0	-	-	-	++	++	0	++	++	++
SH45	0	0	0	0	0	-	-	0	++	0	0	++	++	++
SH63	0	0	0	0	+	-	-	0	++	+	0	++	++	++
SH65	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SH64	0	+	0	0	+	+	-	0	++	+	0	0	++	++
SH66	0	+	0	0	+	+	-	0	++	+	0	++	++	++

6.3 Whole plan appraisal

6.3.1 The following chapters present an assessment of the likely significant effects associated with the SLP in relation to the following topics:

- Air (**Chapter 7**);
- Biodiversity, flora and fauna (**Chapter 8**);
- Climatic factors (**Chapter 9**);
- Cultural heritage (**Chapter 10**);
- Human health (**Chapter 11**);
- Landscape (**Chapter 12**);
- Population and material assets (**Chapter 13**);
- Soil (**Chapter 14**); and
- Water (**Chapter 15**).

6.3.2 Each of the topic sections are presented in terms of baseline, impacts, mitigation and residual effects, where appropriate. The topics have been appraised in terms of plan-wide impacts and draw on all aspects of the SA process, including the findings presented for the assessment of policies and site allocations (see **Volume 2: Appendices** for the full assessments). The assessments include consideration of the impacts arising as a consequence of the inter-relationship between the different topics and identify secondary, cumulative and synergistic effects where they arise.

7 Air

7.1 Introduction

7.1.1 Poor air quality is among the largest environmental risks to public health in the UK. Several objectives have been established in relation to air quality at the European, UK and regional levels seeking to reduce emissions of specific pollutants to minimise adverse effects on health and the environment. Key legislation / PPPs include the Environment Act (2021)⁴⁹ which sets out air quality as a priority area, the Air Quality Plan for NO₂⁵⁰ and the Clean Air Strategy⁵¹.

7.2 Baseline and key issues

7.2.1 The entirety of Sandwell Borough is designated as an Air Quality Management Area (AQMA), known as 'Sandwell AQMA'. The AQMA was declared in 2005, due to exceedances in the national annual mean objectives for nitrogen dioxide (NO₂)⁵² owing to the borough's large areas of established industry and complex road network of major arterial roads, including the M5 and M6 motorways.

7.2.2 The principal source of air pollution in Sandwell is vehicle exhaust emissions. Elevated NO₂ levels are observed at busy junctions, narrow congested streets and in town centres. The adjacent authorities of Dudley, Walsall and Wolverhampton are also wholly designated as AQMAs.

7.2.3 The Air Quality Action Plan for Sandwell⁵³ and the Air Quality Annual Status Report⁵⁴ states that NO₂ concentrations in seven areas continue to exceed the annual mean objective. Whilst this represents a decrease compared to the extent of exceedances which led to the AQMA's declaration, the Action Plan sets out key priorities for the Council to continue to improve air quality and reduce associated adverse health impacts, including:

- Developing specific measures in consultation with communities to reduce NO₂ concentrations at 'hot spot' locations;
- Promoting public transport, walking, cycling and switching to low or zero emission vehicles;

⁴⁹ Environment Act 2021. Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted> [Date accessed: 07/08/24]

⁵⁰ DEFRA and DfT (2018) Air quality plan for nitrogen dioxide (NO₂) in UK. Available at: <https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017> [Date accessed: 07/08/24]

⁵¹ DEFRA (2019) Clean Air Strategy. Available at: <https://www.gov.uk/government/publications/clean-air-strategy-2019/clean-air-strategy-2019-executive-summary> [Date accessed: 07/08/24]

⁵² DEFRA (2024) AQMAs Declared by Sandwell Metropolitan Borough Council. Available at: https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=222 [Date accessed: 07/08/24]

⁵³ Sandwell Metropolitan Borough Council (2020) Air Quality Action Plan 2020 – 2025. Available at: <https://www.sandwell.gov.uk/downloads/download/396/air-quality-action-plan-2020-2025> [Date accessed: 07/08/24]

⁵⁴ Sandwell Metropolitan Borough Council (2023) Air Quality Annual Status Report. Available at: <https://www.sandwell.gov.uk/downloads/file/719/2023-air-quality-annual-status-report> [Date accessed: 29/08/24]

- Reviewing what impact the council has on air quality in its role as a provider of public services and develop a plan to reduce emissions from its activities;
- Supporting and encourage taxi and private hire vehicle operators and drivers in reducing emissions from vehicles;
- Applying existing and developing new planning development policies that support air quality improvements;
- Developing information, social media and campaigns to encourage behaviour change around improving physical health and increasing use of low emission vehicles; and
- Working in partnership with Birmingham City Council to minimise negative impacts on Sandwell residents resulted from the implementation of the Clean Air Zone.

7.2.4 As all proposed development in Sandwell will be located within an AQMA, this is likely to lead to adverse impacts on health and may prevent the Council from achieving air quality targets. It is assumed that new development proposals would result in an increase in traffic and thus could potentially increase traffic-related air pollution. Both existing and future residents would be exposed to this change in air quality.

7.2.5 It is widely accepted that the effects of air pollution from road transport decreases with distance from the source of pollution. The Department for Transport (DfT) in their Transport Analysis Guidance consider that, *"beyond 200m from the link centre, the contribution of vehicle emissions to local pollution levels is not significant"*⁵⁵. This statement is supported by National Highways and Natural England based on evidence presented in a number of research papers^{56 57}. Exposure to road transport associated emissions may have long term health impacts.

7.2.6 Air pollution, particularly excessive nitrogen deposition, is known to be harmful to the health and functioning of natural habitats.

⁵⁵ Department for Transport (2019) TAG unit A3 Environmental Impact Appraisal. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf [Date accessed: 04/07/24]

⁵⁶ Bignal, K., Ashmore, M & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

⁵⁷ Ricardo-AEA (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report No. 199.



Key issues for air quality include:

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

7.3 Impacts on air

7.3.1 **Box 7.1** presents a plan-wide summary of the adverse impacts on air that have been identified through the SA process. These adverse impacts are those identified prior to mitigation considerations.

Box 7.1: Summary of identified impacts on air

Impact on air	Summary of identified impact
 <p>Increased pollutant emissions</p>	<p>Impacts on air quality may arise during the construction and occupation of different types of development proposed within the SLP. Some types of new development, such as employment locations, local facility provisions or the cumulative impact of high-density residential development, are likely to increase the volume of traffic and associated emissions within the SLP area.</p> <p>As a result, associated transport-related emissions including NO₂ and PM₁₀ will be released into the atmosphere, with potential adverse effects on local air quality.</p>
 <p>Exposure of human and biodiversity receptors to poor air quality</p>	<p>An increase in air pollution from new development including vehicular emissions could potentially have adverse impacts on biodiversity assets, in particular European sites and SSSIs which are vulnerable to the impact of atmospheric nitrogen deposition, such as nearby SSSIs 'Wren's Nest' or 'The Leasowes'. Ecological networks in Sandwell are also vulnerable to eutrophication, acidification and increased toxicity as a result of increased emissions.</p> <p>Exposure to sources of air pollution could potentially have adverse effects on the health of local residents, with children, the elderly and those of poor health identified as the most vulnerable. Development within or in close proximity to AQMAs would be likely to make it more difficult to achieve National Air Quality Objectives⁵⁸ within these areas.</p> <p>The entirety of Sandwell is currently classed as an AQMA. Consequently, all allocated sites are located within Sandwell AQMA. In addition, the majority</p>



⁵⁸ Defra (no date) UK and EU Air Quality Limits. Available at: <https://uk-air.defra.gov.uk/air-pollution/uk-eu-limits> [Date accessed: 09/07/24]

Impact on air	Summary of identified impact
	<p>of site SH43 is located within 200m of Birmingham AQMA, and site SEC1-5 lies adjacent to Dudley AQMA.</p> <p>Some 48 allocated sites are located within 200m of a main road, raising the potential for exposure of site end users to atmospheric pollution from traffic.</p>

7.4 Local Plan mitigation

7.4.1 **Box 7.2** lists the policies within the SLP which would be likely to mitigate, either fully or partially, some of the identified adverse impacts on air. Where there are no mitigating policies, or the contents of the SLP only partially mitigates the adverse impacts, a residual adverse effect is identified.

Box 7.2: Mitigating effects of the Local Plan policies on air

Policy mitigation for air	Summary of mitigating effect
 <p>Policy mitigation for impact of increased pollutant emissions</p>	<p>Various policies support improved low-emission forms of transport provision, including Policy STR1: Priorities for the development of the transport network and Policy STR9: Planning for low emission vehicles, as well as policies STR2, STR3, STR4, STR5, STR6, STR8 and SHW3. These policies support a reduction in private car use through improved public transport connectivity and supporting methods of sustainable and active travel, whilst seeking to improve traffic flow to reduce pollutant emissions.</p> <p>Policy SCC2: Reducing operational carbon for new build non-residential development, supported by Policy SCC1 – Energy Infrastructure, Policy SDS2: Increasing efficiency and resilience and Policy SDMI: Design Quality, promote energy-efficient development proposals which support low carbon technologies, which will likely result in a decrease of pollutant emissions from the construction and occupation of new development.</p> <p>Policy SDS8: Green and Blue Infrastructure in Sandwell and Policy SNE3: Provision, retention and protection of trees, woodlands and hedgerows encourage enhancements to the provision and connectivity of GI/BI, which will help to support ecosystem service functions such as the filtration of air pollutants and could potentially result in reducing impacts from increased emissions.</p>
 <p>Policy mitigation for exposure of human and biodiversity receptors to poor air quality</p>	<p>Policy SHW3: Air quality will only permit development where it can be demonstrated that it will not further deteriorate existing poor air quality, supported by Policy SHWI: Health Impact Assessments. Any development that has potential to lead to significant adverse impacts on air quality will need to provide an air quality assessment.</p> <p>Policy SDS2: Increasing efficiency and resilience ensures that development proposals will be designed to mitigate climate change impacts, in order to avoid a reduction in air quality and subsequently adverse impacts on human health. The policy is underpinned by other policies that aim to avoid changes in air quality through promoting energy efficiency for new development, including Policy SDMI: Design Quality, Policy SCC1: Energy Infrastructure and Policy SCC2: Reducing operational carbon for new build non-residential development. Policy SDS8: Green and Blue Infrastructure in Sandwell and Policy SNE3: Provision, retention and protection of trees, woodlands and hedgerows encourage enhancements to the provision and connectivity of GI/BI, which will help to support ecosystem service functions such as the filtration of air pollutants and could potentially result in improvements to air quality.</p> <p>Various policies seek to improve traffic flow and promote sustainable and active modes of transport in order to avoid reductions in air quality, including Policy STR1: Priorities for the development of the transport network and Policy STR5: Creating coherent networks for cycling and walking, as well as policies STR2, STR3, STR4, STR6, STR8 and Policy STR9.</p>

7.5 Residual effects on air

7.5.1 Drawing on the information presented in **Box 7.1** and **7.2**, **Box 7.3** explores the nature of the residual effects on air.

Box 7.3: Residual effects for air

Residual effects	Further details of the residual effect
<div style="font-size: 2em; font-weight: bold; border: 2px solid black; border-radius: 50%; width: 40px; height: 40px; display: flex; align-items: center; justify-content: center; margin: 0 auto;">1</div> <p style="font-weight: bold; margin-top: 10px;">Increased pollutant emissions</p>	<p>The policies outlined in Box 7.2, coupled with technological advances and alternative solutions to energy generation and transport modes, will help to reduce the extent of emissions over time. However, an increase in air pollutants including NO₂ and PM₁₀ is expected following the development proposed within Sandwell.</p> <p>Increased traffic volumes and increased energy demand will be likely as a result of the introduction of 10,434 dwellings and 1,221ha of employment floorspace. Increased pollutant emissions will be likely as a result of the new development and therefore associated impacts on air quality.</p> <p>An increase in pollutant emissions will be likely to be a long-term but potentially temporary significant effect.</p>
<div style="font-size: 2em; font-weight: bold; border: 2px solid black; border-radius: 50%; width: 40px; height: 40px; display: flex; align-items: center; justify-content: center; margin: 0 auto;">2</div> <p style="font-weight: bold; margin-top: 10px;">Exposure of human and biodiversity receptors to poor air quality</p>	<p>The introduction of 10,434 dwellings and 1,221ha of employment floorspace will be expected to increase the number of vehicles, and consequently vehicle emissions, in the Plan area. The policies outlined in Box 7.2 are expected to reduce the likelihood of adverse impacts occurring and could potentially help reduce these adverse impacts. Strategies implemented through the West Midlands Transport Plan⁵⁹ and the Sandwell Air Quality Action Plan⁶⁰ will complement the SLP policies. However, due to the volume of development proposed within an existing AQMA, an increase in traffic flows and subsequent reduction of air quality will be expected to have residual adverse effects which cannot be fully mitigated through the SLP policies alone.</p> <p>A reduction in air quality across Sandwell would be expected to be a long-term but potentially temporary significant effect.</p>

⁵⁹ Movement for Growth: The West Midlands Strategic Transport Plan. Available at: <https://www.tfwm.org.uk/media/3ukj3yw0/movement-for-growth.pdf> [Date accessed: 23/08/24]

⁶⁰ SMBC (2020) Air Quality Action Plan 2020-2025. Available at: <https://www.sandwell.gov.uk/downloads/download/396/air-quality-action-plan-2020-2025> [Date accessed: 23/08/24]

8 Biodiversity, flora and fauna

8.1 Introduction

- 8.1.1 The conservation of biological and geological diversity and the protection and monitoring of endangered and vulnerable species and habitats is of great importance. National and European policies identify a hierarchy of designations which aim to promote the protection and enhancement of the natural environment. Key PPPs include the 25 Year Environment Plan⁶¹ and the Biodiversity Strategy for England⁶² which seek to halt biodiversity loss, promote nature recovery, and expand multi-functional green infrastructure (GI) networks.
- 8.1.2 The Environment Act 2021⁶³ introduced targets, plans and policies for improving the natural environment. An important aspect of the Act is the focus on biodiversity net gain (BNG), and the incorporation of the Statutory Biodiversity Metric⁶⁴ into law to ensure all new development delivers 10% net gain in biodiversity. Mandatory BNG has since come into force for Town and Country Planning Act developments as of February 2024⁶⁵. Sandwell has conducted a Biodiversity Net Gain Study⁶⁶ to inform the delivery of BNG as part of the SLP.
- 8.1.3 Local-level action plans for biodiversity and GI strategies should reflect these ecosystem-wide approaches and complement this with local priorities and goals to ensure that the Plan area's wildlife, ecology, geology and ecosystem services are protected and enhanced.

⁶¹ HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [Date accessed: 04/07/24]

⁶² Department for Environment, Food & Rural Affairs (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services. Available at: <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services> [Date accessed: 04/07/24]

⁶³ Environment Act 2021. Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted> [Date accessed: 04/07/24]

⁶⁴ HM Government (2024) Statutory biodiversity metric. Available at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides> [Date accessed: 04/07/24]

⁶⁵ Natural England (2022) Get ready for the new Biodiversity Net Gain legislation. Available at: <https://naturaleland.blog.gov.uk/2024/02/12/get-ready-for-new-biodiversity-net-gain-legislation/> [Date accessed: 04/07/24]

⁶⁶ Lepus Consulting (2023) Biodiversity Net Gain Study. Available at: <https://www.sandwell.gov.uk/downloads/file/1553/sandwell-biodiversity-net-gain-bng-strategy-september-2023-> [Date accessed: 08/07/24]

8.2 Baseline and key issues

European sites

- 8.2.1 European sites provide valuable ecological infrastructure for the protection of rare, endangered and/or vulnerable natural habitats and species of exceptional importance within the EU. These sites consist of Special Areas of Conservation (SACs) designated under the Habitats Directive, and Special Protection Areas (SPAs) classified under the Birds Directive. Additionally, paragraph 187 of the NPPF (2023) requires that sites listed under the Ramsar Convention are to be given the same protection as fully designated European sites.
- 8.2.2 The closest European sites to Sandwell are 'Fens Pools' SAC approximately 3km to the west and 'Cannock Extension Canal' SAC approximately 8km to the north. Threats and pressures to Fens Pools include habitat fragmentation and water pollution⁶⁷, and for Cannock Extension Canal water pollution and air pollution are key threats⁶⁸.
- 8.2.3 A Habitats Regulations Assessment (HRA)⁶⁹ has been prepared alongside the development of the SLP to provide an in-depth assessment of the potential threats and pressures to a number of European sites and analysis of potential impact pathways. The outputs of the HRA process have been used to inform the SA.

National and local designations

- 8.2.4 There are no Sites of Special Scientific Interest (SSSIs) within Sandwell. Nearby SSSIs include 'Wren's Nest' and 'The Leasowes' in Dudley. SSSI Impact Risk Zones (IRZs) within Sandwell flag larger scale industrial / commercial development as requiring consultation with Natural England such as aviation and quarrying, rather than residential development likely to be within influence of the SLP.
- 8.2.5 There are no National Nature Reserves (NNRs) located within the SLP area, but both 'Wren's Nest' and 'Saltwells' NNRs lie within 1km of the Sandwell boundary to the west, in Dudley.
- 8.2.6 Nine Local Nature Reserves (LNRs) are located 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). This includes recent boundary amendments to some SLINCs at 'Alexandra Road', 'John's Lane', 'Land at Yew Tree' and 'Brandhall' as a result of ecology survey work conducted between 2019 and 2022, endorsed by the Local Sites Partnership. Areas of geological interest include Sandwell Valley Country Park and the Rowley Hills.
- 8.2.7 National and local biodiversity designations in and around Sandwell are shown on **Figure 8.1**.

⁶⁷ Natural England (2014) Site Improvement Plan: Fens Pools. Available at: <http://publications.naturalengland.org.uk/file/4872756676001792> [Date accessed: 04/07/24]

⁶⁸ Natural England (2014) Site Improvement Plan: Cannock Extension Canal. Available at: <http://publications.naturalengland.org.uk/file/6749431462363136> [Date accessed: 04/07/24]

⁶⁹ Lepus Consulting (2024) Sandwell Local Plan Regulation 19: Habitats Regulations Assessment.

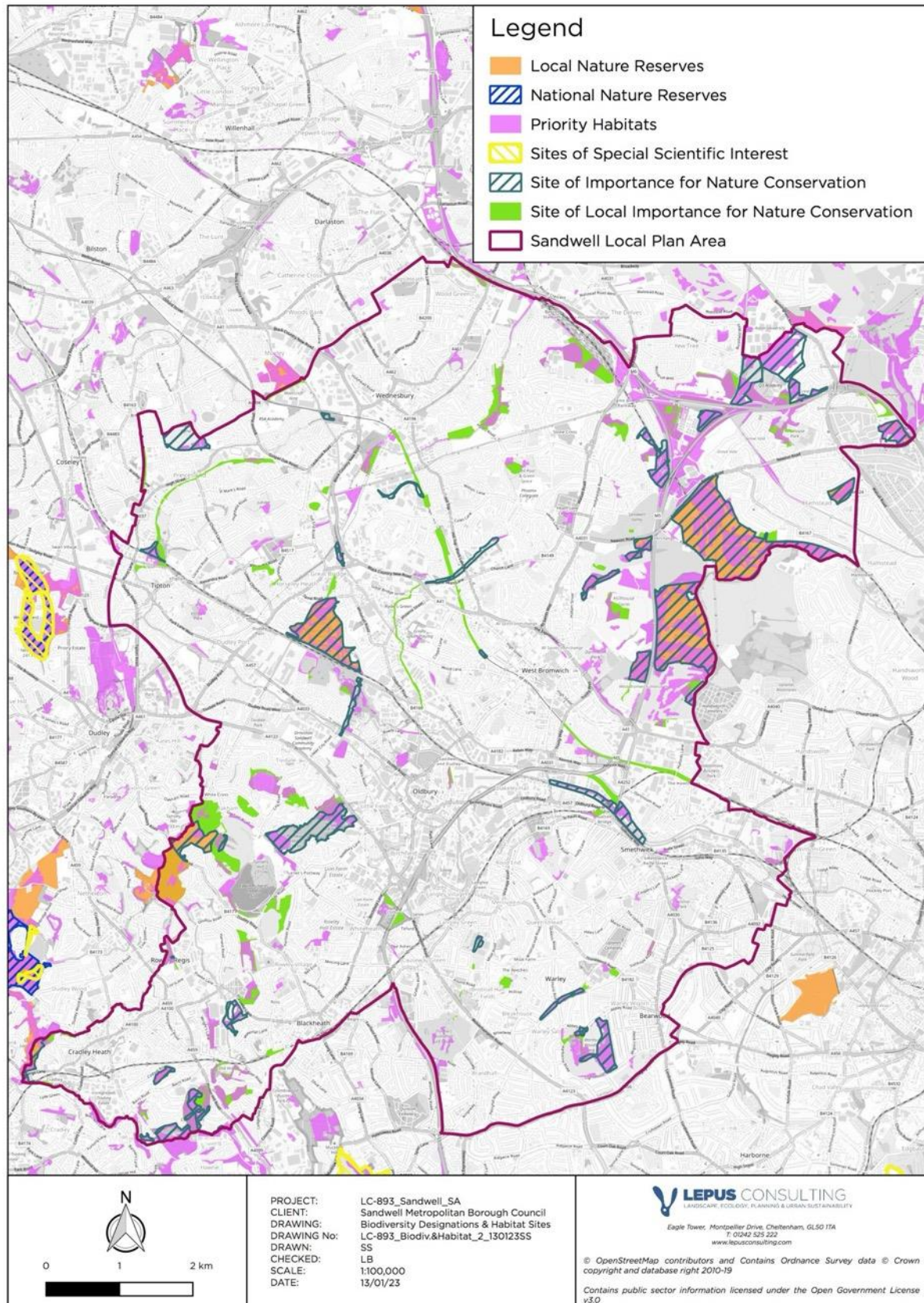


Figure 8.1: Biodiversity sites and habitats in and around the SLP area (source: Natural England and SMBC)

Habitats and green infrastructure

- 8.2.8 Priority habitats found within Sandwell include deciduous woodland, coastal and floodplain grazing marsh, and good quality semi-improved grassland. Some small extents of lowland priority habitats including heathland, meadows and acid grassland can also be found. Careful consideration should be given during the plan-making process to the potential impacts on habitats and species of principle importance in accordance with the NERC Act 2006⁷⁰.
- 8.2.9 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 NPPF⁷¹. There are very few areas of ancient woodland within the SLP area.
- 8.2.10 Sandwell contains a relatively small area of Green Belt land; however, it supports a high level of ecological value⁷² with opportunities for implementing the Nature Recovery Network (see **Figure 8.2**). Multi-functional GI assets including natural and semi-natural features within the urban areas should also be conserved and enhanced to support ecosystem services and nature recovery.

⁷⁰ Natural Environment and Rural Communities Act 2006. Available at:
<http://www.legislation.gov.uk/ukpga/2006/16/contents> [Date accessed: 04/07/24]

⁷¹ 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: 04/07/24]

⁷² EcoRecord (2019) An Ecological Evaluation of the Black Country Green Belt, October 2019. Available at:
<https://blackcountryplan.dudley.gov.uk/media/13896/an-ecological-evaluation-of-the-black-country-green-belt-final-report-2019-redacted.pdf> [Date accessed: 04/07/24]

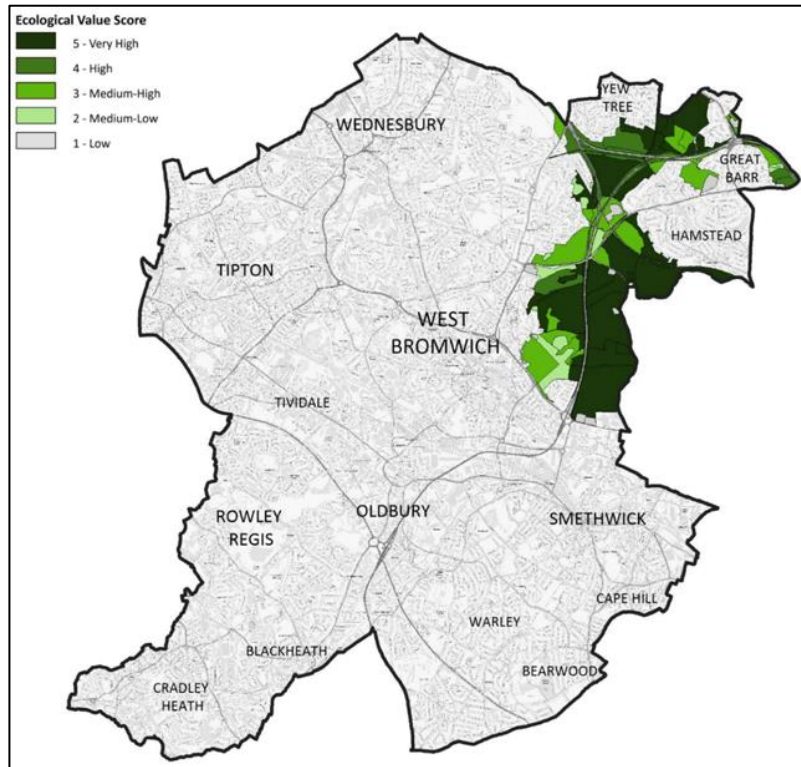


Figure 8.2: The Ecological Value Score of Sandwell's Green Belt⁷³

⁷³ Ibid.

Key issues for biodiversity, flora and fauna include:

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



Key issues relating to areas designated pursuant to Directives 79/409/EEC and 92/43/EEC (the Birds and Habitats Directives)

- ⇒ The following vulnerabilities have been identified in the HRA screening process alongside the Local Plan preparation:
 - Water quality and quantity issues (Fens Pools SAC, River Mease SAC, Ensor's Pool SAC, Humber Estuary SAC, SPA and Ramsar, Severn Estuary SAC, SPA and Ramsar and Cannock Extension Canal SAC); and
 - Air quality (Fens Pools SAC and Cannock Extension Canal SAC).
 - The Publication Draft HRA (2024) includes an appropriate assessment which was undertaken to assess these identified likely significant effects more precisely in the context of European site conservation objectives, and the protective framework provided by the emerging Local Plan policies, alongside existing planning policy frameworks.
- ⇒ Taking into consideration these factors, the HRA concluded that the SLP would have no adverse impact on site integrity at any European site, either alone or in-combination.

8.3 Impacts on biodiversity, flora and fauna

8.3.1 **Box 8.1** presents a plan-wide summary of the adverse impacts on biodiversity, flora and fauna that have been identified through the SA process. These adverse impacts are those identified prior to mitigation considerations.

Box 8.1: Summary of identified impacts on biodiversity, flora and fauna




Impact on biodiversity	Summary of identified impact
 <p>Threats or pressures to European sites</p>	<p>A number of likely significant effects (LSEs) have been identified in the HRA screening process with regard to several European sites as described in section 8.2; this includes adverse effects across a number of impact pathways including regarding air quality, and water quality and quantity.</p>
 <p>Threats or pressures to locally designated and non-statutory biodiversity sites</p>	<p>Adverse impacts on locally designated sites arising due to development proposed in the SLP could potentially include direct impacts on habitats and / or indirect impacts such as increased recreational disturbance caused by local residents visiting these sites.</p> <p>Six allocated sites have been identified as having potential to result in adverse impacts on LNRs, including site SH43 where a small proportion coincides with 'Forge Mill Lake', sites SEC3-26 and SH13 which are located in close proximity to 'Saltwells' and 'Mousesweet Brook', and sites SH5, SH35 and SEC1-1 which are located in close proximity to 'Sheepwash'.</p> <p>Three allocated sites have been identified as having potential to result in adverse impacts on SINC's, including site SH43 where a small proportion coincides with 'Forge Mill, Sandwell Valley', site SH21 which lies adjacent to 'Gower Branch Canal' and site SH30 which lies adjacent to 'Ridgeacre Branch Canal'.</p> <p>Some 23 allocated sites have been identified as having potential to result in adverse impacts on SLINC's. Nine sites coincide with SLINC's such as sites SH9 and SH18 where these sites wholly encompass 'Friar Park', where the remaining 14 sites are also located adjacent to SLINC's.</p>
 <p>Fragmentation of the ecological network and priority habitats</p>	<p>Over half of all allocated sites are located on previously undeveloped land or land with environmental value, which is likely to result in the loss of soil resources and the ecosystem services they provide. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases of fragmentation or loss of habitats and connections between habitats will occur. High levels of development and increased density within the urban area of Sandwell may also result in losses to the GI network, where it is important to retain ecological links amongst built form.</p> <p>In addition, priority habitats support a range of species of principal importance. Some 12 allocated sites partially/wholly coincide with priority habitats covering 8% of the total cumulative site allocation area, including deciduous woodland and good quality semi-improved grassland.</p> <p>Potential impacts associated with loss of habitats include:</p> <ul style="list-style-type: none"> • Direct effects: Permanent loss of priority habitat in short term. • Secondary effects: Such as reduced habitat connectivity and increased fragmentation, with increased fragility of habitats.

Impact on biodiversity	Summary of identified impact
	<ul style="list-style-type: none"> • Indirect effects: Reduced ecological coherence.

8.4 Local Plan mitigation

8.4.1 Several policies within the SLP aim to protect and enhance biodiversity within the borough. The policies discussed in **Box 8.2** are expected to provide effective protection for biodiversity assets, and are therefore likely to mitigate some of the adverse impacts identified in **Box 8.1**.

Box 8.2: Mitigating effects of the Local Plan policies on biodiversity, flora and fauna

Policy mitigation for biodiversity	Summary of mitigating effect
 <p>Threats or pressures to European sites</p>	<p>Policy SNE1: Nature conservation ensures development will not be permitted where this has potential to result in an adverse impact on an internationally designated site, including the Fens Pools SAC and the Cannock Chase SAC.</p> <p>An HRA has been prepared to identify any likely significant effects as a consequence of the emerging Local Plan on European sites within the influence of the SLP. The nature of effects and the mitigation of those effects are evaluated in the emerging HRA.</p>
 <p>Threats or pressures to locally designated and non-statutory biodiversity sites, priority habitats and species</p>	<p>Policy SNE1: Nature Conservation seeks to protect, conserve and enhance biodiversity assets including local designations. Where the benefits of development strategically outweigh the importance of a local nature conservation site, <i>"damage must be minimised"</i> and remaining impacts must be fully mitigated with an accompanying mitigation strategy.</p> <p>Policy SNE2: Protection and enhancement of wildlife habitats supports the provision and enhancement of priority habitats as part of the implementation of biodiversity net gain.</p>
 <p>Fragmentation of the ecological network and priority habitats</p>	<p>Policy SNE1: Nature Conservation 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>. This is supported by Policy SNE2: Protection and enhancement of wildlife habitats, which lays out the foundations for implementing the Local Nature Recovery Strategy and BNG, as well as integrating local opportunities for habitats to thrive amongst new development.</p> <p>Policy SNE3: Provision, retention and protection of trees, woodlands and hedgerows aims to utilise these biodiversity features for habitat creation and the restoration of ecological networks. This is supported by Policy SDS8: Green and Blue Infrastructure in Sandwell, Policy SNE5: The Rowley Hills and Policy SNE6: Canals, all of which seek to improve habitat creation and enhancement in the Plan area.</p>

8.5 Residual effects on biodiversity, flora and fauna

8.5.1 Drawing on the information presented in **Boxes 8.1** and **8.2**, **Box 8.3** explores the nature of the residual effects and, where applicable, provides further recommendations for mitigation or enhancement of biodiversity, flora and fauna in Sandwell.

Box 8.3: Residual effects for biodiversity, flora and fauna

Residual effects	Further details of the residual effect
<p style="text-align: center; font-size: 2em; font-weight: bold;">1</p> <p>Threats or pressures to European sites</p>	<p>Drawing on the protective framework provided by the SLP, and existing protection measures set out in existing planning policy frameworks that serve to help overcome the identified potential adverse effect, the HRA Appropriate Assessment concluded that the SLP will have no adverse impact on site integrity at any European site, either alone or in-combination.</p>
<p style="text-align: center; font-size: 2em; font-weight: bold;">2</p> <p>Threats or pressures to locally designated and non-statutory biodiversity sites</p>	<p>The SLP policies regarding biodiversity are not likely to fully mitigate potential adverse impacts on LNRs, SINC and SLINC sites situated in proximity to the proposed development. Although these will ensure locally designated and non-statutory biodiversity assets are protected, conserved and enhanced wherever possible, not all remaining impacts are fully mitigated. As a result, there is potential for residual impacts on locally designated or non-statutory biodiversity sites, including habitat loss and recreational impacts. These will require further conservation and enhancement of biodiversity assets and improvements to the wider GI network.</p> <p>Threats and pressures on locally designated and non-statutory biodiversity sites is expected to be a long-term and permanent significant effect.</p>
<p style="text-align: center; font-size: 2em; font-weight: bold;">3</p> <p>Fragmentation of the ecological network and priority habitats</p>	<p>Despite BNG provisions at the site level, there remains potential for cumulative adverse impacts on biodiversity at the landscape scale, or where the majority of a site coincides with a priority habitat such as where SEC3-193 coincides with deciduous woodland. Incremental habitat losses will be likely as a result of construction resulting from the SLP on undeveloped land which will include the loss of soil resources. Ecological links between biodiversity assets are unlikely to be protected, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network.</p> <p>Fragmentation of the ecological network and loss of priority habitats across Sandwell is expected to be a long-term and permanent significant effect.</p>

9 Climatic factors

9.1 Introduction

- 9.1.1 Anthropogenic climate change is predominantly the result of greenhouse gas (GHG) emissions. GHGs are emitted from a wide variety of sources, including transport, construction, agriculture and waste. Typically, development leads to a net increase in GHG emissions in the local area, although efforts can be made to help limit these increases.
- 9.1.2 Commitments to reduce GHG emissions have been introduced from the international level to the sub-regional level. The PPPs address policy development across all sectors and at all levels, combining both demand management (reduced energy consumption and increased efficiency of use) and supply-side measures (low carbon options and renewables). The Committee on Climate Change (CCC)'s latest progress report⁷⁴ discusses the need for further measures to be implemented by the government to ensure the UK meets the target of net zero by 2050. The West Midlands Combined Authority are aiming to achieve net zero by 2041, with key priorities identified in their Five Year Plan⁷⁵.
- 9.1.3 The Environment Agency (EA) provides guidance on flood risk for planners, developers and advisors in order to inform flood risk assessments and the plan-making process and stresses the importance of making allowances for climate change⁷⁶. Adaptation measures proposed by the PPPs include a presumption against development in flood risk areas, appropriate design of new development, the promotion of new infrastructure such as Sustainable Drainage Systems (SuDS), measures to increase biodiversity, measures dealing with overheating and improved maintenance to help address the changes that are likely to occur as a result of climate change.

⁷⁴ CCC (2022) Reducing UK emissions: 2024 Progress Report to Parliament. Available at: <https://www.theccc.org.uk/publication/progress-in-reducing-emissions-2024-report-to-parliament/> [Date accessed: 20/07/24]

⁷⁵ West Midlands Combined Authority (2022) WM2041 Five Year Plan 2021 – 2026. Available at: <https://www.wmca.org.uk/what-we-do/environment-and-energy/> [Date accessed: 08/07/24]

⁷⁶ Environment Agency (2022) Flood risk assessments: climate change allowances. Available at: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances> [Date accessed: 08/07/24]

9.2 Baseline and key issues

Carbon emissions

9.2.1 The latest UK local authority emissions estimates⁷⁷ indicate that Sandwell has lower per capita carbon dioxide (CO₂) emissions compared to the average for the West Midlands and nationally (see **Table 5.1**). The dataset shows a general trend of reduced emissions over time; however, it will be an important role of the SLP to encourage sustainable development and construction and support low carbon energy sources and transport infrastructure to speed up this trend. Transport is the largest source of CO₂ emissions in Sandwell, followed by domestic.

Table 9.1: Estimated CO₂ emissions in 2022⁷⁸

	Total CO ₂ emissions estimates (kt CO ₂)	Per Capita CO ₂ emissions (t CO ₂)
Sandwell	1,247.3	3.6
West Midlands	26,732.4	4.4
National Total	243,641.3	4.3

9.2.2 SMBC declared a Climate Emergency in March 2020 and have produced a Climate Strategy⁷⁹ which sets out the target to reach carbon neutrality by 2041, and includes an Action Plan to reach this, based on six delivery themes as follows:

- Council estate and operations;
- The built environment;
- Transport;
- Waste;
- Adaptation; and
- Natural capital.

9.2.3 The Climate Change Strategy and each of the six action plans sets out progress to date, future ambitions and immediate actions for each service area. In addition, a Net Zero Carbon Policy Support Offsetting Document⁸⁰ assesses various options to address climate change within the Local Plan policies through carbon offsetting. The principles set out in the Strategy and Action Plan, and the Net Zero Carbon Policy Support Offsetting Document should be embedded into emerging SLP policies.

⁷⁷ DBEIS (2022) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2022. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-statistics-2005-to-2022> [Date accessed: 22/08/24]

⁷⁸ Ibid

⁷⁹ Sandwell Metropolitan Borough Council (2020) Climate Change Strategy 2020-2041. Available at: https://www.sandwell.gov.uk/info/200274/pollution/4402/climate_change_and_air_quality_in_sandwell [Date accessed: 08/07/24]

⁸⁰ Bioregional and Edgars (2024) SMBC Local Plan: Net Zero Carbon Policy Support Offsetting.

9.2.4 The layout and design of future development can have benefits to achieving sustainable development and reducing contributions to climate change. The SLP could potentially help to encourage the development of more energy efficient homes to help reduce Sandwell's GHG emissions. Energy efficient homes can include Eco Houses, Zero Carbon Homes and Passivhaus⁸¹.

9.2.5 The promotion of on-site renewable or low carbon technologies incorporated with new development in the SLP would help to decrease reliance on energy that is generated from unsustainable sources, such as fossil fuels.

Flooding

9.2.6 Climate change is anticipated to increase the risk of extreme weather events, leading to rising risk of flooding. Surface water flooding in urban areas may increase in particular in light of more torrential and frequent rainfall events, especially during winter. Extents of low, medium and high surface water flood risk are present across the SLP area (see **Figure 5.1**).

9.2.7 Some significant areas of Flood Zones 2, 3a and 3b can be found throughout Sandwell and particularly in the north, associated with the River Tame (see **Figure 5.2**).

9.2.8 Indicative Flood Zone 3b can be found in the central and northern areas of Sandwell (see **Figure 5.2**). This has been identified within the previous Black Country Level 1 Strategic Flood Risk Assessment (SFRA)⁸² which was the most up-to-date SFRA at the time site assessments took place. An updated Level 1 SFRA⁸³ for Sandwell now supersedes the Black Country Level 1 SFRA. This document identifies flood risk across the Sandwell, from all sources in the present and in the future. The assessment has identified potential increases in flood risk due to climate change and produced modelled outputs.

9.2.9 Careful consideration should be given to the level of flood risk new residents are exposed to, as well as the impacts of development on risk. It is good practice to make allowances for climate change in flood risk assessments⁸⁴. Allowing for the impacts of climate change helps to minimise vulnerability whilst providing greater resilience to flooding by anticipating changes to peak river flows, peak rainfall intensities, sea level rise and offshore wind speeds. Climate change allowances can be based on climate change projections under different CO₂ scenarios.

9.2.10 Increased naturalisation of watercourses and restoration of the flood plain, including the opening up of culverts where possible, would help to reduce the risk of flooding, as well as provide benefits to biodiversity, amenity and water quality.

⁸¹ Urbanist Architecture (2022) How to design Eco, Passivhaus and Zero Carbon Homes. Available at: <https://urbanistarchitecture.co.uk/how-to-design-eco-houses-passivhaus-and-zero-carbon-houses/> [Date accessed: 08/07/24]

⁸² JBA Consulting (2020) The Black Country Authorities Level 1 Strategic Flood Risk Assessment Final Report 25th June 2020. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date accessed: 08/07/24]

⁸³ JBA Consulting (2024) SMBC Level 1 Strategic Flood Risk Assessment.

⁸⁴ Environment Agency (2022) Flood risk assessments: climate change allowances. Available at: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances> [Date accessed: 08/07/24]

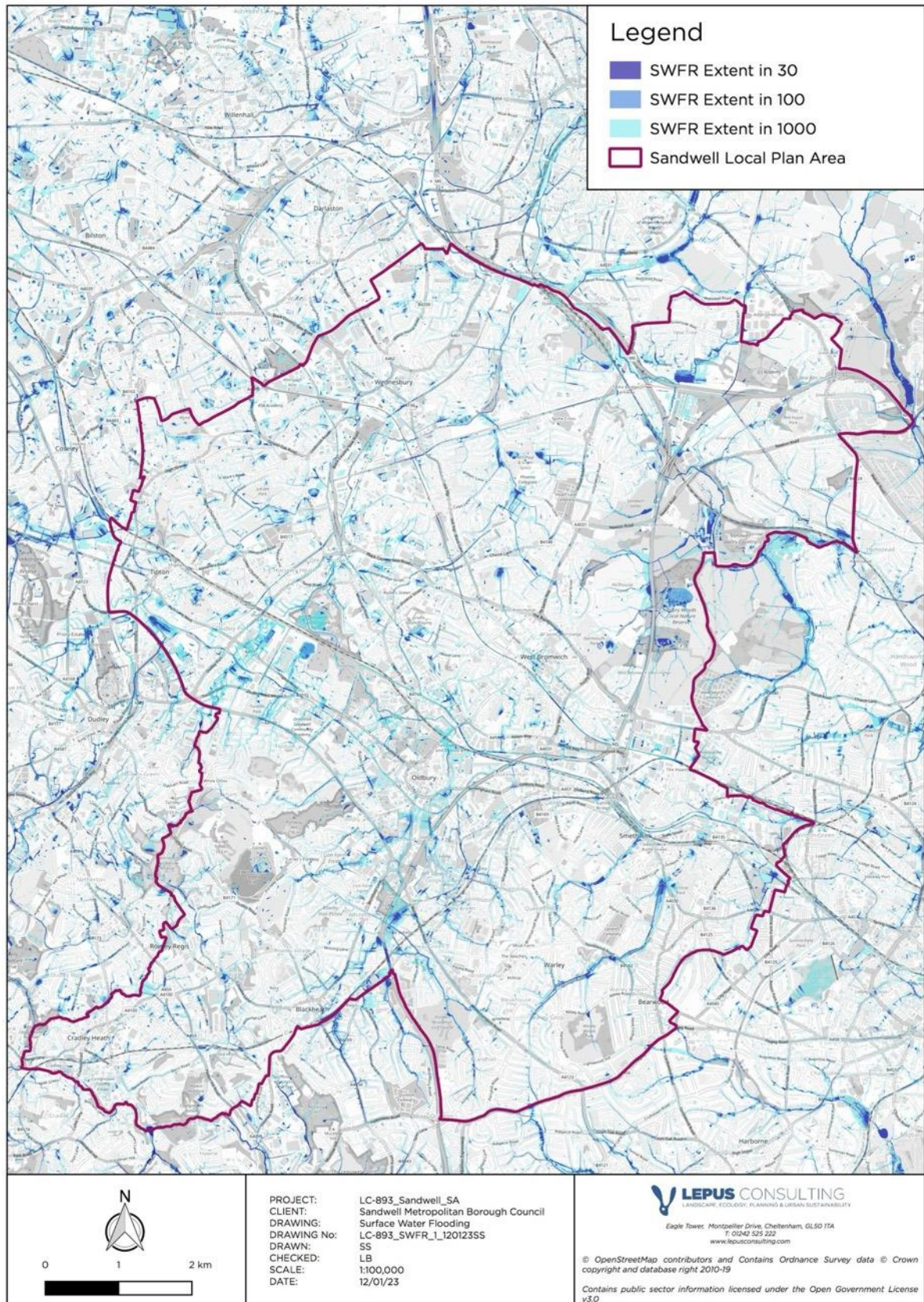


Figure 9.1: Extent of Surface Water Flood Risk in and around the SLP area (source: JBA Consulting and Environment Agency)

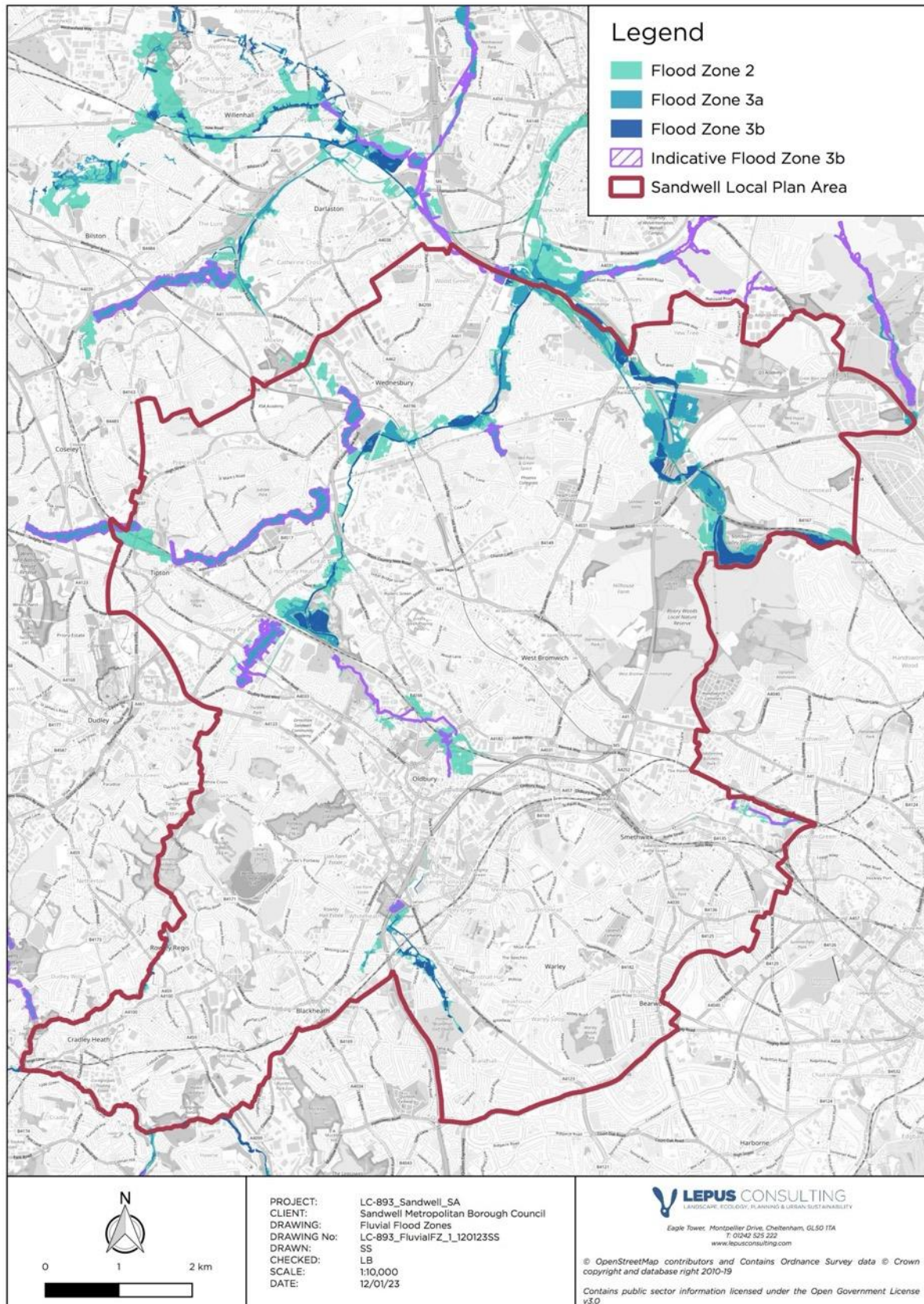


Figure 9.2: Fluvial Flood Zones and Indicative Flood Zone 3b within the SLP area (source: JBA Consulting and Environment Agency)

Green and blue infrastructure

- 9.2.11 Sandwell’s GI network has an important role to play in providing ecosystem services. A well-managed and robust GI network can provide many benefits including for human health, climate change adaptation and wildlife value. GI can play an important role in helping urban areas adapt to climate change, by filtering airborne pollutants, providing shade and local cooling, carbon sink functions, and reducing surface water runoff⁸⁵. The water environment (such as canals, rivers and ponds) can also be referred to as ‘blue infrastructure’ (BI) and often works alongside GI to provide multi-functional benefits including building resilience to climate change and acting as wildlife refuges and corridors.
- 9.2.12 Sandwell’s GI network includes natural and semi-natural features such as LNRs, SLINCs, SINCs, allotments, playing fields, parks, woodlands, field margins, hedgerows, golf courses and canals. These assets should be protected and enhanced where possible, to increase resilience to climate change as well as increasing wildlife and amenity value.

⁸⁵ Landscape Institute (no date) Green Infrastructure (GI). Available at: <https://www.landscapeinstitute.org/policy/green-infrastructure/> [Date accessed: 08/07/24]


Key issues for climatic factors include:



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

9.3 Impacts on climatic factors

9.3.1 **Box 9.1** presents a plan-wide summary of the adverse impacts on climatic factors that have been identified through the SA process, prior to consideration of mitigation or implementation of adaptive technologies.

Box 9.1: Summary of identified impacts on climatic factors


Impact on climatic factors	Summary of identified impact
 <p>Fluvial and surface water flood risk</p>	<p>Development within Flood Zones 2 or 3 (including 3a and 3b) has the potential to locate site end users at risk of fluvial flooding, may increase the risk of damage to property and increase risks to human health in the immediate area and/or contribute to exacerbation of flood risk in the surrounding areas.</p> <p>The majority of allocated sites are located in Flood Zone 1; however, five sites in total partially coincide with some areas of Flood Zones 2 and 3, which makes up 51.86ha of allocated land. These include eight sites with</p>

Impact on climatic factors	Summary of identified impact
	<p>capacity for housing (SH2, SH5, SH16, SH28, SH35, SH36, SH59 and SM2) and employment-led site SEC1-7.</p> <p>Indicative flood zone 3b is primarily based on an aggregated 1km square grid and is present in areas where flooding will potentially occur in the future due to climate change. Areas of indicative flood zone 3b are predominantly located in the north west and centre of the borough and affect a total of four sites including SEC3-9, SH35, SH36 and SH59.</p> <p>Additionally, development in areas of surface water flood risk may locate site end users in areas at risk of flooding, with safety implications, and further exacerbate flood risk in the surrounding area.</p> <p>A total of 78 allocated sites coincide with varying extents of surface water flood risk, including 34 sites with some land identified as high risk.</p>
 <p data-bbox="212 907 454 981">Increased GHG emissions</p>	<p>The proposed development of 10,434 dwellings and 1,221ha of employment floorspace within the SLP would be likely to increase to some extent local GHG emissions through increased energy demand associated with the occupation of new dwellings and employment premises, transport-related emissions, and the production and use of materials during construction / release of embodied carbon associated with redevelopment sites. This impact will be expected to contribute towards cumulative effects which exacerbate global climate change issues such as sea level rise and extreme weather events.</p>
 <p data-bbox="212 1191 478 1296">Loss of multi-functional green infrastructure</p>	<p>The proposed development within the SLP will cumulatively result in the loss of a significant area of previously undeveloped land or land with environmental/ecological value, despite there being 46 allocated sites in areas of previously developed land. Some of the proposed development could potentially also result in the loss of trees, hedgerows and other vegetation currently on site. Multi-functional GI is vital in helping to reduce adverse impacts of climate change.</p>

9.4 Local Plan mitigation

9.4.1 Climate, infrastructure, flood risk, sustainable transport and GI policies within the SLP will be likely to help reduce adverse impacts of the proposed development within the SLP in regard to climatic factors. Policies which are anticipated to help mitigate the impacts identified in **Box 9.1**, are discussed in **Box 9.2**.

Box 9.2: Mitigating effects of the Local Plan policies on climatic factors

Policy mitigation for climatic factors	Summary of mitigating effect
 <p data-bbox="212 1892 518 1975">Fluvial and surface water flood risk</p>	<p>Policy SCC5: Flood risk sets out measures to identify and manage the risk of flooding throughout the borough and ensure that development is avoided in areas of high fluvial and surface water flood risk, in line with the NPPF. The policy also encourages development proposals to naturalise urban watercourses and open up culverts to provide multi-functional benefits, including for reinstating natural river channels.</p> <p>Policy SCC6: Sustainable drainage underpins Policy SCC5 in relation to SuDS, outlining design requirements and states that "surface water</p>

Policy mitigation for climatic factors	Summary of mitigating effect
	<p><i>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: Nature Conservation, SDS8: Green and Blue Infrastructure in Sandwell, and SDM1: Design Quality 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>
<div data-bbox="212 987 507 1093"> </div> <p data-bbox="212 1115 454 1193">Increased GHG emissions</p>	<p>Various policies support improved low-emission forms of transport provision, including Policy STR1: Priorities for the development of the transport network and Policy STR9: Planning for low emission vehicles, as well as policies STR2, STR3, STR4, STR5, STR6, STR8 and SHW3. These policies support a reduction in private car use through improved public transport connectivity and supporting methods of sustainable and active travel, whilst seeking to improve traffic flow to reduce pollutant emissions.</p> <p>Policy SCC2: Reducing operational carbon for new build non-residential development, supported by Policy SCC1 – Energy Infrastructure, Policy SDS2: Increasing efficiency and resilience and Policy SDMI: Design Quality, promote energy-efficient development proposals which support low carbon technologies, which will likely result in a decrease of GHG emissions from the construction and occupation of new development.</p> <p>Policy SCC3: Climate-adapted design and construction aims to reduce the risk of heat gain and the urban heat island effect (UHI) through efficient building design. The policy requires “<i>passive ventilation</i>” and “<i>active cooling systems</i>”, in order to reduce heat gain lost to the environment, which has potential for cumulative adverse effects when considering the impacts of global warming as a consequence of climate change.</p> <p>Policy SCC4: Embodied carbon and waste aims to limit the amount of embodied carbon resulting from the proposed development by completing a whole-life carbon assessment for large-scale developments and considering a range of options for small-scale development.</p> <p>Policy SDS8: Green and Blue Infrastructure in Sandwell and Policy SNE3: Provision, retention and protection of trees, woodlands and hedgerows encourage enhancements to the provision and connectivity of GI/BI, which will help to support ecosystem service functions such as the filtration of air pollutants and could potentially result in reducing impacts from increased GHG emissions.</p>
<div data-bbox="212 1715 507 1821"> </div> <p data-bbox="212 1843 475 1966">Loss of multi-functional green infrastructure</p>	<p>Policy SDS8: Green and Blue Infrastructure in Sandwell sets out how the GI and BI network will be embedded into new development and how its connectivity will be improved across the borough. This policy is underpinned by Policy SCC3: Climate-adapted design and construction, Policy SCC5: Flood Risk, and Policy SHW4: Open Space and recreation, also indicate recommendations to maximise GI provision within Sandwell.</p> <p>Several policies including Policy SNE1: Nature conservation, Policy SNE2: Protection and enhancement of wildlife habitats, and Policy SNE3: Provision, retention and protection of trees, woodlands and</p>

Policy mitigation for climatic factors	Summary of mitigating effect
	hedgerows seek to improve biodiversity provision and ecological networks and Sandwell, which is likely to positively contribute to the conservation and enhancement of the GI/BI network.

9.5 Residual effects on climatic factors

9.5.1 The SLP sets out several policies which aim to help mitigate the adverse impacts relating to climatic factors (see **Box 9.2**). However, the implementation of these requirements will not be expected to fully mitigate the adverse impacts associated with net increases in GHGs. Box 9.3 lists the likely residual effects of the Plan in relation to climatic factors.

Box 9.3: Residual effects for climatic factors

Residual effects	Further details of the residual effect
<p style="text-align: center;">1</p> <p>Fluvial and surface water flood risk</p>	<p>The Level 1 SFRA (2024) set out a number of recommendations for SMBC to consider in regard to flood risk, including: to ensure that flood risk is reduced through application of the Sequential Test, and where necessary the Exception Test; to promote SuDS to mimic natural drainage routes; reduce surface water runoff from new developments; to restore natural river corridors and habitats; and to seek opportunities for flood risk betterment.</p> <p>Assuming that the Sequential Test is passed, or the Exception Test is applied where required, and the recommendations of the SFRA are adopted, the SLP is expected to mitigate potential adverse impacts associated with development in areas at risk of fluvial or surface water flooding.</p>
<p style="text-align: center;">2</p> <p>Increased GHG emissions</p>	<p>The proposed development of 10,434 dwellings and 1,221ha of employment floorspace over the Plan period will be likely to increase to some extent local carbon emissions. Energy demand will be expected to increase in the Plan area, alongside increased congestion and transport related emissions.</p> <p>Although the policies within Box 9.2 will be expected to have a positive impact in helping to reduce GHG emissions, particularly in regard to energy efficient design, minimising the release of embodied carbon and the utilisation of low carbon sources, these measures are not expected to fully mitigate the impacts associated with the large quantum of growth expected from the SLP.</p> <p>An increase in GHG emissions as a consequence of the proposed development is expected to be a long-term and permanent significant effect.</p>
<p style="text-align: center;">3</p> <p>Loss of multi-functional green infrastructure</p>	<p>Various SLP policies aim to conserve and enhance multi-functional green and blue infrastructure across the borough, encouraging development proposals to incorporate GI and increase connectivity of the wider GI network. Furthermore, the SLP policies recognise the multi-functional benefits of GI in regard to ecosystem services and ensure development proposals seek to maximise opportunities to implement GI into developments.</p> <p>The SLP will result in the loss of greenfield land and associated GI to some extent, however SLP policies will ensure mitigation is in place to reduce the loss of GI and protect the wider GI network. A positive effect on provision of GI in the longer term is expected. This would be anticipated to have a positive effect in terms of promoting resilience to climate change.</p>

10 Cultural heritage

10.1 Introduction

10.1.1 Historic environment priorities from the international to local levels seek to address a range of issues, particularly in relation to the conservation and enhancement of heritage assets that are irreplaceable and play an important role in placemaking and the quality of life.

10.1.2 National and local guidance seeks to protect designated assets and their settings, including listed buildings, conservation areas (CAs), scheduled monuments (SMs) and registered parks and gardens (RPGs). Various PPPs seek to ensure that cultural aspects of landscapes are recognised and protected against inappropriate development, encourage recognition of the potential and actual value of unknown and undesignated assets, as well as the conservation and enhancement of sites and landscapes of archaeological and heritage interest so that they may be enjoyed by both present and future generations.

10.1.3 Historic England advocate the seeking of opportunities alongside development for delivering heritage-led regeneration⁸⁶, creating, revealing or enhancing local distinctiveness, encouraging the use of traditional building skills, and promoting climate change resilience and innovative reuse of historic buildings where appropriate⁸⁷. The SLP will also have a role to play in establishing cross-cutting provisions relating to development, including between the historic environment and the functionality of open spaces and landscape connectivity.

10.2 Baseline and key issues

10.2.1 Within Sandwell there are four RPGs (plus a section of 'Great Barr Hall, Walsall' RPG), seven SMs, nine CAs, two Grade I Listed Buildings, eight Grade II* Listed Buildings and 195 Grade II Listed Buildings (see **Figure 10.1**).

⁸⁶ BPF (2017) Heritage Works: A toolkit of best practice in heritage regeneration. Available at: <https://bpf.org.uk/our-work/research-and-briefings/heritage-works-a-toolkit-of-best-practice-in-heritage-regeneration/> [Date accessed: 08/07/24]

⁸⁷ Historic England (2016) Sustainability Appraisal and Strategic Environmental Assessment – Historic England Advice Note 8. Available at: <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/> [Date accessed: 08/07/24]

10.2.2 Six heritage assets within Sandwell are listed on Historic England's Heritage at Risk register⁸⁸: 'Chances Glassworks, Smethwick' SM; 'High Street, West Bromwich, Black Country' CA; 'Market Place, Wednesbury' CA; 'Great Barr Hall, Walsall' RPG; and the Listed Buildings 'Waterloo Hotel, Shireland Road, Smethwick' and 'Soho Foundry, Foundry Lane, Smethwick'. Local heritage initiatives include the Wednesbury High Street Heritage Action Zone (HSHAZ)⁸⁹ funded by Historic England, which seeks to restore, enhance and celebrate Wednesbury's historic town centre including the 'Market Place, Wednesbury' CA. Similar initiatives could be pursued to target improvement of other Heritage at Risk features.

⁸⁸ Historic England (2022) Heritage at Risk Register – Sandwell. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/results/?searchType=HAR&search=sandwell> [Date accessed: 08/07/24]

⁸⁹ Wednesbury High Street Heritage Action Zone. Available at: https://regeneratingsandwell.co.uk/sandwell_projects/wednesbury-high-street-heritage-action-zone/ [Date accessed: 08/07/24]

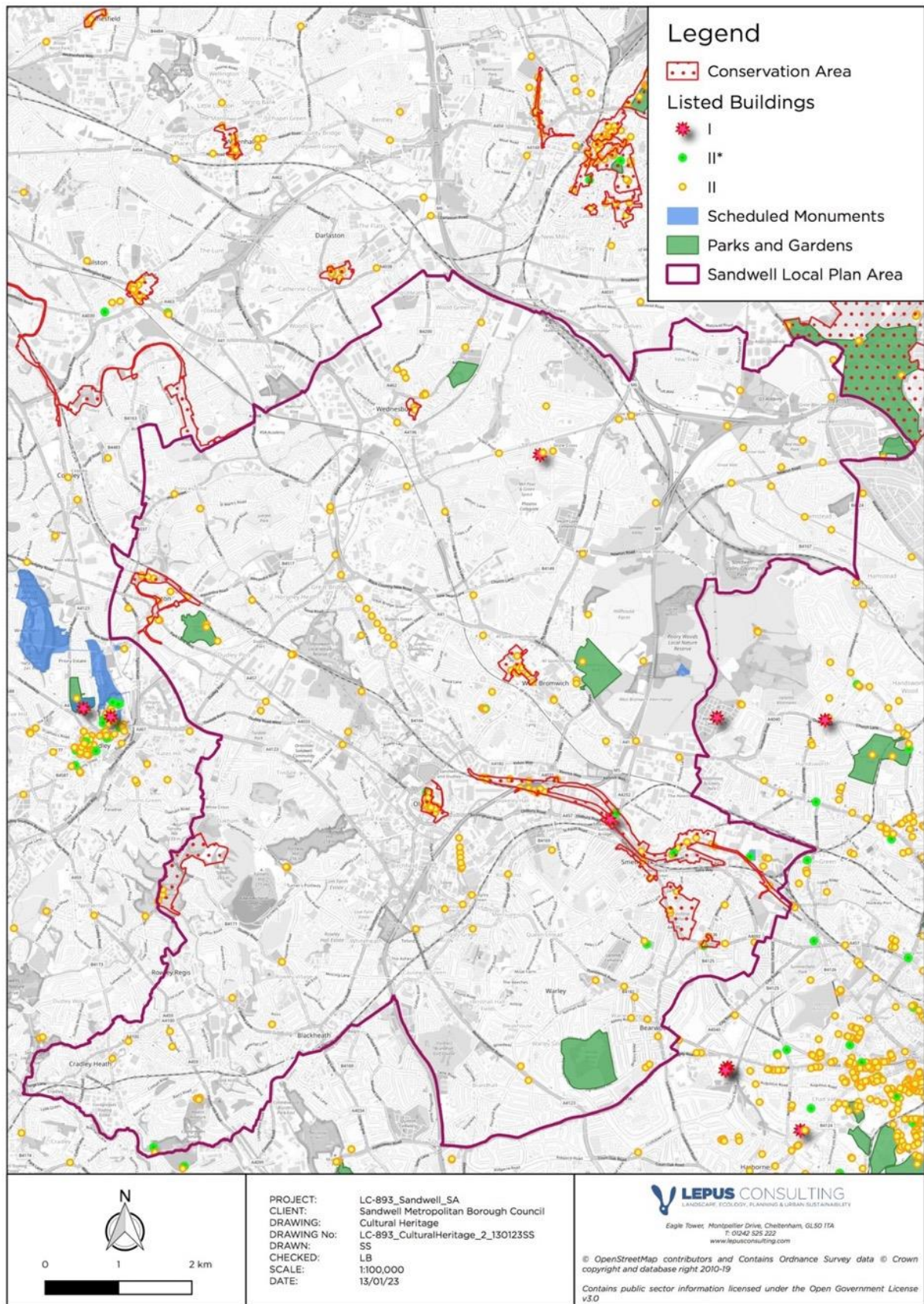


Figure 10.1: Cultural heritage assets in and around the SLP area (source: Historic England)

- 10.2.3 The Black Country Historic Landscape Characterisation (HLC) Study⁹⁰ 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. 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.
- 10.2.4 The HLC Study identifies 15 Character Areas within Sandwell. Like the other Black Country authorities, Sandwell has a rich industrial history, and this is reflected in the Character Areas with many aspects dominated by the legacy of mining as well as the canal and rail network, with significant housing growth particularly in the 19th Century.
- 10.2.5 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 "*where built heritage makes a significant contribution to the local character and distinctiveness*" and have been identified due to their sense of place, street plan and form, streetscape, views and setting, and representation. DLHHVs are "*designed landscapes that make an important contribution to local historic character but do not meet the criteria for inclusion on the national Register of Parks and Gardens*" and have been identified due to the date, preservation, aesthetics, and associations with people and past events. The HEADs including AHHTVs, DLHHVs and APAs are shown on **Figure 10.2**.
- 10.2.6 Impacts on heritage assets will be largely determined by the specific layout and design of development proposals. The level of impact will depend on the nature and significance of, and proximity of the proposal to, the heritage asset in question.
- 10.2.7 Adverse impacts on heritage assets can include direct loss or truncation of an asset, impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset. These negative impacts are expected to be long-term and irreversible. It is anticipated that the SLP will require a heritage statement and/or an archaeological desk-based assessment to be prepared to accompany future planning applications, where appropriate. This site-specific information will help to better identify and quantify effects, compared to the high-level appraisal that has been possible in the SA process, given the limited information that has been available to inform conclusions with regard to cultural heritage at this stage.

⁹⁰ Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf
[Date accessed: 08/07/24]

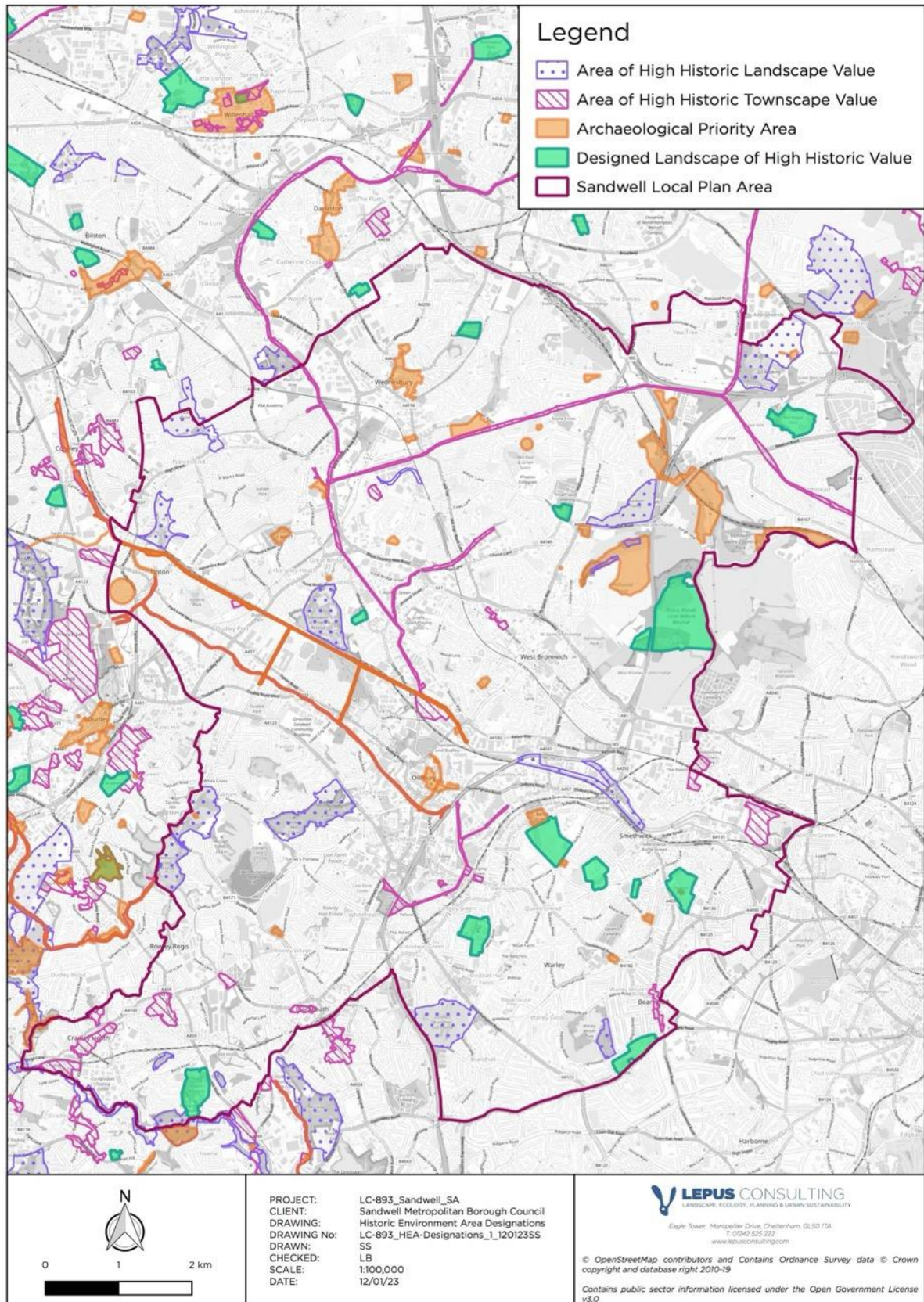


Figure 10.2: Historic Environment Area Designations in the SLP area (source: SMBC)


Key issues for cultural heritage include:

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


10.3 Impacts on cultural heritage

10.3.1 **Box 10.1** presents a plan-wide summary of the adverse impacts on cultural heritage that have been identified through the SA process. These adverse impacts are those identified prior to mitigation considerations and for cultural heritage relate primarily to the alteration of historic character and setting associated with designated heritage assets.

Box 10.1: Summary of identified impacts on cultural heritage

Impact on cultural heritage	Summary of identified impact
 <p>Alter character and/or setting of designated heritage assets</p>	<p>Development which coincides with or is located in close proximity to heritage assets has the potential to affect both the asset itself and its setting. This will depend on contextual factors relating to the nature and location of development and factors that contribute to the significance of heritage assets, including its setting.</p> <p>A total of five of allocated sites coincide with Listed Buildings, including SEC3-66 which coincides with Grade II* Listed Building 'Soho Foundry Former Boulton and Watt Foundry Pattern Stores and Erecting Shops', and sites SH7, SH14, SEC3-66 and SM1 which also coincide with Grade II Listed Buildings. The proposed development at 16 further sites in close proximity to Grade II* and Grade II Listed Buildings has the potential to adversely affect their settings.</p> <p>Conservation Areas (CAs) are identified as areas of architectural or historic interest and designated at a local level. The SA adopts a precautionary approach to the assessment by presuming that development within or in proximity to a CA has the potential to adversely impact the heritage asset and its setting. It is however acknowledged that the replacement of buildings which currently have a detrimental impact on a CA could potentially result in a neutral, mixed or beneficial effect (to be informed by published conservation area appraisals⁹¹ and site assessments).</p>

⁹¹ SMBC. Conservation Area Appraisals. Available at: <https://www.sandwell.gov.uk/planning/historic-environment/3> [Date accessed: 29/08/24]



Impact on cultural heritage	Summary of identified impact
	<p>A total of eight allocated sites coincide with a CA: Site SH7 and SH10 with 'Factory Locks', sites SM1, SH41, and SH54 with 'Smethwick, Galton Valley', SH51 and SM5 with 'High Street West Bromwich', and SH65 with 'High Street and Crocketts Lane'. Development at these eight sites will have potential to affect the character of the CA. A total of six allocated sites are located adjacent (SEC3-148, SEC4-4, SEC3-66 and SH55) or in close proximity (SH37 and SH58) to CAs, all of which would have the potential to affect the setting of the CAs.</p> <p>Scheduled monuments (SMs) are nationally important archeological sites or historic monuments which require protection to ensure the SM and its setting are conserved and enhanced. Some three sites coincide with SMs, including SEC3-66 which wholly coincides with 'Remains of the Boulton and Watt Soho foundry and mint', SM1 which wholly coincides with 'Chances Glassworks', and SH41 which wholly coincides with 'Smethwick Engine House' and partially coincides with 'Engine Arm Aqueduct'.</p> <p>Registered parks and gardens are designated heritage landscapes. Development in close proximity to an RPG has the potential to affect both the asset itself and its setting. One allocated site, SEC1-5, lies in close proximity an RPG 'Victoria Park, Tipton'.</p>
 <p>Effects on the historic environment</p>	<p>The Black Country Historic Landscape Characterisation (HLC) Study⁹² identified a number of Archeological Priority Areas (APAs), where there is high potential for these areas to contain particularly rare or well-preserved remains of high archaeological and historic interest.</p> <p>A total of three allocated sites including SH7, SH26 and SH33 directly coincide with APAs, and seven further sites lie adjacent to APAs.</p> <p>Several Areas of High Historic Townscape Value (AHHTVs) and Designed Landscapes of High Historic Value (DLHHVs) were also identified within the Black Country HLC Study are areas or landscapes which make an important contribution to historic character. A total of eight sites coincide with AHHTVs, including sites SEC3-99, SH33, SH34 and SEC3-66 which wholly coincide with AHHTVs, and sites SH7, SH14, SH16 and SM1 where the majority of the site coincides with AHHTVs.</p>

⁹² Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf
 [Date accessed: 07/08/24]

10.4 Local Plan mitigation

10.4.1 The SLP aims to maintain and enhance the natural and historic environment and preserve the local distinctiveness of townscapes and the industrial heritage within Sandwell. The policies anticipated to help conserve and enhance the historic environment and heritage assets are listed in **Box 10.2**.

Box 10.2: Mitigating effects of the Local Plan policies on cultural heritage

Policy mitigation for cultural heritage	Summary of mitigating effect
 <p>Alter character and / or setting of designated heritage assets</p>	<p>Policy SHE1: Listed buildings and conservation areas recognises that listed buildings, RPGs and SMs are an irreplaceable resource. 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: Development in the historic environment states that heritage assets within the borough will be <i>"retained and, wherever possible, enhanced and their settings respected"</i>.</p> <p>Policy SHE3: Locally listed buildings ensures heritage assets are conserved and enhanced, stating that development proposals affecting locally listed buildings will only be permitted where they <i>"positively contribute towards the significance of the heritage asset and avoid harm"</i>.</p> <p>Policy SDS5: Achieving well-designed places aims to ensure that new development conserves and where possible enhances the setting and significance of heritage assets, demonstrating a <i>"clear understanding of the local and wider context, character, heritage and local distinctiveness"</i>.</p>
 <p>Effects on the historic environment</p>	<p>Policy SHE1: Listed buildings and conservation areas states that development proposals will be required to <i>"conserve and enhance local character"</i> and those aspects of the historic environment together with their settings.</p> <p>Policy SHE2: Development in the historic environment states that areas of distinctive heritage within the borough will be <i>"retained and, wherever possible, enhanced and their settings respected"</i>.</p> <p>Policy SHE4: Archaeology states that <i>"development should protect and conserve both designated and non-designated archaeological assets and the character and setting of areas of acknowledged archaeological significance"</i>. The policy also requires sites with known archaeological potential to provide an archaeological assessment and / or field evaluation.</p> <p>Many SLP policies including Policy SDS1: Spatial Strategy for Sandwell and SDS3: Regeneration in Sandwell encourage regeneration and redevelopment of industrial land, town centres and canal corridors with potential opportunities for enhancement of cultural heritage features and historic buildings which can contribute to creating a strong sense of place and celebrating Sandwell's history.</p> <p>Policy SNE6: Canals recognises the historic, architectural, archaeological and cultural significance of the canal network and will ensure that any development proposals affecting canals will protect and enhance these aspects.</p>

10.5 Residual effects on cultural heritage

10.5.1 The SLP policies seek to mitigate potential adverse impacts on heritage assets due to the proposed development, as well as protect and enhance the townscape character and local distinctiveness of Sandwell, including the historic environment. The residual effects of the proposed allocations on heritage assets are discussed in **Box 10.3**.

Box 10.3: Residual effects for cultural heritage

Residual effects	Further details of the residual effect
<p style="text-align: center;">1</p> <p>Alter character and / or setting of designated heritage assets</p>	<p>The SLP policies will likely mitigate potential adverse impacts on designated heritage assets which may occur as a result of the development proposed within the SLP, including impacts on listed buildings, CAs, SMs, RPGs and their settings. Adverse impacts on the character or settings of designated heritage assets will likely be mitigated through SLP policies, primarily policies SHE1, SHE2 and SHE3.</p> <p>A range of legislation, the NPPF and published national and local guidance also affords protection to heritage assets in line with their significance.</p> <p>The SLP will be expected to mitigate the potential for significant impacts on the designated heritage assets arising from the proposed development sites, and a negligible impact is predicted overall.</p>
<p style="text-align: center;">2</p> <p>Effects on the historic environment</p>	<p>Areas of distinctive heritage including non-designated heritage assets identified within the HLC will likely be mitigated from potential adverse impacts which may occur as a result of the development proposed within the SLP, including impacts on APAs, AHHTVs and DLHHVs. Adverse impacts on historic character will likely be mitigated through SLP policies, primarily policies SHE1, SHE2 and SHE4. The SLP is expected to protect, conserve and enhance historic, architectural and archaeological features, and may lead to longer term benefits to Sandwell’s historic environment through encouraging regeneration and redevelopment of industrial land, town centres and canal corridors.</p>

11 Human health

11.1 Introduction

11.1.1 National and local health strategies and policies seek to promote the development of healthy communities, such as through delivering age-friendly environments for the elderly, encouraging healthier food choices and facilitating active travel. In line with the NPPF, local planning authorities should seek to promote social interaction, create communities which are safe and accessible, and ensure there is good accessibility to a range of GI, sports facilities, local shops, cultural buildings and outdoor space.

11.1.2 Key PPPs include Public Health England's Strategy for 2020 – 2025⁹³ which sets out priorities within the health system including a focus on addressing health inequalities, an issue that is particularly relevant for Sandwell.

11.2 Baseline and key issues

Air quality

11.2.1 As discussed in **Chapter 7**, the entirety of the SLP area is designated as an AQMA. Development proposals located within an AQMA, and particularly those in close proximity to main roads, are likely to expose site end users to transport associated noise and air pollution, with adverse impacts on health and wellbeing such as respiratory conditions, cardiac health and cancer.

11.2.2 As all proposed development in Sandwell will be located within an AQMA, this is likely to lead to adverse impacts on health and may prevent the Council from achieving air quality targets. It is assumed that new development proposals would result in an increase in traffic and thus could potentially increase traffic-related air pollution. Both existing and future residents would be exposed to this change in air quality.

Healthcare facilities

11.2.3 In order to facilitate healthy and active lifestyles for existing and new residents, the SLP should seek to ensure that residents have good access to NHS hospitals and GP surgeries.

11.2.4 Healthcare provision within the SLP area includes Sandwell General Hospital and Midland Metropolitan University Hospital⁹⁴ which is due to open in 2024, both of which provide an A&E services, and a total of 73 healthcare centres. Ideally, residents should be within an approximate ten-minute walking distance to their nearest GP surgery, whilst a hospital within 5km would be considered a sustainable distance. According to accessibility modelling data⁹⁵, almost the entirety of Sandwell lies within a sustainable 15-minute walking distance or travel time via public transport to a GP surgery (see **Figure 11.1**).

⁹³ Public Health England (2019) PHE Strategy 2020 to 2025. Available at: <https://www.gov.uk/government/publications/phe-strategy-2020-to-2025> [Date accessed: 08/07/24]

⁹⁴ NHS (2024) NHS hospitals overview. Available at: <https://www.nhs.uk/service-search/other-services/Accident-and-emergency-services/LocationSearch/428> [Date accessed: 20/08/24]

⁹⁵ Unpublished data provided to Lepus by the Council

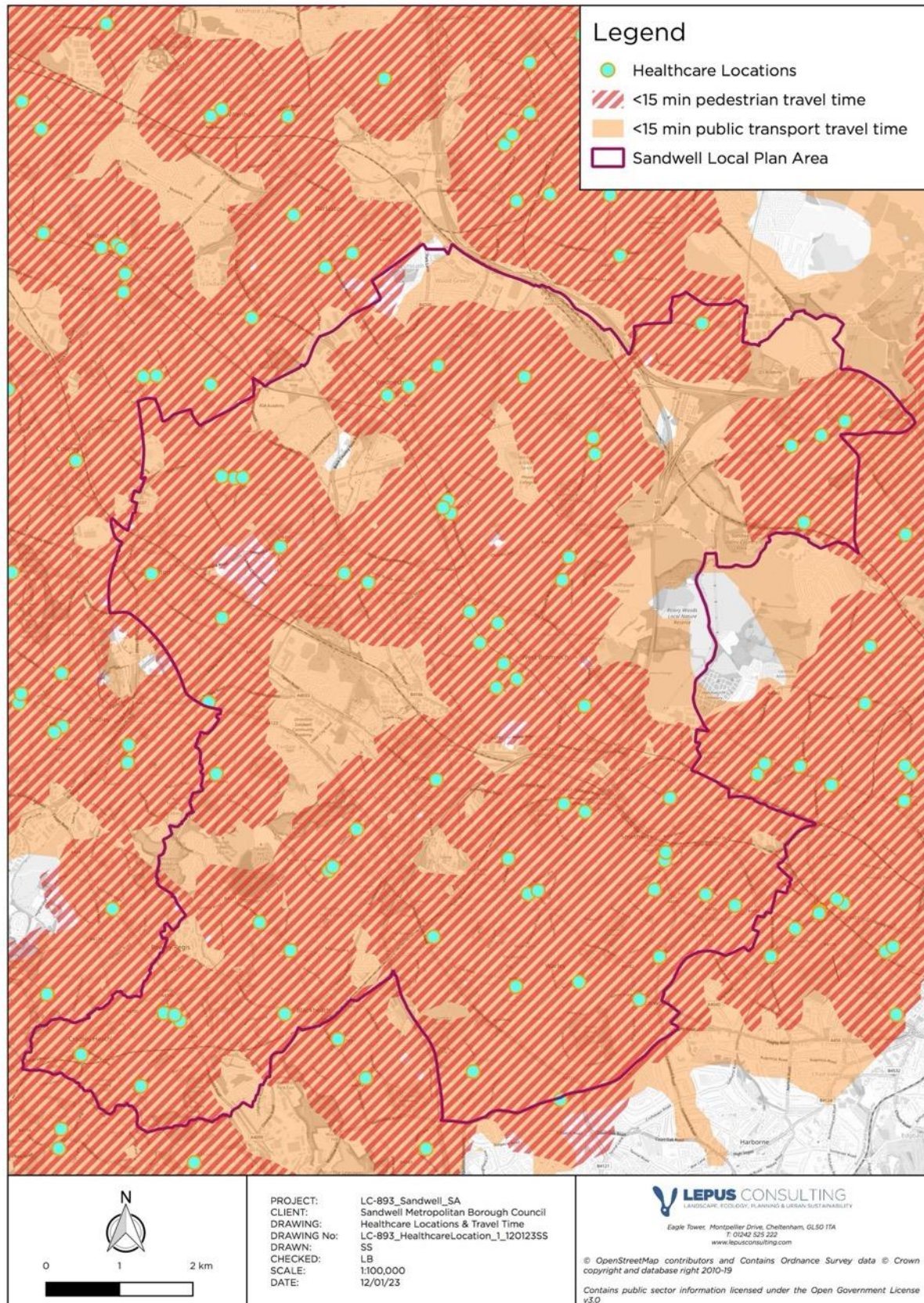


Figure 11.1: Location of healthcare facilities and modelled travel time across the SLP area (source: SMBC)

Green spaces

- 11.2.5 Opportunities to experience a diverse range of natural habitats and recreational spaces is known to be beneficial for physical and mental health and wellbeing. Good access to such areas can reduce stress, fatigue, anxiety and depression⁹⁶, and has been linked with healthy foetal growth in pregnant women, higher birth weights, healthy microbiomes in babies and reduced rates of obesity and type 2 diabetes. Impacts of restricted access to the natural environment are particularly significant for lower socio-economic groups.
- 11.2.6 Providing residents with sustainable access to a diverse range of natural habitats can be an effective means of reducing health inequalities in the area. According to the Green Space Strategy⁹⁷, Sandwell contains a total of 539 green sites covering an area of 2,042ha, equivalent to 24% of the total area of the borough, with 14% being accessible green space. Key features include parks, nature reserves and play areas. Other key elements of outdoor recreational space include the PRow network and the canal system, which serve a purpose in encouraging active travel.
- 11.2.7 The SLP area supports a network of biodiversity sites, providing local residents with opportunities to visit natural outdoor spaces and view wildlife (see **Chapter 3**).

Key issues for human health include:

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





11.3 Impacts on human health

- 11.3.1 **Box 11.1** presents a plan-wide summary of the adverse impacts on human health that have been identified through the SA process. These adverse impacts have been identified prior to considering opportunities for mitigation.

⁹⁶ Houlden. V., Weich. S. and Jarvis. S. (2017) A cross-sectional analysis of green space prevalence and mental wellbeing in England

⁹⁷ Sandwell Metropolitan Borough Council Green Space Strategy 2022 – 2025. Available at: <https://www.sandwell.gov.uk/downloads/download/109/green-spaces-strategy-implementation-and-business-plan-2223--2526> [Date accessed: 20/08/24]


Box 11.1: Summary of identified impacts on human health




Impact on human health	Summary of identified impact
 <p>Sustainable access to healthcare facilities</p>	<p>Sandwell is a predominately urban area, and as a consequence has access to a large number of health facilities. Sandwell General Hospital, as well as the Midland Metropolitan University Hospital (as of Autumn 2024) provides A&E services to the borough, and most areas have access to GP surgeries and leisure facilities. Where there is more limited access to these facilities, residents may be discouraged from living active and healthy lifestyles, which could potentially have adverse impacts on mental wellbeing as well as physical health.</p> <p>Some nine allocated sites are located outside of the 5km sustainable target distance to NHS hospitals providing an A&E service.</p> <p>Some 12 allocated sites are located outside of the 15-minute travel time via walking to GP surgeries, and two allocated sites (SEC3-22 and SH19) are located outside of the 15-minute travel time via public transport to GP surgeries.</p>
 <p>Exposure to air / noise pollution (from AQMAs / main roads)</p>	<p>The long-term health of residents, in particular vulnerable groups including children and the elderly, could be adversely affected by local reductions in air quality. This impact is discussed further in Chapter 7.</p> <p>The entirety of the SLP area is classified as an AQMA, known as 'Sandwell AQMA'. Development within 200m of an AQMA or main road could potentially expose site end users to increased levels of traffic related air pollution or noise impacts, with adverse implications for health.</p> <p>All allocated sites are located within Sandwell AQMA. In addition, the majority of site SH43 is located within 200m of Birmingham AQMA, and site SEC1-5 lies adjacent to Dudley AQMA.</p> <p>Some 48 allocated sites are located within 200m of a main road, raising the potential for air quality impacts associated with atmospheric pollution from vehicular traffic at these sites.</p>
 <p>Loss of public greenspace</p>	<p>Good access to public green or open spaces, a diverse range of natural habitats and travelling via walking and cycling are known to have physical and mental health benefits. Whilst there is generally good access to open space across Sandwell as a whole, there are spatial variations on existing access to different types and sizes of open space across different areas, and a total of eight sites have potential to result in a net loss of green space.</p>
 <p>Limited access to PRoW or cycle network</p>	<p>The majority of allocated sites are located in areas with good coverage by the PRoW and/or cycle networks, providing many site end users with opportunities for active travel and recreation parks, open space or the surrounding countryside. However, 13 allocated sites are located beyond the sustainable target distance of 600m to a PRoW or cycle path, where site end users may have more limited opportunities for outdoor recreation and active travel.</p>

11.4 Local Plan mitigation

11.4.1 Several SLP policies aim to promote healthy and active lifestyles for new and existing residents within the Plan area. Many of these policies are expected to result in benefits to human health, through the provision of open spaces, improvements to walking and cycling networks and improved sustainable transport and access to healthcare facilities. Mitigation is discussed further in **Box 11.2**.

Box 11.2: *Mitigating effects of the Local Plan policies on human health*

Policy mitigation for human health	Summary of mitigating effect
 <p>Sustainable access to healthcare facilities</p>	<p>Policy SDS1: Spatial Strategy for Sandwell seeks to direct housing growth towards locations with the highest levels of sustainable transport access to services including healthcare facilities.</p> <p>Policy SHW1: Health Impact Assessments sets out the requirement for certain development proposals to undertake an HIA to ensure that adverse effects associated with physical and mental health and access to and demand for health and social care services are addressed, and that opportunities for promoting healthy lifestyles are maximised.</p> <p>Policy SHW2: Healthcare infrastructure 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 has unacceptable impacts upon the functionality of healthcare facilities to “<i>contribute to the provision or improvement of such services</i>”, and will ensure there is sufficient capacity in healthcare infrastructure to serve new growth.</p> <p>Policy SDM9: Community facilities includes measures to increase provision for community and leisure facilities, which has potential to encourage site end users to live active and healthy lifestyles.</p> <p>Policy STR1: Priorities for the development of the transport network states that “<i>all new developments must provide adequate access for all modes of travel, including walking, cycling and public transport</i>”, which will likely improve access to healthcare and leisure facilities.</p>

Policy mitigation for human health	Summary of mitigating effect
 <p>Exposure to air / noise pollution (from AQMAs / main roads)</p>	<p>Policy SHW3: Air quality will only permit development where it can be demonstrated that it will not further deteriorate existing poor air quality, supported by Policy SHWI: Health Impact Assessments. Any development that has potential to lead to significant adverse impacts on air quality will need to provide an air quality assessment.</p> <p>Policy SCC2: Reducing operational carbon for new build non-residential development, supported by Policy SCC1: Energy Infrastructure, Policy SDS2: Increasing efficiency and resilience and Policy SDMI: Design Quality, promote energy-efficient development proposals which support low carbon technologies, which will likely result in a decrease of pollutant emissions from the construction and occupation of new development.</p> <p>Various policies seek to improve traffic flow and promote sustainable and active modes of transport in order to avoid reductions in air quality, including Policy STR1: Priorities for the development of the transport network and Policy STR5: Creating coherent networks for cycling and walking, as well as policies STR2, STR3, STR4, STR6, STR8 and Policy STR9.</p> <p>Policy SDS8: Green and Blue Infrastructure in Sandwell and Policy SNE3: Provision, retention and protection of trees, woodlands and hedgerows encourage enhancements to the provision and connectivity of GI/BI, which will help to support ecosystem service functions such as the filtration of air pollutants and could potentially result in reducing impacts from increased emissions.</p>
 <p>Loss of public greenspace</p>	<p>Policy SDS1: Spatial Strategy for Sandwell will ensure that new public open spaces are created to serve new housing developments.</p> <p>Policy SHW5: Playing fields and sports facilities and Policy SHW4: Open space and recreation will ensure sufficient greenspace and recreational space is available in Sandwell through addressing any shortfalls. These policies encourage wider community use of school playing fields and sports facilities as well as maintaining/enhancing the accessibility, quality and quantity of open spaces.</p> <p>Policy SDS8: Green and blue infrastructure in Sandwell provides measures to support green and blue infrastructure within the borough, increasing green cover through contributing to the provision and function of greenspaces in Sandwell.</p>
 <p>Limited access to PRow or cycle network</p>	<p>Policy STR1: Priorities for the development of the transport network prioritises access for all modes of travel for new developments, including walking and cycling.</p> <p>Policy STR5: Creating coherent networks for cycling and walking enables active travel through the provision of safe cycling and walking infrastructure, including the implementation of new cycle parking facilities, appropriate signage and active travel links to public transport.</p> <p>Various SLP policies including Policies STR3: Managing transport impacts of new development, STR6: Influencing the demand for travel and travel choices, SHW2: Healthcare infrastructure, SHW3:</p>

Policy mitigation for human health	Summary of mitigating effect
	<p>Air quality and SDS5: Achieving well-designed places include measures that aim to improve accessibility to active travel routes.</p>

11.5 Residual effects on human health

11.5.1 Many of the policies are expected to mitigate and result in positive impacts in relations to healthy lifestyles and access to healthcare facilities. Residual positive and negative effects of the SLP on human health are discussed in **Box 11.3**.

Box 11.3: Residual effects for human health

Residual effects	Further details of the residual effect
<p>1</p> <p>Limited sustainable access to healthcare facilities</p>	<p>The majority of site allocations are located within a sustainable target distance to an NHS hospital and GP surgery via walking and public transport methods. SLP policies, such as SHW1 and SHW2, are likely to increase sustainable access to facilities for a large number of residents, as well as improving the quality and capacity of existing services. Whilst the proposed growth within the SLP will be likely to increase demand for healthcare services, assuming that the SLP policies together with wider healthcare infrastructure improvements will ensure sufficient capacity to serve new development, an overall negligible effect is identified with regard to sustainable access to healthcare facilities and services.</p>
<p>2</p> <p>Exposure to air / noise pollution (from AQMAs / main road)</p>	<p>SLP policies are expected to reduce some adverse impacts associated with the exposure of site end users to poor air quality within the Sandwell AQMA, and impacts associated with reduced air and noise quality alongside main roads.</p> <p>The policies are expected to prevent unacceptable impacts on human health associated with air pollution but may lead to a cumulative adverse effect on air quality as a whole, which the policies in the Plan in itself cannot fully mitigate as it would require other transport interventions, for example the introduction of car-free zones.</p> <p>Adverse impacts on human health resulting from exposure to poor air quality and noise pollution across the Plan area would be expected to be a long-term but potentially temporary significant effect.</p>

Residual effects	Further details of the residual effect
<p style="text-align: center;">3</p> <p>Loss of public greenspace</p>	<p>Various SLP policies, as discussed within Box 11.2, seek to provide a range of open spaces, sports facilities and recreational spaces for site end users and compensate for any shortfalls, which will be expected to facilitate healthy and active lifestyles and supplement the borough’s existing recreational resource. An overall positive effect is likely with regard to the provision of and access to green spaces.</p>
<p style="text-align: center;">4</p> <p>Access to PRow or cycle network</p>	<p>A large number of allocated sites are located within close proximity to existing PRow and cycle paths. Various SLP policies seek to promote cycling and walking which is likely to improve the coverage of, and accessibility to, the pedestrian, PRow and cycle networks across Sandwell. This is expected to encourage residents to participate in physical exercise and active travel. An overall positive effect will be likely with regard to pedestrian and cycle access.</p>

12 Landscape

12.1 Introduction

12.1.1 At the European, national, regional and local levels emphasis is placed on the protection of landscape as an essential component of people's surroundings and sense of place. Landscape is described as comprising natural, cultural, social, aesthetic and perceptual elements. This includes flora, fauna, soils, land use, settlement, sight, smells and sound⁹⁸.

12.1.2 Various PPPs seek to increase recognition of the relationships between the different aspects of landscapes including but not limited to local distinctiveness, the historic environment, natural resources, farming and forestry, education, leisure and recreation, transport and infrastructure, and nature conservation.

12.1.3 National Design Guidance⁹⁹ advocates well-designed places that are functional, attractive and provide a sense of safety, inclusion and community cohesion. Landscape also links closely with GI, with well-managed GI networks providing multi-functional benefits including improving the health of people and wildlife.

12.2 Baseline and key issues

Green Belt

12.2.1 Sandwell is highly urbanised, with only a small extent of Green Belt land situated to the north east of the SLP area comprising the Sandwell Valley, forming part of the Green Belt surrounding the West Midlands Conurbation. Although Green Belt itself is not necessarily of high landscape value, it often serves to protect the character and setting of historic towns and support landscape-scale biodiversity networks. New development could potentially increase noise and light pollution and reduce the perception of tranquillity in some areas.

12.2.2 Whilst the Green Belt is not a statutory landscape designation, it is a significant element of landscape protection in the area. The Green Belt is intended to¹⁰⁰:

- check the unrestricted sprawl of larger built-up areas;
- prevent neighbouring towns from merging into one another;
- assist in safeguarding the countryside from encroachment;
- preserve the setting and special character of historic towns; and

⁹⁸ Natural England (2014) An Approach to Landscape Character Assessment. Available at: <https://www.gov.uk/government/publications/landscape-character-assessments-identify-and-describe-landscape-types> [Date accessed: 08/07/24]

⁹⁹ MHCLG (2023) National Design Guide: Planning practice guidance for beautiful, enduring and successful places. Available at: <https://www.gov.uk/government/publications/national-design-guide> [Date accessed: 08/07/24]

¹⁰⁰ MHCLG (2023) NPPF, Chapter 13: Protecting Green Belt land. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf [Date accessed: 08/07/24]

- assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

12.2.3 As part of the evidence base for the former BCP, the Green Belt Study¹⁰¹ classified parcels of Green Belt land into different 'harm' ratings, based on the assessment of potential harm caused by removing each parcel from the Green Belt based on a range of criteria (see **Figure 12.1**). Appropriate areas of the Green Belt which can support a limited amount of development will be identified through using the findings of the Green Belt Study, where identified housing requirements cannot be met within existing urban areas.

Landscape character and sensitivity

12.2.4 The Black Country Landscape Sensitivity Assessment¹⁰² assessed the sensitivity of Green Belt land to housing and commercial development. The aim of the study was to identify the extent to which the character and quality of Green Belt land is susceptible to change as a result of future development. Parcels of land were classified ranging from 'high' to 'low' sensitivity (see **Figure 12.2**).

12.2.5 It should be noted that although there is a relationship between the Landscape Sensitivity Assessment and the Green Belt Harm Assessment, the Green Belt Study states that "*there are fundamental distinctions in the purposes of the two assessments, reflecting the fact that landscape quality is not a relevant factor in determining the contribution to Green Belt purposes, or harm to those purposes resulting from the release of land*".

¹⁰¹ LUC (2019) Black Country Green Belt Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced_redacted.pdf [Date accessed: 08/07/24]

¹⁰² LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 08/07/24]

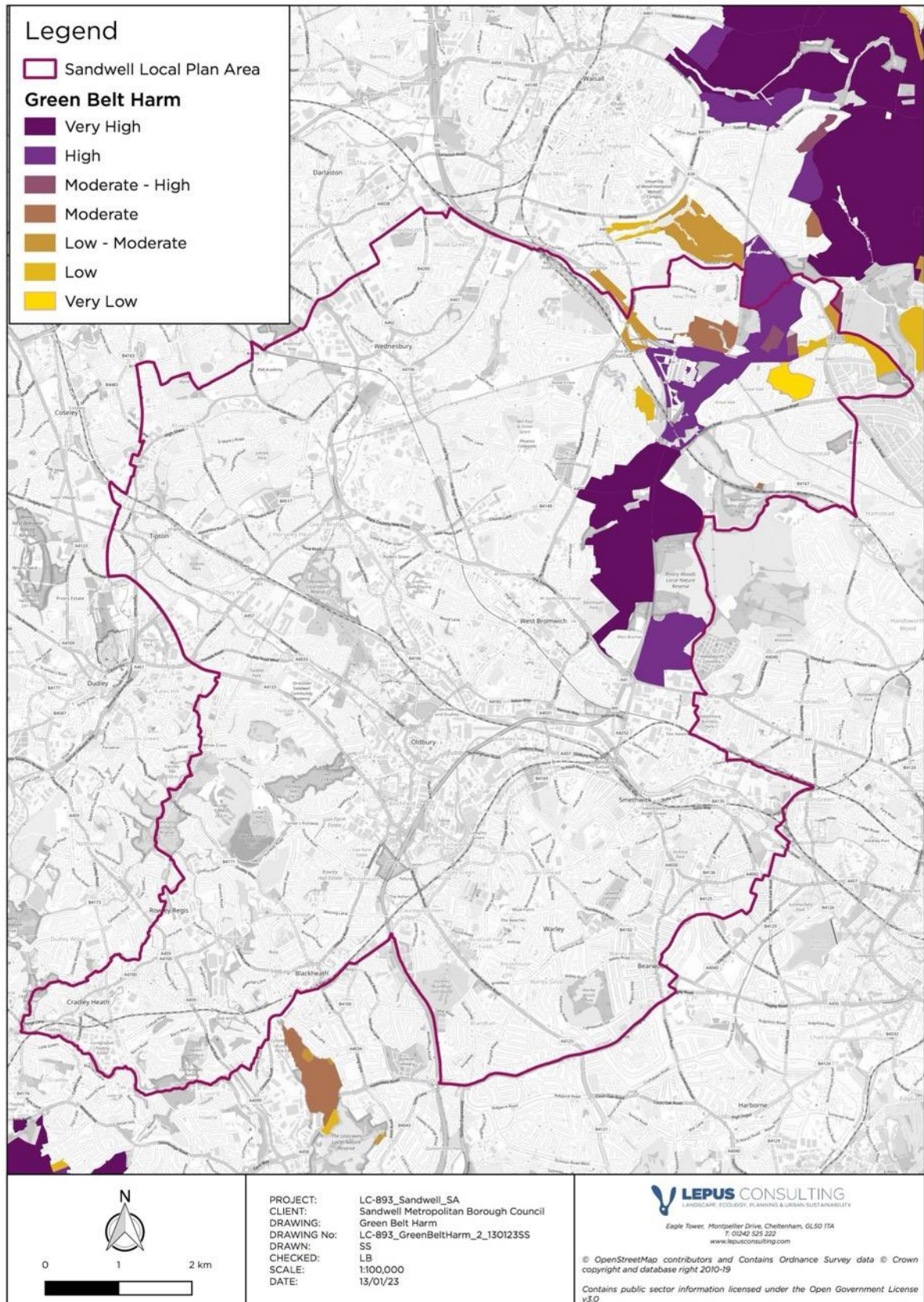


Figure 12.1: Green Belt Harm Rating in and around the SLP area (source: LUC)

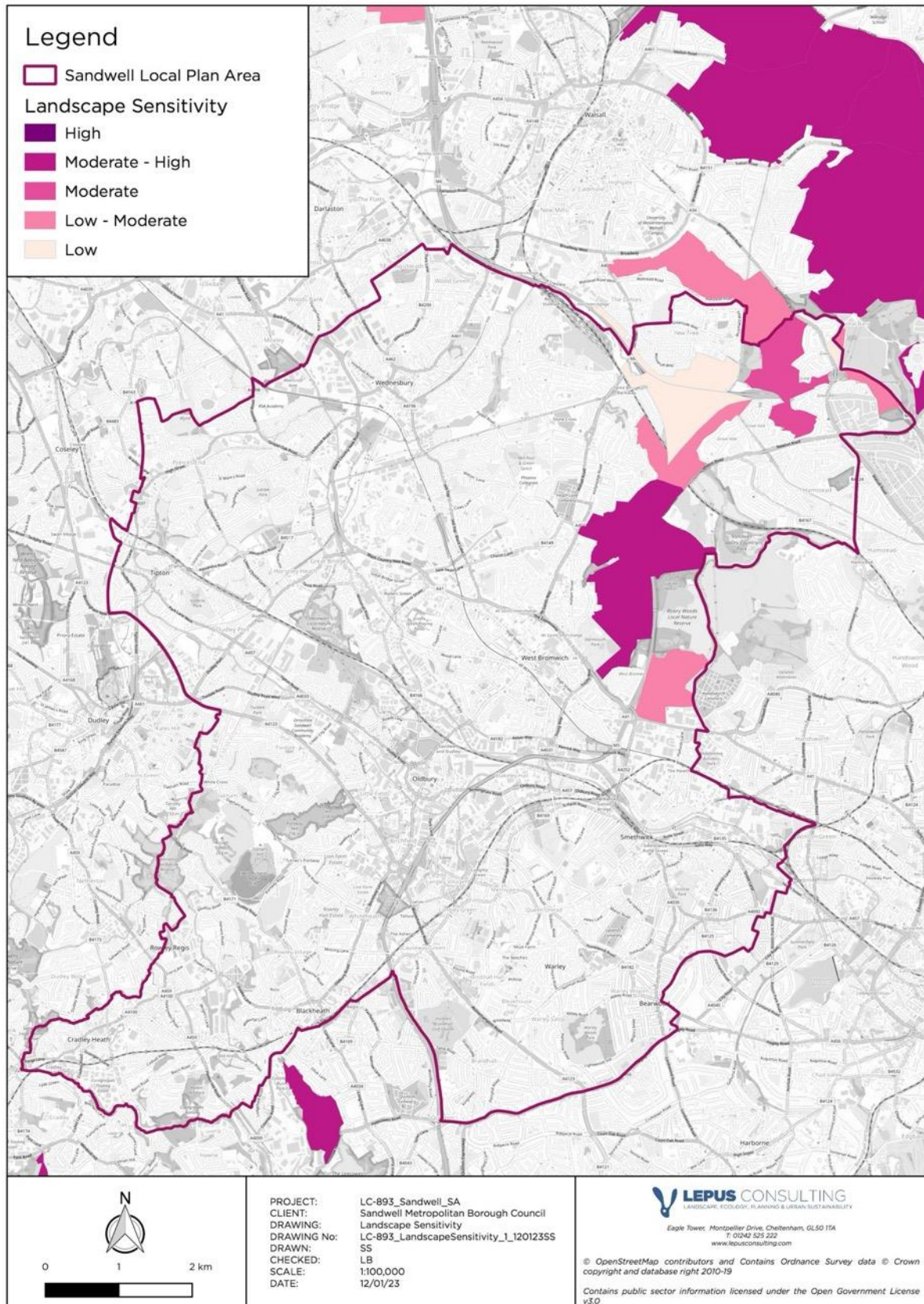


Figure 12.2: Landscape Sensitivity within and around the SLP area (source: LUC)

Townscape character

- 12.2.6 Townscapes can be defined as “*the landscape within the built-up area, including the buildings, the relationship between them, the different types of urban open spaces, including green spaces and the relationship between buildings and open spaces*”¹⁰³.
- 12.2.7 The character of townscapes interacts strongly with cultural heritage aspects (see **Chapter 10**). The Black Country HLC Study¹⁰⁴ identifies 15 Character Areas within Sandwell. The area’s history and industrial legacy provides distinctive character and a sense of local identity, but can also present challenges in terms of maintaining and enhancing the local character when historic buildings are no longer in active use.
- 12.2.8 The emerging SLP should seek to embed the priorities of the Sandwell Regeneration Strategy 2022 - 2027¹⁰⁵ which aspires to rejuvenate Sandwell, boosting the economy and improving quality of life for residents and visitors, whilst remaining in keeping with its history.

Key issues for landscape include:

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

12.3 Impacts on landscape


- 12.3.1 **Box 12.1** presents a plan-wide summary of the adverse impacts on landscape that have been identified through the SA process. These adverse impacts are those identified prior to mitigation considerations.

Box 12.1: Summary of identified impacts on landscape

¹⁰³ Landscape Institute (2017) Townscape character assessment. Available at:
<https://www.landscapeinstitute.org/technical-resource/townscape/> [Date accessed: 08/07/24]

¹⁰⁴ Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at:
https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf
[Date accessed: 08/07/24]


¹⁰⁵ Sandwell Metropolitan Borough Council (2022) Sandwell Regeneration Strategy 2022 – 2027. March 2022. Available at:
<https://regeneratingsandwell.co.uk/wp-content/uploads/2022/09/Regeneration-Strategy-2022-2027.pdf> [Date accessed: 08/07/24]

Impact on landscape	Summary of identified impact
 <p>Threaten or result in the loss of locally distinctive or sensitive landscapes</p>	<p>The introduction of new built form can contradict and conflict with distinctive local landscapes and townscapes which can result in adverse impacts on sensitive landscapes and loss of local character.</p> <p>The Black Country Landscape Sensitivity Assessment¹⁰⁶ considered the landscape and visual aspects of green belt parcels in and around Sandwell and the Black Country. No allocated sites lie within the landscape sensitivity assessment area, and consequently the impact of all allocated sites on distinctive landscapes remains uncertain.</p> <p>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 discussed within Chapter 10: Cultural heritage).</p>

12.4 Local Plan mitigation

12.4.1 The spatial strategy for Sandwell sets out the aim to deliver the majority of new development on previously developed land and sites within the urban area, as well as protecting areas of landscape value. However, to meet the identified housing requirements, a large proportion of growth is allocated on previously undeveloped land. Various SLP policies aim to protect and, where appropriate, enhance the local character and distinctiveness of Sandwell’s landscapes and townscapes. These policies are discussed in **Box 12.2**.

Box 12.2: Mitigating effects of the Local Plan policies on landscape

Policy mitigation for landscape	Summary of mitigating effect
 <p>Threaten or result in the loss of locally distinctive or sensitive landscapes</p>	<p>Policy SHE1: Listed buildings and conservation areas states that development proposals will be required to <i>"conserve and enhance local character"</i>. This is supported by Policies SHE2: Development in the historic environment, SHE3: Locally listed buildings and SHE4: Archaeology, which will ensure the protection and enhancement of heritage assets within the borough to positively contribute to local character and distinctiveness.</p> <p>Policy SDS8: Green and blue infrastructure in Sandwell provides measures to support green and blue infrastructure within the borough, which is expected to positively contribute to the locally distinctive landscape and townscape character. Policy SDS2: Increasing efficiency and resilience supports this by encouraging an increase in green cover and the incorporation of <i>"landscaping schemes"</i>.</p> <p>Policy SNE3: Provision, retention and protection of trees, woodlands and hedgerows supports the provision, retention and protection of trees, woodlands and hedgerows, which would also be expected to contribute towards the conservation and enhancement of landscape character through urban greening.</p>

¹⁰⁶ LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 21/08/24]

Policy mitigation for landscape	Summary of mitigating effect
	<p>Policy SNE5: The Rowley Hills aims to protect the Rowley Hills from inappropriate development that will lead to the loss of valued qualities that make up the local landscape character, including panoramic views.</p> <p>Policies SDM1: Design quality, SDM2: Development and design standards, SDM3: Tall buildings and gateway sites, SDS5: Achieving well-designed places and other Development Management policies seek to ensure that new development creates a strong sense of place and help to conserve and enhance the landscape / townscape character, and will ensure the visual effects of relevant proposals (such as tall buildings) are identified and assessed.</p> <p>Many SLP policies including Policy SDS1: Spatial Strategy for Sandwell and SDS3: Regeneration in Sandwell encourage regeneration and redevelopment of industrial land, town centres and canal corridors with potential opportunities for enhancement of Sandwell’s townscapes which can contribute to creating a strong sense of place and improve the appearance and function of urban areas.</p>

12.5 Residual effects on landscape

12.5.1 The SLP sets out numerous policies which will be expected to help mitigate potential adverse impacts of the proposed development on the landscape, as set out in **Box 12.2**. As discussed in **Box 12.3**, these policies are expected to be sufficient in mitigating any residual impacts on landscape.

Box 12.3: Residual effects for landscape

Residual effects	Further details of the residual effect
<p style="text-align: center;">1</p> <p>Threaten or result in the loss of locally distinctive or sensitive landscapes</p>	<p>Various Local Plan policies seek to ensure that development proposals maintain and improve the distinctiveness of Sandwell’s landscape and townscape character, including through the provision of green infrastructure, urban greening, the protection of historic assets, appropriate design and the consideration of views from sensitive landmarks such as the Rowley Hills. Where relevant, the SLP policies will ensure the potential for adverse effects is explored, including through LVA/LVIA to inform the development of any tall buildings. As a consequence, it is likely that any potential adverse impacts on landscape will be fully mitigated, even where these currently remain uncertain. An overall positive effect is expected, particularly where developments seek to enhance and regenerate Sandwell’s landscape, townscape and historic environment.</p>

13 Population and material assets

13.1 Introduction

- 13.1.1 The consideration of 'Population' is a broad matter and includes topics such as pollution and waste, housing, transport and accessibility, education, economy and employment. The population topic seeks to create places where residents live a high quality of life for longer, are well educated and have the necessary skills to gain employment and succeed in modern society. Indicators of these objectives include the proximity of development proposals to schools, accessibility to employment land and proximity to services and amenities.
- 13.1.2 PPPs on population cover a range of different objectives, including tackling social exclusion and inequalities, improving health, improving housing quality, and reducing levels of education failure, ill health, substance misuse, crime and anti-social behaviour. At the regional and local levels, support for cultural diversity and young people are key aims.
- 13.1.3 'Material assets' covers a variety of built and natural assets which are accounted for in a range of topics. It is a requirement of Schedule 2 of the SEA Regulations to consider material assets, although the Regulations does not define them. The SA process considers material assets as the social, physical and environmental infrastructure implications of the local plan.
- 13.1.4 The material assets sustainability theme covers a range of policy areas, including waste management, minerals, energy production and previously developed land. PPPs seek to protect mineral resources and promote appropriate after uses for mineral workings, and promote the 'waste hierarchy'.

13.2 Baseline and key issues

Population

- 13.2.1 Sandwell has a population of 341,900 according to the latest Census (2021)¹⁰⁷. Population size has increased by 11.0%, from around 308,100 in 2011 to 341,900 in 2021. This is higher than the overall increase for England (6.6%), where the population grew by nearly 3.5 million to 56,489,800.
- 13.2.2 The borough's population is predicted to grow at a faster rate than both the population of the West Midlands and the national average and is forecast to increase by 30,000 between 2016 and 2030. On average, Sandwell has a higher proportion of the population aged under 20, and a lower proportion aged over 50, than the average for the rest of the UK¹⁰⁸.

¹⁰⁷ 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: 08/07/24]

¹⁰⁸ Sandwell Trends (2022) 2021 Census: Overview. Available at: <https://www.sandwelltrends.info/2021-census/#:~:text=Ethnic%20Group%20%26%20Language,69.9%25%20in%20the%202011%20Census.> [Date accessed: 08/07/24]

Equality and diversity

13.2.3 Sandwell is a diverse area, with individuals from a range of ethnic backgrounds, religions and cultures. In 2021, 57.3% (195,620) of usual residents in Sandwell identified their ethnic group within the high-level 'White' category, compared with 81.7% in England & Wales¹⁰⁹.

13.2.4 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England¹¹⁰. LSOAs are small areas designed to be of similar population, of approximately 1,500 residents or 650 households. Out of 317 Local Authorities in England, Sandwell is ranked as the 12th most deprived. Overall, deprivation is high across the SLP area, with 36 LSOAs in Sandwell ranked among the 10% most deprived in England.

Housing

13.2.5 Government guidance requires local authorities to determine the local housing need figure for their area. The local plan preparation process should then test the deliverability of this housing need figure. The local housing need figure is calculated by summing the national standard method figure, using 2014-based ONS household projections and affordability ratios which are updated annually.

13.2.6 SMBC have produced a Strategic Housing Land Availability Assessment (SHLAA)¹¹¹, which is updated annually, to assess land with potential for development in order to inform the housing land supply and trajectory.

13.2.7 Any identified options for the quantum of housing growth, as well as reasonable alternative sites for development, will be assessed as part of the SA process.

Economy

13.2.8 Sandwell Borough is multi-centric, with a Strategic Centre (West Bromwich), seven other main town centres and several smaller local centres serving the population. The highest density of employment locations can be found in the centre and north of the SLP area and along the key transport routes. Accessibility modelling data¹¹² indicates that the majority of Sandwell lies within a 30-minute travel time to an employment site, either via walking or public transport (see **Figure 9.1**).

¹⁰⁹ Sandwell Trends (2022) 2021 Census: Overview. Available at: <https://www.sandwelltrends.info/2021-census/#:~:text=Ethnic%20Group%20%26%20Language,69.9%25%20in%20the%202011%20Census>. [Date accessed: 08/07/24]

¹¹⁰ MHCLG (2019) The English Indices of Deprivation 2019. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/iod2019_Statistical_Release.pdf [Date accessed: 08/07/24]

¹¹¹ Sandwell Strategic Housing Land Availability Assessment (SHLAA) (April 2023) Available at: <https://www.sandwell.gov.uk/downloads/file/2616/sandwell-shlaa-2023> [Date accessed: 08/07/24]

¹¹² Unpublished data provided to Lepus by the Council

- 13.2.9 The proportion of unemployed adults in Sandwell is 6%, which is higher than the average for West Midlands (4.9%) and for Great Britain (3.8%)¹¹³. Sandwell has a high proportion of workers in the manufacturing and wholesale and retail trade industries, with fewer employees in financial, IT and professional occupations than the average for the West Midlands and Great Britain.
- 13.2.10 Sandwell lies 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)¹¹⁴ sets out the identified employment land requirements within Sandwell of 185ha. Identified options for the quantum of employment growth, as well as reasonable alternative sites for development, has been assessed as part of the SA process.

Education, skills and training

- 13.2.11 20 secondary schools and 98 primary schools can be found within Sandwell. 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. Accessibility modelling data¹¹⁵ indicates generally good levels of sustainable accessibility to schools across the SLP area although some gaps are identified (see **Figures 9.2** and **9.3**).
- 13.2.12 Further and higher education opportunities in Sandwell and nearby areas include Sandwell College, University of Wolverhampton and Dudley College of Technology. Within the wider West Midlands, there are several universities including the University of Birmingham, Birmingham City University and Aston University.
- 13.2.13 Sandwell's residents have on average lower qualification levels compared to the West Midlands and Great Britain¹¹⁶.

¹¹³ Nomis (2021) Labour Market Profile – Sandwell. Available at:
<https://www.nomisweb.co.uk/reports/lmp/la/1946157189/report.aspx> [Date accessed: 08/07/24]

¹¹⁴ WECD (2023) Black Country Authorities Employment Land Needs Assessment 2020 to 2041. Available at:
<https://www.sandwell.gov.uk/downloads/file/1546/black-county-authorities-employment-land-needs-assessment-2020-2041-august-2023-> [Date accessed: 21/08/24]

¹¹⁵ Unpublished data provided to Lepus by the Council

¹¹⁶ Nomis (2021) Labour Market Profile – Sandwell. Available at:
<https://www.nomisweb.co.uk/reports/lmp/la/1946157189/report.aspx> [Date accessed: 08/07/24]

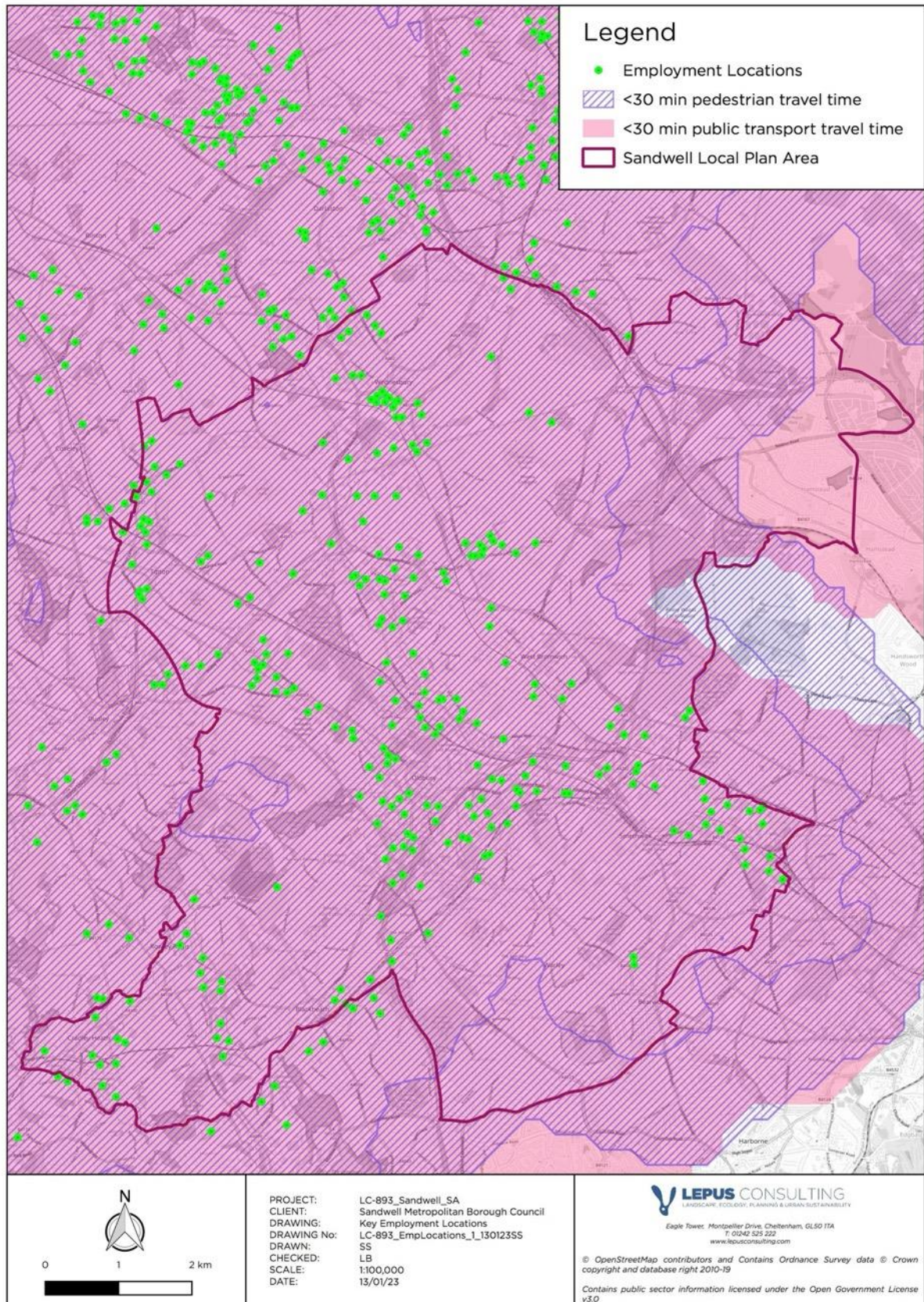


Figure 13.1: Key employment Locations and modelled travel time across the SLP area (source: SMBC)

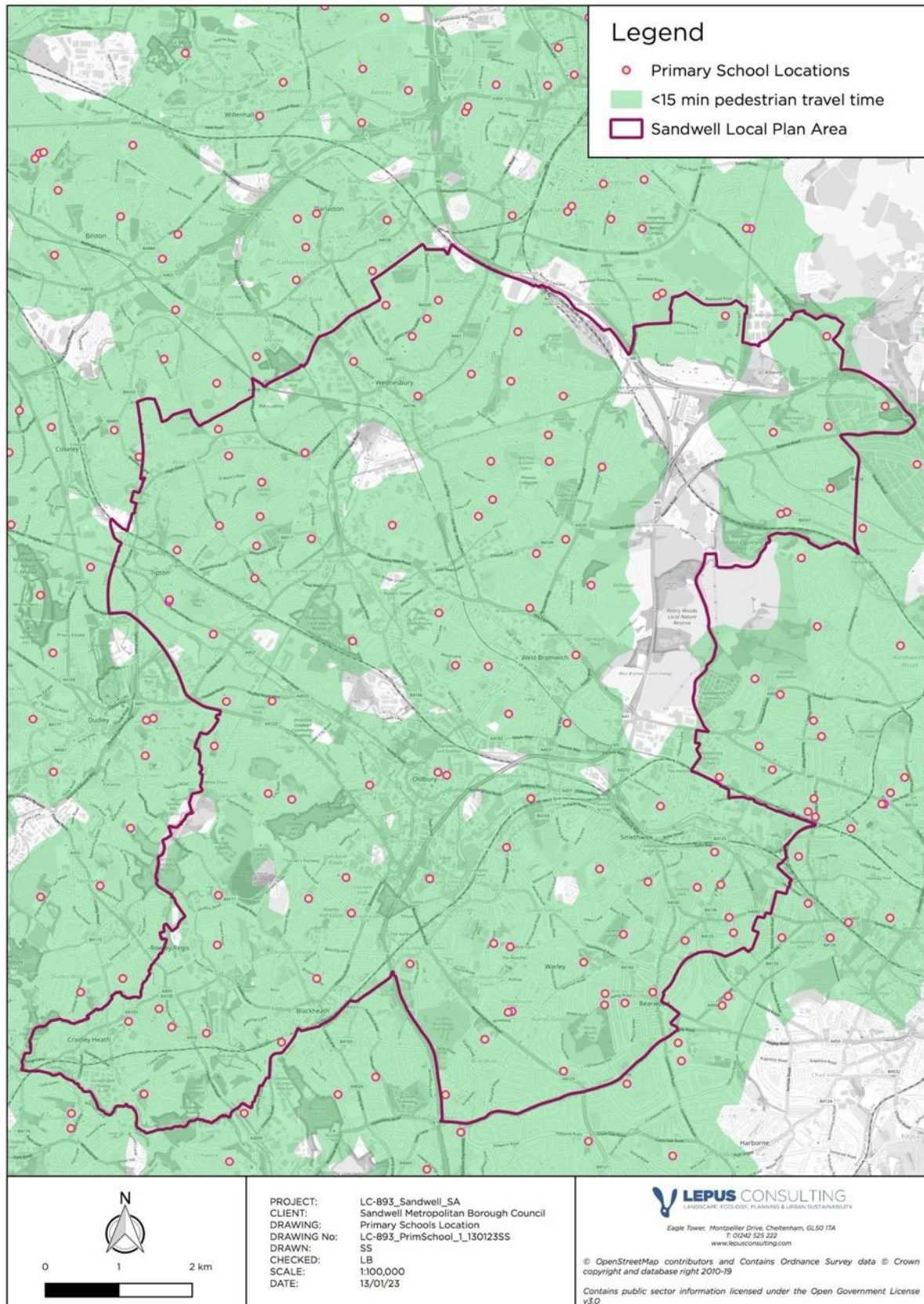


Figure 13.2: Location of primary schools and modelled travel time across the SLP area (source: SMBC)

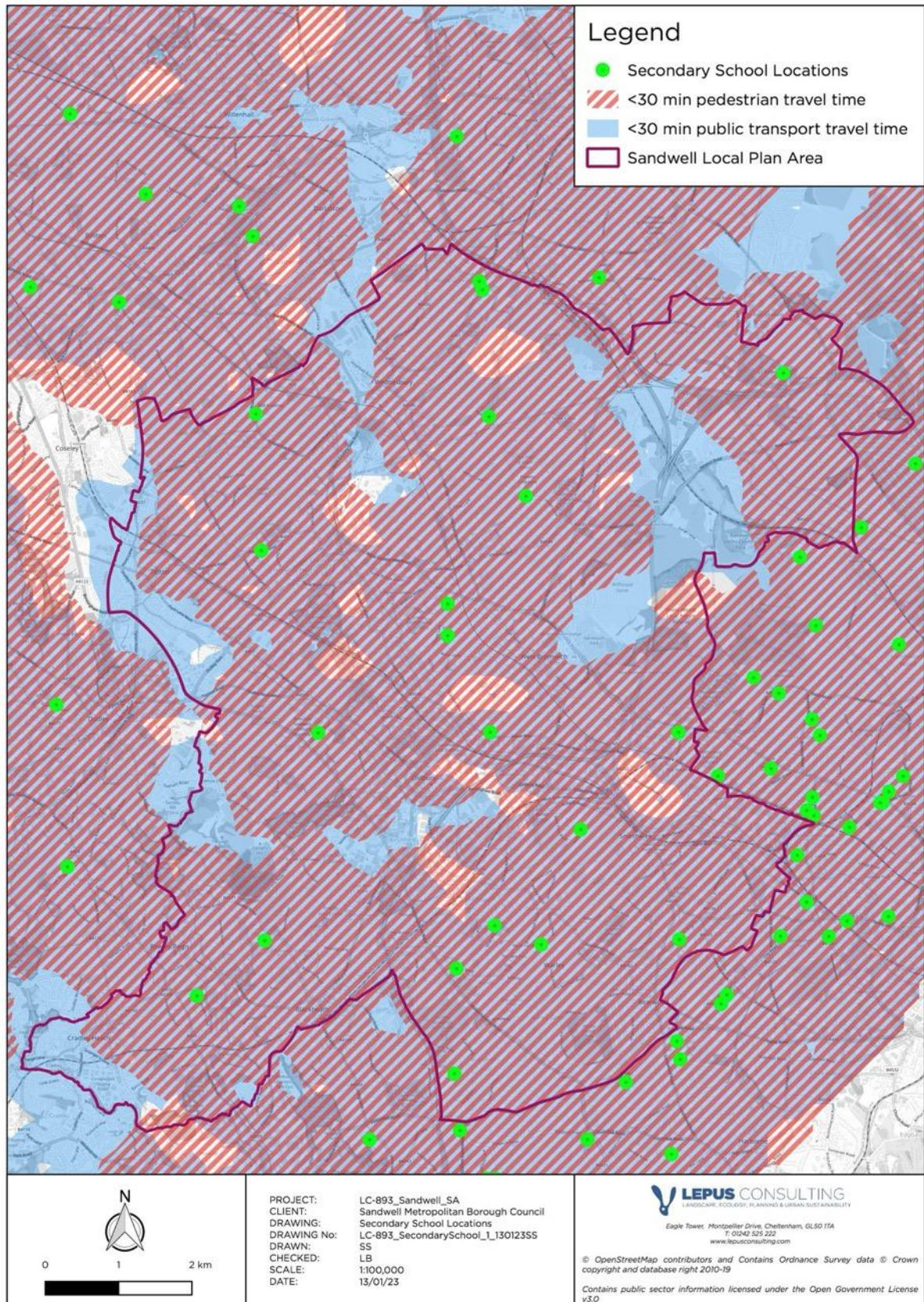


Figure 13.3: Location of secondary schools and modelled travel time across the SLP area (source: SMBC)

Waste

- 13.2.14 The proposed development within the SLP area and associated increase in residents would be expected to result in a significant increase in waste produced. It is assumed that new residents will have an annual waste production in line with the national average, which was 477kg per person in 2022¹¹⁷.
- 13.2.15 The proportion of local authority collected waste in the West Midlands sent for recycling and composting is below the national levels, whereas the waste managed through incineration is higher than national levels.
- 13.2.16 Although national trends suggest that the volume of household waste produced is decreasing, the Black Country Waste Study¹¹⁸ indicates that additional capacity for certain types of waste management will be required, taking into account the large amount of projected growth in the area as well as continuing to facilitate the import of waste from other neighbouring authorities.

Minerals

- 13.2.17 The presence of mineral resources, in particular coal, was a key reason for the original prosperity and development of the Black Country region. The legacy of mineral extraction on ground stability and contamination remains a key issue affecting future development, and some minerals are still of economic importance with active quarries and brickworks.
- 13.2.18 There is a need for a balanced approach between safeguarding mineral resources and supporting housing and economic growth. The protection and extraction of mineral resources is important to help support the levels of development proposed over the Plan period and to meet demand for aggregates. There are no Mineral Safeguarding Areas within Sandwell, although there are various mineral infrastructure sites including brickworks, concrete plants and aggregate recycling facilities present within the SLP area¹¹⁹.

¹¹⁷ DEFRA (2021) Statistics on waste managed by local authorities in England in 2022/23. Available at: <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results/local-authority-collected-waste-management-annual-results-202223#:~:text=In%202022%2F23%2C%20total%20local,per%20cent%20from%202021%2F22> [Date accessed: 08/07/24]

¹¹⁸ WSP (2023) Black Country Waste Study. Available at: <https://www.sandwell.gov.uk/downloads/file/1501/bca-waste-study-update-september-2023-> [Date accessed: 08/07/24]

¹¹⁹ WSP (2023) Black Country Minerals Study Update. Available at: <https://www.sandwell.gov.uk/downloads/file/1719/bc-minerals-study-update-2023-sandwell> [Date accessed: 08/07/24]



Key issues for population and material assets include:

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

13.3 Impacts on population and material assets

13.3.1 **Box 13.1** presents a plan-wide summary of the adverse impacts on population and material assets that have been identified through the SA process. These adverse impacts are those identified prior to mitigation considerations.

Box 13.1: Summary of identified impacts on population and material assets

Impact on population and material assets	Summary of identified impact
 <p>Provision of housing to meet local need</p>	<p>The SLP proposes the development of 10,434 dwellings across the Plan period to 2041. This is expected to meet a large proportion of the identified housing need, with the remainder being met through other forms of housing provision such as through windfall developments and export to neighbouring local authorities via the Duty to Co-operate. The degree to which residents from vulnerable groups, such as those on low incomes and the elderly, will benefit from the increased housing provision will be dependent upon the size, type and tenure of housing provided.</p>
 <p>Provision of employment opportunities</p>	<p>The SLP allocates 1,221ha of employment floorspace (of which 28ha is currently vacant). The Plan will be likely to have a positive impact on the local economy, as well as the wellbeing of residents. The proposals in the SLP are expected to satisfy the identified requirements for the borough in line with the latest evidenced needs.</p>

Impact on population and material assets

Summary of identified impact



Sustainable access to services and facilities

A small number of site allocations are situated outside of sustainable distances to essential services, including public transport options, and beyond the recommended sustainable travel times to schools, local services and employment opportunities. Good access to these services is essential to reduce reliance on private car use, encourage healthy and active lifestyles and provide accessibility to spaces which could potentially have benefits to mental wellbeing and community cohesion.

Of the 69 sites allocated for residential or mixed-use development, the majority will have sustainable access to a primary school, however, site SH17 lies outside the 15-minute sustainable distance on foot for access to a primary school, nine sites lie outside a 25-minute walk and five sites lie outside the 25-minute journey via public transport to a secondary school.

The majority of sites are anticipated to be situated within a 15-minute journey to a local store to meet day-to-day food needs, however, 25 sites lie outside the 15-minute sustainable distance to access local services by foot and site SEC3-193 lies outside the 15-minute sustainable distance to local services by public transport.

All residential-led site allocations lie within a 30-minute public transport journey to employment opportunities, however site SH43 is located over a 30-minute sustainable distance on foot to employment opportunities.

Some three sites including SH18, SH35 and SH36 are located over 400m from a bus stop providing regular services, and two sites including SH37 and SH42 are located over 2km from a railway or metro station.

Sustainable access to healthcare services is considered under **Chapter 11: Human Health**.



Increased pressure on local services and facilities

The proposed development within the SLP is expected to increase population density across Sandwell. This will be likely to apply greater pressures on the capacity of services within the Plan area, including schools, GP surgeries, leisure centres and open spaces.




Addressing inequalities

All residents should be provided with equal access to a range of opportunities, to support the local population in living happy and healthy lifestyles. Fostering interactive and vibrant communities often benefit from a strong sense of place, a reduced fear of crime and a strong local economy.

A total of 38 allocations are situated within the top 10% most deprived Lower layer Super Output Areas (LSOAs); introducing new development into these areas has potential to exacerbate existing inequalities within Sandwell.



On the other hand, the proposed new development and regeneration opportunities within the SLP will be likely to have a positive effect with regard to establishing and maintaining cohesive communities and improving equality, through seeking to provide a range of housing, employment opportunities and supporting infrastructure to meet the varied needs of the local population.

Impact on population and material assets	Summary of identified impact
 <p>Increased household waste generation</p>	<p>SMBC has responsibility for the provision of waste collection and recycling services for households as part of the management of waste. The proposed development of 10,434 new dwellings within the SLP is expected to increase household waste generation, and have a potential adverse effect on the capacity of waste management facilities within the Plan area.</p>

13.4 Local Plan mitigation

13.4.1 Many of the SLP policies are expected to have positive residual effects in relation to population, in particular for housing and employment floorspace provision. The spatial strategy for development in Sandwell to 2041 directs the majority of new development towards existing urban areas, in line with the provision of services and facilities. The policies which help mitigate adverse effects on population and material assets are discussed in **Box 13.2**.

Box 13.2: Mitigating effects of the Local Plan policies on population and material assets

Policy mitigation for population and material assets	Summary of mitigating effect
 <p>Provision of housing to meet local need</p>	<p>Policy SH01: Delivering sustainable housing growth and Policy SDS1: Spatial Strategy for Sandwell supports the delivery of 10,434 homes in order to contribute to meeting the identified housing need which provide a range of choice of new homes, whilst setting out locations of housing land supply including for potential windfall developments as set out in Policy SH02: Windfall developments.</p> <p>Policy SH03: Housing density, type and accessibility seeks to provide a "range of types and sizes of accommodation" in order to create "mixed, sustainable and inclusive communities", which is supported by Policy SH04: Affordable housing which aims to provide a proportion of affordable homes on developments of ten or more residences.</p> <p>Other policies such as Policy SH05: Delivering accessible and self / custom build housing, Policy SH06: Protecting family housing (Use Class C3) and Policy SH07: Houses in multiple occupation set out a variety of regulations to ensure housing standards meet the needs of occupants.</p> <p>Policy SH09: Accommodation for Gypsies, Travellers and Travelling Showpeople seeks to protect existing Gypsy, Traveller and Travelling Showpeople sites and ensures a sufficient number of pitches are allocated to meet the identified need.</p>
	<p>Policy SDS1: Spatial Strategy for Sandwell aims to provide 1,221ha of employment land throughout the Plan period, which also includes measures to retain existing employment areas.</p> <p>Policy SDS3: Regeneration in Sandwell states that the defined Regeneration Areas will provide high-quality employment land and will be the principal location for new industrial/logistics development, with likely</p>

Policy mitigation for population and material assets

Provision of employment opportunities

Summary of mitigating effect

benefits in terms of economic growth and providing opportunities for developing a skilled workforce.

Policy SEC1: Providing for economic growth and jobs also supports the renewal and regeneration of existing employment areas and sets out the provision of employment land to be delivered. This is supported by Policy **SDM9: Community facilities** which ensures any proposals for community facilities will not be permitted should it involve the loss of premises or sites located within a strategic or local employment area.

Policy SEC2: Strategic Employment Areas ensures these spaces will be defined primarily by commercial uses, businesses and services with "excellent accessibility". Alongside this, **Policy SEC3: Local Employment Areas** characterises these spaces as being predominantly having industrial, warehouse or services in accessible locations for local markets and employees. Policy **SEC4: Other Employment Sites** supports this by providing new industrial employment or extensions to existing industrial employment uses.

Policy SEC5: Improving access to the labour market supports major developments for new jobs that will be readily available for residents of Sandwell, specifically those living in the most deprived areas.

Policies SDM1: Design Quality, STR1: Priorities for the development of the transport network, STR2: Safeguarding the development of the KRN, STR3: Managing transport impacts of new development and STR5: Creating coherent networks for cycling and walking ensure that residents have sustainable access to employment opportunities through well-designed places and strong transport infrastructure.

Policies SID2: Digital infrastructure and SDM10: Telecommunications will aim to improve access to employment opportunities, including home working, through the provision of a strong fibre network and telecommunications infrastructure.



Sustainable access to services and facilities

Policy STR1: Priorities for the development of the transport network states that "all new developments must provide adequate access for all modes of travel, including walking, cycling and public transport". The policy also identifies the "Midlands Rail Hub" and "West Midlands Core Bus Network corridors" as key transport priorities, amongst others.

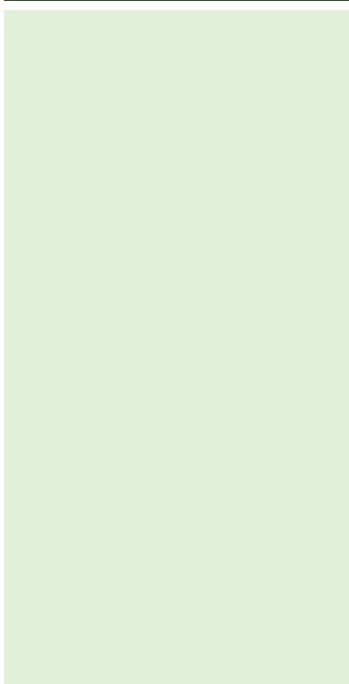
Policy STR2: Safeguarding the development of the Key Route Network (KRN) seeks to ensure the KRN is effectively managed in order to support the level of growth proposed in the SLP over the Plan period, and could potentially encourage coordination and streamlining of transport systems including public transport such as rapid transit and bus routes.

By directing development towards the Strategic Centre (West Bromwich) and the hierarchy of Town, District and Local Centres, **Policy SDS1: Spatial Strategy for Sandwell** will be likely to facilitate more sustainable communities, by locating residents in close proximity to services, facilities and public transport.

Policy SDS3: Regeneration in Sandwell highlights a number of transport infrastructure projects which will help to improve access to sustainable travel options, including the new Midland Metro Extension and

Policy mitigation for population and material assets

Summary of mitigating effect



Dudley Port railway station. Improvements to public transport connectivity / interchanges within regeneration areas and linking to these wider projects will be supported.

Various SLP policies including Policies **STR3: Managing transport impacts of new development**, **STR5: Creating coherent networks for cycling and walking**, **STR6: Influencing the demand for travel and travel choices**, **SHW2: Healthcare infrastructure**, **SHW3: Air quality** and **SDS5: Achieving well-designed places** include measures that aim to improve accessibility to bus services, rail infrastructure, active travel routes and local services.

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: Provision of Small-scale local facilities not in centres** which supports the provision of new small-scale local facilities outside of centres.

Policy SH08: Education facilities supports the development or expansion of education facilities and states that nurseries, schools and higher education facilities should be *"well- served by public transport infrastructure"*.



Increased pressure on local services and facilities

Policy SDS1: Spatial Strategy for Sandwell is likely to facilitate more sustainable communities, where residents are located in close proximity to an expanded number of services, facilities and means of public transport.

Sandwell's Centres **Policies SCE1-SCE6** support appropriate uses within centres to meet day to day needs of residents and visitors to these areas to improve the distribution and capacity of local facilities, supported by **Policy SCE5: Provision of Small-scale local facilities not in centres** which supports the provision of new small-scale local facilities outside of centres.

Policy SDM9: Community facilities supports the retention of, and development of new, community facilities.

Policy SH08: Education facilities supports the development or expansion of education facilities and states that nurseries, schools and higher education facilities should be *"well- designed"* to increase the quality and capacity of educational facilities.



Addressing inequalities

Policies SDS1: Spatial Strategy for Sandwell, **SDS5: Achieving well-designed places**, **SCE5: Provision of small-scale local facilities not in centres**, **SDS3: Regeneration in Sandwell**, **SEC5: Improving access to the labour market** and **SID1: Infrastructure provision and viability assessments** include measures that will 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, including for those living in the most deprived areas.

Policy SDM9: Community facilities sets out support for new community facilities within centres, and will ensure that any security and crime issues associated with new community developments are identified and addressed. This has the potential to reduce crime and social deprivation.

Policies SH08: Education facilities and **SHW2: Healthcare infrastructure** state that educational and healthcare facilities should be

Policy mitigation for population and material assets

Summary of mitigating effect

"located to address accessibility gaps" which will help to reduce health inequalities and improve equal access to educational opportunities.

Policy SHW5: Playing fields and sports facilities states that playing fields and sports facilities *"will be encouraged, especially in areas where public provision is deficient"*.

Policies SH03: Housing density, type and accessibility, SH04: Affordable housing and SH010: Housing for people with specific needs aim to ensure that the Plan delivers an appropriate density and mix of housing, well-distributed affordable housing provision and for housing to meet the varied needs of current and future residents in Sandwell.

Policy SH05: Delivering accessible and self/custom build housing seeks to ensure an appropriate mix of accessible and adaptable homes are delivered across the Plan area, as well as the opportunity for self-build homes, in line with national policy and the Building Regulations.

Policy SH09: Accommodation for Gypsies, Travellers and Travelling Showpeople will ensure the SLP meets the identified pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople, as set out in the latest Gypsy and Traveller Accommodation Assessment (GTTA).

Policy mitigation for population and material assets

Summary of mitigating effect



Increased household waste generation

Policy SWA1: Waste infrastructure future requirements sets out the waste infrastructure requirements to be adhered to throughout the borough, seeking to reduce the generation of waste and associated pollution, promote re-use and recycling of waste in line with the waste hierarchy. The policy ensures the *"minimisation of waste production and the re-use and recovery of waste materials"* by providing sufficient waste facilities.

Policy SWA5: Resource management and new development 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. The policy will help 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.

Policy SCC4: Embodied carbon and waste encourages building design to facilitate the re-use of and easy disassembly of materials which would contribute to reducing the need for demolitions when buildings are no longer required, reducing the quantity of waste produced in the construction and demolition of the proposed development.

Policy SEC3: Local Employment Areas seeks to safeguard areas for *"waste collection, transfer and recycling uses"*, supporting the efficient management and disposal of waste.

Policy SID1: Infrastructure provision and viability assessments sets out the overarching requirement for the provision of new infrastructure to support new development proposed in the Sandwell area, which is expected to include utilities such as waste and recycling.

Policies SWA2: Waste sites, SWA3: Preferred areas for new waste facilities and SWA4: Locational considerations for new waste facilities set out measures to ensure waste facilities meet the demand of the borough in regard to capacity. These make sure waste facilities are sustainable by nature/design, whilst being strategically located in suitable locations.

13.5 Residual effects on population and material assets

13.5.1 Many of the policies would be expected to have positive residual effects in relation to population, in particular for housing and employment floorspace provision. A residual adverse effect in relation to material assets would be likely to be the expected increase in household waste generation over the Plan period. Residual effects in relation to population and material assets are discussed further in Box 13.3.

Box 13.3: Residual effects for population and material assets

Residual effects	Further details of the residual effect
<p style="text-align: center;">1</p> <p>Provision of housing to meet local need</p>	<p>In order to meet the identified housing need, the SLP proposes to deliver at least 10,434 new dwellings. Policies in the Plan set out the requirements to provide an appropriate mix of housing types and tenures, and seek to meet the needs of different groups including the provision of accessible and adaptable dwellings, in line with the Building Regulations. The Plan also seeks to deliver sites sufficient to meet the needs of Gypsies, Travellers and Travelling Showpeople, as set out in the Black Country GTAA¹²⁰</p> <p>The Plan aims to deliver the identified housing need, therefore a positive residual effect on housing is anticipated.</p>
<p style="text-align: center;">2</p> <p>Provision of employment opportunities</p>	<p>The Plan allocates 1,221ha of employment land, seeking to meet the need identified in the latest EDNA¹²¹. A total of 36 proposed allocations for employment or mixed-use development are anticipated to provide a range of jobs for new and existing residents, and will locate new residents within sustainable distances of employment opportunities or provide sustainable transport choices to access employment opportunities. A positive residual effect on employment provision is anticipated.</p>
<p style="text-align: center;">3</p> <p>Sustainable access to local services and facilities</p>	<p>Policies within the SLP are anticipated to help improve residents' accessibility via sustainable transport options, including improvements to the rail and bus network and enhanced pedestrian and cycle networks. Access to local services is also likely to improve for the majority of sites, as well as ensuring all residents are located within a sustainable distance to educational facilities and employment areas. A positive residual effect is expected for sustainable access to local services and facilities.</p>
<p style="text-align: center;">4</p> <p>Increased pressure on local services and facilities</p>	<p>A number of SLP policies support the expansion of local services and facilities both within and outside of town centres, including the development of new community facilities. Educational opportunities will also be improved and compensated for such as through increasing the capacity of local schools. These policies will promote the development of high-quality facilities in Sandwell with sufficient capacities, therefore a negligible effect will be anticipated for increased pressure on local services and facilities overall.</p>

¹²⁰ RRR Consultancy (2022) Black Country GTAA. Available at: <https://www.sandwell.gov.uk/downloads/file/1558/black-country-gtaa-april-2022-> [Date accessed: 21/08/24]

¹²¹ WECD (2023) Black Country Authorities Employment Land Needs Assessment 2020 to 2041. Available at: <https://www.sandwell.gov.uk/downloads/file/1546/black-county-authorities-employment-land-needs-assessment-2020-2041-august-2023-> [Date accessed: 21/08/24]

Residual effects	Further details of the residual effect
<p style="text-align: center;">5</p> <p>Addressing inequalities</p>	<p>The SLP policies demonstrate SMBC's commitment to enhancing community cohesion and improving inequalities by addressing the diverse accommodation needs of the population, safeguarding community services and facilities, and encouraging development proposals to incorporate careful design which delivers a high-quality public realm. These proposals aim to help residents feel safe and improve equal access to opportunities, whilst giving potential for rejuvenation within deprived areas.</p> <p>The impact of this broad range of policy interventions is anticipated to improve community cohesion through improving opportunities for social interaction, sense of place and reducing social inequalities. A positive residual effect on equality is anticipated.</p>
<p style="text-align: center;">6</p> <p>Increased household waste generation</p>	<p>The SLP sets out a policy framework for the sustainable management of waste, seeking to ensure sufficient capacity in waste management infrastructure over the Plan period, and promoting the reduction, re-use and recycling of waste in line with the waste hierarchy.</p> <p>It is difficult for the SLP to specifically reduce waste generation within the Plan area. Although national trend data indicates a general decrease in household waste generation over time, the introduction of 10,434 new households is expected to increase waste production to some extent and potentially impact the capacity of these facilities.</p> <p>The impact of increased waste generation on the capacity of waste management facilities could potentially be a long-term albeit potentially temporary significant effect.</p>

14 Soil

14.1 Introduction

14.1.1 National policies and strategies on soil, including DEFRA's 'Safeguarding our Soils' strategy¹²², seek to prevent soil pollution; reduce soil erosion from wind and water; maintain soil diversity; improve the quality of soil, including through promoting an increase in organic matter in soil; and increase the resilience of soils to a changing climate. Focus should be placed on protecting the quality and availability of agricultural land, through reducing soil degradation and maintaining soil productivity.

14.2 Baseline and key issues

14.2.1 Soil is an essential and non-renewable resource that provides a wide range of ecosystem services. It filters air, stores and cycles water and nutrients, decomposes and cycles organic matter, supports plant growth and provides medicines. It is also one of the most important natural carbon sinks available and its conservation is therefore vital in efforts to mitigate climate change.

14.2.2 Development can potentially have adverse impacts on soil stocks, such as by direct loss of soil (e.g. excavating), contamination, increased erosion, breakdown of structure and loss of nutrients. The quality of soils in the UK has rapidly degraded, predominantly due to intensive agricultural production and industrial pollution.

14.2.3 As a highly urbanised borough, there are few areas of undeveloped land, the majority of which are restricted to the Green Belt. According to the Agricultural Land Classification (ALC), Sandwell is almost entirely 'urban' land, with sections of 'non-agricultural' land, a small area of Grade 4 ALC (poor quality agricultural land) and a small area of Grade 3 ALC (good to moderate quality agricultural land) found in the Sandwell Valley area in the north east of the borough (see **Figure 10.1**). The top three ALC grades, Grades 1, 2 and 3a, are referred to as 'best and most versatile' (BMV) land¹²³.

14.2.4 In accordance with the NPPF, development on previously developed land (PDL) is recognised as an efficient use of land. Development on previously undeveloped land will pose a threat to the soil resource within the proposal perimeter due to excavation, soil compaction, erosion and an increased risk of soil pollution and contamination during the construction phase. This is expected to be a permanent and irreversible impact.

14.2.5 It should be noted that PDL can also be of environmental value, and as such, potential impacts on natural resources should be considered on a site-by-site basis.

¹²² DEFRA (2011) Safeguarding our soils: A strategy for England. Available at:

<https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england> [Date accessed: 08/07/24]

¹²³ MAFF (1988) Agricultural Land Classification of England and Wales: Revised criteria for grading the quality of agricultural land. Available at:

<http://publications.naturalengland.org.uk/publication/6257050620264448?category=5954148537204736> [Date accessed: 08/07/24]

14.2.6 Many urban brownfield sites, and some greenfield sites, in Sandwell and the surrounding area are affected by the legacy of mining and industrial processes. It is anticipated that development proposals within the SLP will require site-specific assessments of ground contamination and effective remediation of soils affected prior to development.

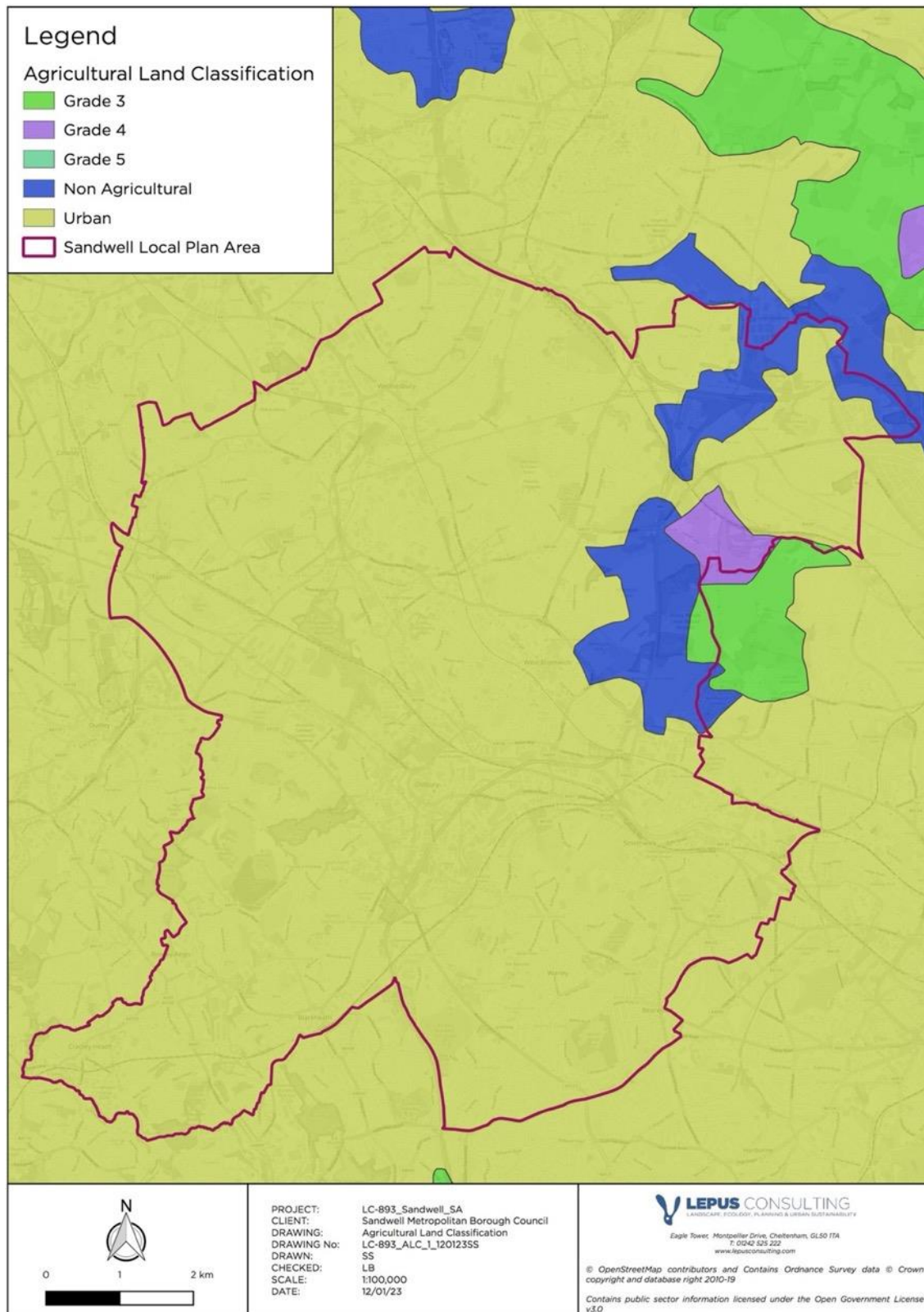


Figure 14.1: Agricultural Land Classification in and around the SLP area (source: Natural England)


Key issues for resources include:

⇒ Soil is a non-renewable resource that will continue to be lost as a result of new development proposed within the emerging SLP as well as supporting infrastructure. The majority of land in the SLP area is ALC 'urban', with pockets of ALC Grade 3 and 4, which may be under threat from new growth areas and associated infrastructure.

14.3 Impacts on soil

14.3.1 **Box 14.1** sets out a plan-wide summary of the likely impacts on soil that have been identified through the SA process. These impacts are those identified prior to the consideration of mitigation in the form of Local Plan policies.

Box 14.1: Summary of identified impacts on soil


Impact on soil	Summary of identified impact
 <p>Direct loss of soil resources</p>	<p>Soil provides a range of essential services to the local area, including nutrient cycling, abating flood risk, filtering water, carbon storage and providing the basis for vegetation to flourish. In order for soil to continue providing each service, careful consideration should be given to its structure and stability. Where construction occurs, soil could potentially be compacted by heavy vehicles on-site. During the occupation or operation phase of development, soil, in some circumstances, could potentially be paved over, become subject to increased footfall or be subject to increased volumes of chemicals.</p> <p>The SLP proposes development at 97 allocated sites. Of these 97 sites, 52 allocations are wholly or partially located on previously undeveloped land. Based on the indicative areas of these 52 sites, the SLP could result in the loss of up to approximately 224ha of previously undeveloped land or land with environmental value¹²⁴. The development of new buildings on land with environmental value will be expected to result in a direct loss of soil resource, with little or no scope for mitigation.</p>

14.4 Local Plan mitigation

14.4.1 The SLP seeks to promote an efficient use of resources and the spatial strategy directs new development within the existing urban areas and previously developed land where possible. Relevant SLP policies are discussed in **Box 14.2**.

Box 14.2: Mitigating effects of the Local Plan policies on soil


¹²⁴ Please note this figure is based on gross site areas and so does not take into account net developable areas excluding new open space / green infrastructure provision or sites which are already partially developed.

Policy mitigation for soil	Summary of mitigating effect
 <p>Policy mitigation for direct loss of the soil resources</p>	<p>The proposed development strategy for the SLP promotes the use of brownfield land as much as possible. Policy SDS1: Spatial Strategy for Sandwell states that development within the borough will seek to achieve sustainable development through "<i>delivering development on brownfield sites in the urban area</i>".</p> <p>Underpinning Policy SDS1 are Policies SDS3: Regeneration in Sandwell which focuses on regeneration of existing urban areas, SC03: Land contamination and instability which encourages development to make use of contaminated land, SDM3: Tall Buildings and Gateway Sites which supports higher density development and so will reduce overall land-take and make efficient use of land, and SHO2: Windfall developments which aims to prevent the use of unallocated greenfield land for development. These policies will help to ensure undeveloped land is protected and that previously developed land in urban areas is utilised.</p> <p>Policies SNE1: Nature conservation, SNE2: Protection and enhancement of wildlife habitats, SNE3: Provision, retention and protection of trees, woodlands and hedgerows, SDS7: Sandwell's Green Belt and SDS8: Green and blue infrastructure in Sandwell, include measures that protect land and soil resources with ecological, agricultural or environmental value.</p>

14.5 Residual effects on soil

14.5.1 As outlined in **Box 14.2**, the SLP includes measures to reduce the quantity of soil lost to development, including ensuring GI and open spaces are maximised and promoting the efficient use of land. However, some site allocations are situated on previously undeveloped land or land with environmental value. The policies within the SLP cannot fully mitigate the adverse impacts associated with loss of the soil resource and the associated ecosystem services it provides. **Box 14.3** sets out the residual adverse effects of the SLP on soil.

Box 14.3: Residual effects for soil

Residual effects	Further details of the residual effect
 <p>Loss of soil resources</p>	<p>Despite seeking to make the best use of available brownfield sites, and ensuring the protection of high-quality agricultural land, the proposed allocations within the SLP will cumulatively result in the loss of a significant amount of previously undeveloped land or land which may have environmental / ecological value. Although the SLP aims to increase GI provision across the Plan area, the loss of permeable soils has potential to increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on air quality, agricultural yield and the ability of soil biome to effectively provide ecosystem services. Therefore, a residual adverse effect will be expected.</p> <p>The loss of approximately 224ha of previously undeveloped land, is expected to be a long-term and permanent significant effect.</p>

15 Water

15.1 Introduction

15.1.1 National water policies are primarily driven by the aims of the EU Water Framework Directive 2000/60/EC, as translated into national law by the Water Framework Regulations 2003. Key objectives include improving the quality of rivers and other water bodies to 'good' ecological status by 2027; considering flood risk at all stages of the plan and development process in order to reduce future damage to property and loss of life; and incorporating water efficiency measures into new developments. Key PPPs for the SLP area include the Severn¹²⁵ and Humber¹²⁶ River Basin Management Plans (RBMPs) which provide information on the status of surface and groundwater bodies and how water quality can be improved.

15.2 Baseline and key issues

Water resources

15.2.1 It is likely that the demand for water and the volume of wastewater will increase during the Plan period owing to the increasing population. Wastewater treatment plants will need to ensure there is the capability to withstand the additional capacity and be expanded, if necessary, prior to development taking place.

15.2.2 Sandwell is supplied with water by Severn Trent Water and South Staffs Water. Severn Trent Water¹²⁷ and South Staffs Water¹²⁸ plan to manage and meet future demand through encouraging water use efficiency, for example by installing water meters, and reducing leakage.

¹²⁵ DEFRA & Environment Agency (2022) Severn River basin district, river basin management plan. Available at: [https://www.gov.uk/guidance/severn-river-basin-district-river-basin-management-plan-updated-2022#:~:text=The%20Severn%20river%20basin%20district%20\(%20RBD%20\)%20river%20basin%20management%20plan,Wales%20jointly%20manage%20this%20RBD%20](https://www.gov.uk/guidance/severn-river-basin-district-river-basin-management-plan-updated-2022#:~:text=The%20Severn%20river%20basin%20district%20(%20RBD%20)%20river%20basin%20management%20plan,Wales%20jointly%20manage%20this%20RBD%20) [Date accessed: 08/07/24]

¹²⁶ DEFRA & Environment Agency (2022) Humber River basin district river basin management plan. Available at: <https://www.gov.uk/guidance/humber-river-basin-district-river-management-plan-updated-2022> [Date accessed: 08/07/24]

¹²⁷ Severn Trent Water (2024) Water Resources Management Plan 2024. Available at <https://www.severntrent.com/about-us/our-plans/water-resources-management-plan/> [Date accessed: 08/07/24]

¹²⁸ South Staffs Water (2023) Water Resources Management Plan 2019. Available at <https://www.south-staffs-water.co.uk/about-us/our-strategies-and-plans/our-water-resources-management-plan#:~:text=At%20least%20every%20five%20years,now%20and%20in%20the%20future> [Date accessed: 08/07/24]

15.2.7 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. SPZ 3, known as the 'Source Catchment Protection Zone' is found in the south east of the SLP area which represents "the area needed to support the protected yield from long-term groundwater recharge"¹³⁵ (see **Figure 15.2**).


Key issues for water include:

- ⇒ New development and an increased population would be likely to place pressure on water resources and may result in a deficit between supply and demand if not carefully planned and managed alongside the water companies.
- ⇒ There is a need to give close consideration to the impacts of development proposals on wastewater treatment in the local area, and the capacity of treatment works, as well as the consequences of new wastewater generation for local water quality and the ecological status of ground and surface water bodies.
- ⇒ Culverted watercourses have the potential to become blocked by debris during periods of heavy or sustained rainfall. They also offer little biodiversity or recreational interest relative to more natural watercourses. In such cases, environmental and water quality benefits can be secured at minimal cost.
- ⇒ Most forms of development reduce the amount of rainfall that is intercepted by vegetation on the ground and can have detrimental implications for surface water run-off.

15.3 Impacts on water

15.3.1 **Box 15.1** presents a plan-wide summary of the adverse impacts on water that have been identified through the SA process. These adverse impacts are those identified prior to mitigation considerations. **Box 15.2** lists the policies within the SLP which will be likely to mitigate, either fully or partially, some of the identified adverse impacts on water. Where the policies do not fully mitigate the adverse impacts, a residual adverse effect is identified. **Box 15.3** explores the nature of these residual effects.


Box 15.1: Summary of identified impacts on water

Impact on water	Summary of identified impact
 <p>Reduction in water quality and ecosystem services</p>	<p>Water provides a range of essential ecosystem services, including providing the basis for vegetation to flourish and supporting biodiversity. Development and urbanisation can be associated with adverse impacts on water quality, primarily induced by nitrates from agricultural sources, including risks of water pollution associated with runoff from roads, and from water outflows during storm conditions.</p>

¹³⁵ Environment Agency (2019) Manual for the production of Groundwater Source Protection Zones – March 2019.

Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/822402/Manual-for-the-production-of-Groundwater-Source-Protection-Zones.pdf [Date accessed: 08/07/24]

Impact on water	Summary of identified impact
	<p>The construction and occupation of new development, especially for the 21 allocated sites located less than 10m from a watercourse, has the potential to increase the risk of contamination and pollution of waterways. This is primarily due to the potential loss of soil and surface water / pollutant runoff.</p> <p>The Phase 2 WCS (2024)¹³⁶ also indicates there is a poorly performing storm tank overflow located at Roundhill Wastewater Treatment Works (WwTW), which has potential to worsen water quality if the operations of such overflows increase.</p> <p>Some 13 allocated sites are located within a groundwater SPZ, where new development could potentially lead to an overall increase in the risk of groundwater contamination or pollution.</p>
 <p>Increased demand for water and wastewater management</p>	<p>The proposed development of 10,434 new dwellings set out in the SLP is likely to lead to population growth, which is likely to increase water demand as well as demand for wastewater treatment across the Plan area.</p> <p>The Severn Trent Water and South Staffs Water WRMPs^{137 138} show a supply-demand deficit regarding water resources, if no action is taken.</p> <p>The Phase 1 Scoping WCS (2020)¹³⁹ noted that some wastewater treatment works serving the Black Country area have limited capacity. Although South Staffs Water indicated that there were no constraints to water supply at the time of writing, early engagement with water companies and further assessment work was recommended in the WCS.</p> <p>The Sandwell Phase 2 WCS (2024) indicates that Severn Trent Water have also not identified any water supply constraints within Sandwell, stating they "<i>do not anticipate issues connecting new development</i>" to their water supply network for sites within their water resource zone. However, it is noted that South Staffs Water, which covers the majority of Sandwell, have not directly commented at this stage.</p> <p>The Phase 2 WCS (2024) highlights the limited capacity of a number of WwTWs in Sandwell, and infrastructural upgrades to WwTWs may be required to accommodate growth. Early engagement is recommended with relevant water companies to ensure WwTWs with limited treatment capacity are addressed prior to an increase in wastewater demand being generated from new development.</p>

¹³⁶ JBA Consulting (2024) Sandwell Water Cycle Study Stage 2.

¹³⁷ Severn Trent Water (2024) Water Resources Management Plan 2024. Available at <https://www.severntrent.com/about-us/our-plans/water-resources-management-plan/> [Date accessed: 08/07/24]



¹³⁸ South Staffs Water (2023) Water Resources Management Plan 2019. Available at <https://www.south-staffs-water.co.uk/about-us/our-strategies-and-plans/our-water-resources-management-plan#:~:text=At%20least%20every%20five%20years,now%20and%20in%20the%20future> [Date accessed: 08/07/24]

¹³⁹ JBA Consulting (2020) Black Country Councils Water Cycle Study: Phase 1 Scoping Study. May 2020. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date accessed: 23/08/24]

15.4 Local Plan mitigation

15.4.1 Policies within the SLP aim to prevent the decrease of water quality and improve water efficiency in new developments within the Plan area. These policies are discussed in detail in **Box 15.2**.

Box 15.2: Mitigating effects of the Local Plan policies on water

Policy mitigation for water	Summary of mitigating effect
 <p>Reduction in water quality and ecosystem services</p>	<p>Various SLP policies including SNE1: Nature Conservation, SNE2: Protection and enhancement of wildlife habitats, SNE3: Provision, retention and protection of trees, woodlands and hedgerows, SDM1: Design Quality, SDS7: Sandwell’s Green Belt and SDS8: Green and blue infrastructure in Sandwell encourage enhancements to the provision and connectivity of GI/BI, which will help to support ecosystem service functions such as the filtration of water and could potentially result in improvements to water quality.</p> <p>Policy SNE6: Canals requires development proposals to protect and enhance the canal network, including the water quality of canals.</p> <p>Policy SCC5: Flood Risk seeks to ensure that no development is permitted within a groundwater SPZ that could physically disturb an aquifer. This is supported by Policy SCC6: Sustainable drainage which outlines requirements for the inclusion of SuDS in development proposals which can play a role in improving water quality as specified.</p>
 <p>Increased demand for water and wastewater management</p>	<p>Policy SDS2: Increasing efficiency and resilience seeks to improve water efficiency through employing high environmental standards in the design of new developments.</p> <p>Policy SCC3: Climate adapted design and construction sets out the requirement for all non-residential development of 1,000m² or more to achieve a BREEAM New Construction Certification of ‘Very Good’ or ‘Excellent’ depending upon the nature of development, which includes full credits for water efficiency.</p> <p>Policy SHW1: Health Impact Assessments will ensure an HIA is undertaken for the majority of new developments, to ensure that the construction and occupation of new residencies will have sufficient capacity to meet the needs of residents such as water supply</p> <p>Policy SH09: Accommodation for Gypsies, Travellers and Travelling Showpeople are required to ensure there is adequate provision for on-site services such as water supply</p> <p>Policy SDM7: Management of hot food takeaways assists with the prevention of fats from reaching the wastewater system in order to minimise blockages.</p>

15.5 Residual effects on water

15.5.1 Residual effects with regard to water are expected to remain following the implementation of the SLP policies. Further details regarding these effects are discussed within **Box 15.3**.

Box 15.3: Residual effects for water

Residual effects	Further details of the residual effect
<p style="text-align: center;">1</p> <p>Reduction in water quality and ecosystem services</p>	<p>As outlined in Box 15.2, several SLP policies will be expected to help protect and enhance water quality either directly or indirectly, by ensuring that development proposals incorporate sustainable drainage systems and increase the provision of multi-functional GI.</p> <p>A negative impact on the quality of the receiving watercourse can result from an increase in the discharge of effluent WwTWs from new development. The Phase 1 WCS (2020) states that the <i>"increased discharges at the WwTWs, serving growth across the Black Country area, have the potential to impact the downstream water quality of receiving waterbodies... in particular, consideration should be paid to those which already have a 'poor' or 'bad' status and are forecast for increased growth"</i>.</p> <p>Although no SSSIs lie within Sandwell itself, a number of SSSIs lie within close proximity to the borough and have potential to be subject to effects of development upstream. According to the Sandwell WCS (2024), the main sources of water pollution in Sandwell are from sewage discharge, and from urbanisation and transport. Water quality modelling carried out as part of the WCS found that <i>"growth alone will not prevent good ecological status"</i> providing that improvements in upstream water quality are made. Water quality modelling indicates growth during the Local Plan period is unlikely to result in any significant deterioration in water quality at any modelled WwTWs, and less significant levels of deterioration can be prevented by improvements being carried out for the treatment works.</p> <p>The WCS (2024) recommends annual monitoring reports regarding new development are provided to WwTWs which take into the account the full volume of growth within the catchment area. SLP policies are also expected to partially mitigate reductions in water quality such as through SuDS provision which will help to treat diffuse pollution at the source to avoid adverse impacts on water quality. However, development is also likely to increase the quantity of raw sewage being disposed of in river channels, which will require additional monitoring. A residual adverse impact on water quality and ecosystem services is therefore identified, in line with the precautionary principle.</p> <p>Deterioration in water quality and ecosystem services has the potential to be a long-term but potentially temporary significant effect.</p>
<p style="text-align: center;">2</p> <p>Increased demand for water and wastewater management</p>	<p>The increased population within the Plan area is expected to increase water demand, such as for drinking water supply and wastewater treatment, despite measures within national policies and the SLP policies to improve water efficiency.</p> <p>The Phase 2 WCS (2024) does not expect water supply to be a constraint to new development within Sandwell. The study recommends SMBC and developers should engage with water companies at an early stage to ensure adequate water supply infrastructure and distribution systems are in place to accommodate for the increased development resulting from the SLP, as is reflected to some extent within SLP policies.</p> <p>Wastewater collection infrastructure has limited capacity which may lead to minor deteriorations in WwTWs which can be improved, providing that upgrades in treatment technology are in place. However, the SLP policies are not expected to fully mitigate these deteriorations. In addition, risks associated with storm overflows have been identified at some locations which can be partially mitigated by incorporating SuDS into the design of new development, as supported by Policy SCC6.</p> <p>Increased pressure on wastewater treatment has the potential to be a long-term but potentially temporary significant effect.</p>

16 Cumulative effects assessment

16.1 About this chapter

16.1.1 Cumulative effects assessment (CEA) is the process of identifying and evaluating the effects that arise when the total significant effects of the SLP are assessed alongside known existing underlying trends and other plan and programmes.

16.1.2 Cumulative effects are different from effects that occur alone. Alone, the SLP may not result in residual adverse effects for a particular topic, for example the effects of urban sprawl on landscape character, but when considered cumulatively, may result in significant effects that require mitigation or monitoring.

16.1.3 **Table 16.1** summarises the residual effects identified for each of the SEA topics (as set out in **Chapters 7-15**) and presents the likely cumulative effects of the SLP when considering these alongside other plans and programmes as well as national trends.

Table 16.1: Cumulative effects assessment of the SLP

Summary of identified effects in the SA process	Details of cumulative effect	Cumulative effect
Air <ul style="list-style-type: none"> Increased pollutant emissions Exposure of human and biodiversity receptors to poor air quality 	<p>Nationally, measures to improve air quality are in place and continue to be prioritised by the UK government, which includes proposals to ban sales of petrol and diesel cars by 2035.</p> <p>Local, regional and national policy including the West Midlands Transport Plan¹⁴⁰ and the Sandwell Air Quality Action Plan¹⁴¹ will complement the SLP policies, seeking to increase the coverage and connectivity of public transport, pedestrian and cycle networks which would be likely to help reduce reliance on private car use.</p> <p>However, due to the introduction of 10,434 dwellings and 1,221ha of employment floorspace through the SLP, all of which will lie within Sandwell AQMA, an increase in traffic flows and subsequent reduction of air quality will be expected to have residual adverse effects which cannot be fully mitigated through the SLP policies alone.</p> <p>Overall, the Plan will likely result in a long-term but potentially temporary significant cumulative adverse effect on air quality, which could result in secondary effects such as for the health of residents.</p>	-
Biodiversity, flora and fauna	<p>Biodiversity sites designated for their national, international or local biodiversity value will continue to benefit from legislative protection, and the policy framework set out in the SLP will</p>	-

¹⁴⁰ Movement for Growth: The West Midlands Strategic Transport Plan. Available at: <https://www.tfwm.org.uk/media/3ukj3yw0/movement-for-growth.pdf> [Date accessed: 23/08/24]

¹⁴¹ SMBC (2020) Air Quality Action Plan 2020-2025. Available at: <https://www.sandwell.gov.uk/downloads/download/396/air-quality-action-plan-2020-2025> [Date accessed: 23/08/24]

Summary of identified effects in the SA process	Details of cumulative effect	Cumulative effect
<ul style="list-style-type: none"> • Threats or pressures to European sites • Threats or pressures to locally designated and non-statutory biodiversity sites • Fragmentation of the ecological network and priority habitats 	<p>ensure biodiversity assets are protected, conserved and enhanced where possible.</p> <p>The SLP seeks to increase the coverage of GI, alongside mandatory 10% BNG); however, there remains potential for the proposed development to adversely affect some biodiversity, flora and fauna features when considered together at a landscape scale. Site-based approaches to nature conservation can fail to identify strategic landscape ecological considerations. The background trends indicate an overall picture of habitat losses and reduction in species diversity in the UK.</p> <p>Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network and incremental losses of priority habitats.</p>	
<p>Climatic factors</p> <ul style="list-style-type: none"> • Fluvial and surface water flood risk • Increase GHG emissions • Loss of multi-functional green infrastructure 	<p>Climate, infrastructure, flood risk, sustainable transport and GI policies within the SLP will be likely to help reduce adverse impacts of the proposed development within the SLP in regard to climatic factors. These policies set out provisions to mitigate the increased GHG emissions, UHI effect, loss of green infrastructure and exacerbated flood risk that may potentially occur as a result of the proposed development.</p> <p>Despite these policies, it is likely there will be a cumulative increase in GHG emissions during occupation of new development including those associated with increased energy demand associated with the occupation of new dwellings and employment premises, transport-related emissions, the production and use of materials during construction, and the release of embodied carbon.</p> <p>Overall, the SLP could potentially result in a cumulative adverse effect on climate change which may lead to secondary effects such as flood risk, threats to the health and safety of residents and possibly the supply of water across the Plan area.</p> <p>It should be noted that the Future Homes Standard is expected to come into effect in 2025 which will seek to ensure that new homes are future-proofed with low-carbon heating systems, air-source heat pumps and high levels of energy efficiency. The necessary legislation is expected to be introduced in 2024, ahead of implementation in 2025. This new standard, coupled with local interventions and consideration of carbon offsetting schemes, has the potential to limit Sandwell’s contributions to the climate crisis in the longer term.</p>	-
<p>Cultural heritage</p> <ul style="list-style-type: none"> • Alter character and/or setting of 	<p>Sandwell supports range of designated and non-designated historic features. The SLP policies in combination with legislation such as Conservation Area Appraisals¹⁴² will be</p>	0

¹⁴² SMBC. Conservation Area Appraisals. Available at: <https://www.sandwell.gov.uk/planning/historic-environment/3> [Date accessed: 29/08/24]

Summary of identified effects in the SA process	Details of cumulative effect	Cumulative effect
<p>designated heritage assets</p> <ul style="list-style-type: none"> Effects on the historic environment 	<p>expected to ensure no significant impacts on the designated heritage assets arise from the proposed development sites. These will further encourage the conservation and enhancement of historic, architectural and archaeological features which may lead to longer term benefits to Sandwell’s historic environment through encouraging regeneration and redevelopment of industrial land, town centres and canal corridors.</p>	
<p>Human health</p> <ul style="list-style-type: none"> Sustainable access to healthcare facilities Loss of public greenspace Limited access to the PRow or cycle network 	<p>The majority of site allocations in the SLP are located in areas with good sustainable access to healthcare facilities and sustainable transport options, as well as walking and cycling links. SLP policies are likely to increase sustainable access to facilities, as well as improving the quality and capacity of existing services and ensure a range of greenspaces and recreational facilities are provided for new and existing communities. A positive cumulative effect is therefore expected in relation to sustainable access to health facilities, active travel and recreation.</p>	+
<p>Human health</p> <ul style="list-style-type: none"> Exposure to air/noise pollution from main roads and AQMAS 	<p>Air and noise pollution associated with road traffic and AQMAS can have adverse implications for health. Although various SLP policies seek to minimise exposure to pollution, the development proposed may lead to a cumulative adverse effect on air quality as discussed in the ‘air’ section above.</p>	-
<p>Landscape</p> <ul style="list-style-type: none"> Threaten or result in the loss of locally distinctive or sensitive landscapes 	<p>The SLP focuses the majority of growth within the existing urban area. The SLP policies seek to ensure that development proposals maintain and improve the distinctiveness of Sandwell’s landscape and townscape character, including through the provision of GI, urban greening, the protection of historic assets, appropriate design and the consideration of views from sensitive landmarks such as the Rowley Hills. Where relevant, the SLP policies will ensure the potential for adverse effects is explored, including through LVA/LVIA to inform the development of any tall buildings. There is potential for a cumulative positive effect on the landscape in the medium-long term, where the SLP seeks to ensure development proposals enhance and regenerate Sandwell’s landscape, townscape and historic environment.</p>	+
<p>Population and material assets</p> <ul style="list-style-type: none"> Provision of housing to meet local need Provision of employment opportunities Sustainable access to services and facilities Increased pressure on local services and facilities 	<p>The SLP is likely to have a positive cumulative effect on the population and the economy, due to the provision of new homes and jobs to meet the varied needs of the community. Although issues with housing affordability are likely to continue with Sandwell and nationally, the SLP seeks to deliver affordable housing and a range of type, tenure and size of homes in line with the identified housing needs.</p> <p>The SLP policies demonstrate SMBC’s commitment to enhancing community cohesion and improving inequalities by addressing the diverse accommodation needs of the population, safeguarding community services and facilities, and encouraging development proposals to incorporate careful design which delivers a high-quality public realm. The SLP is</p>	+

Summary of identified effects in the SA process	Details of cumulative effect	Cumulative effect
<ul style="list-style-type: none"> Addressing inequalities 	anticipated to result in a positive cumulative effect on local communities through improving opportunities for social interaction, sense of place and reducing social inequalities.	
Population and material assets <ul style="list-style-type: none"> Increased household waste generation 	The introduction of 10,434 dwellings and 1,221ha of employment floorspace through the SLP is likely to increase waste generation over the Plan period. Although recycling rates are increasing on a national scale, it is unlikely this will help to significantly decrease waste generation within the Plan area. A long-term permanent negative cumulative effect is expected for waste.	-
Soil <ul style="list-style-type: none"> Loss of soil resources 	Nationally, rates of soil erosion are increasing. Soil is a non-renewable resource, which performs a number of important ecosystem services and supports a diverse range of habitats. Despite seeking to make the best use of available brownfield sites, and ensuring the protection of high-quality agricultural land, the proposed allocations within the SLP will cumulatively result in the loss of up to 224ha of previously undeveloped land or land which may have environmental / ecological value. Although the SLP aims to increase GI provision across the Plan area, the loss of permeable soils has potential to increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on air quality, agricultural yield and the ability of soil biome to effectively provide ecosystem services. Overall, there is potential for a long-term, irreversible cumulative adverse effect on ecosystem services.	-
Water <ul style="list-style-type: none"> Reduction in water quality and ecosystem services Increased water demand and pressure on wastewater treatment 	The increased population in the Plan area would be expected to increase demand on water supply and management. The WCS (2024) ¹⁴³ indicates that Severn Trent Water do not expect water supply infrastructure to be a constraint to development within Sandwell, and water efficiency is increasing nationally. Water abstraction, consumption and treatment in the local area will continue to be managed by the Environment Agency and water companies through the RBMP, WRMP and CAMS in line with the EU Water Framework Directive. Development within the allocated sites has potential to lead to an increased risk of watercourse and groundwater contamination. The WCS (2024) has identified potential impacts for downstream water quality as a result of growth within the Plan area. In combination with climate change and increased storm events, this is likely to lead to increased potential for overflows of untreated sewage and storm water into nearby waterbodies. A long-term cumulative effect has been identified in terms of water quality.	-

¹⁴³ JBA Consulting (2024) Sandwell Phase 2 Water Cycle Study.

17 Monitoring

17.1 Context

17.1.1 Regulation 17 of the SEA Regulations states *"The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action"*.

17.1.2 The purpose of monitoring is to measure the environmental effects of the Plan as well as its success against its objectives. However, monitoring can place a heavy burden on financial and human resources, and it may therefore be practical to focus on monitoring residual adverse effects and to build on existing monitoring systems.

17.1.3 Monitoring the impacts of the Local Plan should seek to answer:

- Was the likelihood of sustainability impacts identified in the SA process accurate?
- Is the Local Plan successful in achieving its desired sustainability objectives?
- Are mitigation measures performing as expected?
- Are there any unforeseen adverse impacts of the Local Plan, and if so, are these within acceptable limits or is remedial action required?

17.2 Monitoring proposals

17.2.1 Monitoring proposals are set out in **Table 17.1** for SMBC to consider in the implementation of the SLP.

Table 17.1: *Proposals for monitoring adverse sustainability impacts of the SLP*

Theme/ SEA Regulations	Indicator	Scale and frequency	Target
Air	Concentration of NO ₂ and PM ₁₀	Annually, Plan area wide	Decrease
Air	Traffic flows on main roads	Bi-annually, Plan area wide	Decrease
Air	Rates of public transport uptake	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Percentage of SSSIs in favourable condition	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Number of planning approvals granted contrary to the advice of Natural England or Birmingham and Black Country Wildlife Trust	Annually, Plan area wide	Zero
Biodiversity, flora and fauna	Percentage loss of the ecological network	Annually, Plan area wide	Zero
Biodiversity, flora and fauna	Quality and extent of priority habitats	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Canopy cover within Sandwell	Every 3 to 4 years, Plan area wide	Increase
Climatic factors	CO ₂ emissions per capita	Annually, Plan area wide	Decrease

Theme/ SEA Regulations	Indicator	Scale and frequency	Target
Climatic factors	Percentage of energy generated from renewable sources	Annually, Plan area wide	Increase
Climatic factors	Number of properties at risk of flooding	Annually, Plan area wide	Decrease
Climatic factors	Extent of surface water flood risk within Sandwell	Annually, Plan area wide	Decrease
Cultural heritage	Number of conservation area appraisals	Annually, Plan area wide	Increase
Cultural Heritage	Number of heritage assets identified as 'heritage at risk'	Annually, Plan area wide	Decrease
Human health	Percentage of physically active adults	Bi-annually, Plan area wide	Increase
Human health	Number of GP surgeries	Annually, Plan area wide	Increase
Landscape	Quantity of development in sensitive landscapes	Annually, Plan area wide	Zero
Population and material assets	Number of affordable housing completions	Annually, Plan area wide	Increase
Population and material assets	Percentage of economically active residents	Annually, Plan area wide	Increase
Population and material assets	LSOAs in Sandwell within the 10% most deprived in Great Britain	Every 3 to 4 years, Plan area wide	Decrease
Population and material assets	Quantity of household waste sent to landfill	Annually, Plan area wide	Decrease
Soil	Number of dwellings built on PDL	Annually, Plan area wide	Increase
Soil	Area of contaminated land remediated	Annually, Plan area wide	Increase
Water	Number of planning permissions granted contrary to EA advice	Annually, Plan area wide	Zero
Water	Number of waterbodies classified as 'good' ecological status	Annually, Plan area wide	Increase
Water	Number of overflow events of untreated sewage discharges into rivers	Annually, Plan area wide	Zero
Water	Water efficiency in new homes	Annually, Plan area wide	Increase
Water	Water availability for extraction	Annually, Plan area wide	Increase

18 How the SA has influenced the Plan

18.1 The role of the SA

- 18.1.1 The SA has been an influential tool throughout the plan making process to date. It works on an iterative basis. The plan makers identify various options at different stages of the plan making process which are subsequently appraised through the SA process using the methodology in **Chapter 4**.
- 18.1.2 As explained in the Regulation 19 SLP document and in **Chapter 5** of this report, the SA findings have been used to help refine the spatial strategy, policy wording and development sites through the iterative plan making process.
- 18.1.3 The process of appraisal is sequential in nature: an assessment of impacts is made, the mitigation hierarchy is applied, and the assessment of effects is revisited, leading to the identification of residual effects. The mitigation hierarchy is an important element of the assessment process. It considers firstly if the identified adverse effect can be avoided and if not, if it can be adequately mitigated to reduce the effect.
- 18.1.4 SA is necessarily a high-level assessment process, often using secondary data at a scale which is plan-based to make assessments about smaller-scale sites. This can introduce uncertainty to the process (see assumptions and limitations discussed in **Chapter 4** and **Appendix D**). The application of the precautionary principle means that when doubt prevails, a worst-case scenario is identified.
- 18.1.5 The likely evolution of the baseline without the Plan (see **Table 3.1**) shows that there are already a number of important trends, some of which are negative in nature. These include matters such as air quality, GHG emissions and flood risk; events associated with a changing climate. The table suggests that these are likely to continue without the SLP.

18.2 Recommendations

- 18.2.1 Recommendations have been made throughout the SA process to help improve the sustainability of the SLP. This includes a range of recommendations made to SMBC as the SLP has progressed, including within the Regulation 18 (I) Issues and Options SA Report¹⁴⁴, in the Regulation 18 (II) SA Report¹⁴⁵, and in draft iterations of this Regulation 19 SA Report which have been issued to SMBC.
- 18.2.2 **Table 18.1** sets out the recommendations made to improve the SLP policies as they have been prepared, and indicates which have been acted upon within the latest versions of the policies (as assessed within **Appendix F**).

¹⁴⁴ Lepus Consulting (2023) Sustainability of the Sandwell Local Plan – Regulation 18: Issues and Options, January 2023. Available at: <https://www.sandwell.gov.uk/downloads/file/893/sandwell-local-plan-issues-and-options-sustainability-appraisal> [Date accessed: 18/10/23]

¹⁴⁵ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18 (II): Draft Plan. Available at: <https://sandwell.oc2.uk/document/9> [Date accessed: 22/08/24]

Table 18.1: SA recommendations for SLP policies and action taken in the SLP

Policy	Recommendations	Action taken in SLP
SLP Vision and Objectives	<ul style="list-style-type: none"> The SLP Vision and Objectives could be enhanced through incorporating stronger reference to the importance of conservation and enhancement of cultural heritage and the historic environment, such as seeking opportunities for heritage-led regeneration. The SLP Vision and Objectives could be strengthened through including wording to promote nature recovery and delivering measurable net gains in biodiversity alongside residential and economic growth. The SLP Vision would benefit from stronger reference to the importance of active travel networks in encouraging healthy lifestyles and addressing climate change and air quality impacts associated with road transport. The SLP Vision does not directly reference waste or recycling, although waste management is referred to within SLP Objective 10. Wording could be incorporated to recognise the role that the SLP can play in helping to minimise waste generation and promoting the recycling or re-use of materials during construction and occupation of development. Although the conservation of natural environments and importance of GI are highlighted through the SLP Vision and Objectives, it is suggested that wording could be included to recognise the importance of conserving and improving air and water quality for both human and ecosystem health. Air pollution in particular is a key issue for Sandwell. 	<p>The Vision and Objectives as presented within the Draft SLP were updated in light of the SA recommendations at the Regulation 18 (I) Issues and Options stage, and have been re-assessed in Appendix D of the Regulation 18 (II) SA Report. The latest iteration of the Vision and Objectives have been assessed within Appendix F of this Regulation 19 SA Report.</p>
Policy SDS2 – Regeneration in Sandwell	<ul style="list-style-type: none"> It is recommended that the policy provides further specification of the GI measures to strengthen the policy. 	<p>The policy recommendation was actioned within the policy wording at the Regulation 18 (II) Draft Plan stage including cross-reference to SDS7.</p>
Policy SDS4 – Achieving Well-designed Places	<ul style="list-style-type: none"> Policy would benefit from stronger wording surrounding the historic environment and heritage assets, to ensure that the setting and significance of heritage assets is conserved and enhanced. 	<p>The policy recommendation was actioned within the policy wording at the Regulation 18 (II) Draft Plan stage.</p>
Policy SDS6 – Cultural Facilities and the Visitor Economy	<ul style="list-style-type: none"> Policy would benefit from stronger wording surrounding heritage assets and how their settings and significance should be conserved and enhanced alongside any proposed “<i>heritage-related tourism</i>” schemes. 	<p>The policy recommendation was actioned within the policy wording at the Regulation 18 (II) Draft Plan stage.</p>

Policy	Recommendations	Action taken in SLP
Policy SDS6 – Cultural Facilities and the Visitor Economy	<ul style="list-style-type: none"> The policy states that “<i>new development will be expected to conserve or enhance the setting and significance of heritage assets</i>”. It is recommended that stronger policy wording is used, such as to “<i>conserve and where possible enhance</i>” heritage assets and their setting, to more clearly set out the intention to secure benefits for the historic environment. 	<p>The policies in the SLP relating to the historic environment have been subject to in-depth discussions with Historic England as part of the Duty to Co-operate. Their comments have been taken into account and used to reshape and amend text where necessary.</p>
Policy SHO4 – Affordable Housing	<ul style="list-style-type: none"> 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 (NB: now addressed in Policy SID1) 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. 	<p>The policy recommendation was actioned within the policy wording at the Regulation 18 (II) Draft Plan stage.</p>
Policy SHO9 – Accommodation for Gypsies, Travellers and Travelling Showpeople	<ul style="list-style-type: none"> The policy could be strengthened through specifying requirements to ensure such sites are well designed to respect their surroundings and conserve local character, and ensure it is clear what is meant by “<i>reflect any available national guidance</i>”. 	<p>Part 4 of the policy includes a number of criteria that need to be taken into account when decisions are made on proposals for sites, including the need to take into account the privacy and amenity of both occupants and neighbors, and located and designed to facilitate integration with neighbouring communities. Given the other policies in the plan relating to the need for good design and reflecting the character of extant areas, the Council believes this will provide sufficiently strong guidance to manage the impacts of proposals on the character of an area.</p>
Policy SNE1 – Nature Conservation	<ul style="list-style-type: none"> Policy SNE1 should take into account the findings / recommendations of the Habitats Regulations Assessment when available. 	<p>Noted.</p>
Policy SCO2 – Pollution Control	<ul style="list-style-type: none"> The policy would benefit from stronger wording to seek an improvement in air quality and remediation of other pollutants. 	<p>The general approach to air quality is based on the extant policy from the SAD and is informed by the joint BC air quality SPD. This is now in need of revision, as some of its requirements have been superseded by building regs. In</p>

Policy	Recommendations	Action taken in SLP
		<p>conjunction with SHW3 the Council will continue to seek improvements to air quality and the mitigation and minimisation of other pollutants across the borough. The remediation of other forms of pollution such as odour and light are addressed in the policy and the Council feels the wording introduces the ability to exercise more control over those aspects, compared to previous local plan approaches.</p>
<p>Policy SDM1 – Design Quality</p>	<ul style="list-style-type: none"> Stronger wording is recommended surrounding the “<i>historic assets</i>” mentioned, regarding how new development could contribute to conserving and enhancing historic assets and their settings. 	<p>The policy recommendation was actioned within the policy wording at the Regulation 18 (II) Draft Plan stage.</p>
<p>Policy SDM3 – Tall Buildings and Gateway Sites</p>	<ul style="list-style-type: none"> It is recommended that the requirement for LVIA/LVA is made clear within the policy wording rather than the supporting text. - landscape 	<p>The policy recommendation was actioned within the policy wording at the Regulation 18 (II) Draft Plan stage.</p>
<p>Policy SEC2 – Strategic Employment Areas Policy SEC3 – Local Employment Areas</p>	<ul style="list-style-type: none"> The policy could be enhanced through ensuring that development, or redevelopment, within these areas seeks opportunities to enhance the historic environment and the coverage and connectivity of GI with multi-functional benefits including for the landscape, biodiversity, flood risk management. 	<p>Given the other policies in the plan relating to the need for good design, green infrastructure, the historic environment and reflecting the character of extant areas, the Council believes this will provide sufficiently strong guidance to manage the impacts of proposals on the character of an area.</p>
<p>Policy SEC4 – Other Employment Sites</p>	<ul style="list-style-type: none"> The policy could be enhanced through ensuring that development, or redevelopment, within these areas seeks opportunities to enhance the historic environment, respect the surrounding landscape character, and seek opportunities to increase coverage and connectivity of GI with multi-functional benefits such as for climate change, landscape, biodiversity and flood risk management. 	<p>Given the other policies in the plan relating to the need for good design, green infrastructure, the historic environment and reflecting the character of extant areas, the Council believes this will provide sufficiently strong guidance to manage the impacts of proposals on the character of an area.</p>
<p>Policy SEC6 – Relationship between Industry and Sensitive Uses</p>	<ul style="list-style-type: none"> 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. 	<p>The policy recommendation was actioned within the policy wording at the Regulation 18 (II) Draft Plan stage (a footnote has been added).</p>
<p>Policy SHE1 – Listed Buildings and Conservation Areas</p>	<ul style="list-style-type: none"> It is recommended that the word “<i>conserve</i>” rather than “<i>preserve</i>” is used with regard to cultural heritage, reflecting the wording in the NPPF. 	<p>The policy recommendation was actioned within the policy wording at the Regulation 18 (II) Draft Plan stage.</p>
<p>Policy SHE1 and SHE2 – Development in</p>	<ul style="list-style-type: none"> The Council could consider the potential to merge Policy SHE1 and SHE2 into a single policy to provide a clear position 	<p>Please see comments above. The HE policies have been the subject of significant discussion with Historic England, who have not</p>

Policy	Recommendations	Action taken in SLP
the Historic Environment	across all designated heritage assets and to avoid repetition.	indicated concern with the separate policy format. The policies now reflect their comments and requests. Policy SHE1 is the overarching and more strategic policy while SHE2 deals with the requirements and expectations associated with the submission of a planning application / proposals.
Policy SID2 – Mobile Network Infrastructure	<ul style="list-style-type: none"> The policy would benefit from stronger wording on the requirements for the location of infrastructure and measures that would ensure that the potential for adverse effects on landscape, biodiversity and heritage assets are considered and avoided/mitigated accordingly. 	The policy recommendation was actioned within the policy wording at the Regulation 18 (II) Draft Plan stage.
Policy SNE3 – Provision, Retention and Protection of Trees, Woodlands and Hedgerows	<ul style="list-style-type: none"> 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/arboriculturist. 	The policy recommendation was actioned within the policy wording at the Regulation 18 (II) Draft Plan stage.
Policy SWA4 – Locational Considerations for New Waste Facilities	<ul style="list-style-type: none"> Policy SWA4 states “<i>proposals must accord with all other relevant Plan policies in relation to the protection of the environment and public amenity</i>”. It is recommended that this statement is expanded, and further detail provided to ensure clarity on the requirements. 	Point 2.d of the policy provides clarity on these requirements.

18.2.3 **Table 18.2** sets out the more general recommendations that have been made during the SA process for SMBC to consider in the preparation of the Plan and gathering of evidence base information, and indicates SMBC’s response to these recommendations.

18.2.4 It should be noted that the recommendations are not exhaustive, nor are they all essential.

Table 18.2: SA recommendations for the SLP and SMBC response

SA Objective	Recommendations	SMBC response
1: Cultural Heritage	<ul style="list-style-type: none"> Where a development proposal could potentially result in substantial harm to the significance of a historic asset, clear justification should be provided, for example public benefits outweighing the harm to the asset. This will be particularly applicable if SMBC intend to prepare any site policies to accompany specific allocations at the Regulation 19 stage. 	While no specific site-related policies are being introduced into the SLP, it does encourage the use of masterplans where appropriate. These are currently expected to reflect the requirements of the historic environment, and this will continue throughout the life of the SLP. The accompanying suite of policies on the historic environment will need to be taken into account when any such document is drafted.

SA Objective	Recommendations	SMBC response
2: Landscape	<ul style="list-style-type: none"> Ensure development proposals are in-keeping with the local landscape character and the findings of the most recent Landscape Sensitivity Assessment¹⁴⁶, or any subsequent evidence prepared. Ensure development proposals are constructed in accordance with appropriate design guides and codes, including the 'Design: process and tools'¹⁴⁷ government guidance. Support development proposals which are in accordance with the findings of the Green Belt Study¹⁴⁸, where relevant. 	Noted.
3: Biodiversity, flora, fauna and geodiversity	<ul style="list-style-type: none"> Policies should support development which aims to protect, and where possible provide, supporting habitat to nearby Habitats sites. SMBC could consider implementing an Environmental Net Gain policy which would require developers to deliver a wider range of environmental benefits than BNG alone, such as for air quality and flood risk management^{149 150}, which would better reflect the 25-year Environment Plan¹⁵¹. Protect and enhance the local green and blue infrastructure networks through a specific GI policy. It is recommended that a Green Infrastructure Plan or Strategy is prepared. Improve resilience and connectivity of biodiversity sites through landscape scale management. Ensure development proposals consider the potential to deliver wider benefits to natural capital and ecosystem services at every opportunity. 	The Council is considering the development of a GI strategy and has recently undertaken the revision of the Green Space Audit, which will provide additional evidence for such a strategy. It is also working closely with neighbouring authorities and the West Midlands Combined Authority on a regional Local Nature Recovery Strategy, which is reflected in the NE policies in the SLP.

¹⁴⁶ Land Use Consultants (2019) Black Country Landscape Sensitivity Assessment. Available at: https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 22/08/24]

¹⁴⁷ MHCLG (2019) Guidance. Design: process and tools. Available at: <https://www.gov.uk/guidance/design> [Date accessed: 22/08/24]

¹⁴⁸ Land Use Consultants (2019) Black Country Green Belt Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced_redacted.pdf [Date accessed: 22/08/24]

¹⁴⁹ DEFRA (2019) Natural Capital Committee advice to government on net environmental gain. Available at: <https://www.gov.uk/government/publications/natural-capital-committee-advice-to-government-on-net-environmental-gain> [Date accessed: 22/08/24]

¹⁵⁰ National Infrastructure Commission (2021) Natural Capital and Environmental Net Gain: A discussion paper. Available at: <https://nic.org.uk/studies-reports/natural-capital-environmental-net-gain/#:~:text=Environmental%20net%20gain%20is%20the,to%20the%20pre%2Ddevelopment%20baseline.&text=Biodiversity%20net%20gain%20is%20a,for%20achieving%20environmental%20net%20gain> [Date accessed: 22/08/24]

¹⁵¹ HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [Date accessed: 22/08/24]

SA Objective	Recommendations	SMBC response
4: Climate change mitigation	<ul style="list-style-type: none"> • Provide necessary infrastructure to encourage low carbon options and carbon neutral development where possible. • Aim to protect and enhance public space to encourage safe walking and cycling opportunities. • All development proposals should aim to exceed the standards set out in the Building Regulations. • Seek to achieve no biodegradable waste to landfill to reduce emissions, in line with 'Net Zero the UK's contribution to stopping global warming'¹⁵². • Consider retrofitting buildings to make them more energy efficient. • It is recommended that further climate change evidence is gathered; this could also help to identify the carbon capture and storage potential of the Plan area. • Consider local partnerships to establish locally appropriate solutions to the climate crisis. • Where policies mention GI measures, ensure they are detailed and specific to strengthen individual policies. 	<p>The Council has commissioned a review and updating of the extant draft climate change policies for the SLP, which will take into account emerging issues around both mitigation and adaptation.</p>
5: Climate change adaptation	<ul style="list-style-type: none"> • Using relevant data sources, ensure development proposals incorporate green infrastructure where appropriate. • Ensure development proposals do not result in the exacerbation of surface water flood risk in surrounding areas. • Development proposals should be built in accordance with the relevant Surface Water Management Plan¹⁵³. It is recommended that the Black Country Surface Water Management Plan is updated. • Ensure capacity of water treatment works is sufficient to support the planned growth through early consultation with relevant water companies. 	<p>The Council has commissioned a review and updating of the extant draft climate change policies for the SLP, which will take into account emerging issues around both mitigation and adaptation.</p>
6: Natural resources	<ul style="list-style-type: none"> • The retention of trees and other vegetation should be encouraged to help retain the stability of the soil and prevent erosion. • Effective management should be in place to help prevent pollution and unnecessary compaction of soils during construction. Consider the requirement for Construction Environmental Management Plans in Planning Conditions. • Where sites contain bare soil following construction of development, it is recommended that 	<p>All these issues are dealt with in the NE policies and throughout the SLP as a whole, including the need to retain and protect trees on development sites, the provision of additional green spaces and the reuse of brownfield sites.</p>

¹⁵² Committee on Climate Change (2019) Net Zero The UK's contribution to stopping global warming. Available at: <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/> [Date accessed: 22/08/24]

¹⁵³ Scott Wilson (2009) Black Country Water Cycle Study and Scoping Surface Water Management Plan. Available at: https://blackcountryplan.dudley.gov.uk/media/11668/water_cycle_study_scoping_surface_water_mgmnt_plan.pdf [Date accessed: 22/08/24]

SA Objective	Recommendations	SMBC response
	<p>vegetation, in particular native plant species, be used to cover the ground.</p> <ul style="list-style-type: none"> • Where possible, provide green infrastructure or open space to protect areas of BMV soil within a site boundary. • Encourage the reuse of contaminated land for new development, where it can be demonstrated that the contamination can be effectively managed or remediated so that it is appropriate for the proposed use. 	
7: Pollution	<ul style="list-style-type: none"> • Where appropriate, planning obligations should be used to secure contributions to tackle poor air quality or for air quality monitoring. • Development should take into consideration recommendations within the relevant Air Quality Action Plan and the outputs of the Annual Status Reports. • Ensure visual and auditory buffers are incorporated at the edge of development proposals located in close proximity to railway lines to help mitigate noise pollution. • Ensure development proposals which could potentially result in an increase in noise disturbance are adequately mitigated, for example, through efficient layout of development, restrict activities at certain times or the use of noise insulation. • Development proposals should aim to protect areas identified as tranquil. An example method for identifying tranquillity include 'Mapping Tranquillity'¹⁵⁴. • Development proposals should be built in accordance with recommendations within the Water Cycle Study¹⁵⁵ and other relevant documents within the Evidence Base, including Water Resource Management Plans, Catchment Flood Management Plan and Basin Management Plans. It is recommended that the Water Cycle Study is updated. 	<p>The Council has considered the various potential impacts of pollution in various forms on the health of the residents of the borough and seeks to safeguard the health and quality of life of its residents by refusing applications for planning permission that would give rise to unacceptable levels of noise, odours, light or atmospheric pollution. Issues around flooding and water infrastructure have been taken into account when considering sites for allocation / adoption in the SLP</p>
8: Waste	<ul style="list-style-type: none"> • Development proposals should demonstrate measures to minimise waste generation during construction. • Development proposals should integrate well-designated waste storage space to facilitate effective waste storage, recycling and composting. 	<p>Included in revised climate change policies on construction waste / demolition.</p>
9: Transport and accessibility	<ul style="list-style-type: none"> • Ensure all development proposals and Travel Plans (where applicable) aim to reduce the reliance on the private car where-ever possible and aim to promote access to local facilities and services in a 	<p>Accessibility by means other than the private car formed part of the assessment process when the Council was</p>

¹⁵⁴ CPRE (2005) Mapping Tranquillity. Available at: <https://www.cpre.org.uk/resources/mapping-tranquillity/> [Date accessed: 18/10/23]

¹⁵⁵ JBA Consulting (2020) Black Country Councils Water Cycle Study: Phase 1 Scoping Study. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date accessed: 22/08/24]

SA Objective	Recommendations	SMBC response
	<p>manner which minimises climate change emissions and promotes active travel.</p>	<p>considering reasonable alternative sites for both employment and residential development sites. Active travel is also being promoted both through the transport policies and as part of the approach to planning and health set out in the health and wellbeing chapter.</p>
<p>10: Housing</p>	<ul style="list-style-type: none"> Ensure all development proposals are built to a high-quality design in line with the 'Design: process and tools'¹⁵⁶ government guidance. 	<p>The Council will be introducing a Sandwell-specific design code and promote high standards of design throughout the SLP, including in relation to the historic and natural environment as well as for new housing and employment sites.</p>
<p>11: Equality</p>	<ul style="list-style-type: none"> Ensure residential development proposals incorporate functional private or communal open space, including green space. Ensure development proposals provide adequate indoor space in line with, or beyond, the requirements set out in the technical housing standards¹⁵⁷. Where appropriate, consider the option for community ownership of some facilities and services. Ensure development proposals promote social interaction, including the establishment of strong neighbourhood centres. Ensure development proposals take into account privacy, access to sunlight, noise and disturbance, vibration, artificial lighting, odor, crime and safety. Ensure development proposals promote safe and accessible neighbourhoods, helping to reduce crime and the fear of crime. 	<p>All these issues are covered across a number of policies in the SLP, and applicants / developers will be expected to deliver all relevant requirements, unless there are clear, specific and robust reasons why this cannot be achieved. In such cases, the Council will require clear evidence demonstrating why this cannot be achieved in whole or in part.</p>
<p>12: Health</p>	<ul style="list-style-type: none"> Development proposals should take into consideration the findings of the relevant Playing Pitch or Sports Strategies, along with other relevant documents within the evidence base. Improve or enhance the PRoW and cycle network across the Plan area. It is recommended that the Rights of Way Improvement Plan is updated. Provide or improve safe pedestrian and cycle access to public greenspaces and open spaces. Development proposals should be in accordance with the relevant Open or Green Space Strategy. 	<p>The Rights of Way mapping is in the process of being updated. Road safety for all users is also being promoted throughout the SLP, as is the importance of green and blue infrastructure. The SLP has also benefitted from the production of an up to date playing pitch strategy, which has been used to identify areas of shortfall and thus inform larger proposals in</p>

¹⁵⁶ MHCLG (2019) Guidance. Design: process and tools. Available at: <https://www.gov.uk/guidance/design> [Date accessed: 22/08/24]

¹⁵⁷ MHCLG (2015) Technical housing standards – nationally described space standards. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf [Date accessed: 22/08/24]

SA Objective	Recommendations	SMBC response
	<ul style="list-style-type: none"> Ensure development proposals do not result in detrimental impacts to the safety of pedestrians and cyclists. 	<p>terms of the need for additional provision.</p>
13: Economy	<ul style="list-style-type: none"> Ensure residential-led proposals are located in close proximity to bus stops or other sustainable transport options to reach employment opportunities, informed by the latest available accessibility information. Improve access to employment opportunities, through provision of bus stops and bus services, and/or improvements to the local pedestrian and cycle networks. Infrastructure policies should be strongly worded to ensure potential for adverse effects on landscape, biodiversity and heritage assets are considered and avoided/mitigated accordingly. 	<p>Accessibility by means other than the private car formed part of the assessment process when the Council was considering reasonable alternative sites for both employment and residential development sites.</p>
14: Education	<ul style="list-style-type: none"> Increase the provision and capacity of primary and secondary schools across the Plan area in line with the identified need. 	<p>The need for additional educational provision has been the subject of discussions with the Council's education department and areas where additional provision may be required have been considered.</p>

19 Conclusions

19.1 Residual effects following mitigation

- 19.1.1 The SA has assessed the site allocations and policies proposed in the SLP using the methodology in **Chapter 4** and assumptions as set out in **Appendix D** (see **Volume 3**). A range of sustainability effects have been identified, which are highlighted throughout the policy and site assessments in **Appendices E, F and G**, with residual positive, negligible and negative effects summarised and discussed in **Chapters 7 to 15**.
- 19.1.2 Proposals in the SLP vary in terms of their sustainability performance with likely positive effects expected on some SA Objectives and adverse effects on others. The SA has identified likely sustainability effects of SLP proposals alone and in-combination.
- 19.1.3 The SLP is anticipated to result in a range of positive effects on sustainability, which are summarised in **Table 19.1**. This includes GI provision, the historic environment, public greenspace, the PRoW and cycle network, landscapes, housing need, employment opportunities, access to local services and facilities, and addressing inequalities.
- 19.1.4 The mitigation proposals presented in the SLP provide positive planning mechanisms for delivering sustainable development where the Plan is able to reasonably address the issue. It is recognised that the Plan cannot fully address the sustainability effects of national and international trends, such as increased frequency of storm events associated with climate change.
- 19.1.5 The identified residual adverse effects (see **Table 19.2**) are increased pollutant emissions, exposure to air and noise pollution, pressures on local biodiversity sites, fragmentation of the ecological network and priority habitats, increased GHG emissions, increased waste generation and loss of soil resources.

Table 19.1: Likely residual positive sustainability effects of the SLP

Summary of residual positive effects	
1	<p>Improved provision of multi-functional green infrastructure</p> <p>The SLP promotes the conservation and enhancement of the multi-functional GI network through encouraging development proposals to increase connectivity of the wider green and blue infrastructure network.</p> <p>Although the proposed development within the SLP will result in the loss of greenfield land and associated GI to some extent, the SLP policies are expected to mitigate and re-compensate for this loss of GI, resulting in a positive effect on GI provision in the longer term.</p>
2	<p>Effects on the historic environment</p> <p>Where development is located in areas of distinctive heritage or in proximity to non-designated heritage assets within the HLC, these are likely to be mitigated through SLP policies by protecting, conserving and enhancing historic, architectural and archaeological features. The SLP encourages regeneration including that of historic features, industrial areas and canal networks and is therefore likely to have positive effects on the conservation and enhancement of historic areas such as APAs, AHHTVs and DLHHVs.</p>
3	<p>Provision of public greenspace</p>

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

Table 19.2: Likely residual adverse sustainability effects of the SLP

Summary of residual adverse effects	
1	<p>Increased pollutant emissions</p> <p>Various SLP policies alongside local, regional and national policies aim to reduce air pollution and promote sustainable modes of transport such as improved walking, cycling and public transport provision. However, the introduction of 10,434 dwellings and 1,221ha of employment floorspace within the Sandwell AQMA is expected to increase vehicle emissions in the SLP area including NO₂ and PM₁₀, and result in an overall reduction in air quality on a potentially long-term basis.</p> <p>Over time, this adverse impact is likely to be reduced to some extent should there be an increase in sustainable transport methods and a phasing out of petrol and diesel-powered cars by 2035, alongside other advances in technology.</p>
2	<p>Exposure to poor air quality and noise pollution</p> <p>The introduction of 10,434 homes and 1,221ha of employment floorspace in the SLP area is expected to increase the exposure of site-end users to poor air quality within the Sandwell AQMA, and potentially noise pollution as a result of main roads.</p> <p>The policies would be expected to prevent unacceptable impacts on human health associated with air and noise pollution, but in-combination with the volume of development proposed, there is likely to be a cumulative adverse effect of air quality and noise pollution as a whole which is unable to be fully mitigated by SLP policies alone. The volume of development proposed within the Sandwell AQMA also has potential to hinder meeting the pollutant objectives to set out in the Sandwell Air Quality Action Plan¹⁵⁸.</p> <p>The exposure to poor air quality and noise pollution is likely to result in a long-term impact which has potential to be reduced through technological advances and improvements in sustainable transport methods such as the phasing out of petrol and diesel-powered cars. However, ongoing exposure to air and noise pollution can contribute to long-term health impacts for site-end users.</p>
3	<p>Threats or pressures to locally designated and non-statutory biodiversity sites</p> <p>Although locally designated biodiversity sites will benefit from legislative protection including SLP policies which aim to protect, conserve and enhance biodiversity sites, these are unlikely to fully mitigate adverse impacts arising from the proposed development. The proximity of allocated sites to LNRs, SINC and SLINCs is likely to result in adverse impacts including habitat losses, exposure to poor air quality and recreational pressures.</p> <p>When considered at a landscape scale, the construction of 10,434 homes and 1,221ha in-combination is likely to result in a long-term and permanent significant effect of locally designated biodiversity, flora and fauna sites.</p>
4	<p>Fragmentation of the ecological network and priority habitats</p> <p>The SLP is expected to result in the loss of some previously undeveloped land or land with environmental value, including soil resources, priority habitats and ecological links between biodiversity assets.</p> <p>Fragmentation of the ecological network and priority habitats is likely to be a long-term significant adverse effect, in particular where priority habitats cover 8% of the total site allocation area. Should biodiversity net gain and landscape-scale ecological enhancements be effectively implemented, there is potential for this effect to be temporary and beneficial in the long-term.</p>

¹⁵⁸ SMBC (2020) Air Quality Action Plan 2020-2025. Available at:
<https://www.sandwell.gov.uk/downloads/download/396/air-quality-action-plan-2020-2025> [Date accessed: 28/08/24]

Summary of residual adverse effects	
5	<p>Increased GHG emissions</p> <p>The SLP policies aim to increase uptake of sustainable transport and active travel, as well as utilising building design and construction methods to minimise the increase in greenhouse gas emissions related to development. However, the SLP is not expected to fully mitigate these impacts, particularly those related to the occupation of development and increased transport related emissions.</p> <p>An increase in carbon emissions in Sandwell is likely to be a long-term and permanent significant effect. However, over time, there is potential for technological advances and alternative solutions to reduce this impact to some extent.</p>
6	<p>Increased household waste generation</p> <p>It is difficult for the SLP to specifically reduce waste generation within the Plan area, although it aims to promote the reduction, re-use and recycling of waste. National trends indicate a general decrease in household waste generation, however the introduction of 10,434 households and 1,221ha of employment land is expected to increase waste production to some extent.</p>
7	<p>Loss of soil resources</p> <p>Although the majority of sites are located in the urban area and where possible, areas of previously developed land, the proposed allocations would cumulatively result in the loss of up to approximately 224ha of previously undeveloped land or land which may have environmental or ecological value. The loss of permeable soils could potentially increase the risk of flooding and loss of soil biome, resulting in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.</p>
8	<p>Increased demand for water and wastewater management</p> <p>The increased population within the SLP area would be expected to increase demand on water infrastructure. Although the WCS indicated that Severn Trent Water does not expect water supply infrastructure to be a constraint to development within its water resource zone, there is potential for a residual adverse effect in regard to wastewater infrastructure when planned growth is considered in combination with an increase in sewage production and potential for storm overflow events. It is likely that further monitoring and investment to wastewater infrastructure will be required to accommodate development.</p>

19.2 Consultation and next steps

- 19.2.1 This report represents the latest stage of the SA process. As per Regulation 13 of 'The Environmental Assessment of Plans and Programmes Regulations 2004'¹⁵⁹, this Regulation 19 SA Report will be published alongside the Publication Version of the SLP. Consultation findings will be used to inform subsequent stages of the SA process.
- 19.2.2 A six-week period of consultation under the Town and Country Planning Act will be undertaken by SMBC to offer individuals, businesses and other organisations an opportunity to submit representations regarding the SLP.
- 19.2.3 Following this round of consultation, all comments will be analysed by the plan makers as part of the ongoing plan making process. Further stages of SA will be prepared if and when necessary.

¹⁵⁹ The Environmental Assessment of Plans and Programmes Regulations 2004. Regulation 13: Consultation procedures. Available at: <https://www.legislation.gov.uk/uksi/2004/1633/regulation/13/made> [Date accessed: 07/08/24]

Habitat Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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