

# Sustainability Appraisal of the Black Country Plan

## **Volume 1 of 2: Regulation 18 SA Report**

June 2021



# Sustainability Appraisal of the Black Country Plan

## Volume 1 of 2: Regulation 18 SA Report

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this time. This report has been produced to assess the sustainability effects of the Black Country Plan and meets the requirements of the SEA Directive. It is not intended to be a substitute for an Environmental Impact Assessment (EIA) or Appropriate Assessment (AA).

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# Acronyms & Abbreviations

<b>A&amp;E</b>	Accident and Emergency
<b>AHHTV</b>	Area of High Historic Townscape Value
<b>ALC</b>	Agricultural Land Classification
<b>AONB</b>	Area of Outstanding Natural Beauty
<b>AOS</b>	Area of Search
<b>APA</b>	Archaeological Priority Area
<b>AQMA</b>	Air Quality Management Area
<b>BCA</b>	Black Country Authorities
<b>BCP</b>	Black Country Plan
<b>BMV</b>	Best and most versatile
<b>CA</b>	Conservation Area
<b>CaBA</b>	Catchment Based Approach
<b>CF</b>	Carried Forward
<b>DBEIS</b>	Department for Business, Energy and Industrial Strategy
<b>DEFRA</b>	Department for Environment, Food and Rural Affairs
<b>DLHHV</b>	Designed Landscape of High Historic Value
<b>EU</b>	European Union
<b>GI</b>	Green Infrastructure
<b>GIS</b>	Geographical Information System
<b>GP</b>	General Practitioner
<b>ha</b>	Hectare
<b>HEAD</b>	Historic Environment Area Designation
<b>HGV</b>	Heavy Goods Vehicle
<b>HRA</b>	Habitats Regulations Assessment
<b>IMD</b>	Index of Multiple Deprivation
<b>IRZ</b>	Impact Risk Zone
<b>km</b>	Kilometre
<b>LA</b>	Local Authority
<b>LCT</b>	Landscape Character Type
<b>LGS</b>	Local Geological Site
<b>LNR</b>	Local Nature Reserve
<b>LSOA</b>	Lower Super Output Area
<b>LTP</b>	Local Transport Plan
<b>LVIA</b>	Landscape and Visual Impact Assessment
<b>LWS</b>	Local Wildlife Site
<b>m</b>	Metre
<b>MBC</b>	Metropolitan Borough Council
<b>MHCLG</b>	Ministry of Housing, Communities and Local Government
<b>MSA</b>	Minerals Safeguarding Area
<b>NCA</b>	National Character Area
<b>NERC</b>	Natural Environment Research Council
<b>NHS</b>	National Health Service
<b>NNR</b>	National Nature Reserve
<b>NO<sub>2</sub></b>	Nitrogen Dioxide

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

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# Executive Summary

## About this report

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

## Summary findings

### *Housing and Employment Growth*

- E3 A total of five housing and five employment growth options have been assessed as part of the SA to consider different approaches to meeting the housing and employment requirements across the Plan period. These options assess different growth forecasts, considering different proportions of development between the urban areas, greenbelt land and the potential for directing a proportion of development to neighbouring authorities.
- E4 Housing Option 1 proposes the least quantity of development, solely focused in urban areas. This option would be likely to result in the least adverse impacts in regard to a range of SA criteria including landscape, biodiversity and natural resources. However, Option 1 would not meet the identified housing needs for the plan area and may also have a range of negative socio-economic and health implications if pursued in isolation. Options 2 and 5 seek to provide for some development within the Green Belt, which would likely have a negative impact on sustainability criteria such as landscape and natural resources, but to a lesser extent than Options 3 and 4 which seek to deliver the highest proportion of development in the greenbelt. Options 2 and 5 would therefore likely present greater scope for avoiding and mitigating adverse impacts, compared to Options 3 and 4, but Option 2 would also not meet the identified housing needs for the plan area. The BCP therefore proposes a strategy that is most closely aligned with Option 5 which aims to utilise land efficiently through the use of previously developed land but also acknowledges there is a shortage of deliverable sites to meet housing needs and therefore some carefully considered greenbelt release is likely to be required. For housing growth approximately 40,117 homes of the projected housing need of 76,076 homes are proposed to be located in the existing urban areas. Approximately 7,720 homes are proposed to be located on Green Belt release land at the edge of settlements during the plan period. The potential for the remaining shortfall is to be explored through a Duty to Co-operate with neighbouring authorities.

- E5 Employment Options 1 and 2 would fail to meet the minimum low growth scenario in the Economic Development Needs Assessment 2 (364ha + replacement) and therefore are considered to have a minor negative impact on the local economy. Options 3 and 4 could potentially meet the medium growth scenario in EDNA2 (433-522ha + replacement) and are therefore considered to have a minor positive impact on the economy. Option 5 is the only option that could potentially meet the high growth scenario in EDNA2 (502-806ha + replacement) and is therefore considered to have a major positive impact on the economy. In a similar manner to housing it can be assumed that the larger the quantity of development proposed, the greater the risk of adverse impacts on landscape and biodiversity features and natural resources. As a result, Employment Option 1, which proposes the lowest quantity of development, would be expected to have greater scope for avoiding adverse impacts on the natural environment, but would not meet the employment development needs for the area. Option 3 posing the greatest risk of adverse impacts due to involving the greatest loss of Green Belt land at approximately 118-207ha, compared to Options 2, 4 and 5 which would involve 47ha of Green Belt release. The BCA have undertaken an extensive Green Belt and landscape sensitivity assessment and have used this to ensure that development is designed to minimise harm to the purposes of the Green Belt and to landscape character, as identified through the site assessment process. Both employment and housing growth options have been informed by this study, alongside transport and accessibility modelling and other studies undertaken as part of the evidence base. For employment growth, approximately 307 ha of the projected employment land requirements of 565ha are proposed to be located within the existing built-up areas and approximately 48 ha via Green Belt release, with the remaining shortfall to be potentially explored with neighbouring authorities, especially where there may be functional employment or transport linkages.
- E6 The analysis highlights that many sustainability impacts associated with housing and employment growth are based on the spatial distribution of growth and site-specific contextual factors, which are assessed in greater detail in the following sections of the SA report.

### ***Spatial Distribution of Growth***

- E7 The overall spatial approach has evolved from consideration of 11 spatial options for development. These have been informed by the evidence base underpinning the Draft BCP and have been subjected to SA. The most sustainable option was considered to be 'balanced growth' with the spatial strategy focusing growth within the existing Strategic Centres, Core Regeneration Areas and Town and Neighbourhood Areas in the sub-region and taking advantage of their existing infrastructure capacity, alongside a limited number of new Neighbourhood Growth Areas near to the edge of settlements that takes account of environmental, climate change, accessibility and socio-economic requirements. Overall, this option is considered to perform the best, as it strikes a balance between retaining valuable environmental assets whilst also prioritising development in the most sustainable locations.

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

- E8 A total of 635 reasonable alternative sites have been identified across the plan area. Potential future land use includes residential, employment and Gypsies, Traveller and Travelling Showpeople sites and alternative sites for these uses have been assessed as part of the SA process.
- E9 The SA has identified a range of positive and negative potential impacts of the reasonable alternative sites on the objectives within the SA Framework. Negative impacts were mainly related to issues associated with development located in the Green Belt outside of the existing urban areas, including the loss of previously undeveloped land, soil and mineral resources, impacts on biodiversity and landscape features, potential pollutants and greenhouse gas emissions associated with a large scale of development, and the access of site end users to a number of social facilities including healthcare services, local shops, schools and transport services.
- E10 Some (but not all) of these negative impacts may be mitigated through policy and site design.
- E11 Reasons for selection / rejection of the reasonable alternative sites considered in plan making process have been informed by the detailed site assessment process undertaken by the BCA and includes consideration of the findings of the SA.
- E12 A summary overview of the reasons for site selection / rejection for the reasonable alternatives considered have been provided by the BCA and are included in this SA report.

### ***BCP Policies***

- E13 The Draft Plan sets out a series of policies that aim to support the delivery of the vision for the Black Country. The Draft BCP aims to achieve a balance between conserving the Black Country's landscapes, heritage and environmental assets whilst securing the necessary infrastructure to support development and housing and employment needs.
- E14 The policies that form the Draft BCP have been individually assessed against each of the 14 SA Objectives contained within the SA Framework.
- E15 The policies contained within the BCP would be anticipated to help ensure that potential adverse impacts on sustainability identified as a result of the development proposed within the BCP are avoided, mitigated or subject to compensatory measures wherever possible and that development proposals are accompanied by relevant supporting information to ensure that the impacts of development can be appropriately factored into land use decision making processes. Opportunities for enhancement may also be secured through policies in the BCP. Where there are opportunities to improve the sustainability performance of draft policies these have been identified in SA process.

### Next steps

- E16 This Regulation 18 SA Report is subject to consultation alongside the Draft Black Country Plan 2018-2039.
- E17 This report represents the latest stage of the SA process. The SA process will take on-board any comments on this report and use them to furnish the next report with greater detail and accuracy.
- E18 Once the Black Country Authorities have reviewed consultation comments in preparing the next version of the Plan (Regulation 19 stage) preparation of an Environmental Report will begin, also known as a full SA report: the Environmental Report will include all of the legal requirements set out in Annex 1 of the SEA Directive.

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# 1 Introduction

## 1.1 Background

- 1.1.1 The Black Country Authorities (BCA), which include Dudley Metropolitan Council, Sandwell Metropolitan Council, Walsall Council and City of Wolverhampton Council, are in the process of writing the Black Country Plan (BCP), previously referred to as the Black Country Core Strategy Review. As part of this process, a Sustainability Appraisal (SA) is being undertaken that incorporates the requirements of the Strategic Environmental Assessment (SEA) Regulations 2004 (SI 1633). The purpose of SA is to assess the likely social, environmental and economic consequences of a plan from the outset, and throughout its iterative development, to ensure that sustainability considerations are taken into account.
- 1.1.2 The BCA prepared an Issues and Options document in June 2017 as part of the plan-making process. The Issues and Options document set out to review the adopted Black Country Core Strategy in light of these challenges and opportunities. This Regulation 18 SA Report follows on from the SA Scoping Report<sup>1</sup> and SA Issues and Options Report<sup>2</sup> prepared by Lepus Consulting in 2017.
- 1.1.3 The purpose of this report is to provide an appraisal of each option in the Regulation 18 version of the Draft Black Country Plan 2018-2039, to identify their likely sustainability impacts on each objective of the SA Framework. This will help the BCA to identify the most sustainable options and prepare a BCP which is economically, environmentally and socially sustainable.

## 1.2 The Black Country

- 1.2.1 The Black Country is a predominantly urban sub-region of the West Midlands, located to the north west of Birmingham (see **Figure 1.1**). The sub-region includes the boroughs of Dudley, Sandwell, Walsall and the City of Wolverhampton. The Black Country covers an area of 35,728ha and has a combined population of approximately 1,198,900<sup>3</sup>. The sub-region is culturally diverse, and home to a greater proportion of people of people from Asian ethnic

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<sup>1</sup> Lepus Consulting (2017) Sustainability Appraisal Scoping Report. Available at: <https://blackcountryplan.dudley.gov.uk/media/11545/sa-scoping-report-feb-2017.pdf> [Date Accessed: 28/01/21]

<sup>2</sup> Lepus Consulting (2017) SA of the Black Country Core Strategy review - Issues and Options Report. Available at: [https://blackcountryplan.dudley.gov.uk/media/11544/lc-309\\_bccs\\_sa\\_report\\_17\\_130617rc.pdf](https://blackcountryplan.dudley.gov.uk/media/11544/lc-309_bccs_sa_report_17_130617rc.pdf) [Date Accessed: 28/01/21]

<sup>3</sup> Nomis (2019) Labour Market Profile – Black Country. Available at: <https://www.nomisweb.co.uk/reports/lmp/lep/1925185537/report.aspx> [Date Accessed: 15/06/21]



groups (14.64%) and Black ethnic groups (4.19%) in comparison to the national averages (7.5% and 3.3% respectively)<sup>4,5</sup>.

- 1.2.2 The area has a rich industrial heritage, including its extensive canal network, which opened up the mineral wealth of the area for exploitation during the Industrial Revolution. The area owes its name to black smoke, particularly from iron and coal industries, during a time when the Black Country became one of the most heavily industrialised areas in Britain.
- 1.2.3 Mining ceased in the area in the late 1960s, but manufacturing continues today, although on a much smaller scale. There is a total of 445,000 employee jobs across the Plan area<sup>6</sup>. In addition to manufacturing, which equate to approximately 14.6% of employee jobs in the Black Country, the biggest employment sectors include wholesale and retail trade (18.7%) and human health and social work activities (15.3%)<sup>7</sup>.
- 1.2.4 Today, the Black Country contains four Strategic Centres (the towns of Brierley Hill, Walsall and West Bromwich and the City of Wolverhampton), as well as a network of smaller towns and local centres. The major centres provide a wide range of employment, leisure, retail and tourism opportunities to serve the Black Country and the wider area.
- 1.2.5 Due to its large and growing population, the Black Country faces a challenging task to deliver good quality housing to meet the needs of the population and support the economy, whilst protecting its environmental assets and making provisions for climate change.
- 1.2.6 The Draft Black Country Plan (referred to as the BCP throughout this document) contains planning policies and land allocations to support the growth and regeneration of the Black Country over the next 20 years.
- 1.2.7 The BCP, which includes both strategic and local policies, will provide a policy framework to:
- Facilitate the delivery of the right development types to meet identified and emerging needs in the most sustainable places;
  - Prevent uncoordinated development;
  - Provide certainty over the types of development that is likely to be approved;
  - Meet housing needs between now and 2039;
  - Attract new businesses and jobs and offer existing businesses the space to grow by meeting employment land needs;

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<sup>4</sup> Office of National Statistics (2018) Population of England and Wales. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/uk-population-by-ethnicity/national-and-regional-populations/population-of-england-and-wales/latest> [Date Accessed: 20/01/20]

<sup>5</sup> Office of National Statistics (2018) Regional ethnic diversity. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/uk-population-by-ethnicity/national-and-regional-populations/regional-ethnic-diversity/latest#download-the-data> [Date Accessed: 20/01/20]

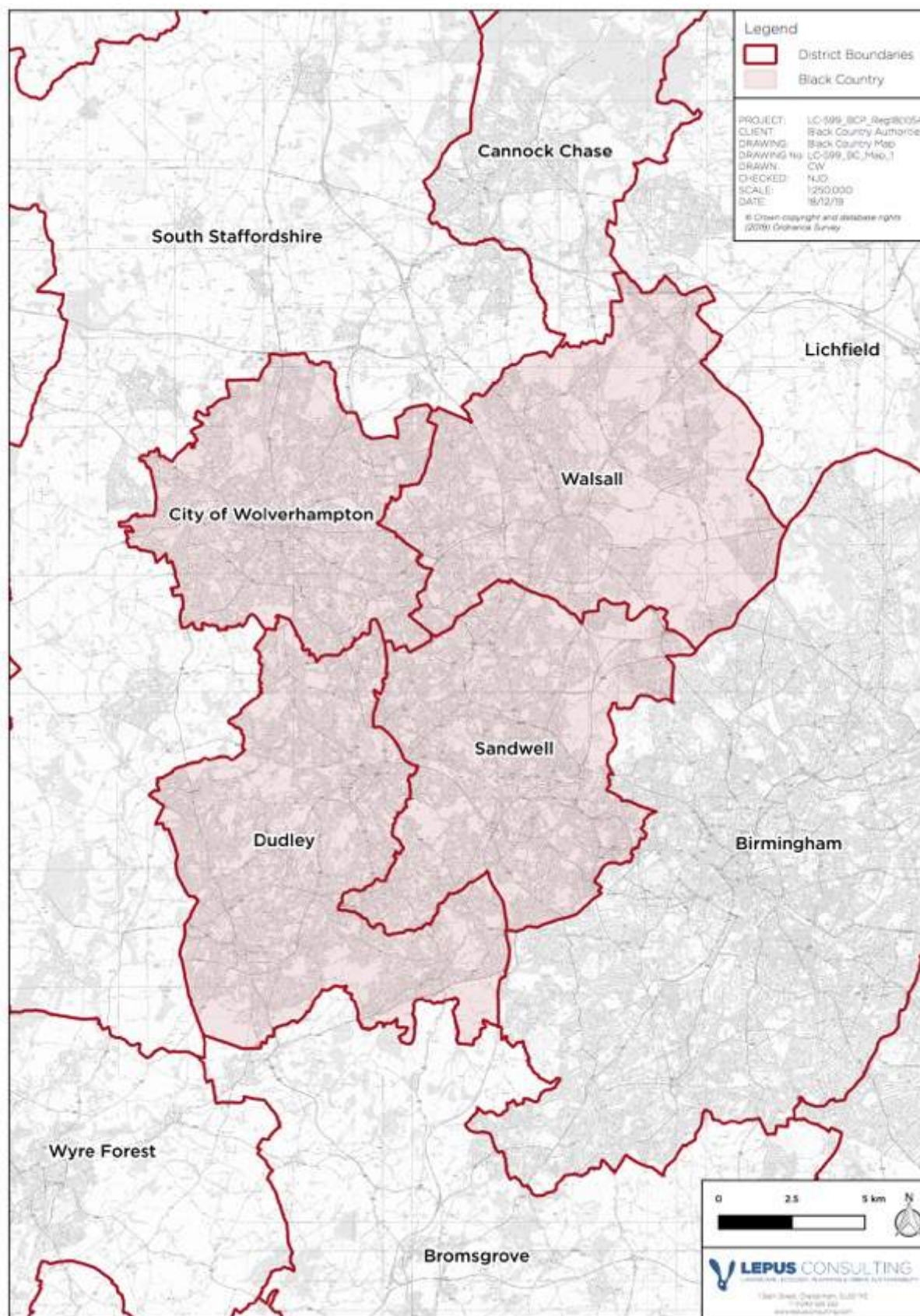
<sup>6</sup> Nomis (2019) Labour Market Profile – Black Country. Available at: <https://www.nomisweb.co.uk/reports/lmp/lep/1925185537/report.aspx> [Date Accessed: 15/06/21]

<sup>7</sup> Ibid

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

1.2.8 When adopted the Black Country Plan will replace the Black Country Core Strategy (2011) and substantial elements of 'Tier 2' Plans in the form of Area Action Plans and Site Allocations Documents.

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

## 1.3 The Black Country Plan

- 1.3.1 The Black Country covers the areas of Dudley Metropolitan Borough Council (MBC), Sandwell MBC, Walsall Council and the City of Wolverhampton Council. The four authorities worked together to produce the Black Country Core Strategy<sup>8</sup>, which was adopted in 2011.
- 1.3.2 The Black Country Plan (BCP) was formerly known as the Black Country Core Strategy Review. The BCP is the planning framework for the whole of the Black Country. Once adopted, the BCP will supplant the adopted Black Country Core Strategy.
- 1.3.3 The aim of the BCP is to enable the four authorities to consider future development beyond the current Plan period up to 2026. As a result, the BCP aims to meet development needs up to 2039.

## 1.4 Duty to Cooperate

- 1.4.1 The Duty to Cooperate was created in the Localism Act 2011<sup>9</sup> and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.
- 1.4.2 In July 2018, the four BCA asked neighbouring authorities to provide an update regarding strategic plan making and raised the issue of meeting the housing and employment need across the Black Country. In particular, asking if the Local Authorities would be able and willing to accommodate some of the Black Country's housing and employment need.
- 1.4.3 The neighbouring authorities which would be likely to take some of the housing and employment need for the BCP are: South Staffordshire; Stafford; Lichfield; and Cannock. Further exporting to Telford and Wyre Forest is also being considered.
- 1.4.4 As a result, the housing and employment number options include the possibility to export development to neighbouring authorities. As the precise quantum of development to be exported to each neighbouring authority has not been concluded at time of writing, the housing and employment number option assessments do not consider the sustainability impacts of exporting development. This development will be considered as part of the Local Plans for each neighbouring authority.
- 1.4.5 The Duty to Co-operate Statement included in the Draft Black Country Plan Statement of Consultation documents how the BCA have fulfilled the duty through the plan preparation process, and how the bodies referred to in the Act have helped to shape the draft BCP. It is

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<sup>8</sup> Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Council and Wolverhampton City Council (2011) Black Country Core Strategy. Available at: <https://blackcountryplan.dudley.gov.uk/t1/p2/> [Date Accessed: 28/01/21]

<sup>9</sup> Localism Act 2011. Available at: <https://www.legislation.gov.uk/ukpga/2011/20/contents> [Date Accessed: 28/01/21]

intended to draft and agree Statements of Common Ground with relevant authorities and bodies on key duty to co-operate issues at the BCP's publication stage.

## 1.5 Integrated approach to SA and SEA

- 1.5.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.
- 1.5.2 The European Union (EU) Directive 2001/42/EC<sup>10</sup> (SEA Directive) applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types). The objective of the SEA procedure can be summarised as follows: *“the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”*.
- 1.5.3 The SEA Directive has been transposed into English law by The Environmental Assessment of Plans and Programmes Regulations 2004<sup>11</sup> (SEA Regulations). Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the LPR to be subject to SEA throughout its preparation.
- 1.5.4 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is a legal requirement as specified by S19(5) of the Planning and Compulsory Purchase Act 2004<sup>12</sup> and should be an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA lies in The Town and Country Planning (Local Planning) (England) Regulations 2012<sup>13</sup>. SA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.
- 1.5.5 Public consultation is an important aspect of the integrated SA/SEA process.

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<sup>10</sup> SEA Directive. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date Accessed: 15/06/21]

<sup>11</sup> The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date Accessed: 15/06/21]

<sup>12</sup> Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date Accessed: 15/06/21]

<sup>13</sup> The Town and Country Planning Regulations 2012. Available at: <http://www.legislation.gov.uk/uksi/2012/767/contents/made> [Date Accessed: 15/06/21]



## 1.6 Best Practice Guidance

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

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment<sup>14</sup>.
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive<sup>15</sup>.
- Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework (NPPF)<sup>16</sup>.
- Ministry of Housing, Communities and Local Government (2019) Planning Practice Guidance (PPG)<sup>17</sup>.
- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans<sup>18</sup>.

## 1.7 Sustainability Appraisal

1.7.1 This document is a component of the SA of the BCP. It provides an assessment of the likely effects of reasonable alternatives, as per Stage B of **Figure 1.2**, according to Planning Practice Guidance.

<sup>14</sup> European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: [http://ec.europa.eu/environment/archives/eia/pdf/030923\\_sea\\_guidance.pdf](http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf) [Date Accessed: 20/01/20]

<sup>15</sup> Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguidesea.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf) [Date Accessed: 20/01/20]

<sup>16</sup> Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework. <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 20/01/20]

<sup>17</sup> Ministry of Housing, Communities and Local Government (2019) Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date Accessed: 20/01/20]

<sup>18</sup> Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <http://www.rtpi.org.uk/media/2668152/sea-sappracticeadvicefull2018c.pdf> [Date Accessed: 20/01/20]

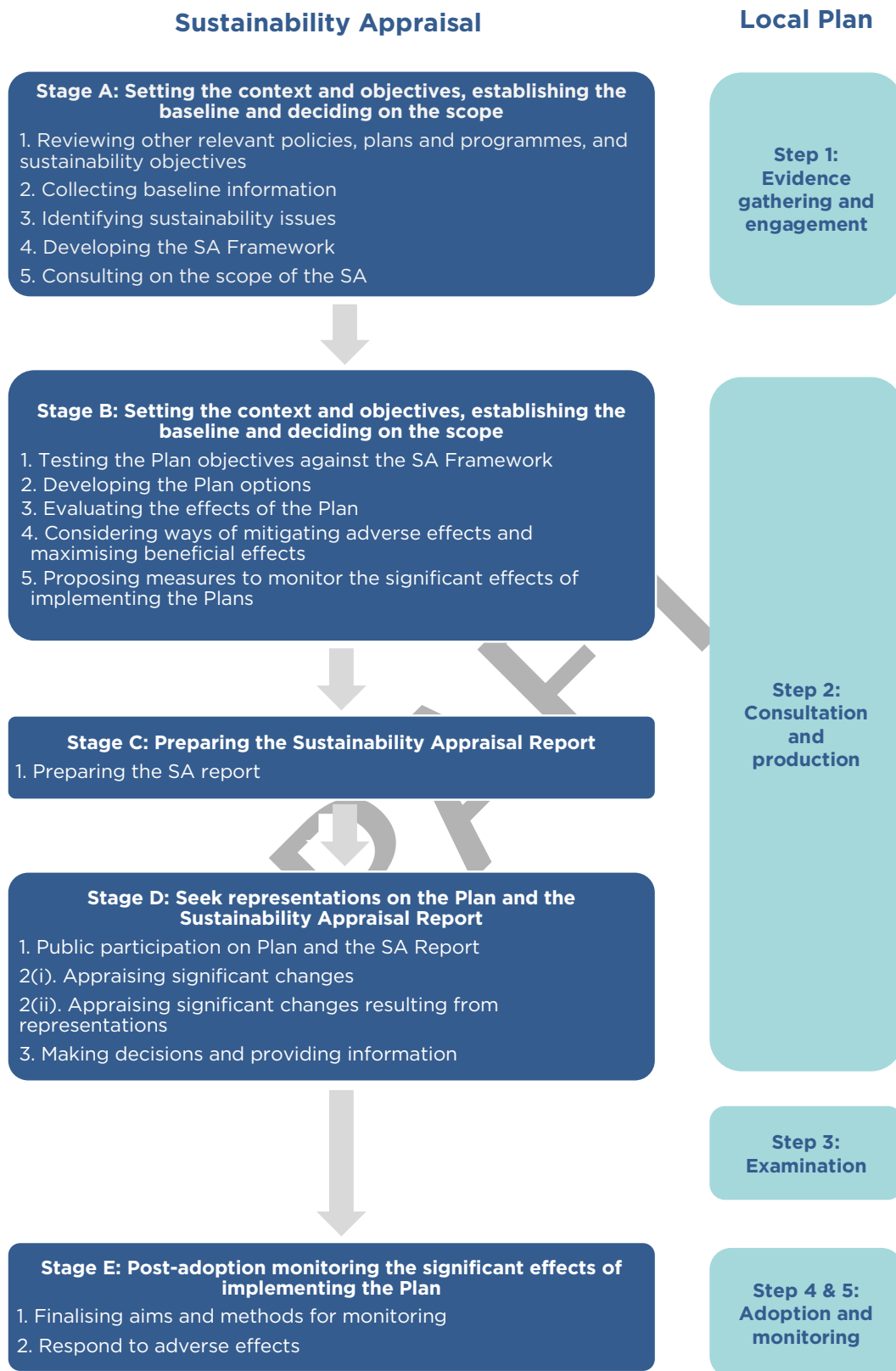


Figure 1.2: Sustainability Appraisal process

## 1.8 The SA process so far

1.8.1 **Table 1.1** below presents a timeline of stages of the BCP and SA process so far. This represents Stages A and B set out in **Figure 1.2**. Detail on these SA stages are presented in **sections 1.9 to 1.12** below.

*Table 1.1: The BCP and Sustainability process to date*

Date	BCP Stage	Sustainability Appraisal
February 2017		<b>SA Scoping Report<sup>19</sup></b> The Scoping Report set out the key issues in relation to sustainability across the Black Country. It also presents the SA Framework against which future sustainability appraisals will be based on.
June 2017	<b>Issues and Options Report<sup>20</sup></b> The report considered nine key challenges and opportunities across the Black Country, which focused on housing and employment need, protecting the environment, providing infrastructure and close working with neighbouring authorities.	<b>Issues and Options SA Report<sup>21</sup></b> The Issues and Options SA Report assessed eight strategic options, five strategic policies and eight policy areas.
June 2021	<b>Regulation 18 version of the Draft Black Country Plan 2018-2039</b>	<b>Regulation 18 SA Report (This report)</b> This SA report contains an assessment of 635 reasonable alternative sites, 77 draft policies, five housing options, five employment options and eleven spatial options.

## 1.9 Scoping Report

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

- Identifying other relevant plans, programmes and environmental protection objectives;
- Collecting baseline information;
- Identifying sustainability problems and key issues;
- Preparing the SA Framework; and

<sup>19</sup> Lepus Consulting (2017) Sustainability Appraisal of the Black Country Core Strategy: Scoping Report. Available at: <https://blackcountryplan.dudley.gov.uk/media/11545/sa-scoping-report-feb-2017.pdf> [Date Accessed: 22/01/20]

<sup>20</sup> Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Council and City of Wolverhampton Council (2017) Black Country Core Strategy: Issues and Options Report. Available at: [https://blackcountryplan.dudley.gov.uk/media/11458/cs\\_final\\_amended\\_200717.pdf](https://blackcountryplan.dudley.gov.uk/media/11458/cs_final_amended_200717.pdf) [Date Accessed: 22/01/20]

<sup>21</sup> Lepus Consulting (2017) Sustainability Appraisal of the Black Country Core Strategy Review 2016 – 2036. Issues and Options Report: Regulation 18 Report. Available at: [https://blackcountryplan.dudley.gov.uk/media/11544/lc-309\\_bccs\\_sa\\_report\\_17\\_130617rc.pdf](https://blackcountryplan.dudley.gov.uk/media/11544/lc-309_bccs_sa_report_17_130617rc.pdf) [Date Accessed: 22/01/20]

- Consultation arrangements on the scope of SA with the consultation bodies.

1.9.2 The Scoping report was consulted on with the statutory bodies Natural England, Historic England and the Environment Agency, as well as other relevant parties and the public. Following consultation, the Scoping report was updated in light of the comments received. Each of the reasonable alternatives or options appraised in this report have been assessed for their likely impacts on each SA Objective of the SA Framework. The SA Framework, which is presented in its entirety in **Appendix A**, is comprised of the following SA Objectives:

- **Cultural heritage:** Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.
- **Landscape:** Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place.
- **Biodiversity, flora, fauna and geodiversity:** Protect, enhance and manage biodiversity and geodiversity.
- **Climate change mitigation:** Minimise the Black Country's contribution to climate change.
- **Climate change adaptation:** Plan for the anticipated levels of climate change.
- **Natural resources:** Protect and conserve natural resources.
- **Pollution:** Reduce air, soil and water pollution.
- **Waste:** Reduce waste generation and disposal and achieve the sustainable management of waste.
- **Transport and accessibility:** Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.
- **Housing:** Provide affordable, environmentally sound and good quality housing for all.
- **Equality:** Reduce poverty, crime and social deprivation and secure economic inclusion.
- **Health:** Safeguard and improve community health, safety and well-being.
- **Economy:** Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.
- **Education, skills and training:** Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness.

1.9.3 The SA Framework is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Annex 1(f)<sup>22</sup> of the SEA Directive. Including the SEA topics in the SA Objectives helps ensure that all of the environmental criteria of the SEA Directive are

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<sup>22</sup> Annex 1(f) identifies: 'the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors'.

represented. Consequently, the SA Objectives reflect all subject areas to ensure the assessment process is transparent, robust and thorough.

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

1.9.5 The Black Country authorities consulted with Historic England, Natural England, the Environment Agency and other relevant bodies on the content of the SA Scoping Report. These comments were taken into consideration and the SA Scoping Report amended where appropriate. The comments received during the consultation period are presented in **Appendix B**.

## 1.10 Issues and Options

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

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

1.10.3 The consultation was held for ten weeks between July and September 2017. The comments received during the consultation period are presented in **Appendix B**.

1.10.4 The recommendations provided within the Issues and Options SA Report and how the BCA have responded to the recommendations are presented in **Table 1.2** below.

**Table 1.2: Recommendations made in the Issues and Options SA Report**

SA Recommendation	Black Country Authorities' Response
<i>"The Black Country soil resource ... could be further safeguarded under, for example, a natural resources policy".</i>	See supporting text for Policy ENV4 in relation to soils with regards to woodland, veteran trees and new tree planting.
<i>"It is recommended that the evidence base be updated to include transport modelling".</i>	Accessibility and transport modelling has informed the evidence base for the BCP in evaluating site alternatives and this has also informed the SA process. The data includes information relating to the location of healthcare facilities, schools, employment locations and fresh food and centres, and identifies areas within the Black Country providing sustainable access to these services for pedestrians, cyclists and via public transport.
<i>Policy ENV1 "will be amended to include ancient woodland in the list of nationally designated sites".</i>	<p>Ancient woodland and veteran trees represent irreplaceable habitat as specified in the NPPF paragraph 175(c) and government guidance<sup>23</sup>.</p> <p>Policy ENV4 seeks to ensure that "Development that would result in the loss of or damage to ancient trees, ancient woodland or veteran trees will not be permitted. Development adjacent to ancient woodland will be required to provide an appropriate landscaping buffer, with a minimum depth of 15m and a preferred depth of 50m" and "Opportunities for increasing tree provision through habitat creation and the enhancement of ecological networks, including connecting up areas of ancient woodland, will be maximised, in particular by means of the biodiversity net gain and nature recovery network initiatives (see Policy ENV3)."</p>

## 1.11 Regulation 18

- 1.11.1 This Regulation 18 SA Report provides an appraisal of housing and employment growth options, spatial options, reasonable alternative sites and policies contained in the Draft Local Plan.
- 1.11.2 The Regulation 18 SA Report will be subject to consultation with a range of stakeholders and the public alongside the Draft BCP. It will enable interested persons to comment on the preferred planning strategy and preferred sites intended to help achieve the strategy. Comments received will provide a basis of any changes that may need to be made to the strategy and preferred sites.

<sup>23</sup> Forestry Commission and Natural England (Updated November 2018). Ancient woodland, ancient trees and veteran trees: protecting them from development. Available at <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences> [Accessed 13th May 2021].



## 1.12 Assessment of reasonable alternatives

- 1.12.1 The purpose of this document is to provide an appraisal of the reasonable alternatives (RAs), also known as ‘options’ (those listed in **para 1.11.1**), in line with Article 5 Paragraph 1 of the SEA Directive<sup>24</sup>:
- 1.12.2 *“Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.”*
- 1.12.3 PPG Paragraph: 018 Reference ID: 11-018-20140306 states that *“Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings”*.
- 1.12.4 Different types of RA are possible and may include:
- Different quantas of development over the plan period. This RA option considers the overall dwelling numbers, employment floorspace and / or retail provision options being considered across the plan period. Options may include aspects such as an uplift above the standard method, housing affordability, or a Duty to Co-operate.
  - Spatial Options – This RA option considers how the overall level of housing or employment floorspace will be distributed across the area and can include different models for growth or follow specific thematic priorities/ approaches;
  - Strategic sites – This option considers reasonable alternative locations for strategic sites. Strategic sites are characterised by larger sites, typically between 300 to 2500 homes (or more in the case of new settlements) and may also include urban extensions;
  - Specific sites (typically derived from a criteria-based process to identifying RA sites, informed by the Call for Sites and strategic reviews of housing and employment availability); and
  - Policies – It may not always be possible to identify RA to policies but approaches can include the ‘policy verses no policy’ approach or variations on a given policy.

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<sup>24</sup> EU Council (2001) Directive 2001/42/EC of the European Parliament and of the Council. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date Accessed: 13/07/18]

1.12.5 Key aspects both the BCP and Regulation 19 SA reporting outputs need to consider in respect to RA are:

- What reasonable alternatives have been identified and on what basis?
- How they have been assessed and compared (including consideration of sustainability issues)?
- What are the preferred alternatives and why they are preferred over other alternatives?

1.12.6 The RPTI have produced best practice guidance on 'SEA and Improving the effectiveness and efficiency of SEA/SA for land use plans'<sup>25</sup>. This recommends a sequential approach to assessing RA as set out in **Figure 1.3** below.

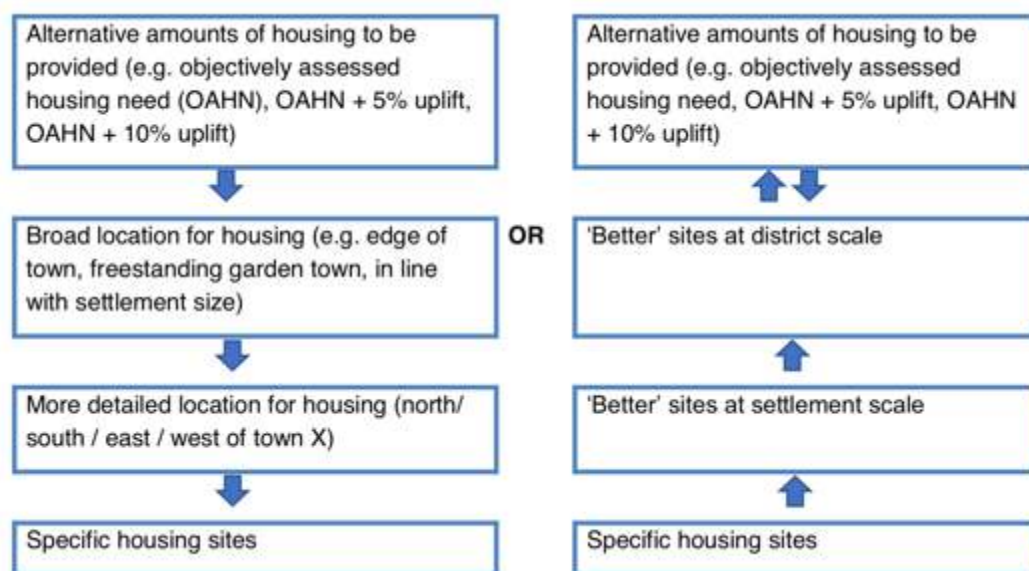


Figure 1.3: Sequencing of Reasonable Alternatives (Source: RTPI)

1.12.7 The BCA have followed the approach set out on the left-hand side of **Figure 1.3** for both housing and employment growth. Details of the alternatives assessed, and their comparative performance against different SA objectives, are presented in **Chapters 3, 4 and 5** of this report.

1.12.8 This report also provides information in relation to the likely characteristics of effects, as per the SEA Directive (see **Box 1.1**).

<sup>25</sup> Royal Town Planning Institute (January 2018). Strategic Environmental Assessment -Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at <https://www.rtpi.org.uk/research/2018/january/strategic-environmental-assessment-seasa-for-land-use-plans/> [Accessed 14/04/21].

**Box 1.1: Annex II of the SEA Directive<sup>26</sup>**

**Criteria for determining the likely significance of effects (Article 3(5) of SEA Directive)**

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

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

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

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

## 1.13 Signposting for this report

### 1.13.1 This Regulation 18 SA Report is structured as follows:

- **Chapter 2** – baseline and local context of the Black Country, set out by SA Objective.
- **Chapter 3** – methodology and summary of the appraisal of housing and employment number options.
- **Chapter 4** – methodology and summary of the appraisal of the spatial options.
- **Chapter 5** – methodology and summary of the appraisal of reasonable alternative sites by SA Objective.
- **Chapter 6** – reasons for selection / rejection of reasonable alternative sites.
- **Chapter 7** – methodology and summary of the appraisal of draft policies.
- **Chapter 8** – sets out the next steps for the SA and Local Plan.
- **Appendix A** – the SA Framework against which all appraisals are based.

<sup>26</sup> EU Council (2001) Directive 2001/42/EC of the European Parliament and of the Council. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date Accessed: 20/01/20]

- **Appendix B** – the consultation responses received during previous stages of the SA preparation.
- **Appendix C** – the appraisal of the five housing number options.
- **Appendix D** – the appraisal of the five employment number options.
- **Appendix E** – the appraisal of the eleven spatial options.
- **Appendices F, G, H & I** – the full appraisal of the 635 reasonable alternative site assessments.
- **Appendix J** – the appraisal of the 77 draft policies.
- **Appendix K** – the appraisal of Gypsy, Traveller and Travelling Showpeople Sites

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## 2 Baseline

### 2.1 SA Objective 1: Cultural heritage

- 2.1.1 There are eleven Registered Parks and Gardens (RPG), 27 Scheduled Monuments (SM), 80 Conservation Areas, ten Grade I Listed Buildings, 57 Grade II\* Listed Buildings and 944 Grade II Listed Buildings located within the Plan area, at the time of writing (see **Figure 2.1** and **2.2**).
- 2.1.2 The Black Country has a rich industrial history. Many of the Listed Buildings and other designated heritage assets within the Plan area are associated with the numerous warehouses, factories, and network of canals that were opened during the Industrial Revolution, as well as the main town centres within Dudley, Sandwell, Walsall and Wolverhampton.
- 2.1.3 Some of the historic assets within the Black Country include the Iron Age Hillfort in Walsall, a late Saxon Cross in Wolverhampton and a medieval castle in Dudley. Walsall is a medieval town first mentioned as a settlement in 1159<sup>27</sup>. By 1200 there was a church, manor house and park created. The medieval town covered approximately 22ha. Wolverhampton is also a medieval town which is estimated to have originated as a Mercian royal estate<sup>28</sup>. There is evidence of Sunday market in Wolverhampton in 1180 and is estimated to have been approximately 22ha.
- 2.1.4 It should be noted that not all of the Black Country's historic environment resource and heritage assets are subject to statutory designations; non-designated features comprise a significant aspect of heritage, which is often experienced on a daily basis. This may include buildings and other features of historic interest which are not listed, as well as both discovered and undiscovered archaeological remains.
- 2.1.5 The Black Country Historic Landscape Characterisation Study<sup>29</sup> aimed to create a strategic landscape-level understanding of the historic character and environment of the Black Country. The study identified 103 Historic Environment Area Designations (HEADs) within the Black Country Green Belt and 354 HEADs in the urban area. The study also identified a number of Archaeological Priority Areas, which are considered to contain particularly rare or well-preserved remains of high archaeological and historic interest.

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<sup>27</sup> Black Country History (no date) Walsall: Medieval Town. Available at:  
[http://blackcountryhistory.org/collections/getrecord/WAHER\\_MBL1915/](http://blackcountryhistory.org/collections/getrecord/WAHER_MBL1915/) [Date Accessed: 02/04/20]

<sup>28</sup> Black Country History (no date) Wolverhampton: Medieval Town. Available at:  
[http://blackcountryhistory.org/collections/getrecord/WOHER\\_MBL5060/](http://blackcountryhistory.org/collections/getrecord/WOHER_MBL5060/) [Date Accessed: 02/04/20]

<sup>29</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at:  
[https://blackcountryplan.dudley.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf) [Date Accessed: 27/02/20]

- 2.1.6 Archaeological Priority Areas (APAs) are identified within the Historic Landscape Characterisation as *“sites with a high potential for archaeological remains of regional or national significance that have not been considered for designation as scheduled monuments, or where there is insufficient data available about the state or preservation of any remains to justify a designation”*. The APAs have been identified using the ‘Scheduled Monuments and nationally important but non-scheduled monuments’<sup>30</sup> and are presented in **Figure 2.3**.
- 2.1.7 Areas of High Historic Townscape Value (AHHTVs) and Designed Landscapes of High Historic Value (DLHHVs) have also been identified within the Historic Landscape Characterisation (see **Figure 2.4**). AHHTVs are areas *“where built heritage makes a significant contribution to the local character and distinctiveness”* and have been identified due to their sense of place, street plan and form, streetscape, views and setting, and representation. DLHHVs are *“designed landscapes that make an important contribution to local historic character but do not meet the criteria for inclusion on the national Register of Parks and Gardens”* and have been identified due to the date, preservation, aesthetics, and associations with people and past events.
- 2.1.8 Impacts on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. The level of the impact has been assessed based on the nature and significance of, and proximity of the proposal to, the heritage asset in question. Additionally, where features identified on Historic England’s Heritage at Risk Register<sup>31</sup> could potentially be affected by the proposed development, this has been stated.
- 2.1.9 Adverse impacts on heritage assets can include direct loss or truncation of an asset, impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset. These negative impacts are expected to be long-term and irreversible.
- 2.1.10 It is assumed that designated heritage assets will not be lost as a result of development, unless otherwise specified by the BCA.
- 2.1.11 It is anticipated that the BCA will require a Heritage Statement or Archaeological Desk-Based Assessment to be prepared to accompany future planning applications, where appropriate. The Heritage Statement should describe the significance of any heritage assets affected by the proposals, including any contribution made by their settings.

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<sup>30</sup> Department for Culture, Media and Sport (2013) Scheduled Monuments and nationally important but non-scheduled monuments. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/249695/SM\\_policy\\_statement\\_10-2013\\_2\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/249695/SM_policy_statement_10-2013_2_.pdf) [Date Accessed: 15/06/21]

<sup>31</sup> Historic England Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register> [Date Accessed: 15/06/21]



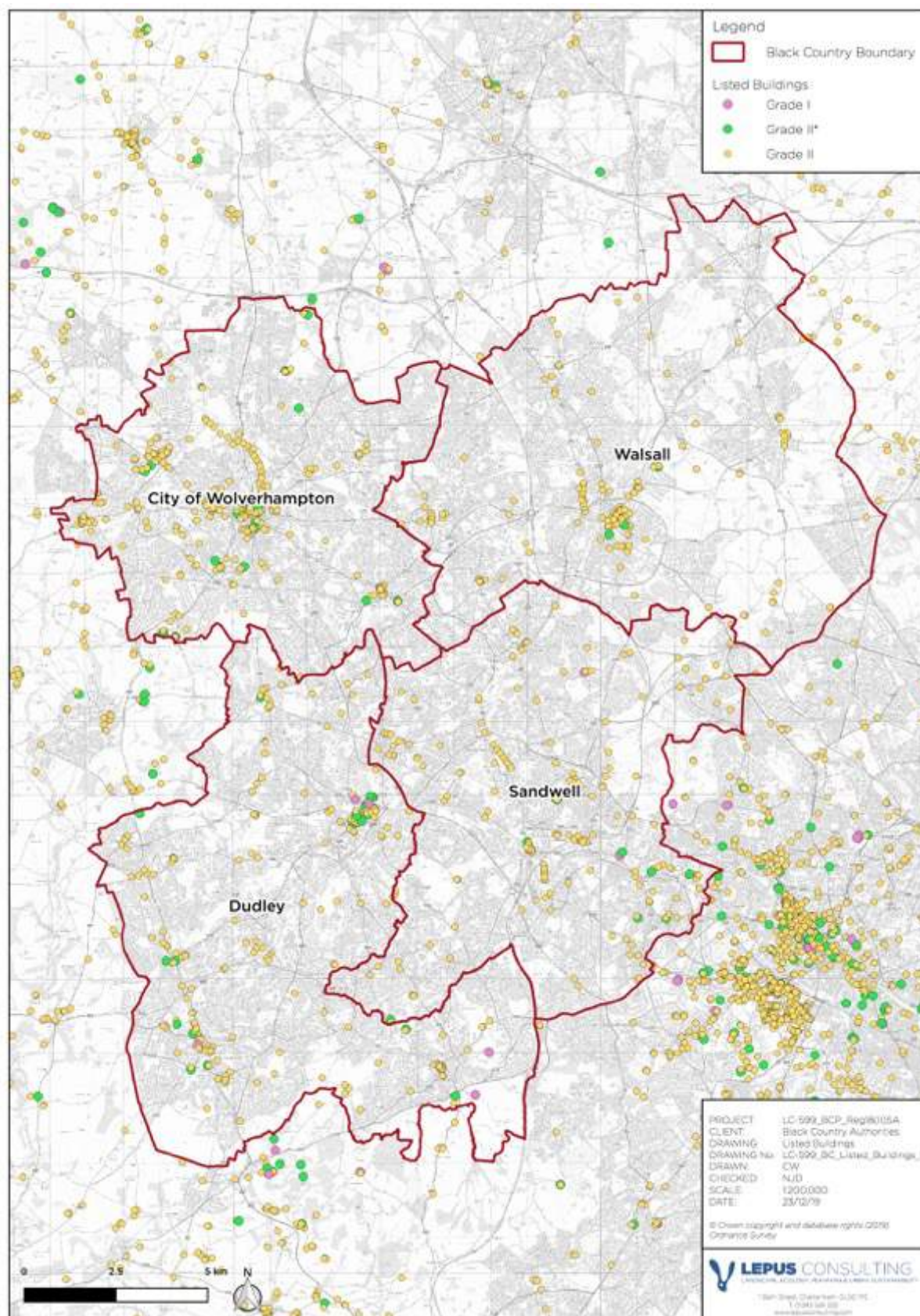
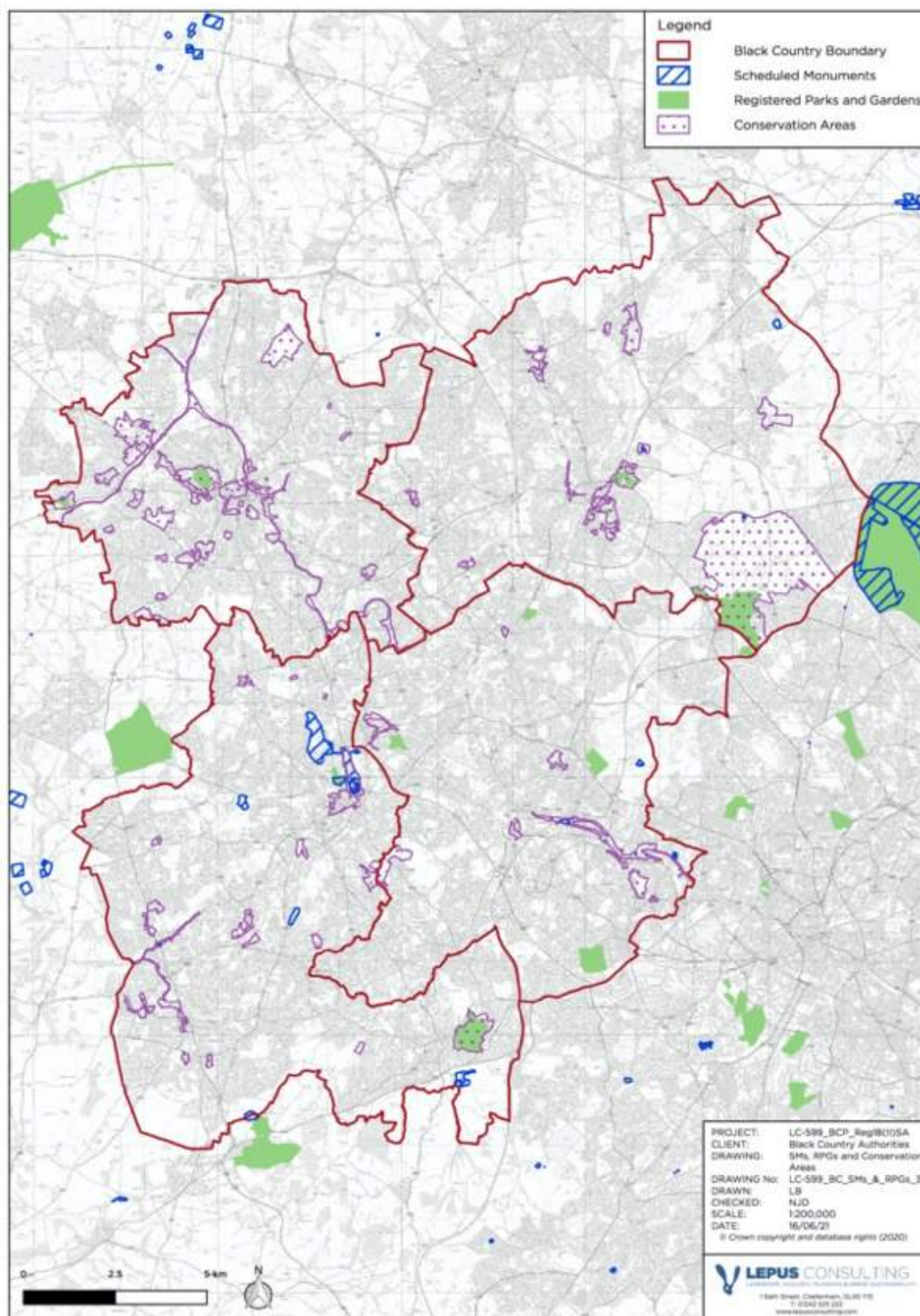


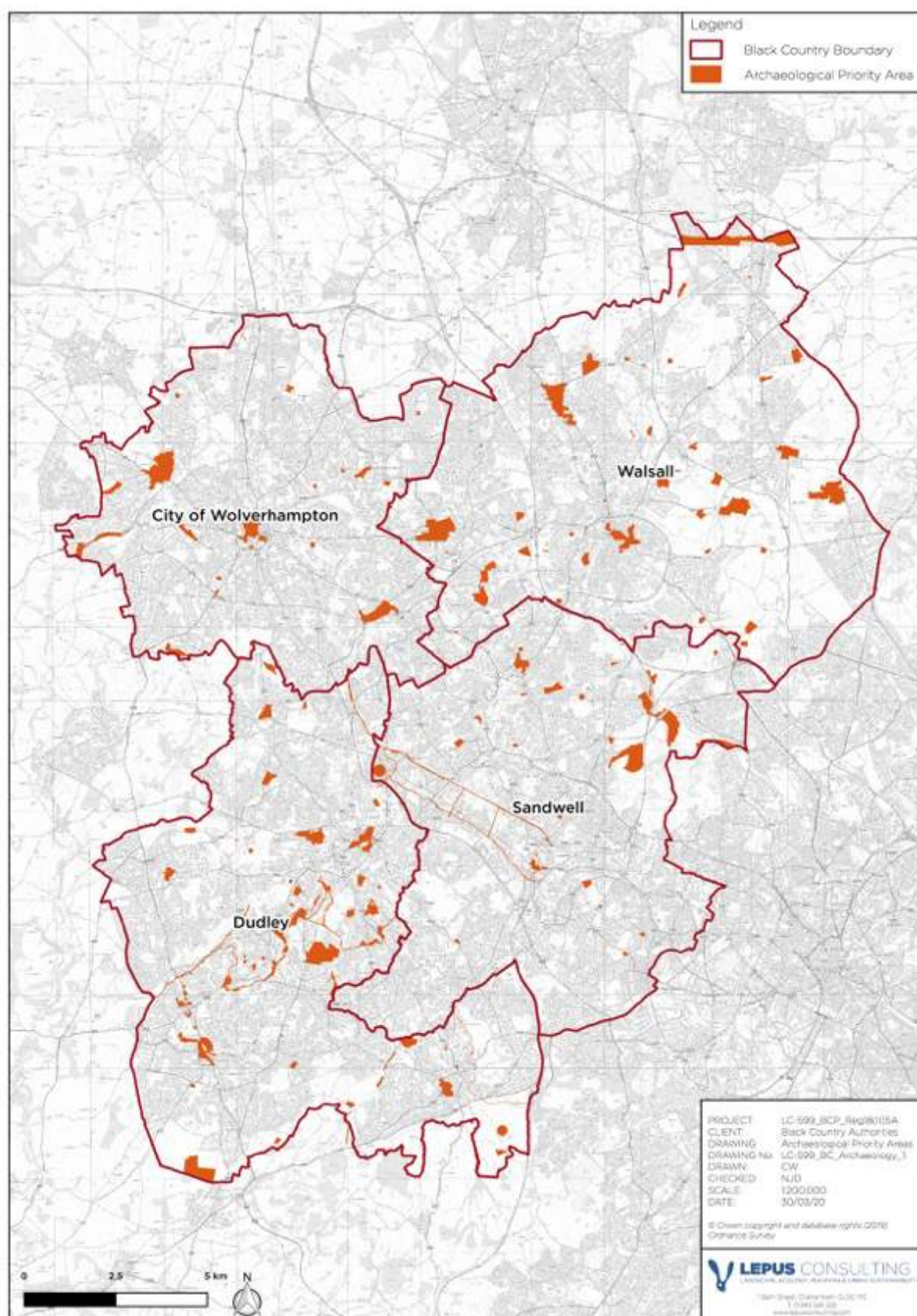
Figure 2.1: Listed Buildings in and around the Black Country (source: Historic England)





**Figure 2.2:** Scheduled Monuments, Registered Parks and Gardens and Conservation Areas in and around the Black Country (source: Historic England and BCA)





**Figure 2.3:** Archaeological Priority Areas (APAs) within the Black Country (source: BCA)



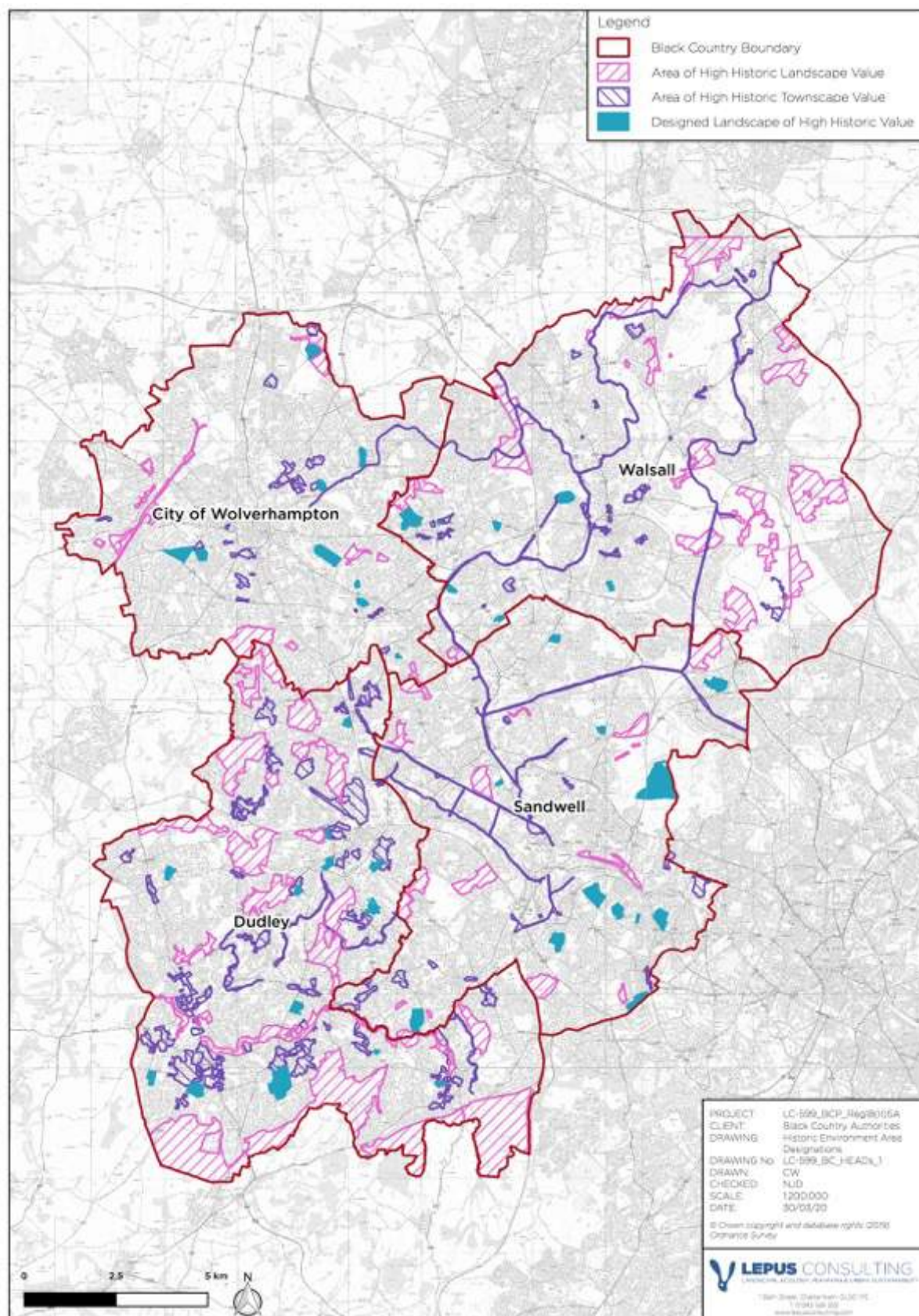


Figure 2.4: Historic Environment Area Designations (HEADs) within the Black Country (source: BCA)

## 2.2 SA Objective 2: Landscape

2.2.1 Impacts on landscape are typically determined by the specific layout and design of development proposals, and their perceived impact on the surrounding environment and associated landscape and/or townscape features. Detailed designs for each development proposal are uncertain at this stage of the assessment. Therefore, the nature of the potential impacts on the landscape are, to an extent, uncertain. There is a risk of negative effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a development proposal is located in close proximity to sensitive receptors or considered to contradict the values and characteristics of the surrounding area. The level of impact has been identified based on the nature and value of the landscape receptor in question and its proximity to the proposed development location.

2.2.2 In order to consider the potential visual effects of development, it has been assumed that the development proposals would, broadly, reflect the character of nearby development of the same type.

2.2.3 It is anticipated that the BCA will require developers to undertake Landscape and Visual Impact Assessments (LVIAs) or Landscape and Visual Appraisals (LVAs) to accompany any future proposals, where relevant. The LVIAs or LVAs should seek to provide greater detail in relation to the landscape character of the proposal and its surroundings, the views available towards the development proposal, the character of those views and the sensitivity and value of the relevant landscape and visual receptors.

### National Character Areas

2.2.4 The Black Country lies within three National Character Areas (NCAs), as illustrated in **Figure 2.5**:

- 'Mid Severn Sandstone Plateau' with open arable fields and steep wooded gorges of the Severn Valley;
- 'Cannock Chase and Cank Wood' ranging from the open heathlands and plantations associated with the AONB to dense urban areas; and
- 'Arden' which is associated with the historic Forest of Arden, a landscape now characterised by wooded farmland and meandering rivers.

### Cannock Chase Area of Outstanding Natural Beauty (AONB)

2.2.5 Cannock Chase AONB is a nationally designated landscape, located approximately 3.7km to the north of the Plan area (see **Figure 2.6**). Whilst new development in the Black Country could potentially lead to adverse impacts on the AONB, such as through increased visitor pressures, it is not anticipated that there would be any adverse visual impacts on the AONB as a result of development proposed within the BCP, due to the distance from the development to the AONB.

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## Green Belt

- 2.2.6 The majority of the central and western part of the Black Country is heavily urbanised, although parts of all four local authorities lie within the Black Country Green Belt (see **Figure 2.7**). The Black Country Green Belt forms part of the West Midlands Green Belt, surrounding the West Midlands Conurbation. Although Green Belt itself is not necessarily of high landscape value, it often serves to protect the character and setting of historic towns and support landscape-scale biodiversity networks. New development could potentially increase noise and light pollution and reduce the perception of tranquillity in some areas.
- 2.2.7 The purposes of the Green Belt include restricting the sprawl of the large built-up areas into the countryside, preventing coalescence and encouraging urban regeneration to be prioritised over development in these areas. Due to the Black Country's highly urbanised nature, this means that the identified housing requirement for the Plan period cannot be met with development only within the existing urban areas. As such, appropriate areas of the Green Belt which can support a limited amount of development will be identified through using the findings of the Green Belt Study<sup>32</sup>.
- 2.2.8 The Green Belt Study, carried out by LUC, classified parcels of Green Belt land into different 'harm' ratings, based on the assessment of potential harm caused by removing each parcel from the Green Belt based on a range of criteria. A summary of the harm ratings is presented in **Figure 2.8**, which shows that in general the areas of lowest harm are areas of Green Belt land surrounded by built development within the urban areas.

## Landscape Sensitivity

- 2.2.9 The Black Country Landscape Sensitivity Assessment<sup>33</sup>, also carried out by LUC, assessed the sensitivity of Green Belt land to housing and commercial development. The aim of the study was to identify the extent to which the character and quality of Black Country Green Belt land is susceptible to change as a result of future development. A summary of the landscape sensitivity assessment is presented in **Figure 2.9**, showing parcels of Green Belt land ranging from 'high' to 'low' sensitivity.
- 2.2.10 It should be noted that although there is a relationship between the Landscape Sensitivity Assessment and the Green Belt Harm Assessment, the Green Belt Study states that "*there are fundamental distinctions in the purposes of the two assessments, reflecting the fact that landscape quality is not a relevant factor in determining the contribution to Green Belt purposes, or harm to those purposes resulting from the release of land*".

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<sup>32</sup> LUC (2019) Black Country Green Belt Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced_redacted.pdf) [Date Accessed: 15/06/21]

<sup>33</sup> LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: [https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf) [Date Accessed: 15/06/21]



- 2.2.11 Within the existing urban areas, development could potentially impact the surrounding townscapes, and surrounding features of note amongst the built form, such as the Barr Beacon, Iron Age hillforts and the network of canals and waterways<sup>34</sup>. Regeneration and development of brownfield sites within the built-up areas may present opportunities to improve the local character, however, the design and layout of potential development is unknown at present. Consideration of the potential impact of development on sensitive townscapes is considered in terms of the historic landscape character within SA Objective 1 (Cultural Heritage).

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<sup>34</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at:  
[https://archaeologydataservice.ac.uk/catalogue/adsdata/arch-939-1/dissemination/pdf/BCHLC\\_FullRpt.pdf](https://archaeologydataservice.ac.uk/catalogue/adsdata/arch-939-1/dissemination/pdf/BCHLC_FullRpt.pdf) [Date Accessed: 07/04/20]

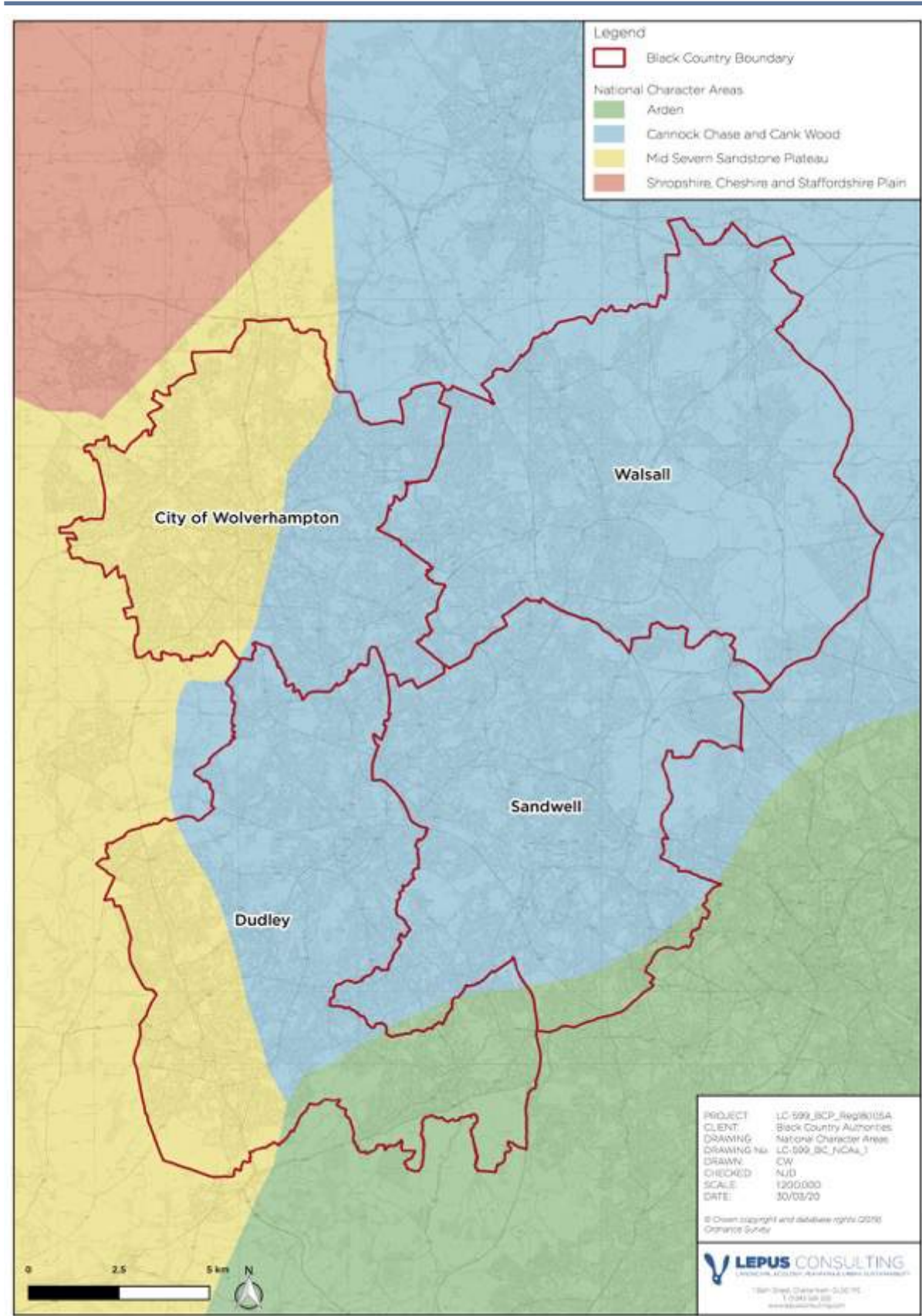
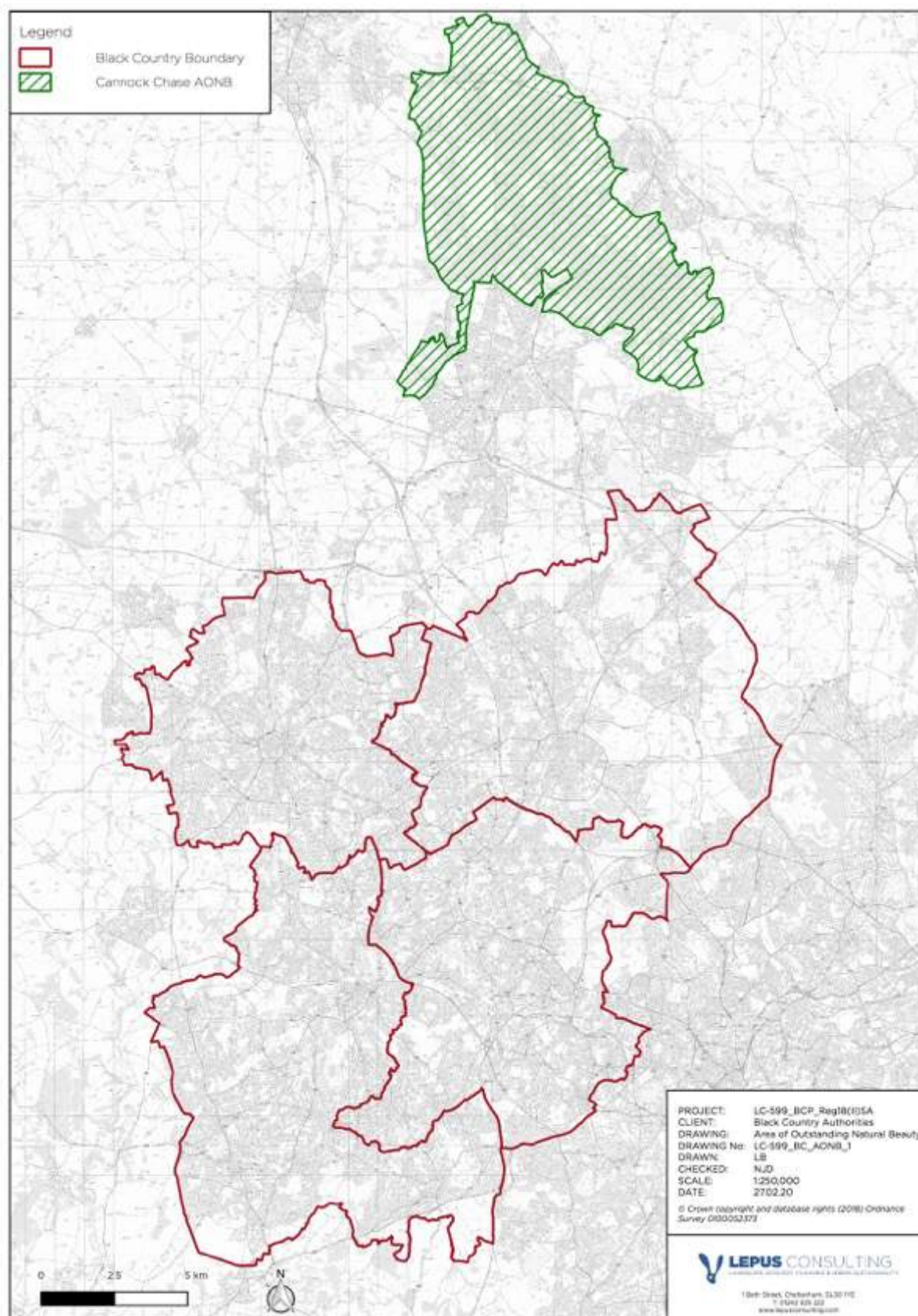
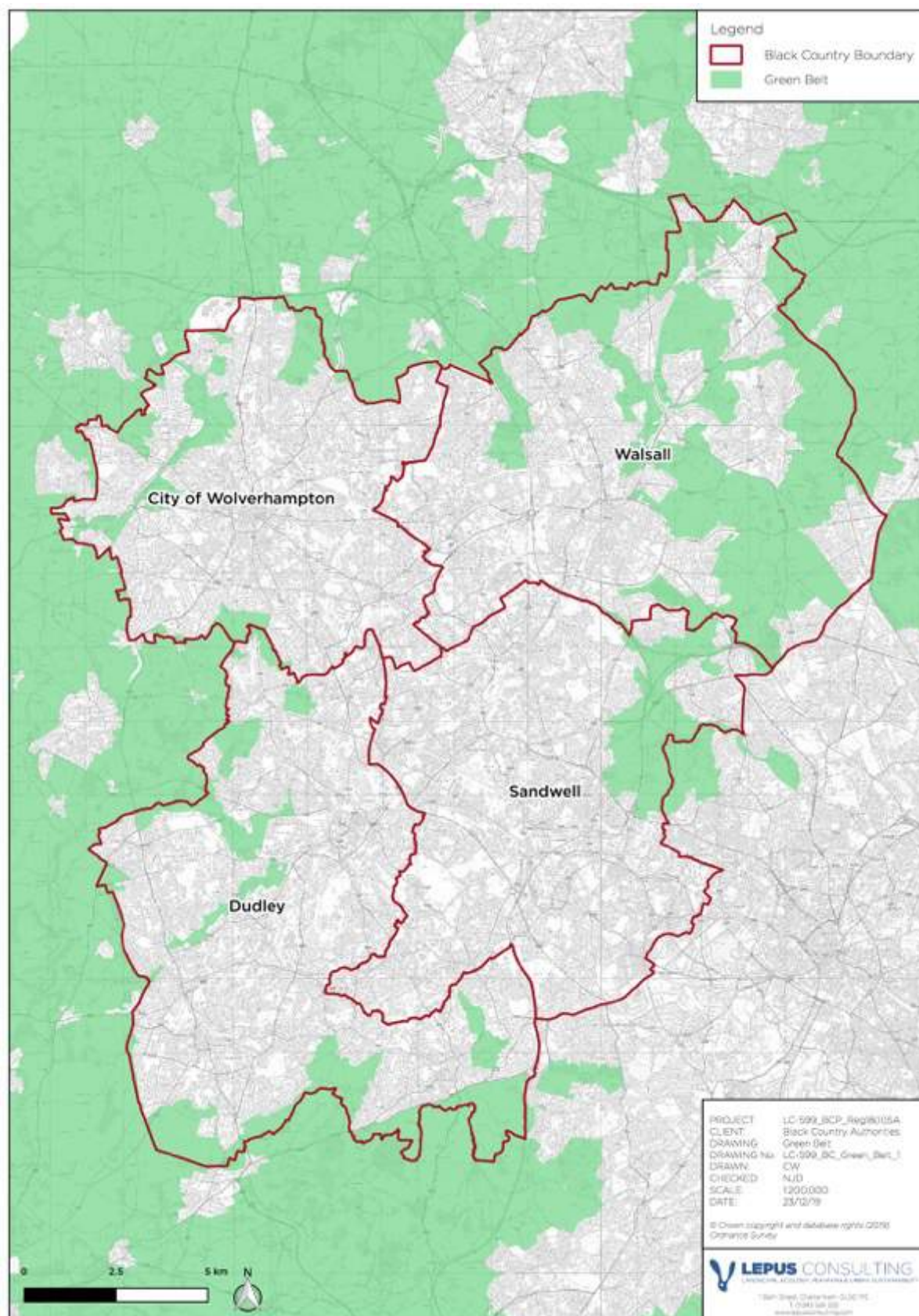


Figure 2.5: National Character Areas (NCAs) within the Black Country



**Figure 2.6:** Location of Cannock Chase Area of Outstanding Natural Beauty (AONB) in relation to the Black Country (source: Natural England)





**Figure 2.7:** Green Belt in and around the Black Country (source: MHCLG)



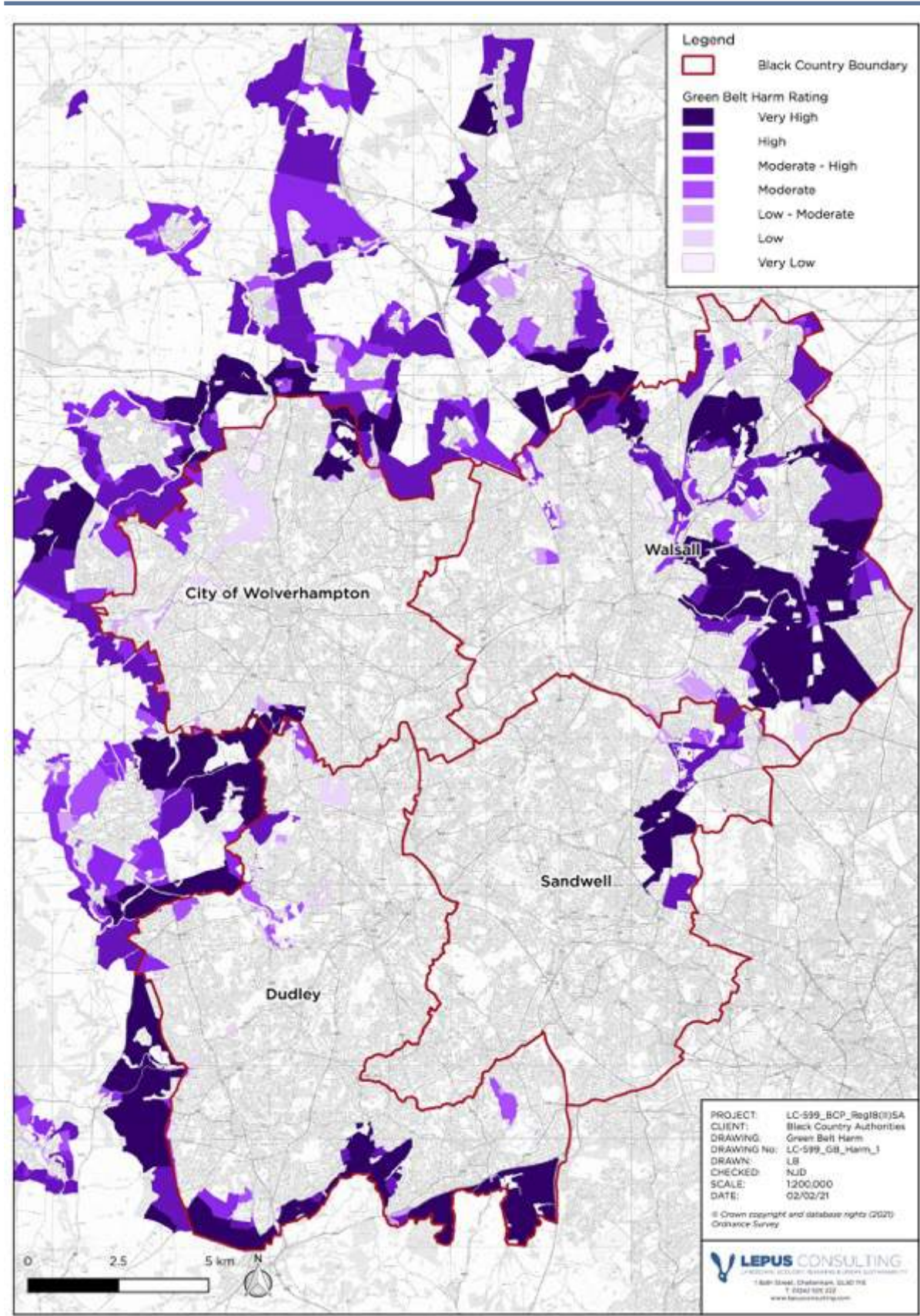


Figure 2.8: Green Belt Harm Rating within and surrounding the Black Country (source: LUC)



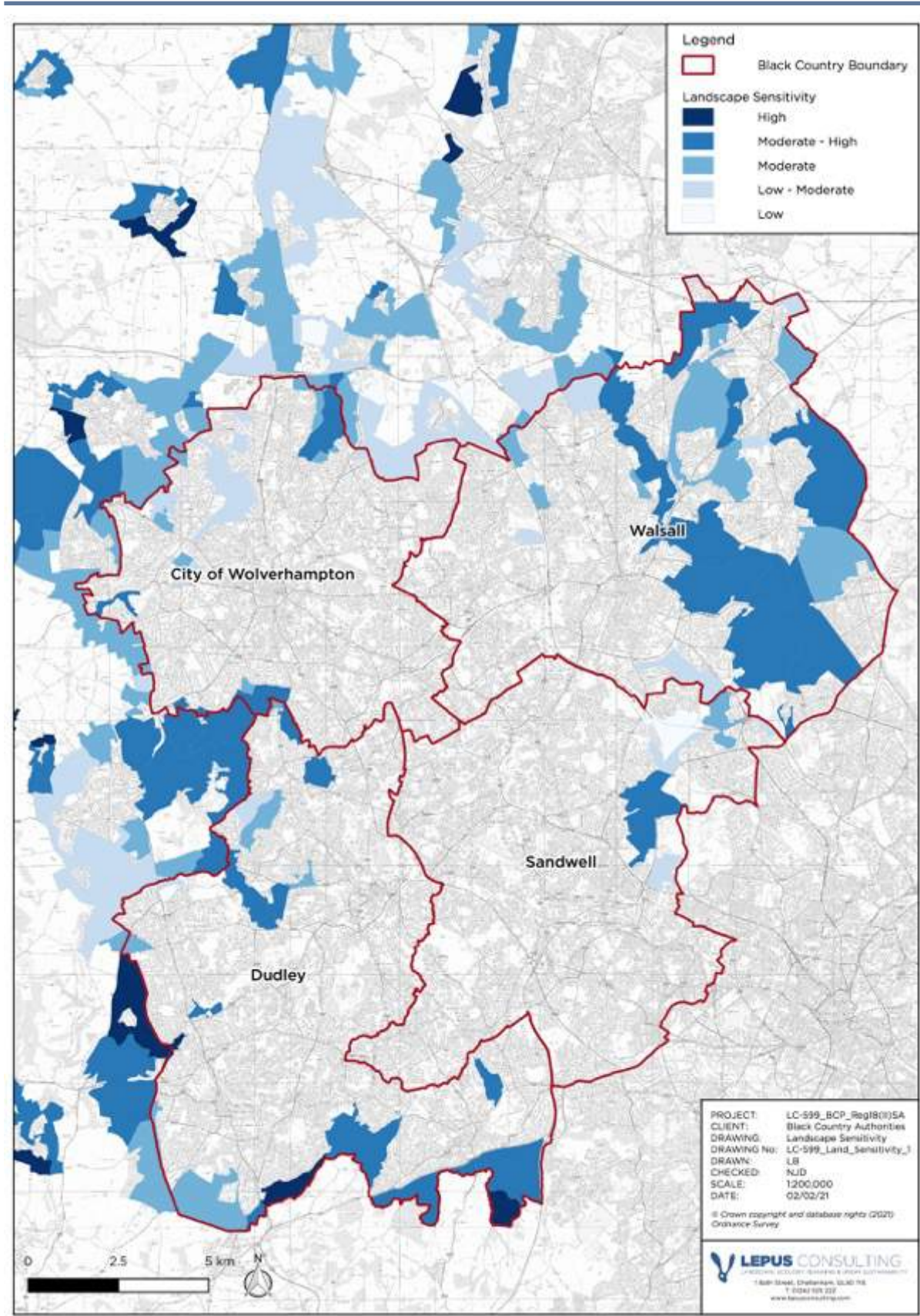


Figure 2.9: Landscape Sensitivity within and surrounding the Black Country (source: LUC)

## 2.3 SA Objective 3: Biodiversity, flora, fauna and geodiversity

- 2.3.1 The biodiversity and geodiversity objective considers the potential for adverse impacts resulting from proposed development at a landscape-scale. It focuses on the potential impacts on a network of designated and undesignated sites, wildlife corridors and individual habitats and features within the Plan area.

### Internationally and European designated sites

- 2.3.2 European sites provide valuable ecological infrastructure for the protection of rare, endangered and/or vulnerable natural habitats and species of exceptional importance within the EU. These sites consist of Special Areas of Conservation (SACs), designated under European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive), and Special Protection Areas (SPAs), classified under European Directive 2009/147/EC on the conservation of wild birds (the Birds Directive). Additionally, paragraph 176 of the NPPF requires that sites listed under the Ramsar Convention (The Convention on Wetlands of International Importance, especially as Waterfowl Habitat) are to be given the same protection as fully designated European sites.
- 2.3.3 Following the UK's exit from the EU, all European designated sites and species will retain the same levels of protection. A publication from Defra<sup>35</sup> outlines the extent of the changes made to the Conservation of Habitats and Species Regulations 2017 (as amended), which largely relate to transferring functions from the European Commission to the relevant authorities in the UK.
- 2.3.4 The area within which development proposals could potentially have direct, indirect and in-combination impacts on the integrity of a European site is referred to as the Zone of Influence (ZOI). This is determined through an identification of sensitive receptors at each European site (its qualifying features) and pathways via which the Local Plan may have an impact.
- 2.3.5 There are two European sites located within the Plan area; 'Fens Pools' SAC and 'Cannock Extension Canal' SAC (see **Figure 2.10**). Threats and pressures which could potentially be exacerbated by the development set out in the BCP at Fens Pools SAC include habitat fragmentation and water pollution<sup>36</sup>. Some of the threats and pressures to Cannock Extension Canal SAC include water pollution and air pollution<sup>37</sup>. No ZOIs have been identified for these sites at the time of writing.

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<sup>35</sup> Defra (2021) Changes to the Habitats Regulations 2017. Available at: <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017> [Date Accessed: 01/02/21]

<sup>36</sup> Natural England (2014) Site Improvement Plan: Fens Pools. Available at: <http://publications.naturalengland.org.uk/file/4872756676001792> [Date Accessed: 15/06/21]

<sup>37</sup> Natural England (2014) Site Improvement Plan: Cannock Extension Canal. Available at: <http://publications.naturalengland.org.uk/file/6749431462363136> [Date Accessed: 15/06/21]



- 2.3.6 'Cannock Chase' SAC lies some 7.5km to the north of the Black Country boundary at Walsall. The identified threats and pressures to the qualifying features of Cannock Chase SAC include air pollution (atmospheric nitrogen deposition), hydrological changes, wildfire/arson and public access and disturbance<sup>38</sup>. A 15km ZOI for Cannock Chase SAC has been identified through analysis of visitor survey data<sup>39</sup> (see **Figure 2.10**). Development proposed within this zone could potentially have an adverse impact on the SAC.
- 2.3.7 A Habitats Regulations Assessment (HRA) is being prepared alongside the development of the Local Plan to provide an in-depth assessment of the potential threats and pressures to a number of European sites and analysis of potential impact pathways. The final report to inform the HRA has not been completed at the time of writing, and as such, mention has only been made within the SA to the European sites within the Plan area, or sites with an identified ZOI within the Plan area. It should be noted that the HRA will identify further impact pathways and consider the potential for adverse impacts at other European sites outside the Plan area and those presented in **Figure 2.10** below.
- Nationally designated sites**
- 2.3.8 There are 18 Sites of Special Scientific Interest (SSSIs) located within the Plan area, all of which fall within Dudley or Walsall (see **Figure 2.11**). These include Wren's Nest SSSI, The Leasowes SSSI, Clayhanger SSSI and Jockey Fields SSSI.
- 2.3.9 Natural England has developed Impact Risk Zones (IRZs) for each SSSI unit in the country. IRZs are a Geographical Information System (GIS) tool which allow a rapid initial assessment of the potential risks posed by development proposals to SSSIs. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts<sup>40</sup>. Where a development proposal falls within more than one SSSI IRZ, the worst-case risk zone is reported upon in the assessment.
- 2.3.10 The IRZ attribute data draws a distinction between 'rural' and 'non-rural' development. For the purposes of this assessment, non-rural proposals are considered to be those that are located within an existing built-up area. Proposals at greenfield locations at the edge of a settlement (i.e. those within the Green Belt) have been considered to be rural.
- 2.3.11 There are three National Nature Reserves (NNRs) located in close proximity to the Plan area; Wren's Nest NNR, located to the north of Dudley, Saltwells NNR in the east of Dudley, and Sutton Park NNR, located adjacent to Walsall's eastern boundary (see **Figure 2.12**).

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<sup>38</sup> Natural England (2014) Site Improvement Plan: Cannock Chase. Available at:  
<http://publications.naturalengland.org.uk/publication/4957799888977920> [Date Accessed: 15/06/21]

<sup>39</sup> Underhill-Day, J. & Liley, D. (2012) Cannock Chase Visitor Impacts Mitigation Report. Footprint Ecology. Unpublished Report.

<sup>40</sup> Natural England (2021) Natural England's Impact Risk Zones for Sites of Special Scientific Interest, 02 June 2020. Available at:  
<https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/ssi-impact-risk-zones> [Date Accessed: 15/06/21]

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### Locally designated sites

- 2.3.12 The Black Country contains an important network of local designations running through the urban area, including Local Nature Reserves (LNR), Sites of Importance for Nature Conservation (SINC) and Sites of Local Importance for Nature Conservation (SLINC) (see **Figures 2.12** and **2.13**). These also form important wildlife corridors, allowing species to move between habitats.
- 2.3.13 Additionally, there are some small areas of ancient woodland located within the Black Country, generally restricted to the Green Belt (see **Figure 2.14**). Ancient woodland is defined as an area that has been “*wooded continuously since at least 1600 AD*”<sup>41</sup>, providing important habitat for rare and threatened species, as well as ecosystem services including soil stability and cultural value.
- 2.3.14 There are a number of priority habitats, protected under the 2006 NERC Act<sup>42</sup>, distributed throughout the Black Country (see **Figure 2.15**). These include deciduous woodland, good quality semi-improved grassland and coastal and floodplain grazing marsh.

### Geological conservation

- 2.3.15 Relative to its size, the Black Country has the most diverse geology in the world<sup>43</sup>, with a number of geological sites of note, including those with exposures of geological features and formations, and areas of geoscientific interest. Geology across the region has been influenced by human settlement, water supply and industry location, in particular major industries such as mining, iron and steel production, foundries, glass manufacture and brickmaking across the mineral-rich area.
- 2.3.16 The UNESCO Global GeoParks are single, unified geological areas where sites and landscapes of international geological significance are managed<sup>44</sup>. The Black Country submitted an application to the Global Geopark Network and UNESCO in 2015<sup>45</sup>, and was awarded Global Geopark status in July 2020. A number of SSSIs and SINCs across the Plan area have been

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<sup>41</sup> Forestry Commission and Natural England (2018) Ancient woodland, ancient trees and veteran trees: protecting them from development. Available at: <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences> [Date Accessed: 15/06/21]

<sup>42</sup> Natural Environment and Rural Communities Act 2006. Available at: <http://www.legislation.gov.uk/ukpga/2006/16/contents> [Date Accessed: 15/06/21]

<sup>43</sup> The Black Country Geological Society (2020) Black Country geology. Available at: <https://bcgs.info/pub/local-geology/black-country-geology/> [Date Accessed: 15/06/21]

<sup>44</sup> Global Geoparks Network (no date) What is a UNESCO Global Geopark? Available at: <http://www.globalgeopark.org/aboutGGN/6398.htm> [Date Accessed: 15/06/21]

<sup>45</sup> Black Country Geopark (2020) Black Country Geopark. Available at: <https://blackcountrygeopark.dudley.gov.uk/bcg/> [Date Accessed: 15/06/21]

designated for their geological importance. In addition, there are numerous 'Geosites' which now form part of the Black Country Global GeoPark<sup>46</sup> and are presented in **Figure 2.16**.

### **Green Infrastructure**

2.3.17 Green Infrastructure (GI) is another important aspect of biodiversity. It is often described as a strategically planned network of multifunctional assets including natural and semi-natural areas, features and green spaces in rural and urban, terrestrial and freshwater environments, which together enhance ecosystem health and resilience, contribute to biodiversity conservation and benefit human populations through the maintenance and enhancement of ecosystem services.

2.3.18 Development proposals could potentially result in benefits to biodiversity, through the incorporation of GI, delivery of environmental net gain and contributions towards strategic Nature Recovery Networks. A Nature Recovery Network is a connected system of habitats that are important for flora and fauna<sup>47</sup>. The redevelopment of brownfield sites could also help to improve the biological and geological value of an area.

### **Potential impact of development**

2.3.19 Adverse impacts on ecological and geological receptors are expected to include those that occur during the construction phase (associated with the construction process and construction vehicles, for example, habitat loss, habitat fragmentation, habitat degradation, as well as noise, air, water and light pollution) and those associated with the operation/occupation phases of development (e.g. public access associated disturbances, increases in local congestion resulting in a reduction in air quality, changes in noise levels, visual disturbance, light pollution, and impacts on water levels and quality). These negative impacts are anticipated to be long-term.

2.3.20 It is assumed that development proposals located on previously undeveloped land would result in a net reduction in vegetation cover and natural capital in the Plan area, leading to greater levels of fragmentation and isolation for the wider ecological network, due to the loss of stepping-stones and corridors that contribute to the sub-region's natural capital. The loss of greenfield land is considered under SA Objective 6.

2.3.21 It should be noted that no detailed ecological surveys have been completed by Lepus to inform the assessments made in this report. Although protected species survey information is available from the local biological records centre, consideration of this data on a site-by-site basis within this assessment would have the potential to skew results – favouring well recorded areas of the Plan area. As such, impacts on protected species have not been

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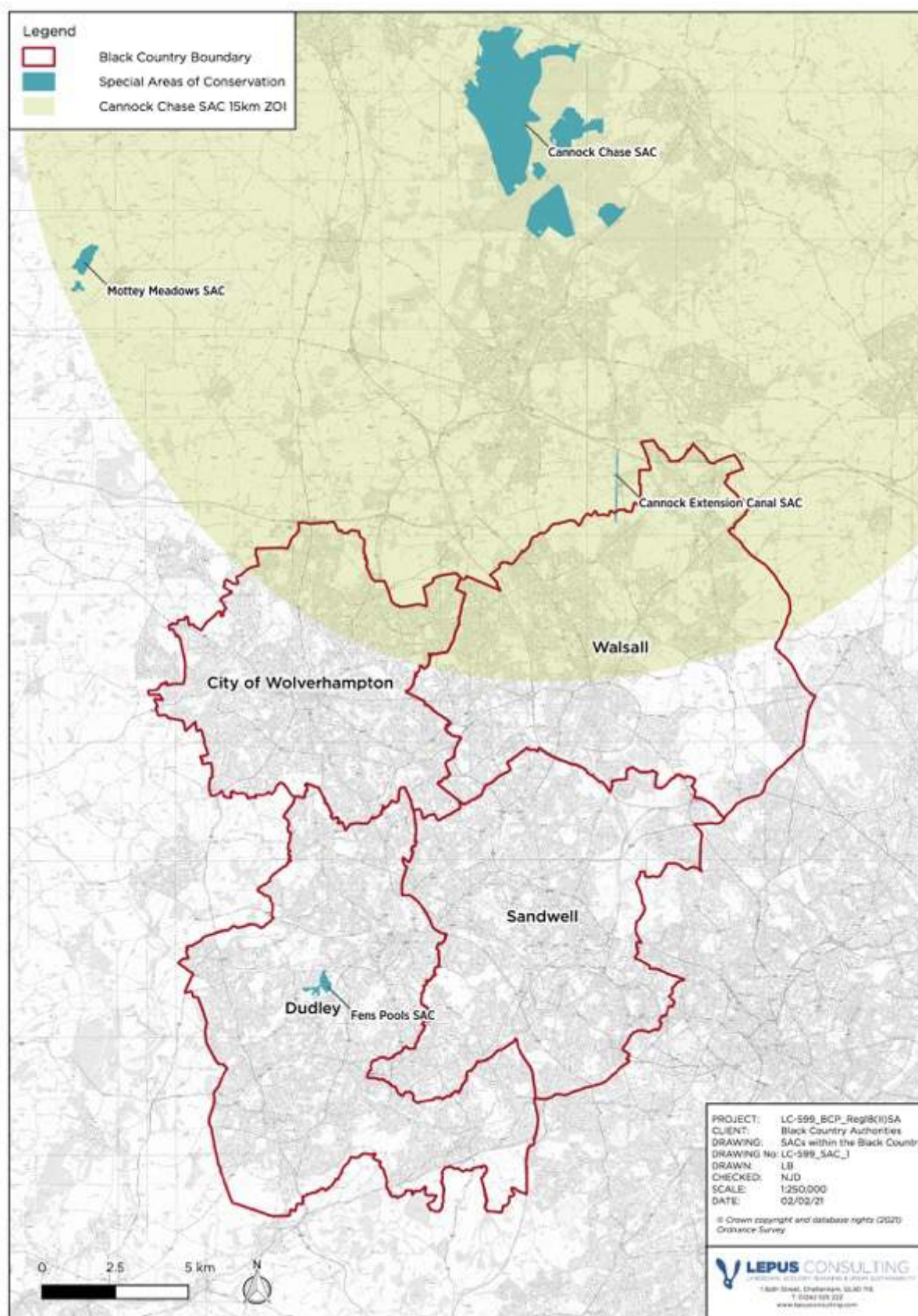
<sup>46</sup> Black Country Geopark (2021) Black Country Geopark. Available at: <https://blackcountrygeopark.dudley.gov.uk/bcg/> [Date Accessed: 19/01/21]

<sup>47</sup> The Wildlife Trusts Birmingham and Black Country (no date) Nature Recovery Network. Available at: <https://www.bbcwildlife.org.uk/NatureRecoveryNetwork> [Date Accessed: 15/06/21]

assessed within this report. It is anticipated that the BCA will require detailed ecological surveys and assessments to accompany future planning applications to determine the presence of priority species and priority habitats protected under the NERC Act and other protected species.

- 2.3.22 It is assumed that the loss of biodiversity assets, such as ancient woodland or an area of priority habitat, are permanent and irreversible effects. It is assumed that components of natural capital which include for example ancient woodlands, mature trees and hedgerows will be retained where possible.

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**Figure 2.10:** Location of European sites and identified Zone of Influence within the Black Country (source: Natural England)



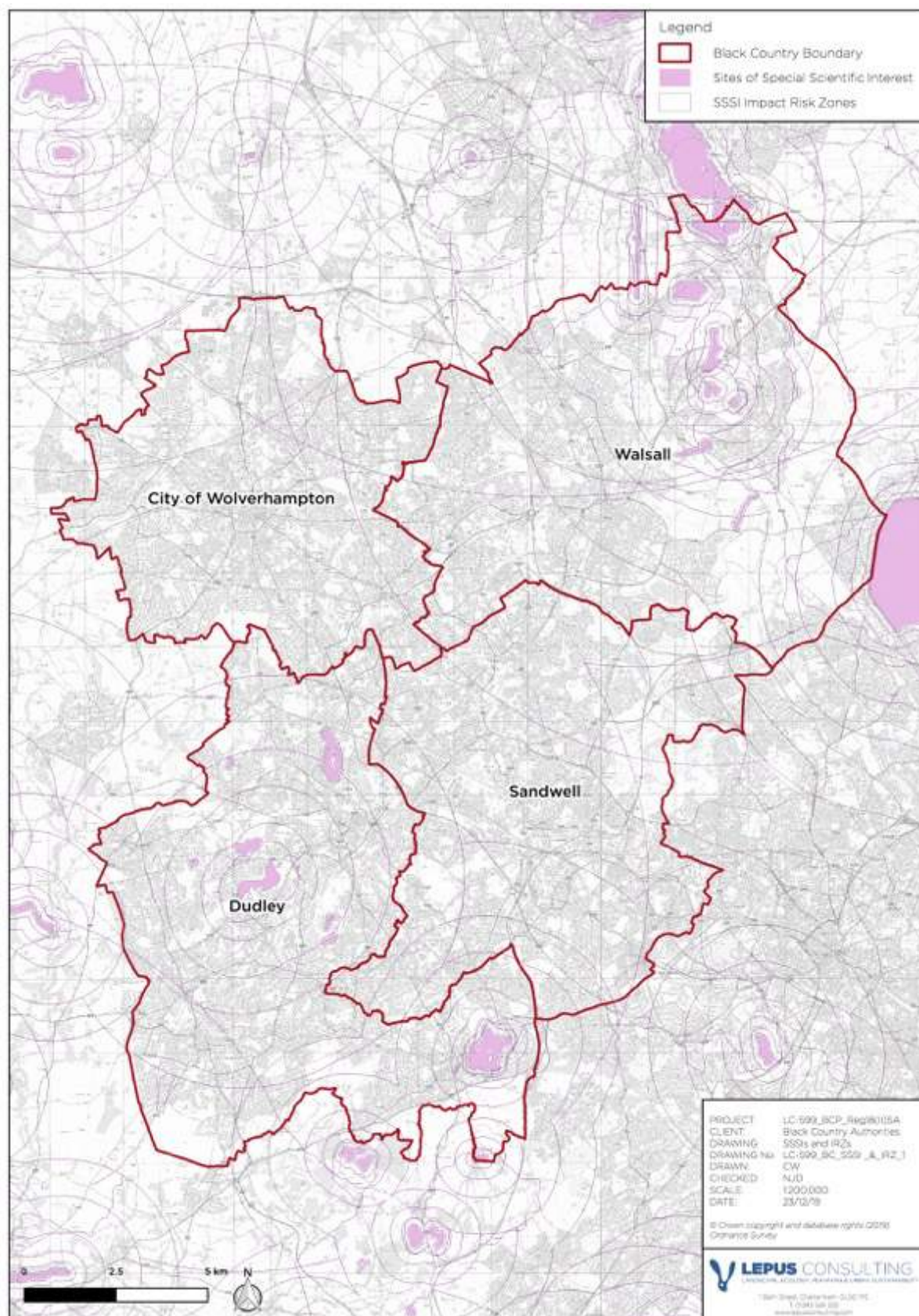
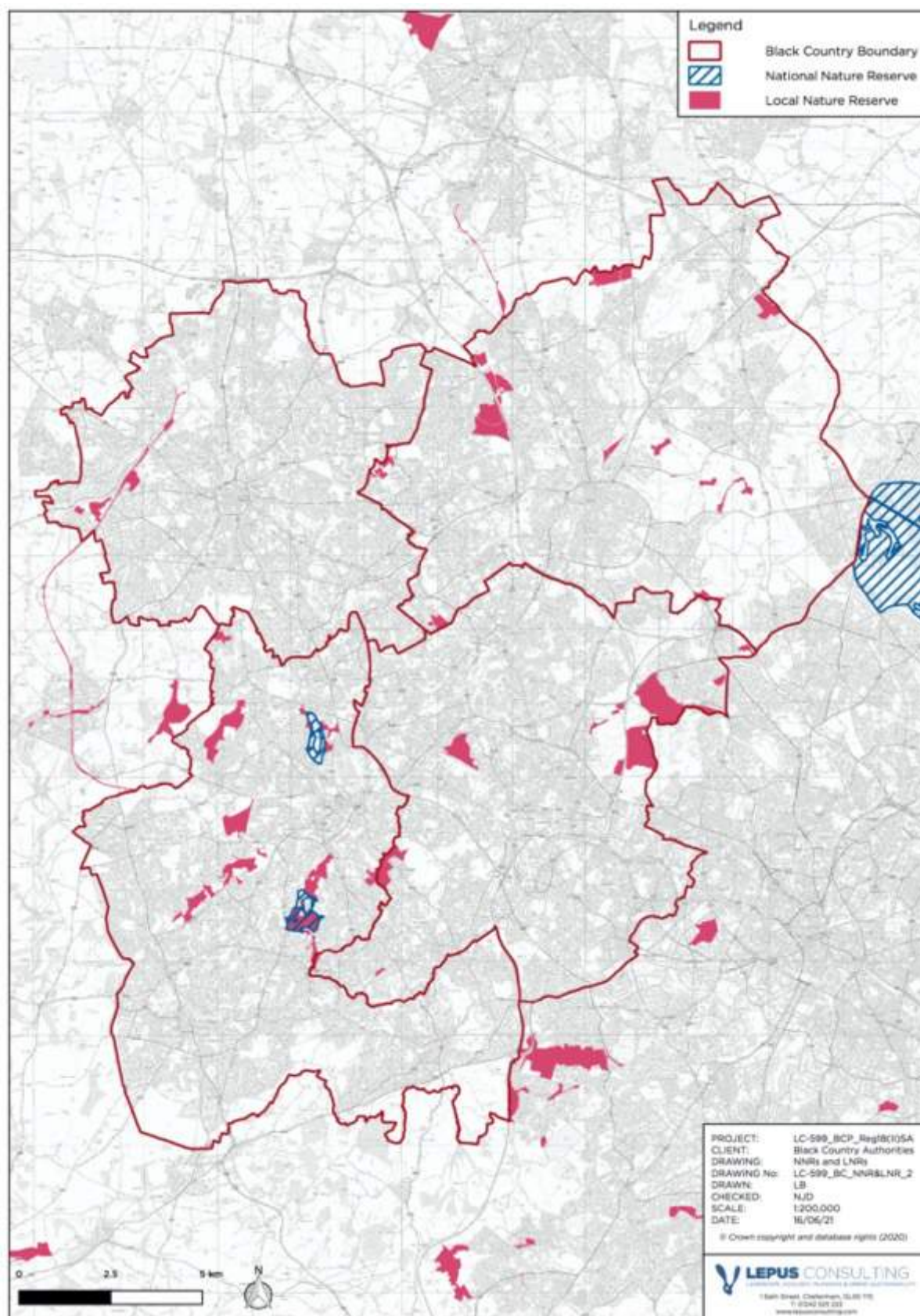


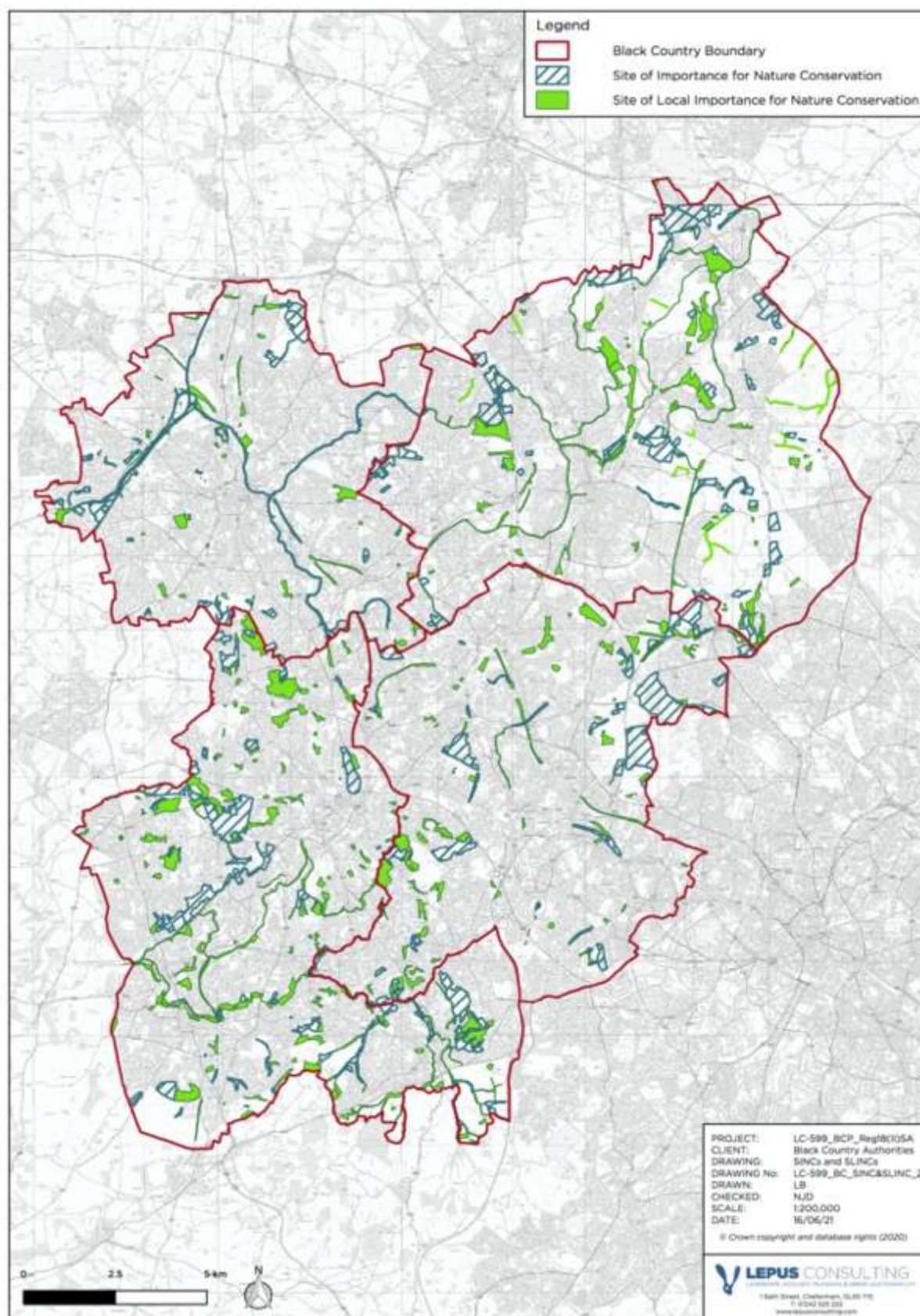
Figure 2.11: SSSIs and IRZs in and around the Black Country (source: Natural England)





**Figure 2.12:** National Nature Reserves and Local Nature Reserves in and around the Black Country (source: Natural England)





**Figure 2.13:** Sites of Importance for Nature Conservation and Sites of Local Importance for Nature Conservation within the Black Country (source: BCA)



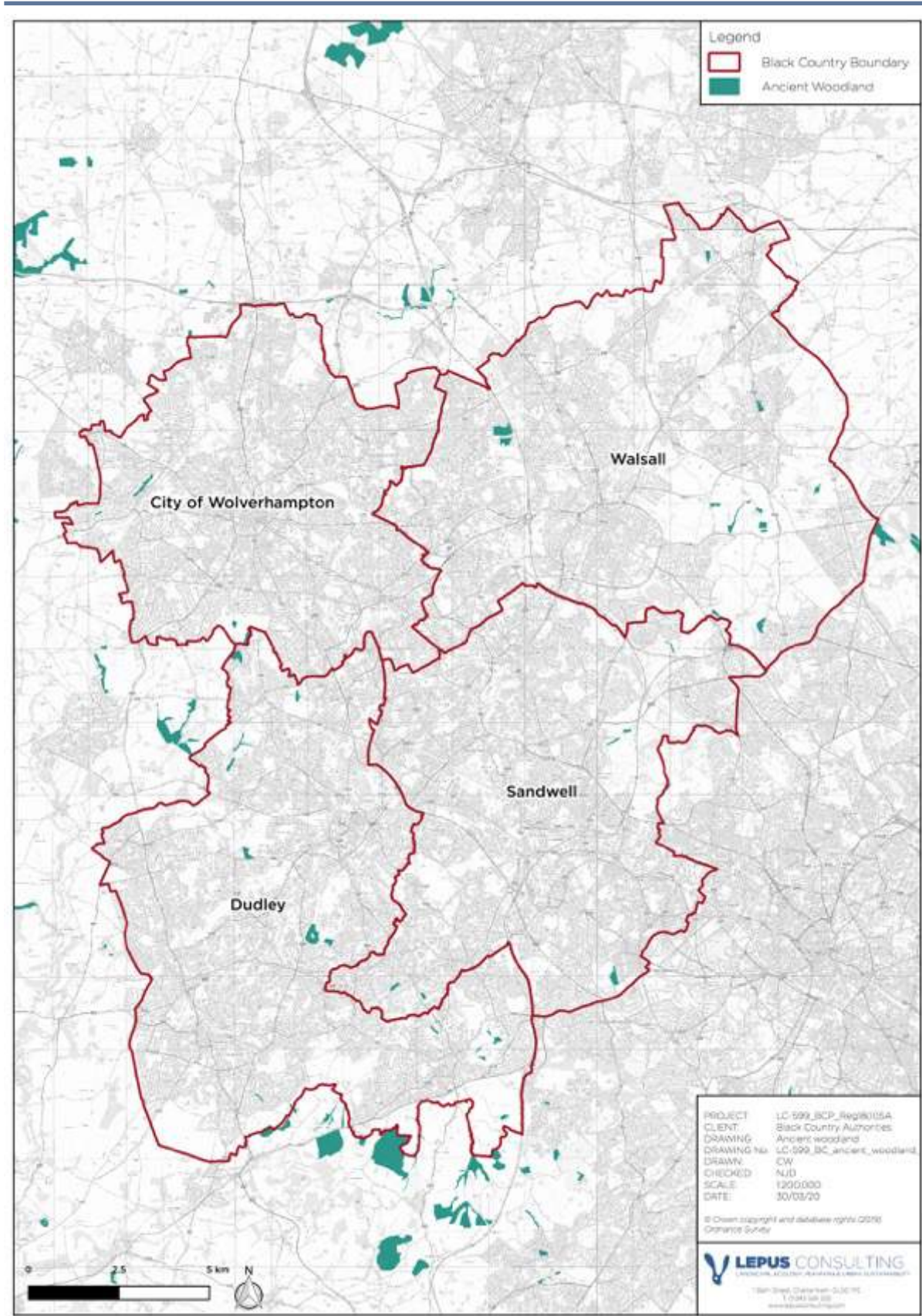
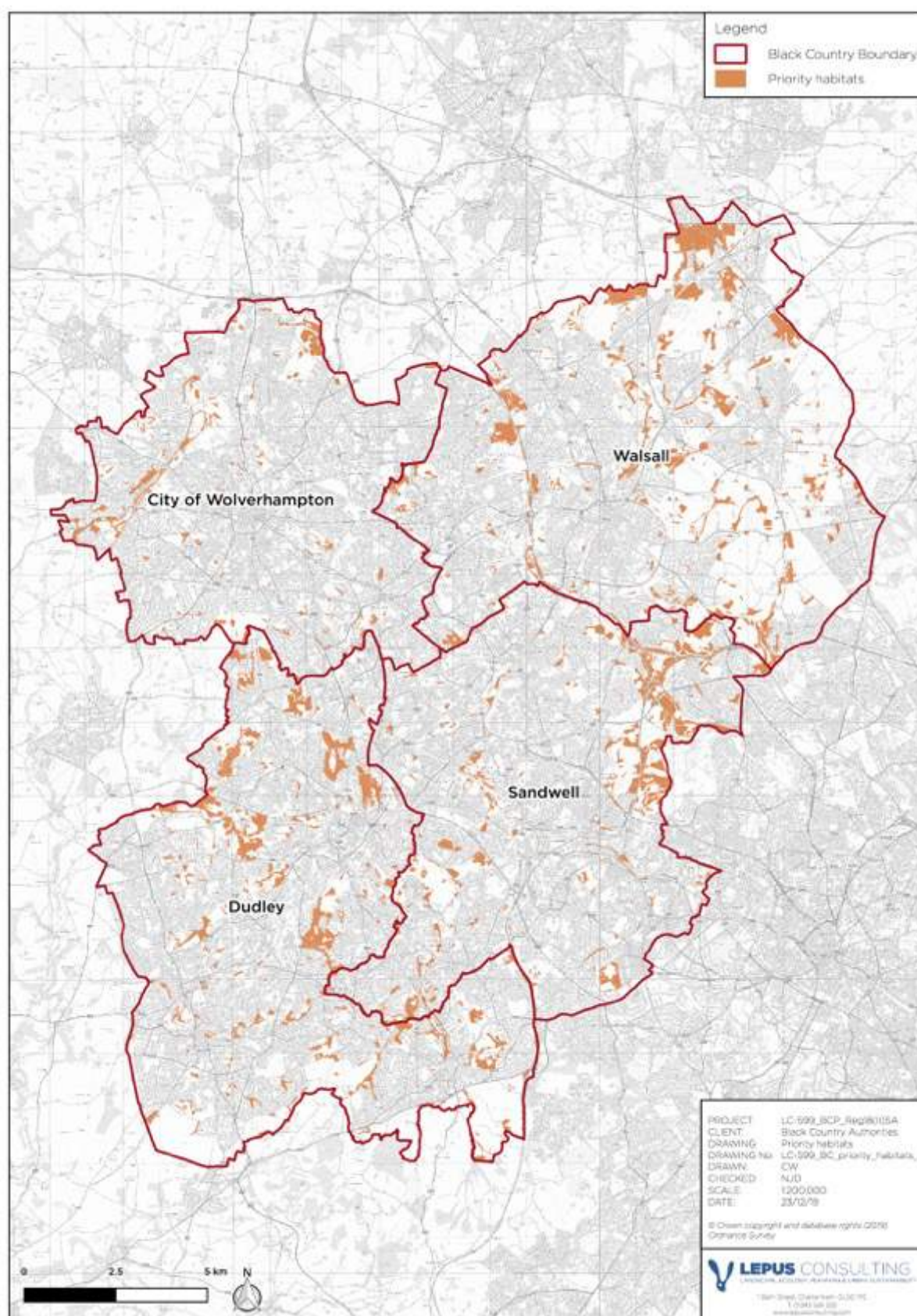


Figure 2.14: Ancient woodland in and around the Black Country (source: Natural England)





**Figure 2.15:** Priority habitats within the Black Country (source: Natural England)



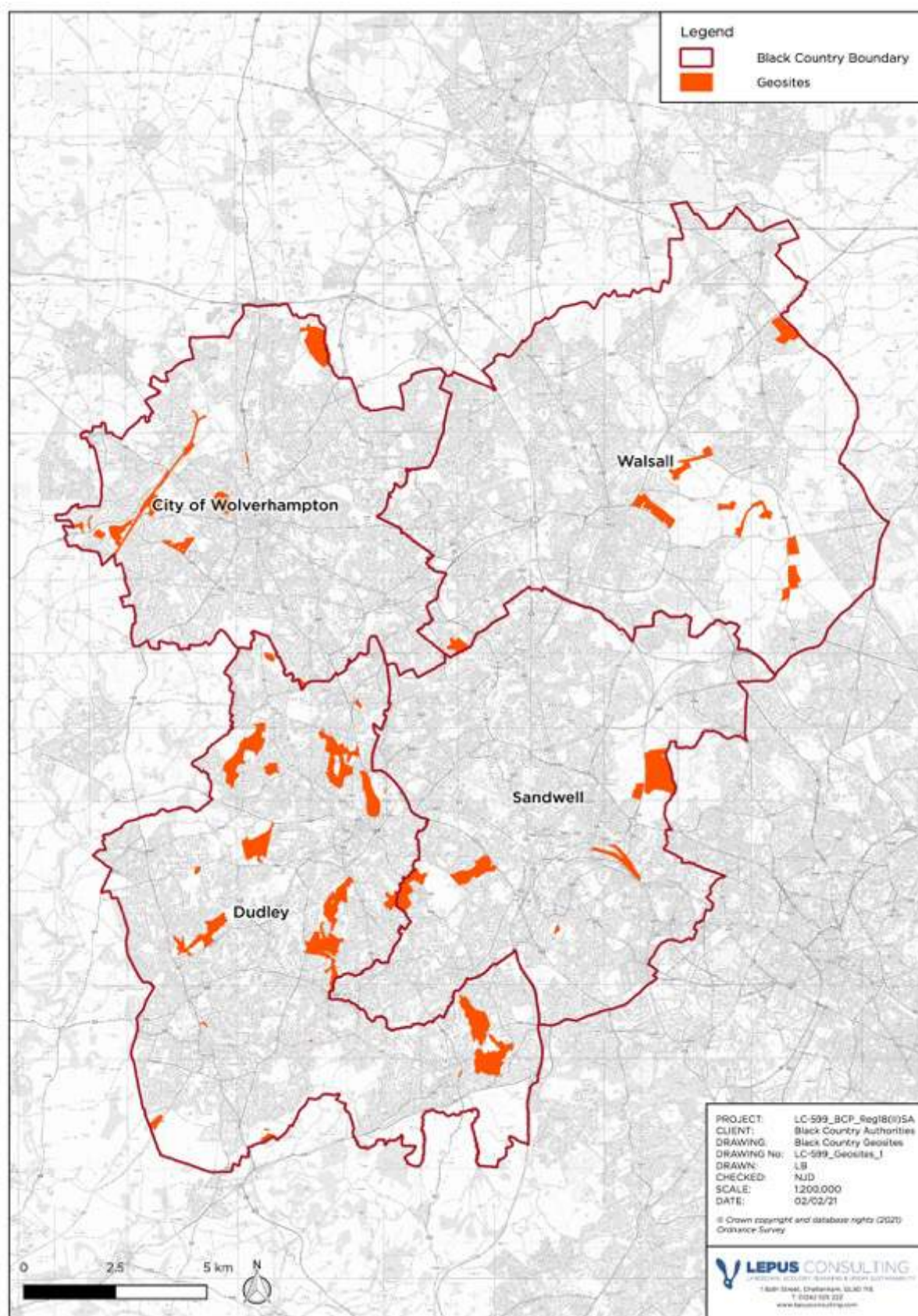


Figure 2.16: Location of 'Geosites' within the Black Country (source: BCA)



## 2.4 SA Objective 4: Climate change mitigation

- 2.4.1 Anthropogenic climate change is predominantly the result of greenhouse gas (GHG) emissions. GHGs are emitted from a wide variety of sources, including transport, construction, agriculture and waste. Typically, development leads to a net increase in GHG emissions in the local area, although efforts can be made to help limit these increases.
- 2.4.2 The Climate Change Act 2008<sup>48</sup> is the basis for the UK's approach to tackling and responding to climate change. It requires that emissions of carbon dioxide and other greenhouse gases are reduced and that climate change risks are prepared for. The Act also establishes the framework to deliver on these requirements.
- 2.4.3 The UK is a member of the United Nations Framework Convention on Climate Change (UNFCCC). The UNFCCC is the key forum which oversees international action to tackle climate change. The UNFCCC led the development and adoption of The Paris Agreement in 2015<sup>49</sup>. A total of 160 countries have pledged to cut their emissions as part of this process. The Committee on Climate Change (CCC) report 'Net Zero – The UK's contribution to stopping global warming'<sup>50</sup> recommended new emission targets: reducing GHG emissions by at least 100% of 1990 levels (net zero) by 2050. The estimated carbon dioxide (CO<sub>2</sub>) emissions in the four authorities in 2017 are presented in **Table 2.1** below.

**Table 2.1:** Estimated CO<sub>2</sub> emissions per authority in 2017<sup>51</sup>

	Total CO <sub>2</sub> emissions estimates (tonnes)	Per Capita CO <sub>2</sub> emissions estimates (tonnes)
Dudley	1,188,200	3.7
Sandwell	1,485,900	4.6
Walsall	1,118,700	4.0
Wolverhampton	972,700	3.7
<b>Black Country Authorities</b>	<b>4,765,500</b>	<b>4.0</b>

- 2.4.4 A major source of GHGs is from vehicle emissions. The vast majority of residents would be likely to have at least one vehicle per household. It is likely that residential development proposed within the Plan area would result in an associated increase in the number of vehicles on the road in the Plan area, and as such a consequent increase in GHG emissions would be expected, contributing to the Greenhouse Effect and exacerbating anthropogenic

<sup>48</sup> Climate Change Act 2008. Available at: <http://www.legislation.gov.uk/ukpga/2008/27/contents> [Date Accessed: 18/02/20]

<sup>49</sup> United Nations Climate Change (2015) The Paris Agreement. Available at: <https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement> [Date Accessed: 18/02/20]

<sup>50</sup> Committee on Climate Change (2019) Net Zero – The UK's contribution to stopping global warming. Available at: <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/> [Date Accessed: 18/02/20]

<sup>51</sup> DBEI (2019) 2005 to 2017 UK local and regional CO<sub>2</sub> emissions – data tables. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/812142/2005-17\\_UK\\_local\\_and\\_regional\\_CO2\\_emissions\\_tables.xlsx](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812142/2005-17_UK_local_and_regional_CO2_emissions_tables.xlsx) [Date Accessed: 21/01/20]

climate change. Encouraging active travel or the use of public transport are effective ways to help reduce vehicle numbers and as a result, reduce GHG emissions.

2.4.5 One strategy to combat GHG emissions is to reduce the quantity of energy produced via fossil fuel led energy production<sup>52</sup>. In the last two decades, there has been a significant increase in the volume of energy generated through renewable energy sources. In 2017, 29.3% of the electricity generated in the UK was from renewable sources, compared to 24.5% in 2016<sup>53</sup>.

2.4.6 The promotion of on-site renewable or low carbon technologies incorporated with new development in the BCP would help to decrease reliance on energy that is generated from unsustainable sources, such as fossil fuels. A reduction in the use of fossil fuels would help to reduce the volume of GHGs that are emitted into the atmosphere. This in turn would reduce the Black Country's contribution towards the causes of climate change.

2.4.7 Renewable energy generated in each of the authorities in 2018 is presented in **Table 2.2**.

**Table 2.2: Renewable energy generation (MWh) in 2018 across the Black Country**<sup>54</sup>

	Dudley	Sandwell	Walsall	Wolverhampton
Renewable Energy Generation (MWh)	25,995	18,271	17,782	21,178

2.4.8 Climate change has the potential to result in a range of environmental risks within the Black Country and nationally, such as those associated with increased heatwaves in the summer months and more frequent storm events in the winter. This can have knock-on implications across a range of receptors, such as for sewer capacity due to heavy rainfall, and biodiversity in terms of the habitat distribution of species sensitive to local conditions.

2.4.9 Vegetation acts as a carbon sink, providing an important ecosystem service. Some site allocations proposed in the SWDPR would be likely to result in a net loss in vegetation cover (i.e. those comprising previously undeveloped land), and as such, may compromise the carbon storage capacity of the natural environment.

2.4.10 Much of the Black Country is heavily urbanised, with a lack of mature trees within the district centres. Lack of green infrastructure results in a reduced capability of the environment to provide ecosystem services including the storage and filtration of water, providing natural flood protection, as well as reduced availability of habitats and connectivity within the green

<sup>52</sup> RTPI (2018) Renewable Energy: Planning's role in delivering renewable energy in the new low carbon economy. Available at: <https://www.rtpi.org.uk/research/2018/june/renewable-energy/> [Date Accessed: 08/04/20]

<sup>53</sup> Department for Business, Energy and Industrial Strategy (2018) UK Energy in Brief. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/728374/UK\\_Energy\\_in\\_Brief\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728374/UK_Energy_in_Brief_2018.pdf) [Date Accessed: 08/04/20]

<sup>54</sup> Department for Business, Energy and Industrial Strategy (2018) Regional Renewable Statistics: Renewable electricity by local authority. Available at: <https://www.gov.uk/government/statistics/regional-renewable-statistics> [Date Accessed: 08/04/20]

network enabling movement of species. Loss of green infrastructure and previously undeveloped land is considered within the assessment for SA Objective 6 (Natural Resources). Flooding is considered within SA Objective 5 (Climate Change Adaptation).

- 2.4.11 The layout and design of future development can have benefits to achieving sustainable development and reducing contributions to climate change. Although specific detail of development is outside the scope of a Local Plan, the BCP could potentially help encourage the development of more energy efficient homes to help reduce the overall carbon emissions of the Black Country. Energy efficient homes are those that are designed to reduce the demand on energy and improve energy efficiency in the home. Energy efficient homes can include Eco Houses; Zero Carbon Homes and Passivhaus<sup>55</sup>.

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<sup>55</sup> Urbanist Architecture. How to design Eco, Passivhaus and Zero Carbon Homes. Available at: <https://urbanistarchitecture.co.uk/how-to-design-eco-houses-passivhaus-and-zero-carbon-houses/> [Date Accessed: 29/01/20]

## 2.5 SA Objective 5: Climate change adaptation

- 2.5.1 Watercourses that pass through the Black Country include the River Tame, River Stour and Ford Brook, as well as 15 canals. Fluvial flood risk across the four authorities is primarily associated with the River Tame and Stour and their tributaries, in particular along the River Tame in Sandwell and Walsall (see **Figure 2.17**). Surface water flood risk is prevalent across much of the Plan area, typically following roads and the canal network located within the Black Country, including the Birmingham Canal, Walsall Canal and Dudley Canal (see **Figure 2.18**).
- 2.5.2 Climate change has the potential to increase the risk of fluvial and surface water flooding, due to increased frequency of extremes in weather including torrential rainfall events in the winter, and soil shrinkages and subsidence associated with summer droughts reducing the natural water storage capacity. Flooding events are likely to increase in both frequency and severity as a result of climate change, leading to the potential for increased damage to development.
- 2.5.3 A Level 1 Strategic Flood Risk Assessment (SFRA) has been carried out for the Black Country<sup>56</sup> to inform the BCA of flood risk across the Plan area from all sources, in the present and in the future. The assessment has identified potential increases in flood risk due to climate change and produced modelled outputs. **Figure 2.19** presents the 'Indicative Flood Zones' identified in this study. Indicative Flood Zones 2 and 3a contain the results of the 'Jflow' modelling of ordinary watercourses in Walsall. Indicative Flood Zone 3b has been compiled using available hydraulic modelling scenarios, and for areas outside of detailed model coverage, Flood Zone 3a is used as a conservative indication.
- 2.5.4 Many of the watercourses in the urban areas of the Black Country have been heavily modified, including approximately 63km of culverted watercourses<sup>57</sup>. These modifications have the potential to cause or exacerbate flood risk, for example due to blockages forming in culverts or becoming overwhelmed in high rainfall events. Future development within the Black Country could increase the risk of flooding posed to neighbouring areas if not carefully managed.
- 2.5.5 The Black Country's GI network has an important role to play in reducing flood risk. It includes LNRs, SLINCs, SINCs, allotments, playing fields, parks, woodlands, agricultural land and margins, hedgerows, ridgelines, disused railways and canals. These green assets should be protected, maintained and enhanced, in order to safeguard the ecosystem services they provide, including the natural storage of flood water and slowing of surface water run-off rates.

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<sup>56</sup> JBA Consulting (2020) The Black Country Authorities Level 1 Strategic Flood Risk Assessment Final Report 25<sup>th</sup> June 2020. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date Accessed: 03/02/21]

<sup>57</sup> Ibid



- 2.5.6 Opportunities should be sought alongside development to improve the management of flooding across the Black Country. Increased naturalisation of watercourses and restoration of the flood plain, including the opening up of culverts where possible, would help to reduce the risk of flooding, as well as provide benefits to biodiversity, amenity and water quality.
- 2.5.7 It is assumed that development proposals will be permanent, and it is therefore likely that the development would be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of flooding.

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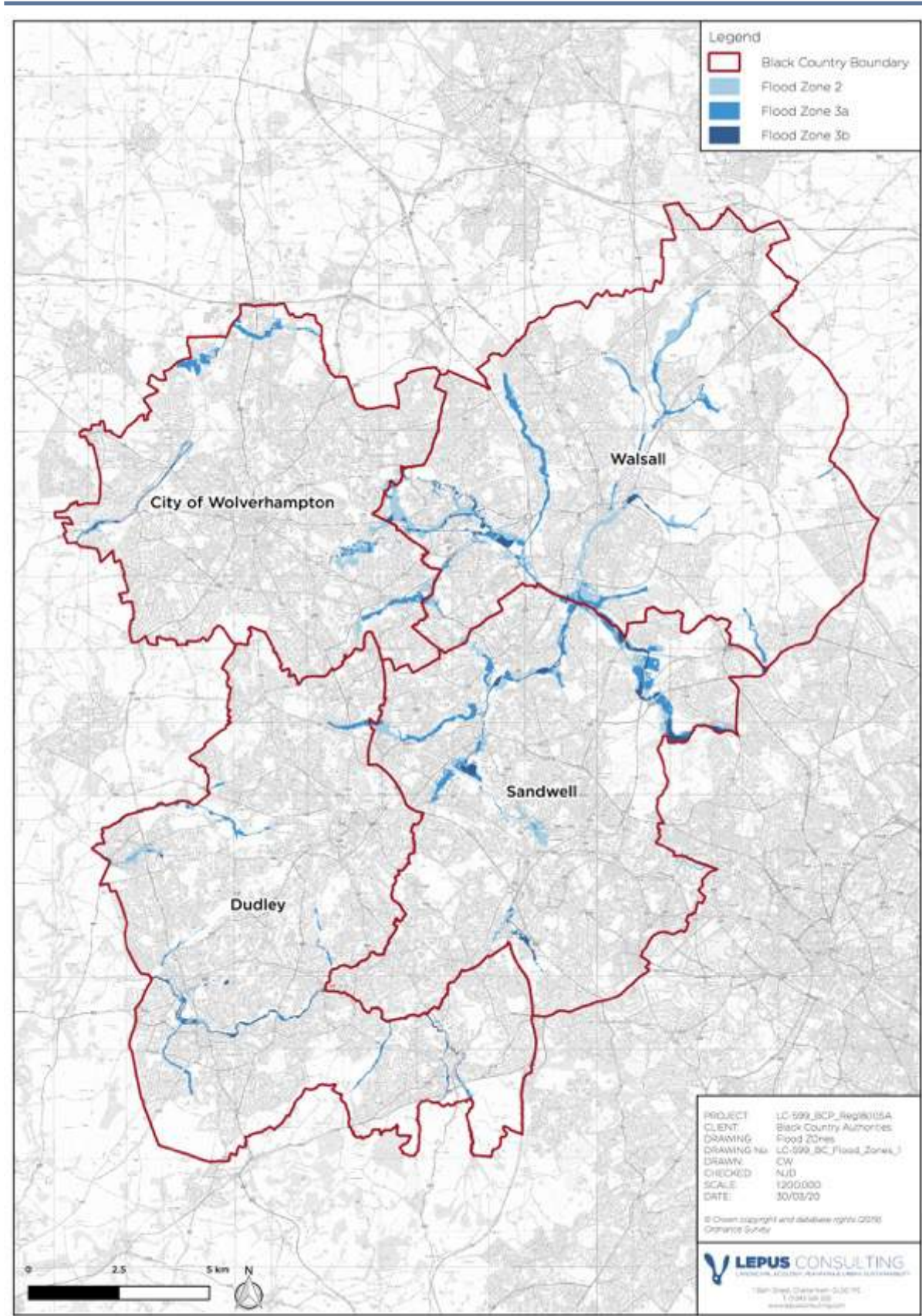
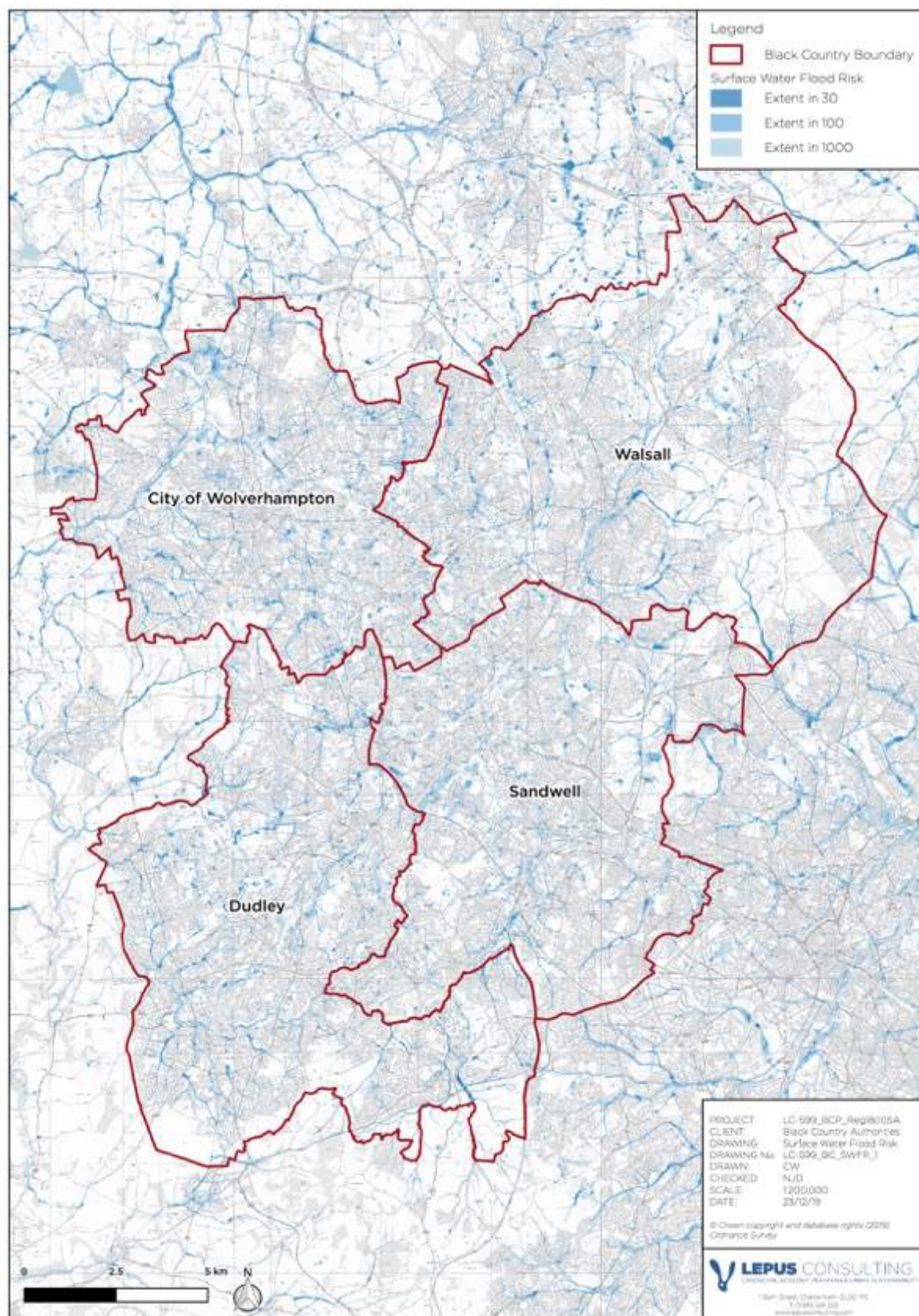


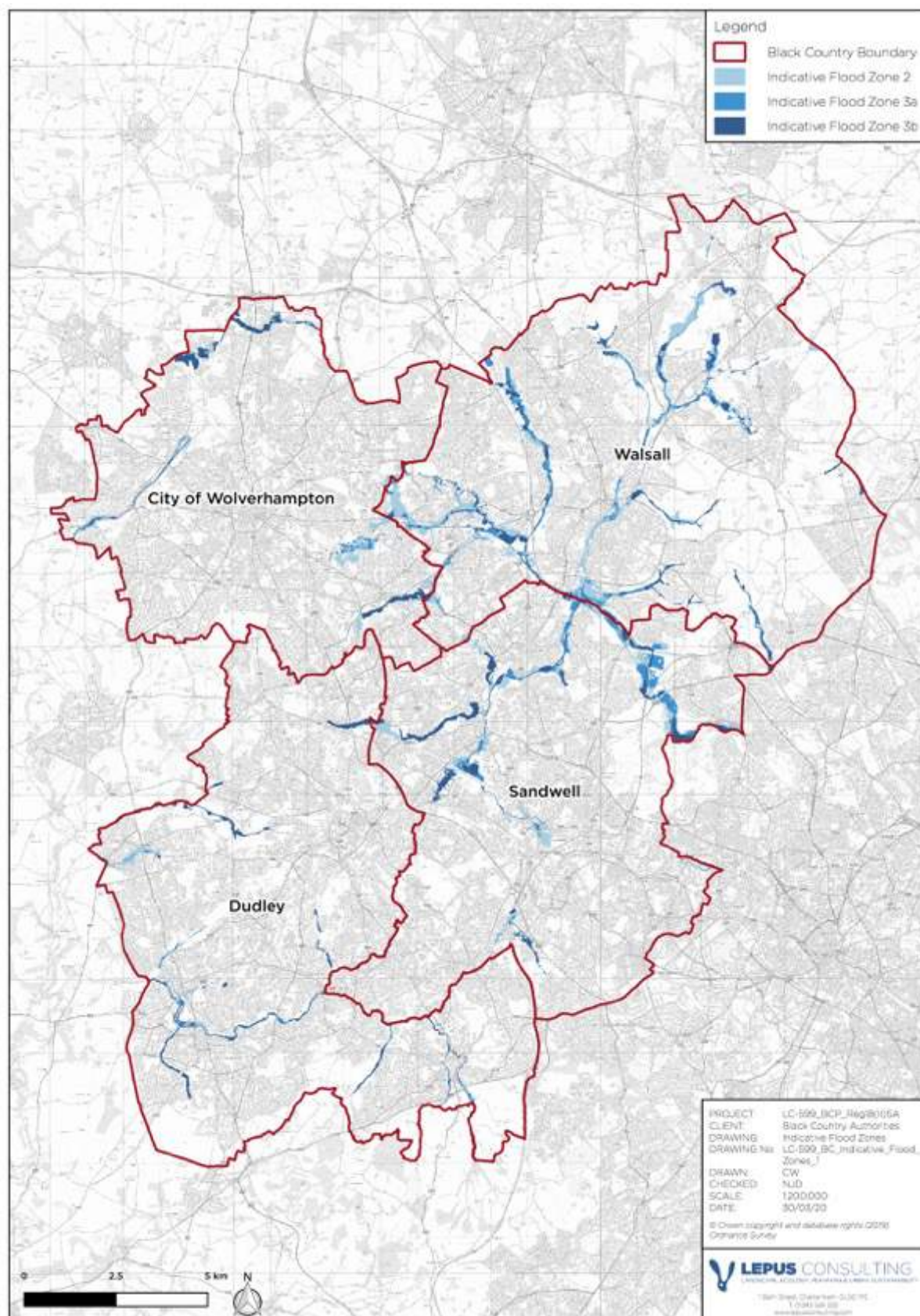
Figure 2.17: Fluvial flood zones in and around the Black Country (source: JBA Consulting and Environment Agency)





**Figure 2.18:** Surface water flood risk in and around the Black Country (source: JBA Consulting and Environment Agency)





**Figure 2.19:** Indicative fluvial flood zones in and around the Black Country (source: JBA Consulting and Environment Agency)



## 2.6 SA Objective 6: Natural resources

- 2.6.1 Soil is an essential and non-renewable resource that provides a wide range of ecosystem services. It filters air, stores and cycles water and nutrients, decomposes and cycles organic matter, supports plant growth and provides medicines<sup>58</sup>. Soil is also one of the most important natural carbon sinks globally and its protection is vital in efforts to mitigate anthropogenic climate change. It can reduce flood risk, alleviate flood damage and improve local water and air quality to the benefit of ecosystem and human health.

### Previously developed/brownfield land

- 2.6.2 In accordance with the core planning principles of the NPPF<sup>59</sup>, development on previously developed land (PDL) will be recognised as an efficient use of land. Development on previously undeveloped land is not considered to be an efficient use of land.
- 2.6.3 Development proposals situated on previously undeveloped land are expected to pose a threat to the soil resource within the proposal perimeter due to excavation, soil compaction, erosion and an increased risk of soil pollution and contamination during the construction phase. This is expected to be a permanent and irreversible impact.
- 2.6.4 It should be noted that PDL could also be of environmental value, and as such, potential impacts on natural resources shall be considered on a site-by-site basis.

### Agricultural Land Classification

- 2.6.5 The Agricultural Land Classification (ALC) system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grades 1, 2 and Subgrade 3a, are referred to as the 'best and most versatile' (BMV) land<sup>60</sup>. Where site-specific ALC studies have not been completed, it is not possible to identify Subgrade 3a and 3b land. Therefore, a precautionary approach is taken, and potential BMV land is assessed as Grades 1, 2 and 3.
- 2.6.6 The Provisional ALC data<sup>61</sup> has been used for the appraisal of the BCP, as this dataset provides strategic information on the extent of BMV land across the Plan area. The post-1988 ALC dataset<sup>62</sup> only covers small areas of the Black Country, and therefore, does not

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<sup>58</sup> Food and Agriculture Organization of the United Nations (2020) Soil ecosystem services. Available at: <http://www.fao.org/agriculture/crops/thematic-sitemap/theme/spi/soil-biodiversity/soil-ecosystems-services/en/> [Date Accessed: 16/06/21]

<sup>59</sup> Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 16/06/21]

<sup>60</sup> Natural England (2019) Agricultural Land Classification (ALC) (England). Available at: [https://naturalengland-defra.opendata.arcgis.com/datasets/5d2477d8d04b41d4bbc9a8742f858f4d\\_0?geometry=-3.131%2C52.513%2C-0.667%2C53.094](https://naturalengland-defra.opendata.arcgis.com/datasets/5d2477d8d04b41d4bbc9a8742f858f4d_0?geometry=-3.131%2C52.513%2C-0.667%2C53.094) [Date Accessed: 16/06/21]

<sup>61</sup> Ibid

<sup>62</sup> Natural England (2019) Agricultural Land Classification (ALC) Grades – Post 1988 (England). Available at: [https://naturalengland-defra.opendata.arcgis.com/datasets/26d1ef630b9f46ea8fc4e96711d81376\\_0](https://naturalengland-defra.opendata.arcgis.com/datasets/26d1ef630b9f46ea8fc4e96711d81376_0) [Date Accessed: 16/06/21]

provide consistent and reliable information for an assessment of agriculturally important soil resources to be made.

- 2.6.7 The majority of the Black Country is located on land classified as ‘urban’ in accordance with the ALC. As such, it can be assumed that development located within the urban area would not result in the loss of BMV land. However, there are some areas of high-quality agricultural land (Grade 2 and 3) within the Plan area, including a significant proportion of Walsall’s Green Belt, which may be under threat from new growth areas and associated infrastructure (see **Figure 2.20**).

### Minerals

- 2.6.8 The presence of mineral resources, in particular coal, was a key reason for the original prosperity and development of the Black Country. The legacy of mineral extraction on ground stability and contamination remains a key issue affecting future development, and some minerals are still of economic importance with active quarries and brickworks, especially in Walsall.
- 2.6.9 The Black Country has identified potentially important mineral resources, which should be safeguarded against loss or sterilisation by non-mineral development<sup>63</sup>. The mineral resources of local and national importance in accordance with the definition set out in the NPPF include sand, gravel, brick clay and fireclay. The Review of the Evidence Base for Minerals<sup>64</sup> recommended the BCA to adopt more tightly defined MSAs focused on these resources.
- 2.6.10 Mineral Safeguarding Areas (MSAs) have been proposed across a large proportion of Walsall borough, in the east (see **Figure 2.21**). These include sand and gravel, brick clay and fireclay resources. Furthermore, a number of ‘Areas of Search’ (AOS) have been identified within the west of Dudley, and the north east of Walsall.
- 2.6.11 There is a need for a balanced approach between safeguarding mineral resources and supporting housing and economic growth. The protection and extraction of minerals resources is important to help support the levels of development proposed over the Plan period and to meet demand for aggregates.
- 2.6.12 The extraction of minerals can also lead to long-term positive impacts following restoration. Restored minerals sites can provide valuable GI including open space and wildlife habitats, once mineral works are complete.

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<sup>63</sup> wood (2020) Review of the Evidence Base for Minerals to support preparation of the Black Country Plan. Available at: <https://blackcountryplan.dudlev.gov.uk/t2/p4/t2p4f/> [Date Accessed: 02/02/21]

<sup>64</sup> “Minerals resources of local and national importance: Minerals which are necessary to meet society’s needs, including aggregates, brickclay (especially Etruria Marl and fireclay), silica sand (including high grade silica sands), cement raw materials, gypsum, salt, fluorspar, shallow and deep-mined coal, oil and gas (including conventional and unconventional hydrocarbons), tungsten, kaolin, ball clay, potash, polyhalite and local minerals of importance to heritage assets and local distinctiveness”.

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### **Contaminated land**

- 2.6.13 Many urban brownfield sites in the Black Country, and some greenfield sites, are affected by the legacy of mining in the area. The exploitation of minerals has led to some localised issues with ground contamination and instability<sup>65</sup>. It is anticipated that development proposals within the BCP will require site-specific assessments of ground contamination and effective remediation of soils affected prior to development. Contaminated land and soil pollution are considered within SA Objective 7 – Pollution.

### **Water resource**

- 2.6.14 The national mandatory water efficiency standard is 125 litres per person per day, as set out in the Building Regulations 2010<sup>66</sup>. The BCA are aiming to introduce a higher standard of 110 litres per person per day in line with the Building Regulations Part G<sup>67</sup> optional requirement.
- 2.6.15 It is assumed that all residential-led development proposals in the BCP will be subject to appropriate approvals and licensing for sustainable water supply from the Environment Agency.

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<sup>65</sup> Mott MacDonald (2009) Black Country JCS Stage 2: Infrastructure and Deliverability Study. Available at: <https://blackcountryplan.dudley.gov.uk/t1/p1/t1p1f/> [Date Accessed: 03/02/21]

<sup>66</sup> The Building Regulations 2010. Available at: <http://www.legislation.gov.uk/uksi/2010/2214/contents/made> [Date Accessed: 22/01/20]

<sup>67</sup> MHCLG (2016) Sanitation, hot water safety and water efficiency: Approved Document G. Available at: <https://www.gov.uk/government/publications/sanitation-hot-water-safety-and-water-efficiency-approved-document-g> [Date Accessed: 01/02/21]

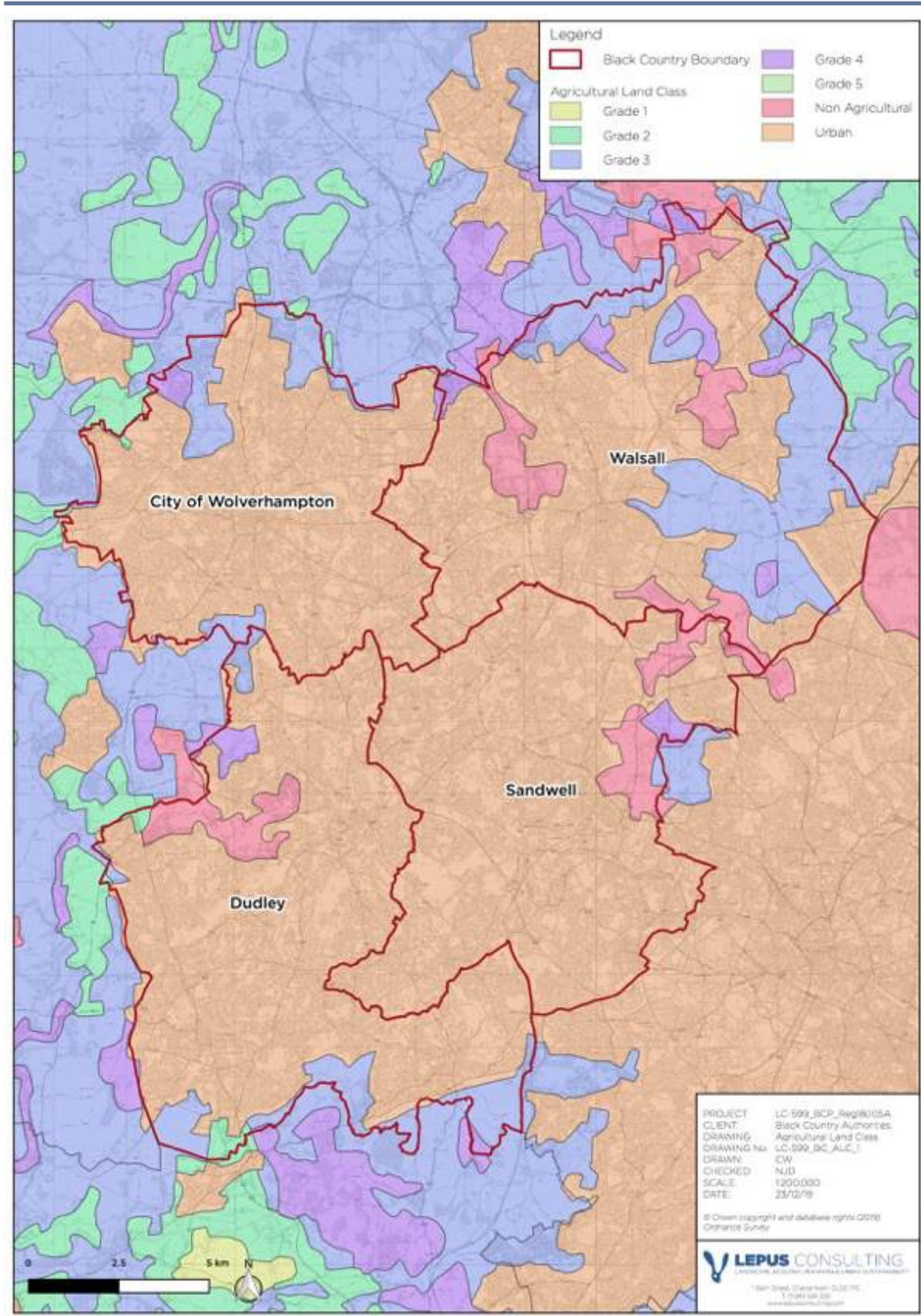
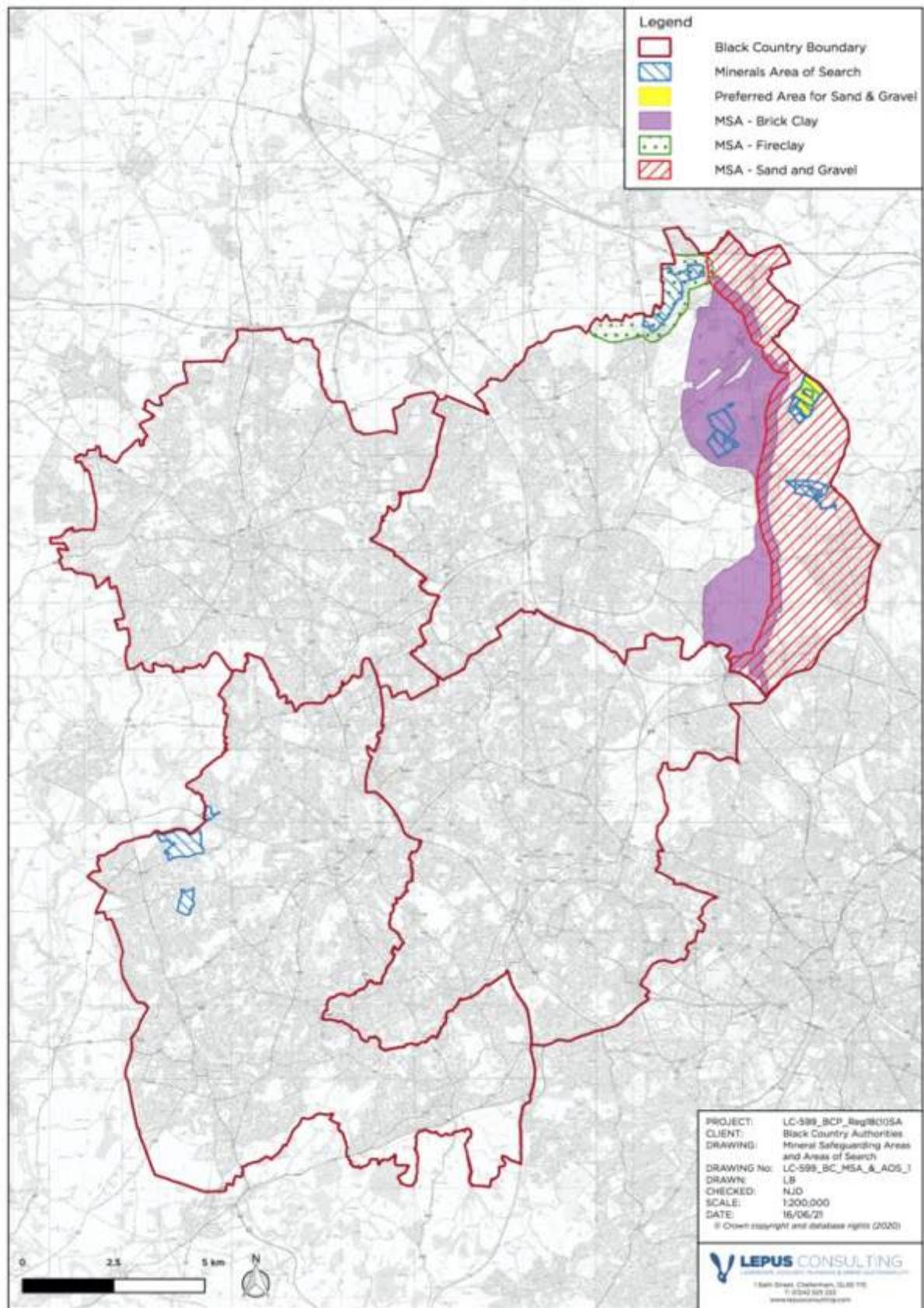


Figure 2.20: Agricultural Land Classification (ALC) in and around the Black Country (source: Natural England)





**Figure 2.21:** Proposed Mineral Safeguarding Areas and Areas of Search in the Black Country (source: BCA and wood consultants)

## 2.7 SA Objective 7: Pollution

### Air pollution

- 2.7.1 The entirety of the Black Country is designated as Air Quality Management Areas (AQMA)s<sup>68</sup>; 'Dudley AQMA', 'Sandwell AQMA', 'Walsall AQMA' and 'Wolverhampton AQMA' (see **Figure 2.22**). 'Chuckery AQMA' is located in the centre of Walsall. AQMA's located adjacent to the Plan area include; 'Birmingham AQMA', 'Hagley AQMA' and 'CCDC AQMA 2'. The four local authority AQMA's are identified due to excessive levels of NO<sub>2</sub>, largely attributed to road traffic, and 'Chuckery AQMA' due to PM<sub>10</sub>.
- 2.7.2 There are a large number of motorways and A-roads which cross the Plan area, each of which represent traffic-related sources of air pollution (see **Figure 2.23**). It is widely accepted that the effects of air pollution from road transport decreases with distance from the source of pollution. The Department for Transport (DfT) in their Transport Analysis Guidance (TAG) consider that, *"beyond 200m from the link centre, the contribution of vehicle emissions to local pollution levels is not significant"*<sup>69</sup>. This statement is supported by Highways England and Natural England based on evidence presented in a number of research papers<sup>70 71</sup>.
- 2.7.3 As all the proposed development is located within an AQMA, this is likely to lead to adverse impacts on health and may prevent the BCA from achieving air quality targets. It is assumed that new development proposals within the Black Country would also result in an increase in traffic and thus could potentially increase traffic-related air pollution. Both existing and future residents would be exposed to this change in air quality.
- 2.7.4 The Black Country Air Quality Supplementary Planning Document (SPD)<sup>72</sup> outlines the context and importance of air quality in the Black Country and sets out methods for identifying, calculating and mitigating air quality issues associated with development proposals.

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<sup>68</sup> Dudley Metropolitan Borough Council (2016) Black Country Air Quality Supplementary Planning Document (SPD) September 2016. Available at: <https://www.dudley.gov.uk/media/6381/adopted-black-country-air-quality-spd-september-2016.pdf> [Date Accessed: 24/01/20]

<sup>69</sup> Department for Transport (2019) TAG unit A3 Environmental Impact Appraisal. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf) [Date Accessed: 22/01/20]

<sup>70</sup> Bignal, K., Ashmore, M & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

<sup>71</sup> Ricardo-AEA (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report No. 199.

<sup>72</sup> Black Country Authorities (2016) Black Country Air Quality Supplementary Planning Document (SPD) September 2016. Available at: <https://www.dudley.gov.uk/residents/planning/planning-policy/dudley-local-plan/black-country-air-quality-spd/> [Date Accessed: 01/02/21]

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### Noise pollution

- 2.7.5 Noise is an inevitable consequence of development and urbanisation; however, it is also an important public health issue which can have a range of adverse impacts on human health and wellbeing<sup>73</sup>.
- 2.7.6 The Black Country is part of the West Midlands Urban Area Agglomeration as defined in the Defra Noise Action Plans<sup>74</sup>. The main source of noise pollution in the Black Country is road traffic, and therefore, most areas affected are those near to major road corridors.
- 2.7.7 Defra's Noise Action Plan for roads aims to promote good health and quality of life through describing a framework for the effective management of noise. Approaches to control noise pollution include: controlling noise at the source by reducing vehicle emissions; national and local planning controls; specific road infrastructure such as low-noise surfaces and noise barriers; and mitigation of noise at receptors such as insulation.

### Soil pollution

- 2.7.8 Soil pollution can refer to land which is contaminated by a range of pollutants including heavy metals, oils, chemicals and radioactive substances<sup>75</sup>. Land is legally defined as 'contaminated land' where substances have the potential to cause:
- significant harm to people, property or protected species;
  - significant pollution of surface water (for example lakes and rivers) or groundwater; or
  - harm to people as a result of radioactivity.
- 2.7.9 In the Black Country, the history of mining has led to some localised issues with soil pollution and contamination as discussed in **section 2.6**. It is anticipated that sites within the BCP affected by contaminated land would be subject to relevant contaminated land assessments<sup>76</sup> and remediation prior to development.

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<sup>73</sup> World Health Organisation (2018) Environmental Noise Guidelines for the European Region (2018). Available at: <https://www.euro.who.int/en/publications/abstracts/environmental-noise-guidelines-for-the-european-region-2018> [Date Accessed: 03/02/21]

<sup>74</sup> Defra (2019) Noise action plans: large urban areas, roads and railways (2019). Available at: <https://www.gov.uk/government/publications/noise-action-plans-large-urban-areas-roads-and-railways-2019> [Date Accessed: 03/02/21]

<sup>75</sup> Contaminated land. Available at: <https://www.gov.uk/contaminated-land> [Date Accessed: 03/02/21]

<sup>76</sup> Environment Agency (2016) Technical guidance on the management of contaminated land including how to investigate, assess and manage the risks. Available at <https://www.gov.uk/government/collections/land-contamination-technical-guidance> [Date Accessed: 03/02/21]

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## Water pollution

- 2.7.10 Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact upon the quality of the water<sup>77</sup>. Watercourses that pass through the Black Country include the River Tame, River Stour and Ford Brook (see **Figure 2.24**).
- 2.7.11 An approximate 10m buffer zone from a watercourse should be used in which no works, clearance, storage or run-off should be permitted<sup>78</sup>. However, it is considered that development further away than this has the potential to lead to adverse impacts such as those resulting from runoff. Each development proposal would need to be evaluated according to land use type, size of development and exact location to determine the potential impacts on water quality.
- 2.7.12 The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater. Groundwater Source Protection Zones (SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants. As such, any proposal that is located within a groundwater SPZ could potentially have an adverse impact on groundwater sources. In the Black Country, these are restricted to the west of Wolverhampton and Dudley, and the east of Walsall and Sandwell (see **Figure 2.25**).

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<sup>77</sup> World Health Organisation (1996) Water Quality Monitoring - A Practical Guide to the Design and Implementation of Freshwater Quality Studies and Monitoring Programmes: Chapter 2 – Water Quality. Available at: [https://www.who.int/water\\_sanitation\\_health/resourcesquality/wqmchap2.pdf](https://www.who.int/water_sanitation_health/resourcesquality/wqmchap2.pdf) [Date Accessed: 03/02/21]

<sup>78</sup> Department of Agriculture, Environment and Rural Affairs (no date) Advice and Information for planning approval on land which is of nature conservation value. Available at: <https://www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value> [Date Accessed: 16/06/21]



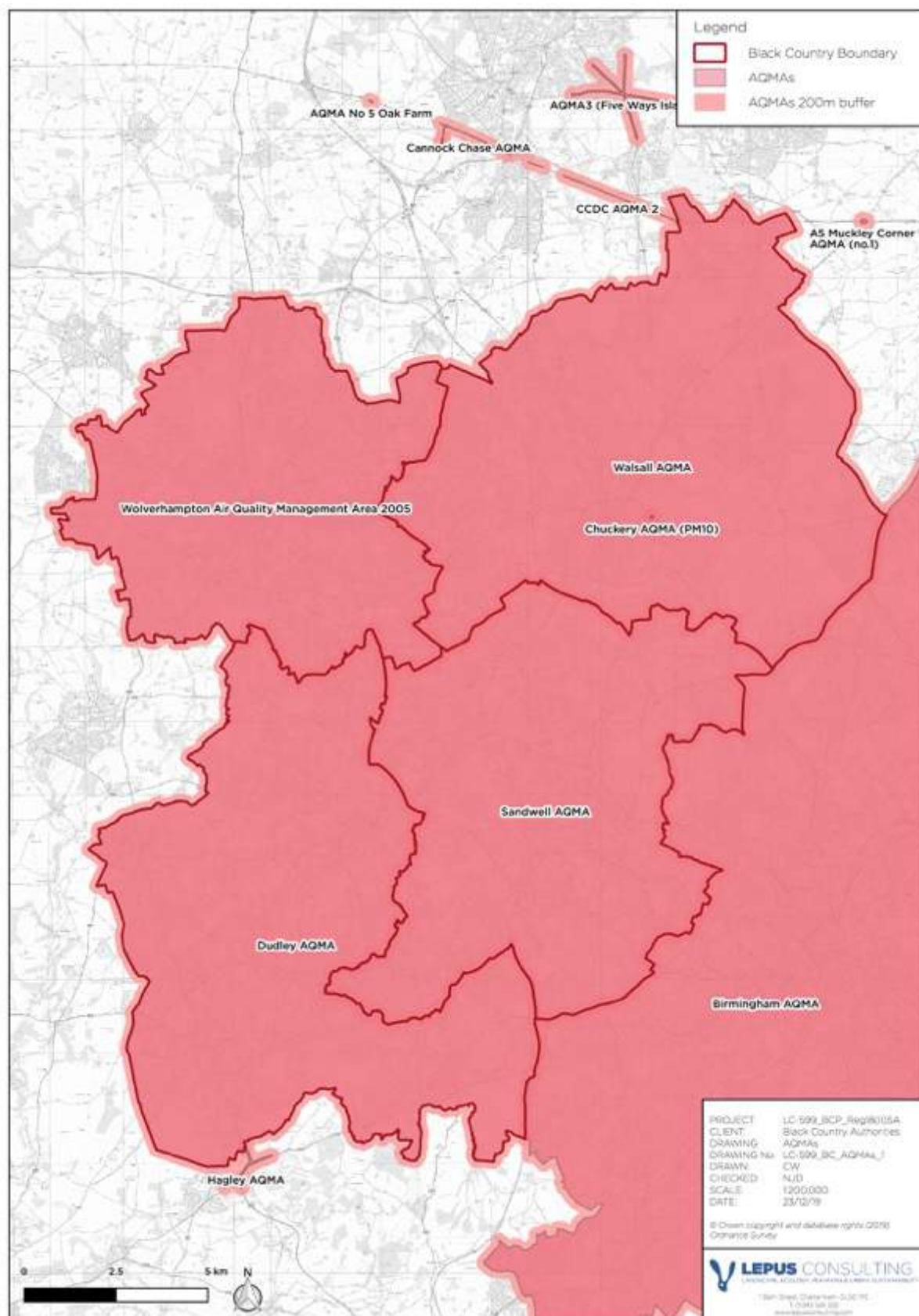


Figure 2.22: Air Quality Management Areas (AQMAs) in and around the Black Country (source: Defra)

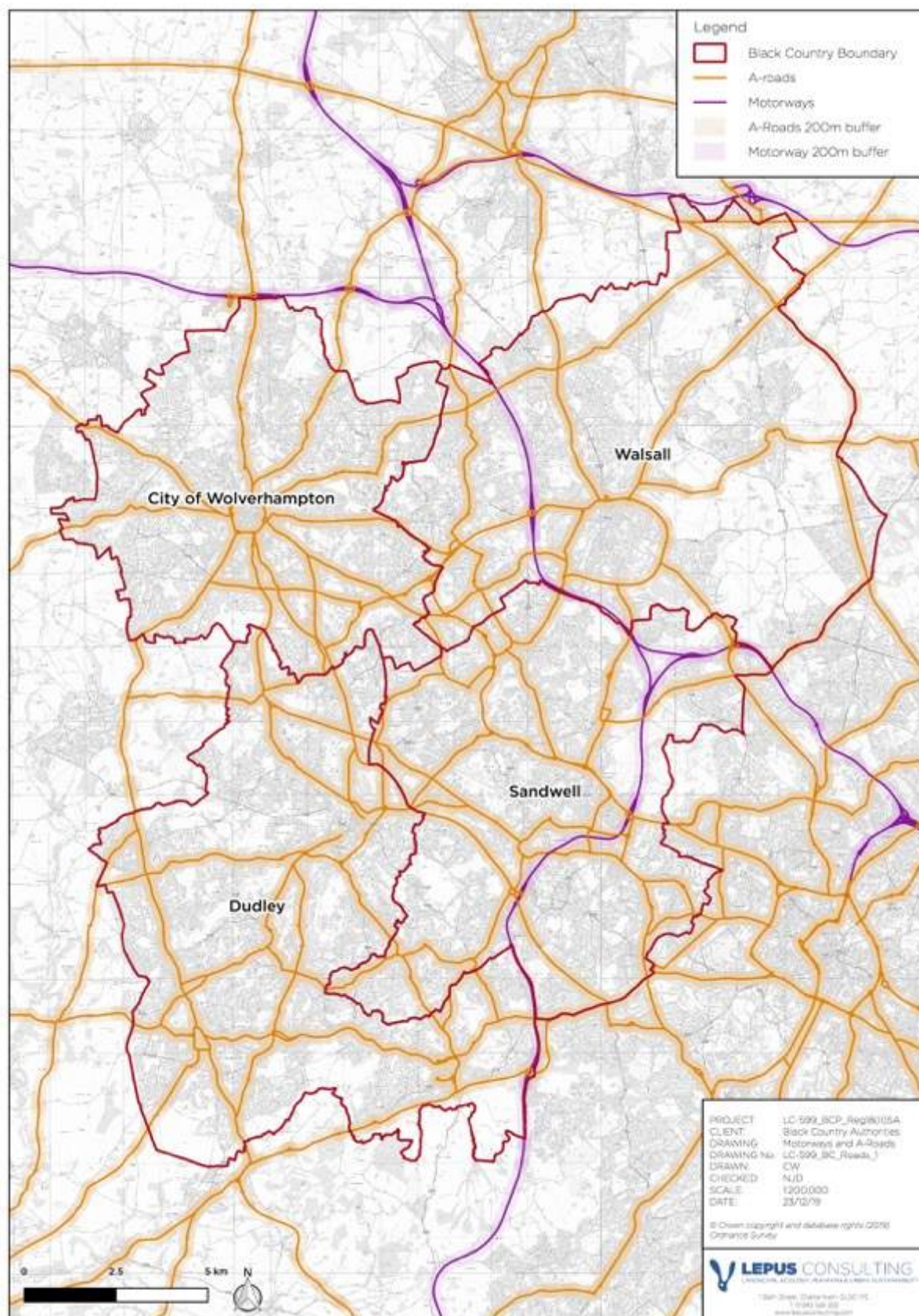


Figure 2.23: Motorways and A-roads in and around the Black Country (source: Defra)



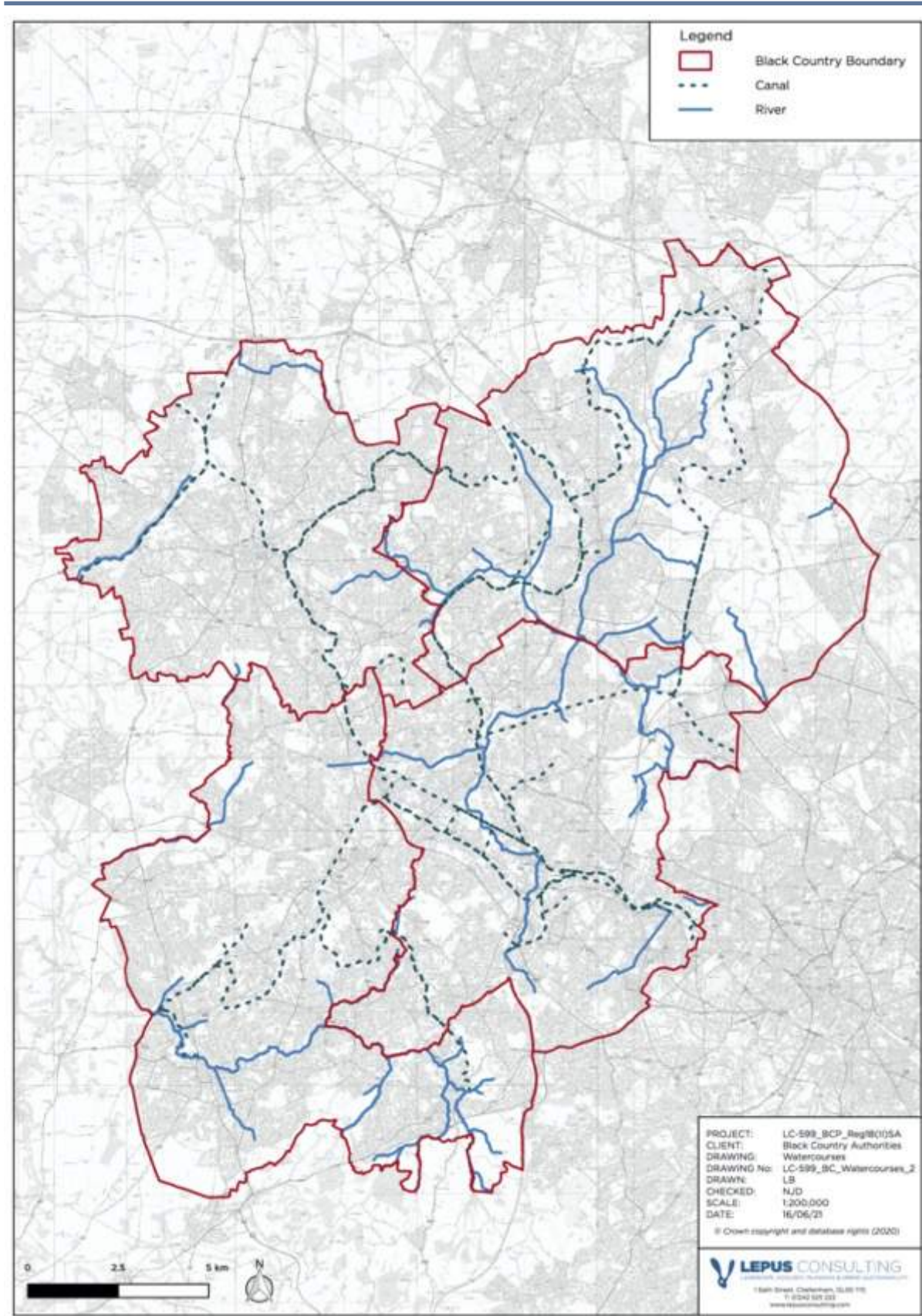
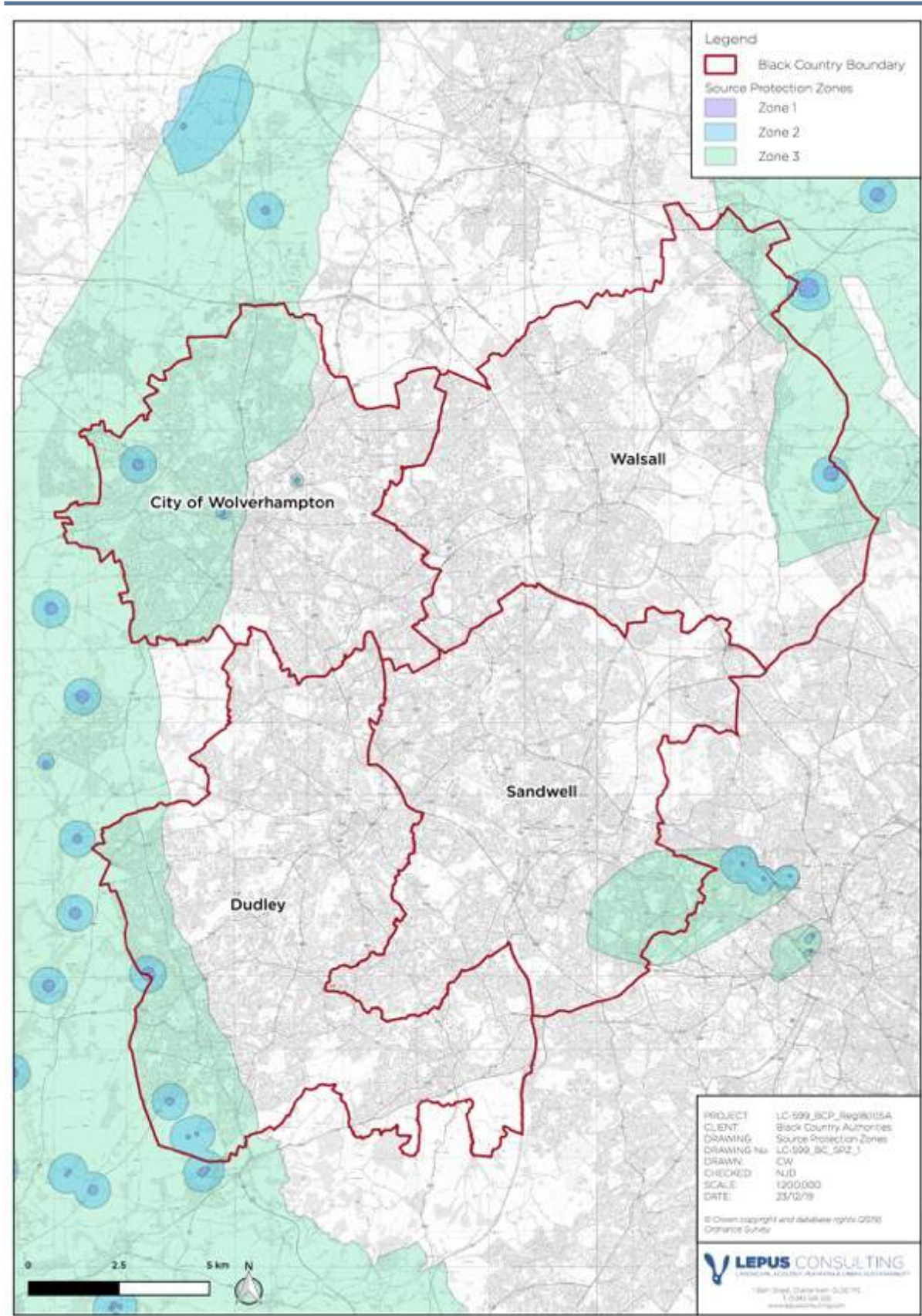


Figure 2.24: Watercourses within the Black Country (source: Ordnance Survey)



**Figure 2.25:** Groundwater Source Protection Zones (SPZs) in and around the Black Country (source: Environment Agency)



## 2.8 SA Objective 8: Waste

2.8.1 Throughout the Black Country and nationally, there is a need to increase the proportion of waste sent for reuse, recycling or compost and move away from the use of landfill for waste disposal. Government guidance documents including the 25 Year Environment Plan<sup>79</sup> and Waste Strategy for England<sup>80</sup> highlight the importance of moving towards sustainable waste management and in particular cutting down on hazardous waste and single-use plastics which lead to adverse implications for the health of people and the environment.

2.8.2 The total local authority collected waste within the Black Country between 2018 and 2019 is presented in **Table 2.3** below.

**Table 2.3:** Total local authority collected household and non-household waste collected per authority in 2018/2019<sup>81</sup>

	Total household waste (tonnes)	Total non-household waste (tonnes)
Dudley	122,929	14,634
Sandwell	129,019	12,729
Walsall	107,005	10,279
Wolverhampton	106,305	20,100
<b>Black Country Authorities</b>	<b>465,258</b>	<b>57,742</b>

2.8.3 The proposed development within the Black Country and associated increase in residents would be expected to result in a significant increase in waste produced. It is assumed that new residents in the Black Country will have an annual waste production of 409.3kg per person, in line with the average for England<sup>82</sup>.

2.8.4 The proportion of local authority collected waste in the West Midlands sent for recycling and composting is below the national levels, whereas the waste managed through incineration is higher than national levels. According to the Black Country Waste Study<sup>83</sup>, in 2017 waste from the Black Country received at permitted sites was managed in the following ways:

- 21% re-used and recycled;
- 34% recovered or treated;

<sup>79</sup> Defra (2018) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) [Date Accessed: 06/05/20]

<sup>80</sup> Defra (2018) Our Waste, Our Resources: A Strategy for England. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/765914/resources-waste-strategy-dec-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf) [Date Accessed: 06/05/20]

<sup>81</sup> Department for Environment Food and Rural Affairs (2019) Local authority collected waste generation from April 2000 to March 2019 (England and regions) and local authority data April 2018 to March 2019. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/849136/LA\\_and\\_Regional\\_Spreadsheet\\_1819.xlsx](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/849136/LA_and_Regional_Spreadsheet_1819.xlsx) [Date Accessed: 21/01/20]

<sup>82</sup> Ibid

<sup>83</sup> Wood (2020) Black Country Waste Study – Review of the Evidence Base for Waste to support Preparation of the Black Country Plan Revised Final Report. Available at: [https://blackcountryplan.dudley.gov.uk/media/15811/black-country-waste-study-final-report\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/15811/black-country-waste-study-final-report_redacted.pdf) [Date Accessed: 03/02/21]

- 9% temporarily stored at transfer stations; and
- 36% disposed of to landfill.

2.8.5 Although national trends suggest that the volume of household waste produced is decreasing, the Waste Study<sup>84</sup> indicates that additional capacity for certain types of waste management will be required, taking into account the large amount of projected growth in the area as well as continuing to facilitate the import of waste from other neighbouring authorities.

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<sup>84</sup> Wood (2020) Black Country Waste Study – Review of the Evidence Base for Waste to support Preparation of the Black Country Plan Revised Final Report. Available at: [https://blackcountryplan.dudley.gov.uk/media/15811/black-country-waste-study-final-report\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/15811/black-country-waste-study-final-report_redacted.pdf) [Date Accessed: 03/02/21]

## 2.9 SA Objective 9: Transport and accessibility

- 2.9.1 Growth within the Plan area would be expected to increase pressure on the road network and transport infrastructure. In the Black Country as well as nationally, there is a need for modal shift to lower carbon transport to reduce the environmental impact of transport, especially as the majority of residents commute to work by car in the West Midlands<sup>85</sup>.

### Road Network

- 2.9.2 There is a vast road network across the Black Country, including motorway links to the south west, south east and north west of England. The primary non-motorway routes include the A454, A4123, A461, A4041 and A456, with the A34, A5 and A449 providing key links between the Black Country and the wider area. Road congestion is an existing problem in the Black Country, in particular following road incidents on the M5 and M6 and at junction pinch-points<sup>86</sup>.

### Public Transport

- 2.9.3 A number of railway lines pass through the four boroughs in the Black Country, providing good rail links to Birmingham and Stafford. There are four passenger rail lines within the Plan area, in addition to the Midland Metro light rail system that operates between Birmingham and Wolverhampton (see **Figure 2.26**).
- 2.9.4 The Black Country is served by regular bus links across the area provided by a number of bus operators acting within the West Midlands Bus Alliance<sup>87</sup> (see **Figure 2.27**). Furthermore, the Sprint network<sup>88</sup>, providing a bus-based rapid transit system, is currently under development and seeks to improve reliability and connectivity between the public transport networks and create new links from Birmingham to Dudley and Walsall.
- 2.9.5 In terms of onward and international travel, the nearest airport is Birmingham Airport, located in Solihull approximately 15km east of the Black Country.

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<sup>85</sup> Nomis (2011) Method of Travel to Work. Available at:  
[https://www.nomisweb.co.uk/census/2011/QS701EW/view/2013265925?rows=cell&cols=rural\\_urban](https://www.nomisweb.co.uk/census/2011/QS701EW/view/2013265925?rows=cell&cols=rural_urban) [Date Accessed: 22/01/20]

<sup>86</sup> West Midlands Combined Authority (2016) Movement For Growth: The West Midlands Strategic Transport Plan. Available at:  
<https://www.tfwm.org.uk/media/1099/movement-for-growth.pdf> [Date Accessed: 22/01/20]

<sup>87</sup> West Midlands Combined Authority (2017) Transport Plan 2017/18. Available at:  
<https://wolverhampton.moderngov.co.uk/documents/s38731/Item%204.1%20-%20Transport%20Plan%202017-18-v12.pdf> [Date Accessed: 09/04/20]

<sup>88</sup> Transport for West Midlands (2020) Sprint: a new, rapid transit system for local people. Available at:  
<https://www.tfwm.org.uk/development/sprint/> [Date Accessed: 09/04/20]

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### **Pedestrian and Cycle Access**

- 2.9.6 There is an extensive Public Right of Way (PRoW) and cycle network in the Black Country. This includes many routes along the canal network and disused railway lines, which provide a recreational resource as well as links to other modes of transport. **Figure 2.28** below indicates the location of some of these routes. Additionally, the Monarch's Way, Beacon Way and the Forest of Mercia Trail pass through the Black Country.
- 2.9.7 Across the West Midlands, there are over 193km of cycle and walking routes<sup>89</sup>. Ongoing development and upgrades to the cycling and walking network seek to connect communities and promote active travel as a healthy and sustainable mode of transport.

### **Local Accessibility**

- 2.9.8 The Black Country contains a range of settlements including strategic centres, towns and local centres, which would be expected to provide a range of shops and services to support the population within these areas.
- 2.9.9 The BCA have provided Lopus with data to show the location of fresh food and centres throughout the Black Country, as well as modelled data indicating areas within a 15-minute walking distance or travel time via public transport to these services (see **Figure 2.29**). The figure shows that the majority of the four authority areas lie within 15-minute travel time, and as such, the majority of new residents would be expected to have sustainable access to local shops and facilities providing fresh food.

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<sup>89</sup> Transport for West Midlands (2019) Cycling and Walking Network. Available at: [https://www.tfwm.org.uk/media/47547/feb19-759487472899466-lcwip-roadmap\\_v30.pdf](https://www.tfwm.org.uk/media/47547/feb19-759487472899466-lcwip-roadmap_v30.pdf) [Date Accessed: 09/04/20]



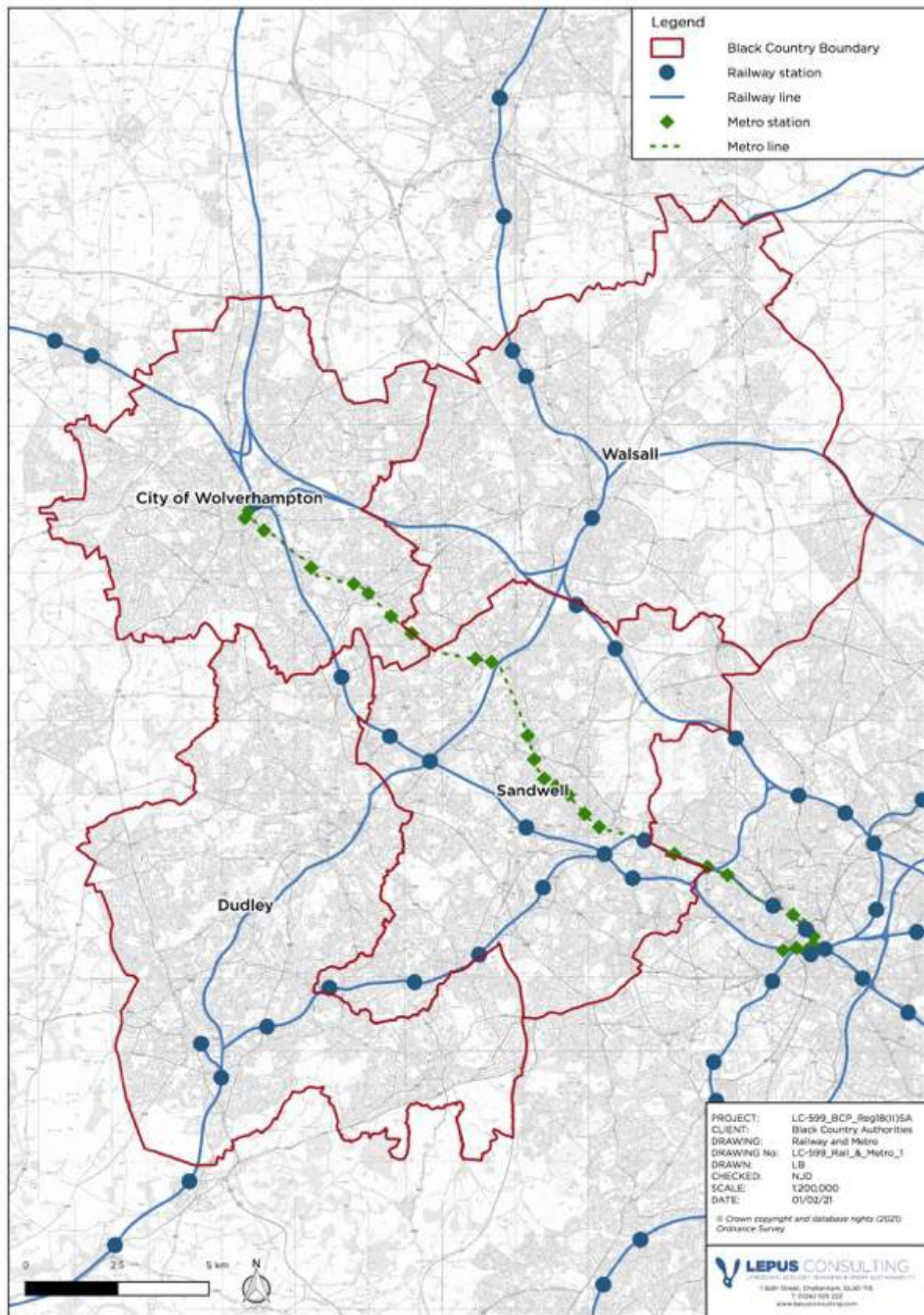


Figure 2.26: Railway and Metro stations in and around the Black Country (source: Transport for West Midlands)



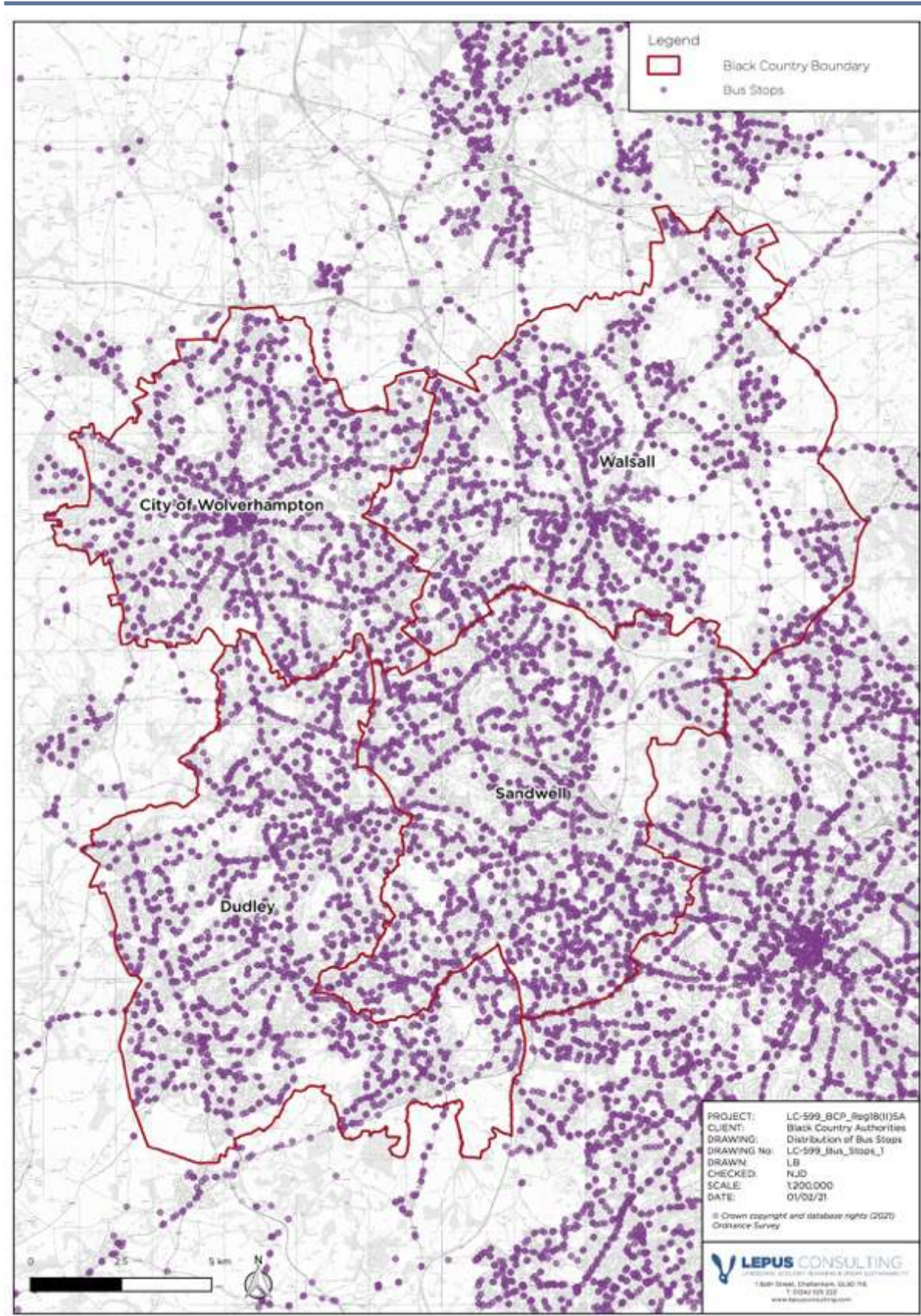
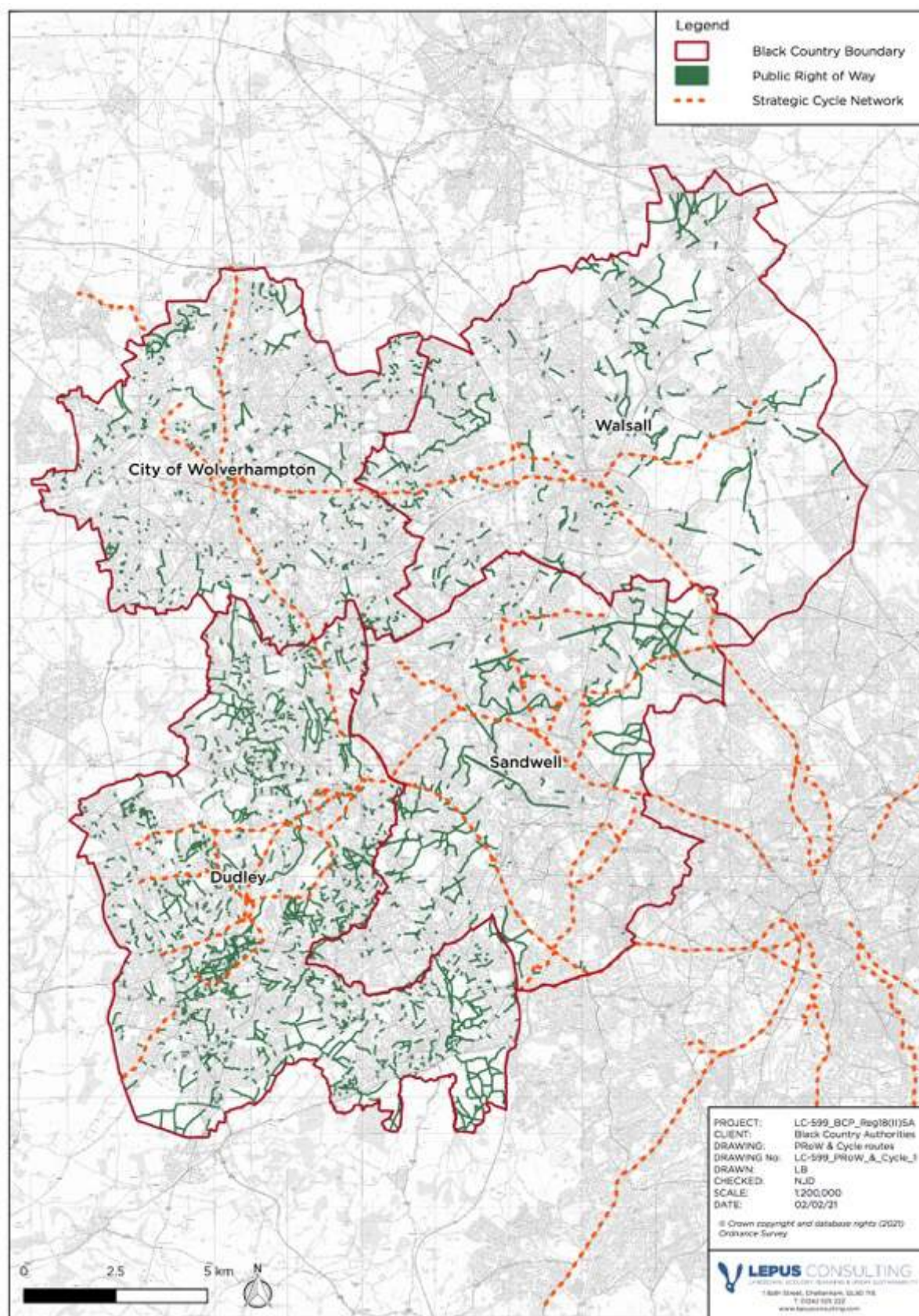


Figure 2.27: Distribution of bus stops in and around the Black Country (source: Transport for West Midlands)





**Figure 2.28:** Public Rights of Way and Strategic Cycle Network within the Black Country (source: BCA and Transport for West Midlands)



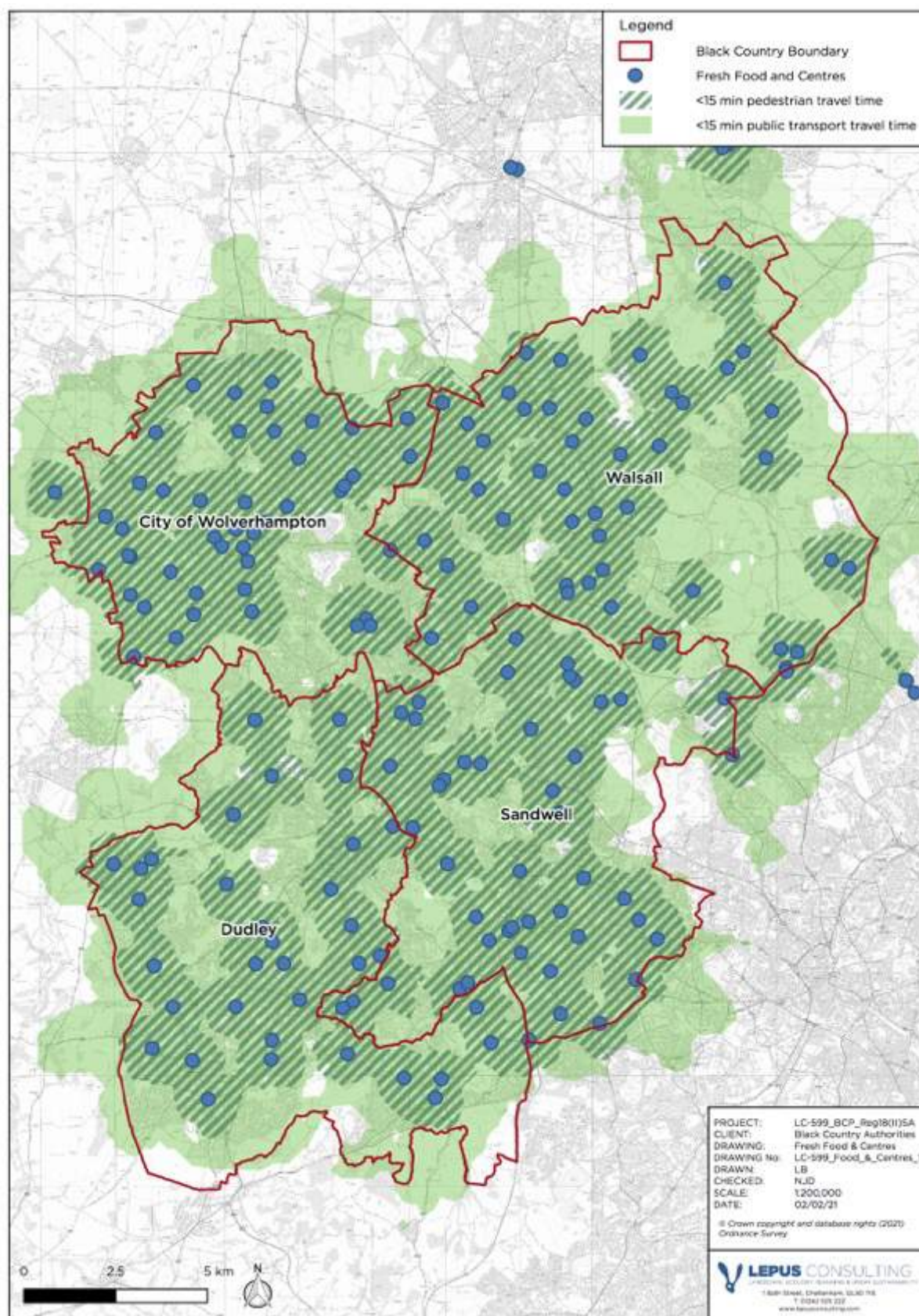


Figure 2.29: Location of Fresh Food and Centres and modelled travel time across the Black Country (source: BCA)



## 2.10 SA Objective 10: Housing

- 2.10.1 According to the Urban Capacity Review<sup>90</sup> (2019), there is a requirement for the development of 71,459 dwellings over the Plan period to 2038 in the Black Country. This has subsequently been updated to a requirement for 76,076 dwellings over the plan period to 2039 based on the standard method (See **Section 3**).
- 2.10.2 Each authority in the Black Country has produced a Strategic Housing Land Availability Assessment (SHLAA)<sup>91</sup>, which will be updated annually, to assess land with potential for development in order to inform the housing land supply and trajectory. Sites for consideration in the BCP have been identified through the 'call for sites' process.
- 2.10.3 The majority of the housing requirement in the Black Country will be met through sites with planning permission and sites allocated for housing. New sites and windfall sites within the urban area and strategic centres will also provide an additional supply of housing. Due to the constraints on housing delivery within the urban area of the Black Country, a proportion of the development will also be directed to the Green Belt and exported to neighbouring authorities through the Duty to Cooperate.
- 2.10.4 A key element of the vision of the BCP is to create a network of cohesive, healthy and prosperous communities across the Black Country. It is assumed that the development proposals will provide a good mix of housing types and tenures in order to meet the identified needs for the population, including affordable housing, and accessible housing options particularly for people aged 65 and over.

### House prices

- 2.10.5 The average UK house price was £239,000 as of August 2020<sup>92</sup>, with house prices in the West Midlands increasing by 2.3% in the year to August 2020. In general, house prices in the Black Country are below the average for the UK (see **Table 2.4**).

**Table 2.4: Houses: Average price paid within the four authorities<sup>93</sup>**

	Dudley	Sandwell	Walsall	Wolverhampton
House: Average Price Paid	£168,404	£144,333	£188,290	£194,321

<sup>90</sup> Black Country Plan (2019) Black Country Urban Capacity Review December 2019 <https://blackcountryplan.dudley.gov.uk/media/13807/bc-urban-capacity-review-update-final-december-2019.pdf> [Date Accessed: 21/01/20]

<sup>91</sup> Dudley Metropolitan Borough Council (2019) Black Country Plan: Housing. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4c/> [Date Accessed: 03/02/21]

<sup>92</sup> Office for National Statistics (2020) UK House Price Index: August 2020. Available at: <https://www.ons.gov.uk/economy/inflationandpriceindices/bulletins/housepriceindex/august2020> [Date Accessed: 03/02/21]

<sup>93</sup> Zoopla (2020) House prices and values. Available at: <https://www.zoopla.co.uk/house-prices/> [Date Accessed: 08/04/20]

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### **Affordable housing**

- 2.10.6 Affordable housing is defined as “*social rented, affordable rented and intermediate housing, provided to specified eligible households whose needs are not met by the market*”<sup>94</sup>. It is estimated that we need to build 3.1 million more social homes in England in the next 20 years<sup>95</sup>.

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<sup>94</sup> Ministry of Housing, Communities and Local Government (2020) Affordable housing supply. Available at: <https://www.gov.uk/government/collections/affordable-housing-supply> [Date Accessed: 29/10/20]

<sup>95</sup> Shelter (2019) Building for Our Future: A Vision for Social Housing. Available at: [https://england.shelter.org.uk/\\_data/assets/pdf\\_file/0005/1642613/Shelter\\_UK - A vision for social housing\\_full\\_interactive\\_report.pdf](https://england.shelter.org.uk/_data/assets/pdf_file/0005/1642613/Shelter_UK_-_A_vision_for_social_housing_full_interactive_report.pdf) [Date Accessed: 03/02/21]

## 2.11 SA Objective 11: Equality

2.11.1 The Black Country is an ethnically diverse area, with individuals from many different religions, cultures, communities and backgrounds<sup>96</sup>. According to the 2011 Census, 77.1% of the Black Country identified as White, 14.4% as Asian, 4.1%, 3.2% as Mixed and 1.2% as 'other'<sup>97</sup>, however, the proportion of different communities varies greatly across the region.

2.11.2 The Equality Act 2010<sup>98</sup> provides a legal framework to protect individuals from unfair treatment and promotes a fair and equal society. It seeks to highlight and strengthen the laws which prevent discrimination. Under the Equality Act, there are nine protected characteristics:

- Age;
- Disability;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief;
- Sex; and
- Sexual orientation.

2.11.3 The Equality Act focuses on four main types of discrimination: direct discrimination; indirect discrimination; harassment; and victimisation.

2.11.4 Furthermore, the Black Country is home to a people from a range of socio-economic status who may also experience discrimination, poverty and social exclusion. Child poverty levels are relatively high. In the West Midlands, 22.7% of children are from low-income families<sup>99</sup>.

### Indices of Multiple Deprivation

2.11.5 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England<sup>100</sup>. LSOAs are small areas designed to be of similar population, of approximately 1,500 residents or 650 households.

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<sup>96</sup> Black Country Healthcare Foundation Trust (no date) Equality, Diversity, Inclusion and Human Rights. Available at: <https://www.bcoft.nhs.uk/about-us/equality-and-diversity> [Date Accessed: 07/04/20]

<sup>97</sup> Active Black Country (2020) Population – Demographics. Available at: <https://www.activeblackcountry.co.uk/insight-hub/data/communities/population-%E2%80%93-demographics/> [Date Accessed: 07/04/20]

<sup>98</sup> Equality Act 2010. Available at: <http://www.legislation.gov.uk/ukpga/2010/15/contents> [Date Accessed: 07/04/20]

<sup>99</sup> Department for Work and Pensions (2013) Households below average income (HBAI) statistics. Available at: <https://www.gov.uk/government/collections/households-below-average-income-hbai--2> [Date Accessed: 01/02/21]

<sup>100</sup> Ministry of Housing, Communities and Local Government (2019) The English Indices of Deprivation 2019. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/835115/iod2019\\_Statistical\\_Release.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/iod2019_Statistical_Release.pdf) [Date Accessed: 07/04/20]

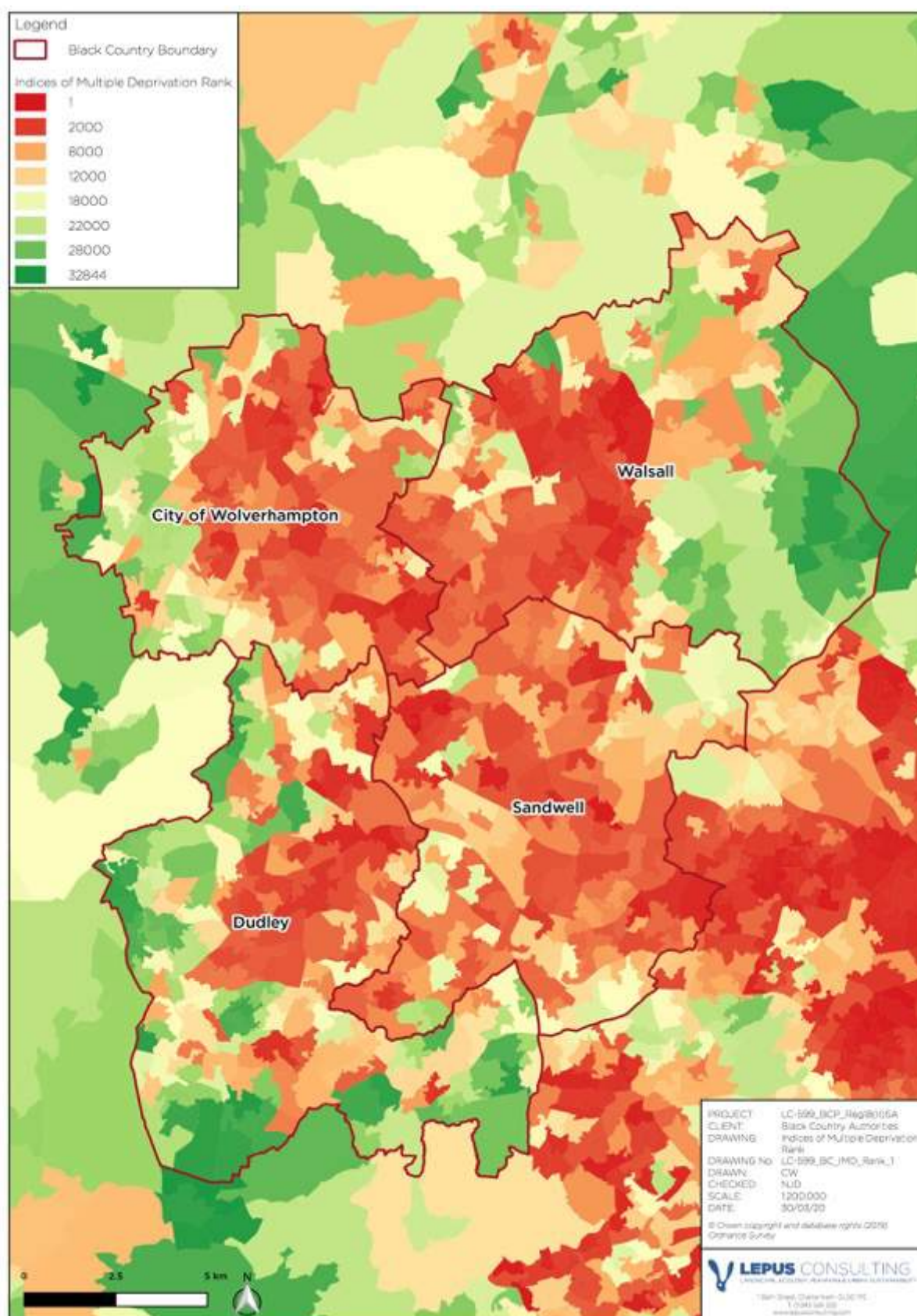
- 2.11.6 In general, deprivation is spread across England, with approximately 61% of local authority districts contain at least one of the most deprived neighbourhoods in England. Middleborough, Liverpool, Knowsley, Kingston upon Hull and Manchester have the highest proportions of neighbourhoods amongst the most deprived in England.
- 2.11.7 IMD follows an established methodology which broadly defines deprivation to encompass a range of an individual's living conditions. The calculation is based on 39 indicators separated into seven distinct domains which are combined and weighted to calculate IMD. The seven domains are: income; employment; health deprivation and disability; education, skills and training; crime; barriers to housing and services; and living environment. All neighbourhoods, or LSOAs, are then ranked according to their level of deprivation in comparison to other areas.
- 2.11.8 It should be noted that the IMD does not apply to every individual living in each LSOA. The IMD is designed to identify and measure specific aspects of deprivation, rather than measure individual affluence.
- 2.11.9 According to the IMD, the majority of the most deprived 10% of neighbourhoods in England face multiple challenges, with 137 neighbourhoods in the most deprived 10% ranking as highly deprived in six of the seven domains.
- 2.11.10 The IMD was last updated in 2019<sup>101</sup>. Out of 317 Local Authorities in England, Dudley is ranked as the 91<sup>st</sup> most deprived, Sandwell 12<sup>th</sup>, Walsall 25<sup>th</sup> and Wolverhampton 24<sup>th</sup> <sup>102</sup>. Overall deprivation is high across the Black Country, with 21 of the LSOAs in Dudley, 36 in Sandwell, 42 in Walsall and 33 in Wolverhampton ranked among the 10% most deprived in England (see **Figure 2.30**).

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<sup>101</sup> Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date Accessed: 17/12/19]

<sup>102</sup> Black Country Consortium (2019) The English Indices of Deprivation 2019. Available at: <https://www.the-blackcountry.com/upload/BC%20IMD%202019.pdf> [Date Accessed: 17/12/19]





**Figure 2.30:** Indices of Multiple Deprivation in and around the Black Country (source: Ministry of Housing, Communities and Local Government)

## 2.12 SA Objective 12: Health

### Air Pollution

- 2.12.1 As discussed in **section 2.7.1**, the entirety of the four authorities are designated as Air Quality Management Areas (AQMA)s<sup>103</sup>.
- 2.12.2 Development proposals located in close proximity to AQMA)s or main roads would be likely to expose site end users to transport associated noise and air pollution, with adverse impacts on health and wellbeing. It is widely accepted that the effects of air pollution from road transport decreases with distance from the source of pollution. The Department for Transport (DfT) in their Transport Analysis Guidance (TAG) consider that, *“beyond 200m from the link centre, the contribution of vehicle emissions to local pollution levels is not significant”*<sup>104</sup>. This statement is supported by Highways England and Natural England based on evidence presented in a number of research papers<sup>105 106</sup>.
- 2.12.3 As all the proposed development within the Black Country is located within an AQMA, this is likely to lead to adverse impacts on health and may prevent the BCA from achieving air quality targets. It is assumed that new development proposals within the Black Country would also result in an increase in traffic and thus traffic-related air pollution. Both existing and future residents would be exposed to this change in air quality.

### Healthcare Facilities

- 2.12.4 In order to facilitate healthy and active lifestyles for existing and new residents, it is expected that the BCA should seek to ensure that residents have good access to NHS hospitals and GP surgeries.
- 2.12.5 There are four NHS hospitals with A&E departments located within the Black Country: Russells Hall Hospital in Dudley, Sandwell General Hospital in Sandwell, Manor Hospital in Walsall and New Cross Hospital in Wolverhampton (see **Figure 2.31**). Birmingham City Hospital and Queen Elizabeth Hospital are also located in close proximity to the Black Country boundary. Accessibility to other NHS facilities (e.g. community hospitals and treatment centres) or private hospitals has not been taken into consideration in this assessment.

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<sup>103</sup> Dudley Metropolitan Borough Council (2016) Black Country Air Quality Supplementary Planning Document (SPD) September 2016. Available at: <https://www.dudley.gov.uk/media/6381/adopted-black-country-air-quality-spd-september-2016.pdf> [Date Accessed: 24/01/20]

<sup>104</sup> Department for Transport (2019) TAG unit A3 Environmental Impact Appraisal. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf) [Date Accessed: 22/01/20]

<sup>105</sup> Bignal, K., Ashmore, M & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

<sup>106</sup> Ricardo-AEA (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report No. 199.

- 2.12.6 The BCA have provided Lepus with information regarding the location of local healthcare facilities and accessibility modelling data (see **Figure 2.32**). According to this data, there are a total of 325 GP surgeries located across the Plan area. As shown in the figure below, a large proportion of the Black Country is located within a 15-minute walking distance or travel time via public transport from a GP surgery. Therefore, the majority of new residents would be expected to be located in areas with sustainable access to healthcare facilities.
- 2.12.7 At this stage, there is not sufficient information available to accurately predict the effect of new development on the capacity of these health facilities.

#### **Green Network**

- 2.12.8 Within the Black Country, there is a rich and diverse range of public open spaces, formal parks, outdoor recreational spaces, as well as the PRoW network and the canal system. There are two Country Parks located within the Plan area: 'Roughwood' Country Park in Walsall and 'Sandwell Valley' Country Park in Sandwell (see **Figure 2.33**). There are also several other Country Parks surrounding the Black Country. All these open spaces positively contribute towards the health and wellbeing of residents, by helping to encourage physical exercise through sports, recreation and active travel. The recreational green spaces combined with the natural green space network would also benefit the mental health and wellbeing of residents.



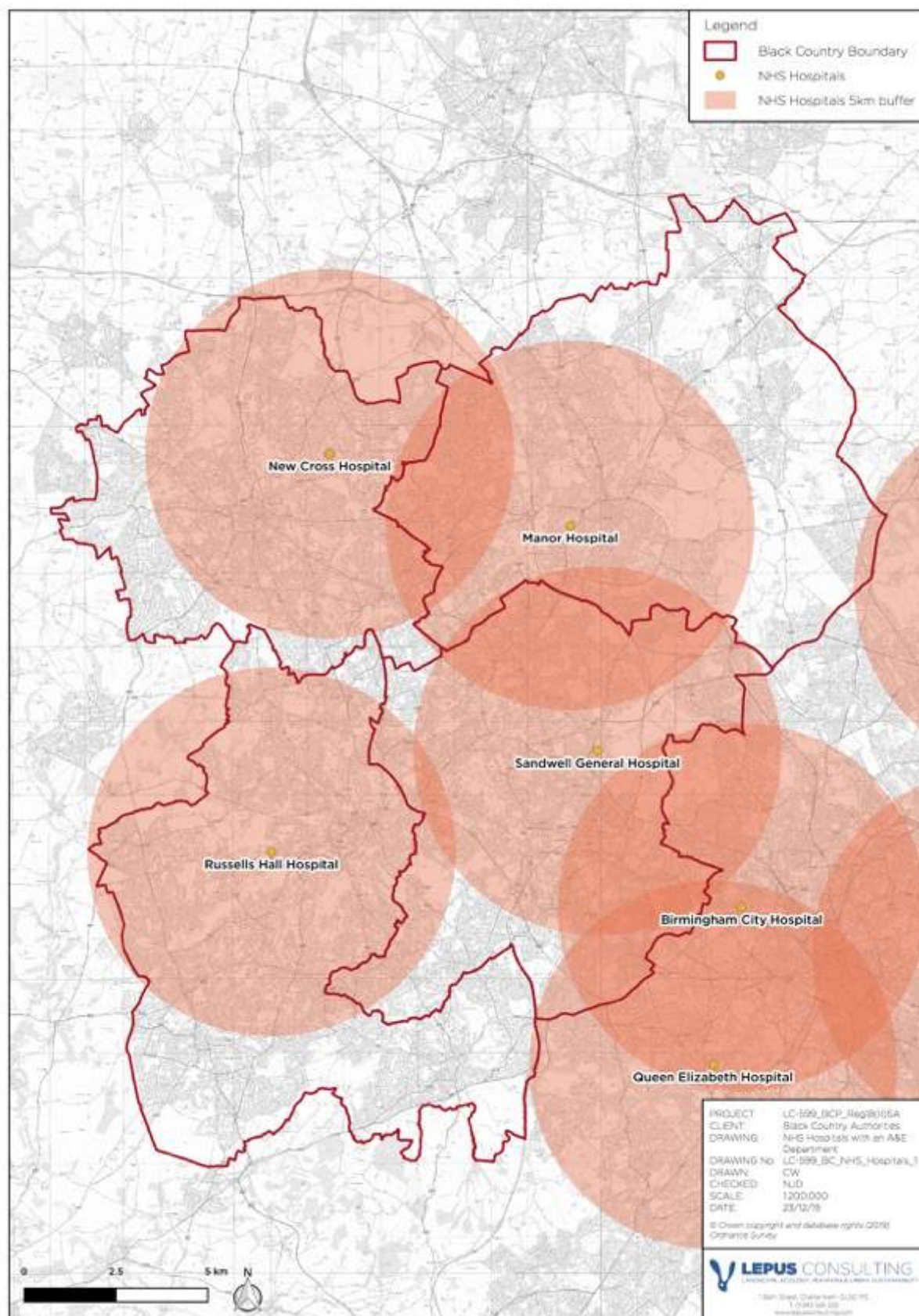


Figure 2.31: NHS Hospitals with an A&E department in and around the Black Country (source: NHS)



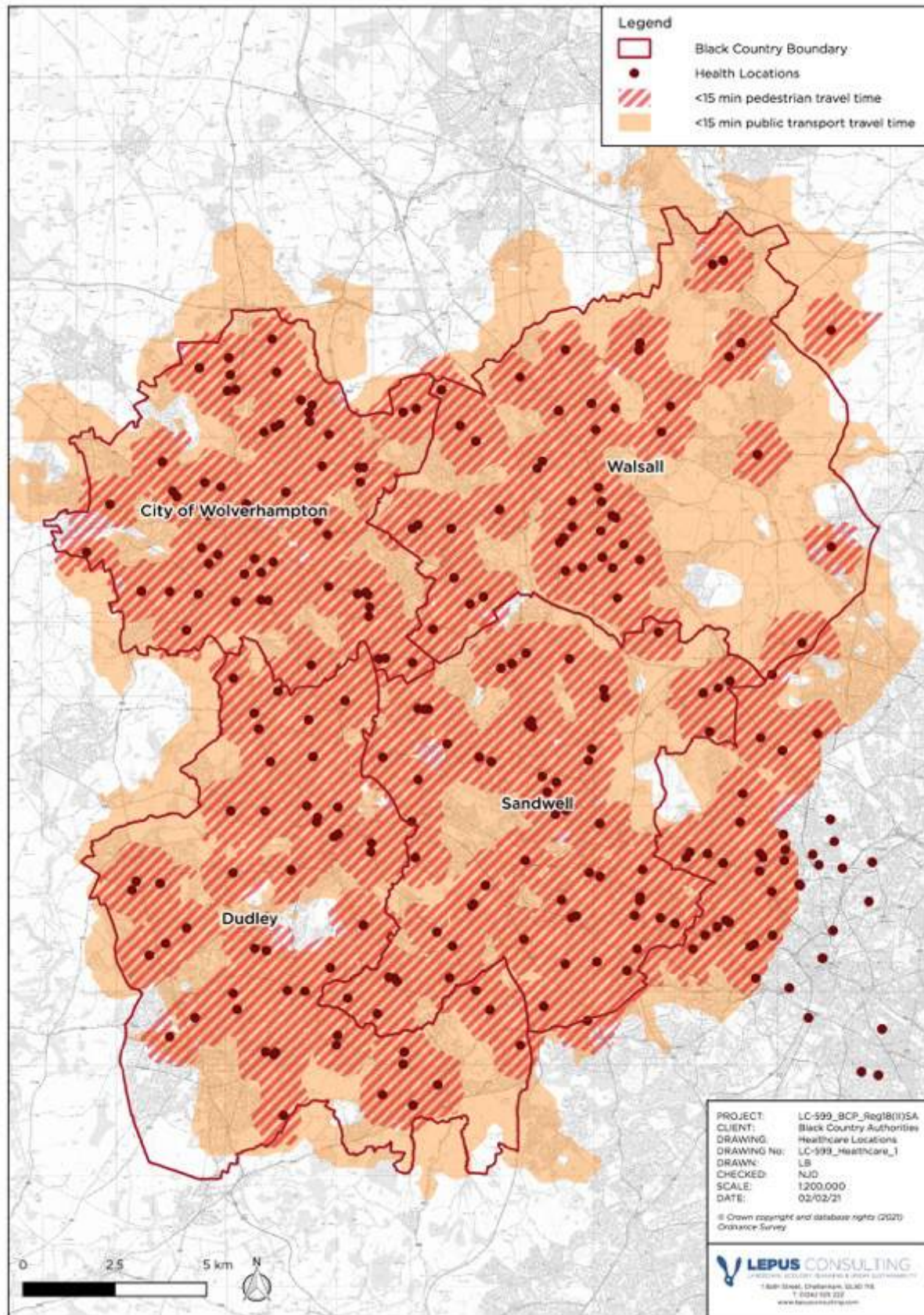
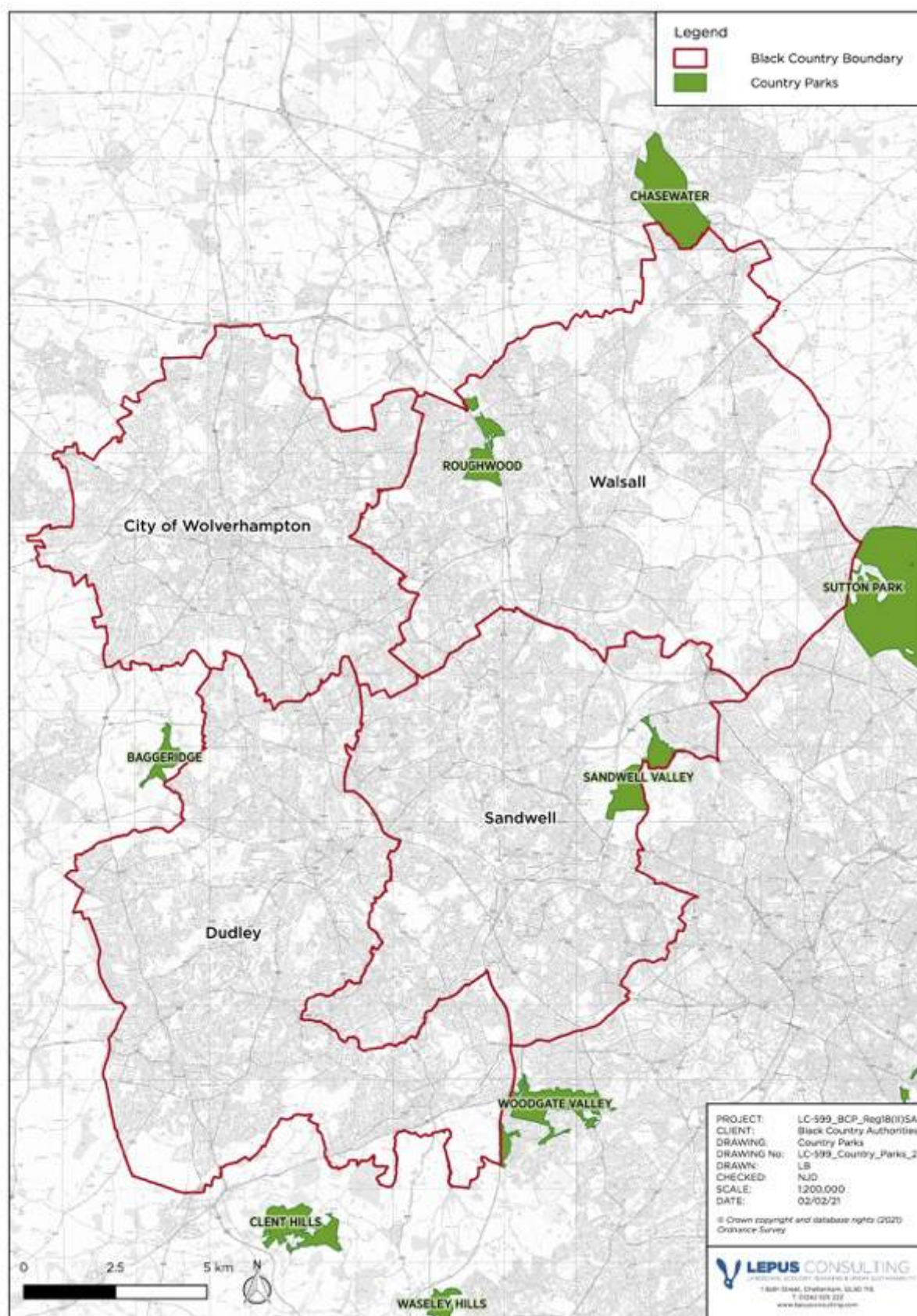


Figure 2.32: Location of healthcare facilities and modelled travel time across the Black Country (source: BCA)





*Figure 2.33: Country Parks in and around the Black Country (source: Natural England)*



## 2.13 SA Objective 13: Economy

2.13.1 Approximately 554,500 people in the Black Country were economically active as of September 2019<sup>107</sup>. Of this, approximately 73.8% were in employment, 9.6% of which were self-employed. In addition, there were estimated to be 68,500 workless households across the Black Country in 2018. **Table 2.5** presents employment by occupations and **Table 2.6** presents business counts across the Black Country.

**Table 2.5: Employment by occupation within the Black Country and Great Britain October 2018 – September 2019**<sup>108</sup>

Occupation	Dudley	Sandwell	Walsall	Wolverhampton	Black Country	Great Britain
Managers, Directors and Senior Officials	10.7	5.7	10.2	7.4	8.4	11.3
Professional Occupations	16.3	13.6	15.4	14.6	15.0	21.2
Associate Professional and Technical	13.1	10.0	14.6	9.4	11.8	14.8
Administrative and Secretarial	13.1	11.4	11.5	11.8	12.0	9.7
Skilled Trades Occupations	14.2	13.6	12.5	12.1	13.2	10.0
Caring, Leisure and Other Service Occupations	8.1	10.0	11.1	10.5	9.8	9.0
Sales and Customer Service Occupations	5.5	7.3	7.2	8.2	7.0	7.3
Process Plant and Machine Operatives	6.4	11.7	8.3	11.5	9.4	6.2
Elementary Positions	11.8	15.6	9.2	14.4	12.8	10.2

**Table 2.6: UK Business Counts (Local Units) 2019**<sup>109</sup>

Local Units	Dudley	Sandwell	Walsall	Wolverhampton
Micro (0 to 9)	9,350	8,585	7,385	7,245
Small (10 to 49)	1,645	1,595	1,275	1,365
Medium (50 to 249)	350	395	315	295
Large (250+)	35	55	45	40
Total	11,380	10,630	9,020	8,945

<sup>107</sup> Nomis (2020) Labour Market Profile – Black Country. Available at: <https://www.nomisweb.co.uk/reports/lmp/lep/1925185537/report.aspx?town=black%20country#tabempunemp> [Date Accessed: 07/04/20]

<sup>108</sup> Nomis (2020) Labour Market Profile – Black Country. Available at: <https://www.nomisweb.co.uk/reports/lmp/lep/1925185537/report.aspx?town=black%20country#tabempunemp> [Date Accessed: 07/04/20]

<sup>109</sup> Nomis (2020) Labour Market Profile. Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157191/report.aspx?cl=1946157192&c2=2092957698> [Date Accessed: 08/04/20]

- 2.13.2 In 2018, the Black Country Gross Value Added (GVA) rose by 2.5% to £21.2 billion in comparison to 2017<sup>110</sup>. Nationally, GVA increased by 3.1%. Per head, GVA in the Black Country has increased 1.9% in comparison to 2017, whereas nationally, there was a 2.5% increase.

#### **Employment Opportunities**

- 2.13.3 Key employment areas are defined as locations which would provide a range of employment opportunities from a variety of employment sectors, including retail parks, industrial estates and major local employers.

- 2.13.4 Some of the strategic centres of the four authorities in the Black Country include Walsall Town Centre, West Bromwich, Wolverhampton Town Centre and Brierley Hill. These areas provide retail, office and leisure floorspace. **Figure 2.34** below shows the location of major employment sites across the Black Country, alongside accessibility modelling data provided to Lepus by the BCA. The map shows that almost the entirety of the Black Country is within a 30-minute travel time to an employment site, either via walking or public transport.

- 2.13.5 The majority of new residents across the Plan area would therefore be expected to be located within a sustainable distance to employment opportunities. Development proposals located in urban areas would be expected to have good sustainable transport connections to nearby employment opportunities.

#### **Employment Floorspace**

- 2.13.6 The Black Country Economic Development Needs Assessment 1 (EDNA)<sup>111</sup> aims to assess employment land needs across the Black Country for the length of the Plan period. A Stage 2 EDNA Assessment has also been undertaken in May 2021 and forms part of the evidence base for the BCP.

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<sup>110</sup> Black Country Consortium (2019) Gross Value Added (GVA) and Gross Domestic Product (GDP): December 2019. Available at: <https://www.the-blackcountry.com/upload/GVA%20Dec%202019%20BC.pdf> [Date Accessed: 08/04/20]

<sup>111</sup> Warwick Economics and Development (2017) Black Country Economic Development Needs Assessment May 2017 Stage 1 Report. Available at: <https://blackcountryplan.dudley.gov.uk/media/11530/black-country-edna-stage-1-report.pdf> [Date Accessed: 22/01/20]

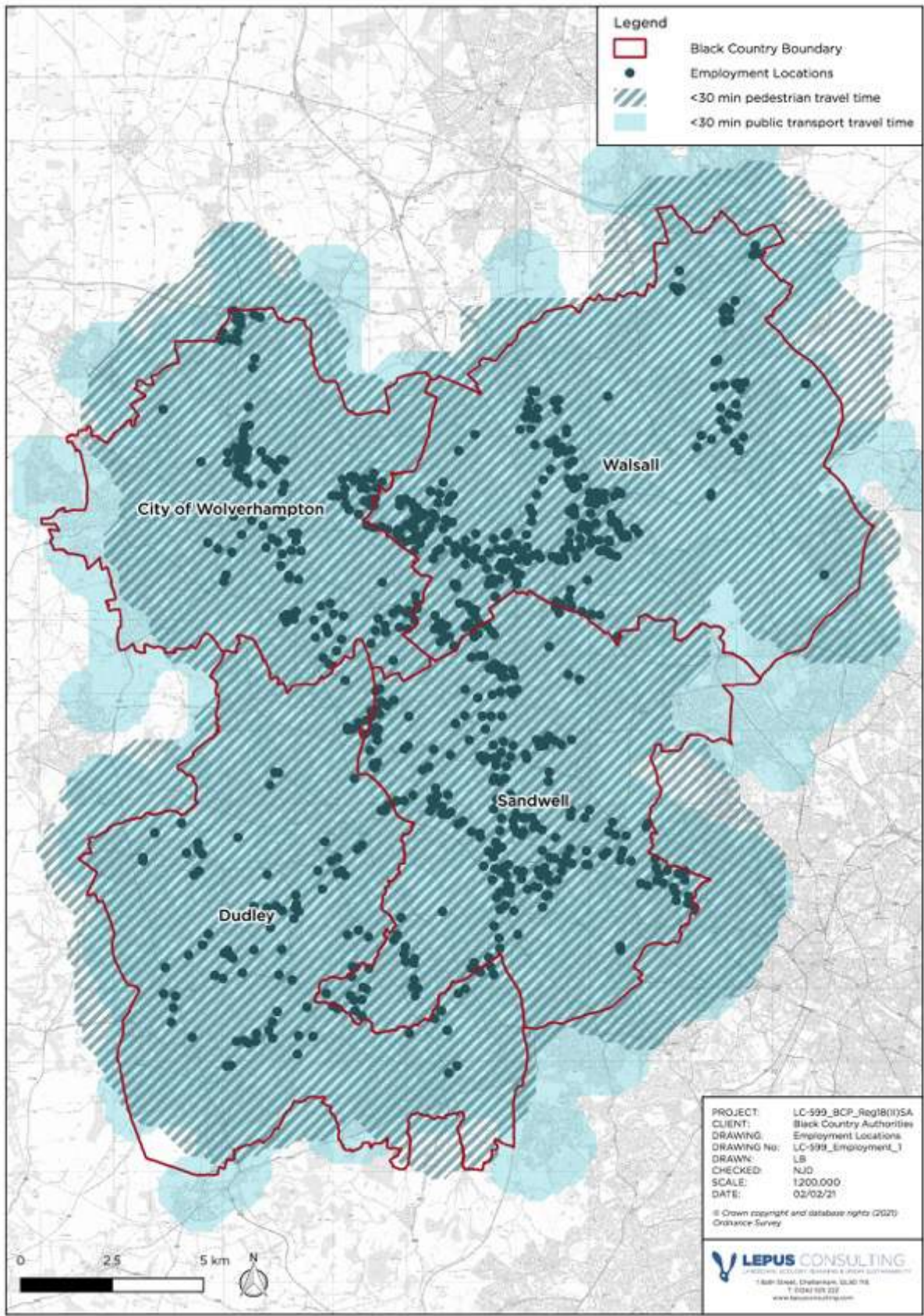


Figure 2.34: Key employment locations and modelled travel time across the Black Country (source: BCA)



## 2.14 SA Objective 14: Education, skills and training

- 2.14.1 In general, education attainment is lower in the Black Country than England. **Table 2.7** below presents the qualifications levels across the four authorities. The Black Country Local Enterprise Partnership (LEP) has identified that the number of Black Country residents with no qualifications will need to decrease by approximately 57,000 by 2033 to enable the Plan area to equal the national average, as of 2017<sup>112</sup>.

**Table 2.7: Qualifications across the Black Country, January 2018 – December 2018<sup>113</sup>**

Qualifications	Dudley	Sandwell	Walsall	Wolverhampton
NVQ4 and above	24.4	21.1	30.2	22.8
NVQ3 and above	39.4	35.1	50.8	36.9
NVQ2 and above	61.3	56.4	67.4	58.1
NVQ1 and above	75.4	68.4	79.4	73.0
Other Qualifications	10.5	11.2	9.2	10.8
No Qualifications	14.1	20.3	11.4	16.3

- 2.14.2 There are a large number of schools located across the Plan area, with a total of 406 primary schools and 127 secondary schools across the four boroughs (see **Figures 2.35** and **2.36**).
- 2.14.3 It is assumed that new residents in the Plan area require access to primary and secondary education to help facilitate good levels of education, skills and qualifications of residents.
- 2.14.4 It is recognised that not all schools within the Black Country are accessible to all pupils. For instance, independent and academically selective schools may not be accessible to all, and some secondary schools may only be for girls or boys. This has been considered within the assessment.
- 2.14.5 There are 56 schools with sixth-forms on the Plan area, plus 13 special schools with post-16 education provision and one special post-16 institution<sup>114</sup>.
- 2.14.6 There are also a number of further education and higher education opportunities within the Black Country, including the University of Wolverhampton, Dudley College of Technology and Sandwell College. Within the wider West Midlands, there are several universities including the University of Birmingham, Birmingham City University and Aston University.

<sup>112</sup> Department for Education (2017) Black Country Areas Review. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/582028/Black\\_Country\\_AR\\_-\\_Report\\_-\\_Final.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/582028/Black_Country_AR_-_Report_-_Final.pdf) [Date Accessed: 08/04/20]

<sup>113</sup> Nomis (2020) Labour Market Profile. Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157188/report.aspx?c1=1946157189&c2=1946157192> [Date Accessed: 08/04/20]

<sup>114</sup> Department for Education (2017) Black Country Areas Review. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/582028/Black\\_Country\\_AR\\_-\\_Report\\_-\\_Final.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/582028/Black_Country_AR_-_Report_-_Final.pdf) [Date Accessed: 08/04/20]

- 2.14.7 At this stage, there is not sufficient information available to be able to accurately predict the effect of new development on the capacity of local schools, or to incorporate local education attainment rates into the assessment.

**Access to schools**

- 2.14.8 Accessibility modelling data has been provided to Lepus by the BCA. The location of primary and secondary schools within the Black Country and the areas within a sustainable travel time to these schools have been mapped.
- 2.14.9 **Figure 2.35** shows the areas of the Black Country within a 15-minute walking distance to a primary school. **Figure 2.36** shows the areas of the Black Country within a 25-minute walking distance and 25-minute distance via public transport to a secondary school. These travel times are assumed to be sustainable for the purposes of SA.
- 2.14.10 The maps indicate that the majority of the Black Country is located within areas providing sustainable access to primary and secondary schools. However, some areas of the Black Country may experience longer travel times, particularly to primary schools, often in the outskirts of settlements as illustrated below. In these areas, travel via car may be relied upon more and these areas are therefore considered to be less sustainable for the purposes of SA.

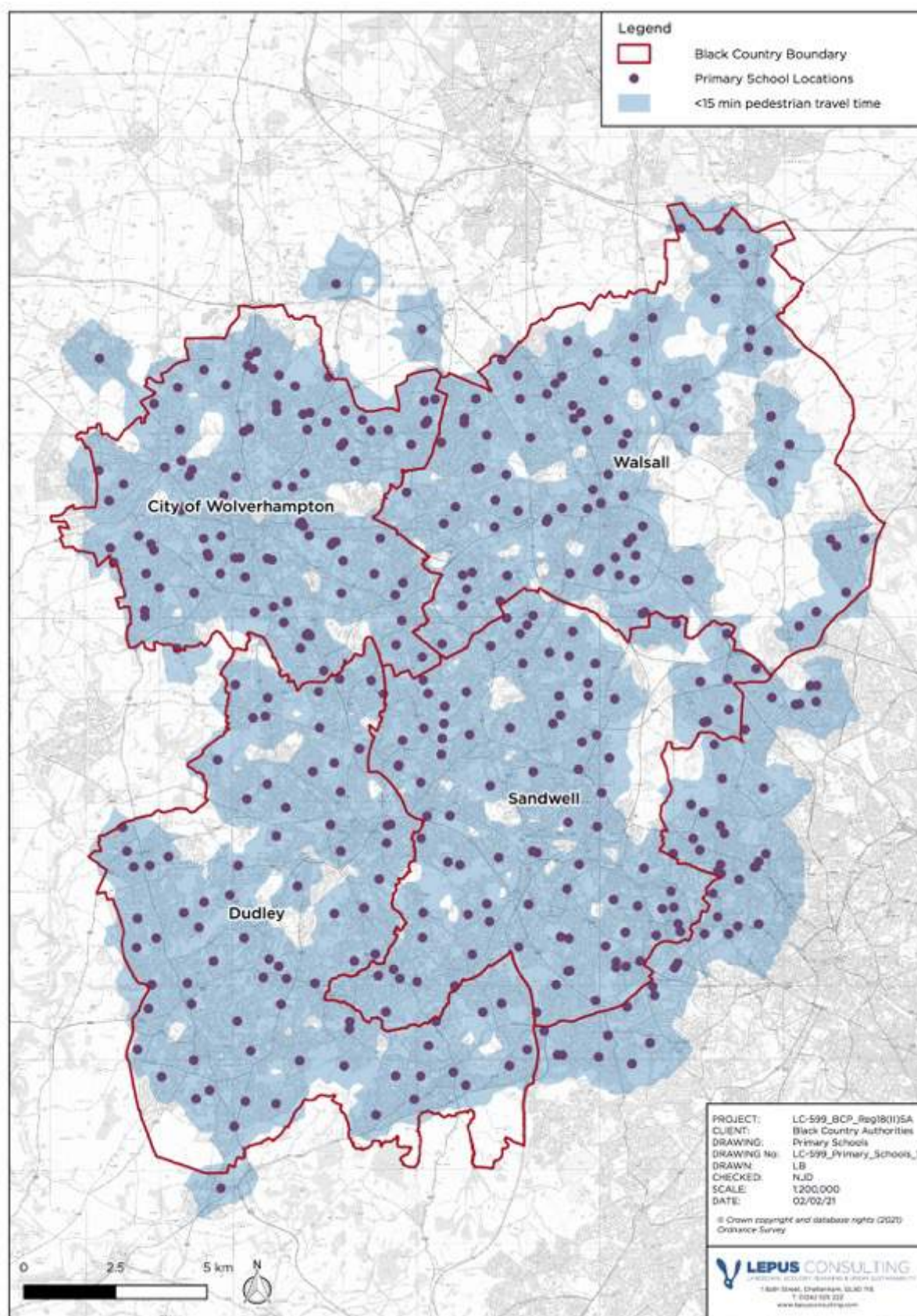


Figure 2.35: Location of primary schools and modelled travel time across the Black Country (source: BCA)



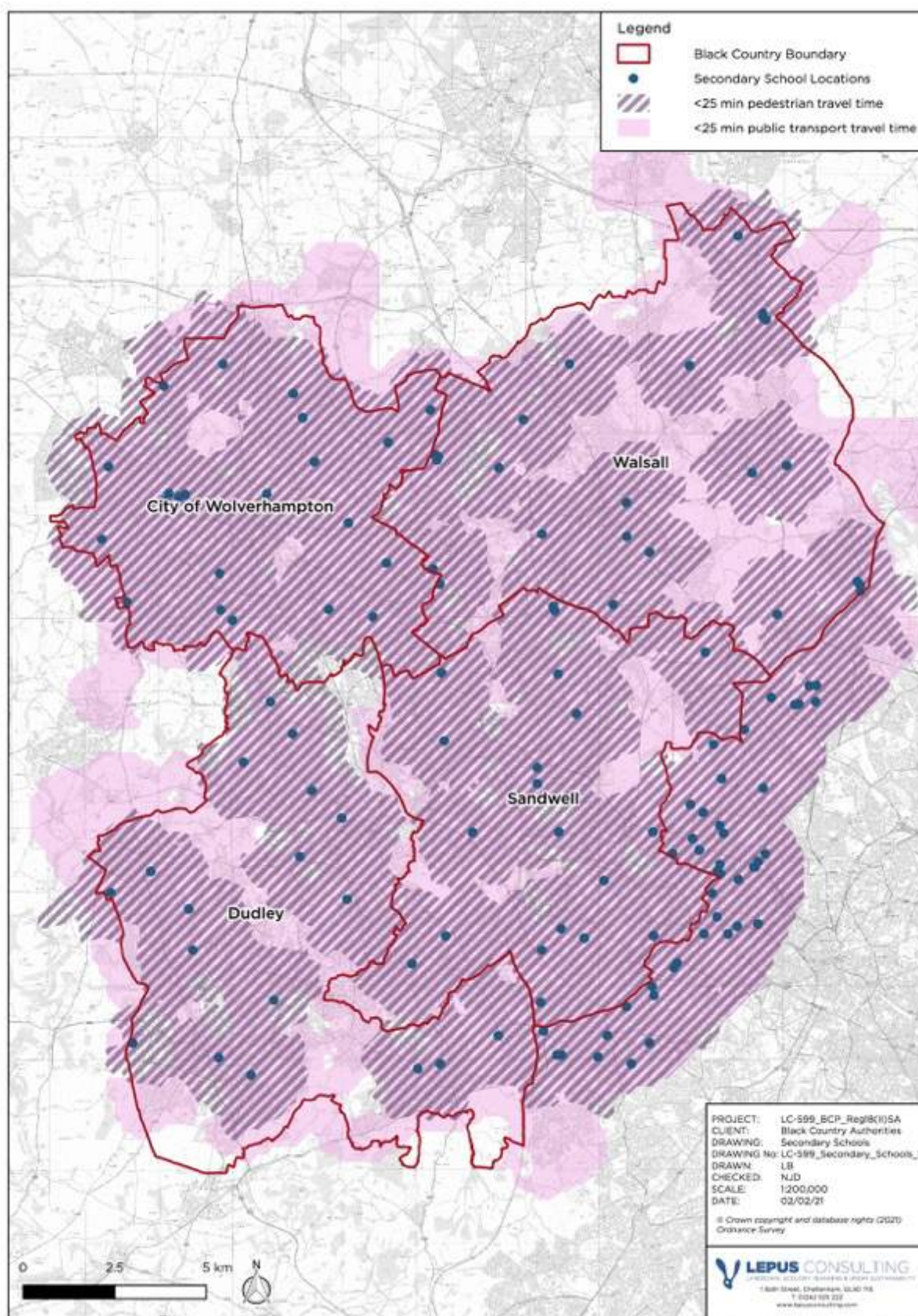


Figure 2.36: Location of secondary schools and modelled travel time across the Black Country (source: BCA)

## 3 Housing and Employment Number Options

### 3.1 Preface

3.1.1 The NPPF requires Local Authorities to consider reasonable alternatives for the overall levels of growth across the Plan period.

3.1.2 As part of the iterative plan making process, and in order for the SA to inform the development strategy, the four authorities developed five housing number and five employment number options to be subject to sustainability appraisal. The preliminary options were assessed in sustainability terms in January 2020 and were informed by the evidence base at that time. The January 2020 options are provided in the following appendices:

- **Appendix C** – Housing Number Options Assessment (Lepus Consulting, January 2020)
- **Appendix D** – Employment Number Options Assessment (Lepus Consulting, January 2020)

3.1.3 The original options considered in January 2020 have subsequently been updated below to reflect the emerging evidence base including (but not limited to):

- The Government's 'Response to the local housing need proposals in "Changes to the current planning system"<sup>115</sup>' issued on 1st April 2021 which includes an uplift to the standard method of 35% across 20 authorities including Wolverhampton. **Table 3.1** therefore reflects the housing projections for the BCA incorporating national requirements in relation to this uplift to the standard method (total projected need of 76,076 homes).
- Updates to the Economic Development Needs Assessment Part 2 (EDNA2) (May 2021). **Table 3.2** reflects the latest employment evidence up to May 2021<sup>116</sup>.

3.1.4 Through the appraisal of these ten options, this process compares the potential impacts of the options, and provides the BCA with the opportunity to consider different approaches to meeting the housing and employment requirements across the Plan period.

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<sup>115</sup> Available at: <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system> [Accessed 10th May].

<sup>116</sup> In addition it is noted that since January 2020 the West Midlands Interchange (WMI) has been granted consent by the Secretary of State through a development consent order. The WMI is a 300ha rail served B8 logistics development. The Site is located in South Staffordshire but has functional Black Country. This scheme however has not be included within any of the employment growth options due to its location in a neighbouring authority.

**3.1.5** The subsequent tables presented in **Tables 3.1** and **3.2** reflects the evolution of the evidence base and national policy which has informed the consideration of reasonable alternative growth and employment options for the Draft BCP up until June 2021.

**Table 3.1: The five housing options (May 2021)**

Option	Description of Option
Option 1	'Do nothing'. Stick with the existing strategy 'brownfield first' and only focus development within the urban area. <ul style="list-style-type: none"> <li>40,117 net homes in urban area.</li> </ul>
Option 2	Stick with the existing strategy 'brownfield first' plus sustainable and deliverable Black Country Green Belt release, totalling 47,837 homes. <ul style="list-style-type: none"> <li>40,117 net homes in urban area.</li> <li>7,720 homes on land released from Black Country Green Belt and deliverable by 2039 and 1,715 homes on land released from Black Country Green Belt and deliverable after 2039.</li> </ul>
Option 3	2020-39 housing requirement of 76,076 homes all located within the Black Country. <ul style="list-style-type: none"> <li>40,117 net homes in urban area.</li> <li>35,959 homes on land released from Black Country Green Belt.</li> </ul>
Option 4	2020-39 housing requirement of 76,076 homes plus 3,000 homes of Birmingham's housing shortfall, totalling 79,076, all located within the Black Country. <ul style="list-style-type: none"> <li>40,117 net homes in urban area.</li> <li>38,959 homes on land released from Black Country Green Belt.</li> </ul>
Option 5	2020-39 housing requirement of 76,076 homes within the Black Country and neighbouring authorities <ul style="list-style-type: none"> <li>40,117 net homes in urban area.</li> <li>7,720 homes on land released from Black Country Green Belt and deliverable by 2039, and 1,715 homes on land released from Black Country Green Belt and deliverable after 2039.</li> <li>28,239 homes exported through Duty to Cooperate.</li> </ul>

**Table 3.2: The five employment options (May 2021)**

Option	Description of Option
Option 1	Retain existing brownfield strategy by focussing development wholly within the urban area. <ul style="list-style-type: none"> <li>306 ha in the urban area</li> </ul>
Option 2	Retain the existing strategy 'brownfield first' plus Black Country Green Belt release. <ul style="list-style-type: none"> <li>306ha in the urban area.</li> <li>47ha on land released from the Black Country Green Belt.</li> </ul>
Option 3	Retain the existing strategy 'brownfield first' plus substantial Green Belt release of 118-207ha. <ul style="list-style-type: none"> <li>306ha in the urban area.</li> <li>118-207ha on land released from the Black Country Green Belt.</li> </ul>
Option 4	Retain the existing strategy 'brownfield first' plus Black Country Green Belt release and exporting to neighbouring authorities. <ul style="list-style-type: none"> <li>306ha in the urban area.</li> <li>47ha on land released from the Black Country Green Belt.</li> <li>71-160ha exported through Duty to Cooperate.</li> </ul>
Option 5	Retain the existing strategy 'brownfield first' plus Black Country Green Belt release and exporting to neighbouring authorities. <ul style="list-style-type: none"> <li>306ha in the urban area.</li> </ul>



- 47ha on land released from the Black Country Green Belt.
- 140-444ha exported through Duty to Cooperate.

## 3.2 Methodology

3.2.1 The appraisal of housing and employment number options aims to assess the likely significant effects of each proposed option, based on the criteria set out in the SEA Directive (see **Box 1.1**).

3.2.2 For the appraisal against each SA Objective, an 'impact symbol' (see **Table 3.1**) has been allocated for each option. The symbols help to identify the overall sustainability impact for each SA Objective. These overall impacts have not been determined through 'adding-up' likely significant effects on receptors, but have been identified through professional judgement, and more often than not, taking a 'worse-case scenario' in line with the precautionary principle<sup>117</sup>.

3.2.3 The appraisal commentary provided should be read alongside the impact symbols.

**Table 3.3: Presenting likely impacts**

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

3.2.4 The appraisal of housing and employment number options should be read alongside the local context and assumptions set out in **Chapter 2**.

## 3.3 Housing Number Options

3.3.1 The BCA have identified five options for the quanta of housing provision across the Plan area. The five options considered are presented in **Table 3.1** above.

<sup>117</sup> Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.

**3.3.2** **Table 3.4** below summarises the likely impacts of each housing option in relation to the 14 SA Objectives. The text below provides a summary of the likely significant effects of the five housing number options.

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**Table 3.4: Impact matrix of the five housing options**

Option Number	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
1	+/-	+/-	0	--	+/-	++	-	--	-	-	+/-	+/-	+/-	+/-
2	+/-	-	+/-	--	+/-	-	-	--	-	-	+/-	+/-	+/-	+/-
3	+/-	--	+/-	--	+/-	--	-	--	-	++	+/-	+/-	+/-	+/-
4	+/-	--	+/-	--	+/-	--	-	--	-	++	+/-	+/-	+/-	+/-
5	+/-	-	+/-	--	+/-	-	-	--	-	++	+/-	+/-	+/-	+/-

3.3.3 All housing options would be expected to result in major negative impacts in regard to climate change mitigation (SA Objective 4) and waste (SA Objective 8) due to the large quanta of development proposed under each option. Each option would be expected to increase carbon emissions through construction and operation and lead to an increase in household waste generation through residential occupancy.

3.3.4 The construction, occupation and operation of development would potentially exacerbate air pollution, including particulate matter (PM) and generate potential impacts on water quality. The entirety of the four authorities are designated as Air Quality Management Areas (AQMA's); 'Dudley AQMA', 'Sandwell AQMA', 'Walsall AQMA' and 'Wolverhampton AQMA'. In addition, there are a large number of motorways and A-roads which cross the Plan area, each of which represent traffic-related sources of air pollution. All options are therefore considered likely to result in minor negative impacts in relation to pollution (SA Objective 7).

3.3.5 Minor negative impacts are recorded in relation to transport and accessibility (SA Objective 9) as the development under all options has potential to increase pressures and congestion on the strategic and local road network. It is also acknowledged that by locating residents in proximity to services, facilities and public transport in the urban centres and at the edge of settlements this could potentially help to reduce the need to travel by private car and also facilitate utilisation of, and investment in, sustainable travel modes. Transport and accessibility modelling therefore forms an important component of the BCP to guide the development strategy.

3.3.6 Mixed effects are identified in terms of equality (SA Objective 11) as the growth strategy has the potential to have positive impacts in terms of accessibility to key services and facilities, employment opportunities and access to housing, including affordable housing, across the BCA area. However, potential negative impacts could arise if high-quality employment land



is lost to housing development in urban areas. The spatial distribution of growth and investment it also an important consideration when considering equality.

- 3.3.7 As the location, site context and proximity to receptors of the proposed housing provision is unknown, all of the options have been identified as having uncertain impacts in relation to cultural heritage (SA Objective 1), climate change adaptation (SA Objective 5), health (SA Objective 12), economy (SA Objective 13), and education (SA Objective 14).
- 3.3.8 Housing Options 3, 4 and 5 would be expected to meet the identified housing requirement of 76,076 homes, and therefore, have a major positive impact on housing provision (SA Objective 10). However, the proposed development under Housing Options 1 and 2 would not deliver enough dwellings to meet the identified housing need, and therefore, these two options would be likely to have a minor negative impact on housing provision. The capacity of the urban areas (40,117 dwellings) has been informed through urban capacity and employment land reviews as well as the Strategic Housing Land Availability Assessments (SHLAAs) for each of the 4 authorities including density uplifts (where appropriate) and redevelopment of vacant or under-utilised employment land. These aspects need to be carefully considered as development solely focused in urban areas could, without careful planning, have adverse impacts on loss of employment opportunities, access to greenspaces for health and well-being and the capacity of education, health and other facilities to accommodate growth. The identified capacity of 40,117 dwellings in the urban areas has taken these and other considerations into account in identifying the capacity of potential growth in the urban areas.
- 3.3.9 Development in the urban areas under Option 1 would help to minimise the overall vegetation cover lost to development and would therefore minimise the potential for negative effects on biodiversity (SA Objective 3). Development under Options 2, 3, 4 and 5 would result in a loss of previously undeveloped land and would involve the loss of natural habitat and soil resources which provide an important ecosystem service. The extent of impacts on habitats, species and habitat connectivity will depend on location and contextual factors as well as site design. The construction of a new dwellings in the Green Belt under Options 2-5 would be expected to result in the loss of biodiversity features to some extent, and this would likely to be more pronounced for Options 3 and 4 owing to the higher proportion of development on Green Belt land. Adhering to biodiversity net gain principles and a commitment to Green Infrastructure improvements could also deliver positive effects in the long term for Options 2, 3, 4 and 5.
- 3.3.10 Options 2, 3, 4 and 5 would lead to some loss of open countryside and therefore varying degrees of adverse impacts on landscape resources are likely (SA Objective 2). The extent of impacts on the surrounding landscape and visual receptors will depend on location and contextual factors and site design. It can be assumed that the larger the quantity of development proposed, the greater the risk of adverse impacts on SA Objective 2. As a result, Housing Option 1, which proposes the lowest quantity of development and within the

urban areas, would be expected to have greater scope for avoiding and mitigating adverse impacts, followed by Options 2 and 5.

- 3.3.11 Housing Option 1 solely focuses development in the urban areas of the Black Country. This strategy would support the redevelopment of brownfield land within the BCA which represents an efficient use of land in accordance with the NPPF. As such, this option would be likely to result in major positive impacts on Natural Resources (SA Objective 6). Housing Options 2, 3, 4 and 5, which direct a proportion of development to the Green Belt, and therefore, on previously undeveloped land would lead to the loss of soil resources which could potentially include some of the 'best and most versatile' (BMV) agricultural land and potentially mineral resources in some locations. Housing Option 1 is likely to situate new residents in areas with good access to existing services, including healthcare facilities (SA Objective 12) and schools (SA Objective 14). However, capacity for new provision would likely be more limited.
- 3.3.12 Housing Option 5 directs a proportion of development to neighbouring districts. As the quanta of development within each district and location of development within each authority is currently unknown, the impact of exporting development outside of the Black Country Plan area is uncertain.
- 3.3.13 Overall, as Housing Option 1 proposes the least quantity of development focused in urban areas, this option would be likely to result in the least adverse impacts in regard to a range of environmental objectives including landscape (SA Objective 2), biodiversity (SA Objective 3) and natural resources (SA Objective 6). However, Option 1 would not meet the identified housing needs for the plan area and may also have a range of negative socio-economic implications if pursued in isolation. Whilst higher density development in urban areas would help to minimise effects on natural resources, this needs to be carefully planned and designed to ensure that there are no adverse impacts on health and wellbeing. Options 2 and 5 seek to provide for some development within the Green Belt, which would likely have a negative impact across a number of environmental criteria including landscape (SA Objective 2) and natural resources (SA Objective 6), but to a lesser extent than Options 3 and 4 which seek to deliver the highest proportion of development in the greenbelt.

### 3.4 Employment Number Options

3.4.1 The Black Country Authorities have identified five options for the quanta of employment floorspace across the Plan area. The five options considered are presented in **Table 3.2** above.

3.4.2 **Table 3.5** below presents the likely impacts of each employment option in relation to the 14 SA Objectives. The text below provides a summary of the likely significant effects of the five employment number options.

*Table 3.5: Impact matrix of the five employment options*

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Option Number	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
1	+/-	+/-	0	+/-	+/-	++	-	+/-	-	0	+	0	-	0
2	+/-	-	+/-	+/-	+/-	-	-	+/-	-	0	+	0	-	0
3	+/-	--	+/-	+/-	+/-	--	-	+/-	-	0	+	0	+	0
4	+/-	-	+/-	+/-	+/-	-	-	+/-	-	0	+	0	+	0
5	+/-	-	+/-	+/-	+/-	-	-	+/-	-	0	+	0	++	0

3.4.3 Employment Options 1 and 2 would fail to meet the minimum low growth scenario in EDNA2 (364ha + replacement) and therefore are considered to have a minor negative impact on the local economy (SA Objective 13). Options 3 and 4 could potentially meet the medium growth scenario in EDNA2 (433-522ha + replacement) and are therefore considered to have a minor positive impact on the economy. Option 5 is the only option that could potentially meet the high growth scenario in EDNA2 (502-806ha + replacement) and is therefore considered to have a major positive impact on the economy.

3.4.4 The delivery of employment floorspace would not be likely to impact local housing provision, or access to healthcare and education facilities. Therefore, the five employment options would be expected to have a negligible impact in regard to housing, health and education (SA Objectives 10, 12 and 14).

3.4.5 By directing development towards the urban area, new site users would be located in areas with good access to sustainable transport options, such as rail and bus services. However, additional development in the urban area could also exacerbate existing issues with congestion and increase pressures on the road network. As a result, all employment options would be expected to result in minor negative impacts in relation to pollution (SA Objective



- 7) and transport (SA Objective 9), primarily as all five options propose 306 ha of employment floorspace within the urban area.
- 3.4.6 All five employment options would be likely to have a minor positive impact on equality of local communities, due to an increase in a range of employment opportunities (SA Objective 11).
- 3.4.7 As the location, site context and proximity to receptors of the proposed employment provision is unknown, all of the options have been identified as having uncertain impacts in relation to cultural heritage (SA Objective 1) and climate change adaptation (SA Objective 5). As the scale and type of employment floorspace proposed is currently unknown, uncertain impacts have been identified for climate change mitigation (SA Objective 4) and waste (SA Objective 8).
- 3.4.8 It can be assumed that the larger the quantity of development proposed, the greater the risk of adverse impacts on landscape and biodiversity features (SA Objectives 2 and 3). As a result, Employment Option 1, which proposes the lowest quantity of development, would be expected to have greater scope for avoiding adverse impacts, with Option 3 posing the greatest risk of adverse impacts due to involving the greatest loss of Green Belt land at approximately 118-207ha, compared to Options 2, 4 and 5 which would involve 47ha of Green Belt release.
- 3.4.9 Development on previously developed land is classed as an efficient use of land. As a result, Employment Option 1 would be likely to help protect the Plan area's natural resources (SA Objective 6).
- 3.4.10 Employment Options 4 and 5 direct a proportion of development to neighbouring authorities. As the quanta of development within each authority and location of development within each authority is currently unknown, the impact of exporting development outside of the Black Country Plan area is uncertain.
- 3.4.11 Overall, as Employment Option 1 proposes the least quantity of development, this option would be likely to result in the least adverse impacts in regard to landscape (SA Objective 2), biodiversity (SA Objective 3) and natural resources (SA Objective 6). However, this option would fail to meet the low growth scenario in EDNA2 (364ha + replacement) and would therefore be unlikely to meet identified employment needs (SA Objective 13).
- 3.4.12 The above analysis highlights that many sustainability impacts associated with housing and employment growth are based on the spatial distribution of growth and site-specific contextual factors, which are assessed in greater detail in the following sections of this SA report.

### 3.5 BCP Preferred Approach - Housing and Employment Growth

3.5.1 Housing capacity has been identified based on the following information:

- Strategic Housing Land Availability Assessments (SHLAAs) and the Black Country Employment Area Review (BEAR);
- An estimate of the likely scale of housing renewal up to 2039;
- An estimate of likely windfall development on small sites up to 2039;
- An assessment of the likely capacity of strategic centres above existing supply, drawing on the Black Country Centres Study;
- Application of a density uplift to existing allocations likely to gain permission after 2024, in line with Policy HOU2; and
- A comprehensive Green Belt review and site assessment process, which has identified new sites suitable and available for release for housing development, and deliverable within the Plan period and beyond.

3.5.2 Housing Growth Evidence base:

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

3.5.3 Employment Growth Evidence Base:

- Economic Development Needs Assessment Part One (2017) and Part Two (2021);
- Black Country Urban Capacity Review Update (2021);
- Black Country Plan Site Assessment Report (2020);
- Black Country BEAR;
- Black Country Strategic Employment Land Reviews; and
- Statements of Common Ground.

3.5.4 These provisions are set out in Policies CPS1-5, HOU 1 and EMP1 of the Draft Plan (See also **Appendix J** for the sustainability assessment of these policies).

3.5.5 The BCA are aiming to utilise land efficiently through the use of previously developed land, vacant properties and surplus industrial land, and maximising housing densities where appropriate, but there is a shortage of deliverable sites to meet housing and economic growth needs.

3.5.6 For housing growth approximately 40,117 homes of the projected housing need of 76,076 homes would be located in the existing urban areas. Approximately 7,720 homes within the plan period to 2039 would be located on greenfield land<sup>118</sup> the majority of which comprises

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<sup>118</sup> A further housing capacity of 1,715 homes has been identified post 2039 (beyond the plan period) on two large green belt release sites, due to housing market delivery constraints.

Green Belt release land located in a limited number of Neighbourhood Growth Areas on the edge of settlements.

- 3.5.7 For employment growth, approximately 307 ha of the projected employment land requirements of 565ha would be met within the existing built-up areas and approximately 48 ha via Green Belt release.
- 3.5.8 This strategy would support the redevelopment of brownfield land within the BCA which represents an efficient use of land in accordance with the NPPF by locating the majority of housing within the existing urban areas.
- 3.5.9 For housing growth, approximately 63% (47,835 homes) of the overall projected housing need of 76,076 homes for the plan period up to 2039 would be met within the Black Country administrative authorities, leaving a shortfall of 37% which would need to be explored through potential contributions through Duty to Co-operate.
- 3.5.10 For employment growth, approximately 63% of the 565ha of identified employment land requirements would be provided within the Black Country authority administrative areas, with a shortfall of 211ha or 37% of employment land which would need to be explored via a Duty to Co-operate, particularly where there is a strong existing or potential functional economic relationship with the Black Country, for example in terms of migration patterns, commuting links and / or connectivity through physical infrastructure such as rail and motorway.
- 3.5.11 The BCA have undertaken an extensive Green Belt and landscape sensitivity assessment and have used this to ensure that development is designed to minimise harm to the purposes of the Green Belt and to landscape character, as identified through the site assessment process. In determining potential allocations, sites have also been assessed in terms of their accessibility by all modes of transport as part of the evidence base for the draft BCP and well as a range of other evidence sources.
- 3.5.12 A number of the proposed strategic housing allocations are located within areas predicted to have a negligible or minor adverse effect on landscape sensitivity (including sites SA-0004-DUD, SA0017-DUD, SA-0025-DUD, SA-0014-WAL, SA-0022-WAL, SA-0048-WAL, SA-0187-WAL, SA-0009-WOL, SA-0010-WOL, SA-0015-WOL and SA-0030-WOL), which relate to areas of 'low', 'low-moderate' or 'moderate' landscape sensitivity as identified in the landscape sensitivity study. A number of the proposed strategic allocations are located within areas predicted to have a minor impact on the Green Belt (including sites SA-0004-DUD, SA-0017-DUD, SA-0009-WOL, SA-0010-WOL, SA-0015-WOL and SA-0030-WOL). Many of the proposed strategic housing allocations in Walsall (as well as other identified reasonable alternatives) are located in more sensitive areas with respect to landscape sensitivity and Green Belt harm which needs to be weighed in the planning balance. In taking forward development plans, it is envisaged that opportunities would be sought to integrate high quality multi-functional GI into the designs and strengthen a wider GI network for all



developments with further consideration of providing areas accessible to the public for the benefit of mental health and wellbeing.

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## 4 Spatial Options

### 4.1 Preface

- 4.1.1 **Table 4.1** below outlines the eleven spatial options identified by the Councils. Each option has been assessed for its likely sustainability impacts, a summary of which is presented in **Table 4.3**. Full explanations and reasonings behind each overall 'score' outlined in **Table 4.3** are set out per SA Objective in **Appendix E**.

*Table 4.1: Black Country Spatial Options*

Spatial Option	Description of Spatial Option
<b>Option A</b>	Business as Usual – Retain current housing and employment allocations
<b>Option A1</b>	Employment-led growth - Business as Usual plus employment-led green belt releases
<b>Option B</b>	Reconfigure uses in the Urban Area to Promote Mixed Use and Local Employment – Retain more local employment land, intensify existing employment areas and explore potential to changes uses in Strategic and Town Centres
<b>Option C</b>	Maximise Densities and Invest in Services to reduce climate change impacts – Increase densities to 50 dph / 200 dph in Centres and invest to fill gaps in residential services (schools, GPs, fresh food, employment)
<b>Option D</b>	Market-Led – Allocate housing in high demand areas and employment land in most attractive commercial locations
<b>Option E</b>	Open Space Protection / Health Promotion - Protect publicly accessible open space within the urban area and create new open space to serve developments, as this is more functional for local communities than Green Belt
<b>Option F1</b>	Green Belt and Landscape Character Protection - Protect all areas of highest Green Belt harm and landscape sensitivity, regardless of potential positive sustainability impact of development in these locations
<b>Option F2</b>	Green Belt Protection – Protect all areas of highest Green Belt harm
<b>Option G</b>	Garden Village / urban greening to adapt to climate change - Lower density, mixed use development on larger sites (Key Large Sites?) with more open space which supports the Nature Recovery Strategy (funded by Biodiversity Net Gain) and flood risk mitigation and more on-site residential services
<b>Option H</b>	Maximise Sustainable Access to reduce climate change impacts - Only build housing in locations with highest levels of sustainable transport access to residential services (schools, GPs, fresh food, employment) and only locate new employment land where good public transport access
<b>Option J</b>	Balanced Growth

## 4.2 Methodology

4.2.1 For the appraisal against each SA Objective, an ‘impact symbol’ (see **Table 4.2**) has been allocated for each option. The symbols help to identify the overall sustainability impact for each SA Objective.

*Table 4.2: Presenting likely impacts*

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

4.2.2 In order to identify the best performing spatial option, a ranking exercise has been carried out in Appendix E to determine the most sustainable options under each SA Objective. The ranking exercise considered the findings of the SA as presented below, as well as applying local knowledge and expert judgement. This is therefore a subjective exercise and should not be relied upon alone in determining likely sustainability impacts. The accompanying narrative in **Appendix E** explains how these ranks have been determined.

4.2.3 **Table 4.3** presents the likely overall SA impacts, with respect to that particular objective.

### 4.3 Assessment of Spatial Options

**Table 4.3:** Impact matrix of all spatial option assessments

Spatial Option	A	A1	B	C	D	E	F1	F2	G	H	J
Description	Business as Usual	Employment-led growth	Reconfigure uses in the Urban Area	Maximise Densities and Invest in Services	Market-Led	Open Space Protection / Health Promotion	Green Belt and Landscape Character Protection	Green Belt Protection	Garden Village / urban greening	Maximise Sustainable Access	Balanced Growth
SA Objective 1 Cultural Heritage	O	-	O	-	-	O	-	-	O	-	O
Objective 2 Landscape	O	-	+	-	-	+	+	+	-	-	+
Objective 3 Biodiversity & Geodiversity	+	-	+	+	+	+	-	-	+	+	+
Objective 4 Climate Change Mitigation	+	-	+	+	+	+	-	-	+	+	+
Objective 5 Climate Change Adaptation	+	-	+	+	+	+	-	-	O	+	O
Objective 6 Natural Resources	+	-	+	+	+	O	-	-	-	+	O
Objective 7 Pollution	-	-	-	-	-	+	O	O	+	-	O
Objective 8 Waste	+/-	+/-	-	-	-	-	-	-	-	-	-
Objective 9 Transport	-	-	+	+	-	+	-	-	O	+	+
Objective 10 Housing	-	-	-	+	-	-	-	-	+	+	+
Objective 11 Equality	-	-	+	-	-	+	-	-	+	+	+
Objective 12 Health	+	+	-	-	+	+	O	O	+	-	O
Objective 13 Economy	--	-	+	+	+	-	-	-	-	+	+
Objective 14 Education	-	-	-	+	-	-	-	-	+	+	+



- 4.3.1 In terms of cultural heritage (SA Objective 1) adverse impacts are predicted in association with **Spatial Options A1, C, D, F1, F2 and H**, largely due to the likelihood of impacts on the character and setting of the historic environment as a result of development in these broad locations. **Spatial Options A, B, E, G and J** are unlikely to result in significant adverse effects on the cultural heritage of the Black Country as they present more opportunities to avoid or mitigate harm to the historic environment. Spatial Option C is considered the best performing option for this objective.
- 4.3.2 In terms of landscape (SA Objective 2) development under **Spatial Option A** would be unlikely to significantly affect the landscape as this option involves changing uses of existing development. **Spatial Options B, E, F1, F2 and J** are considered to contribute towards sustainable development in a positive way, through directing development towards areas of lower sensitivity and promoting open spaces. Spatial Option B is considered the best performing option for this objective.
- 4.3.3 In terms of biodiversity (SA Objective 3), adverse impacts have been identified under **Spatial Options A1, F1 and F2**, largely associated with the promotion of development in the Green Belt resulting in likely losses and fragmentation of the ecological network. On the whole, **Spatial Options A, B, C, D, E, G, H and J** are likely to provide more opportunities to benefit biodiversity and geodiversity due to the protection of sensitive features, and delivery of development at higher densities in the existing urban area. There is very little difference identified between the performance of these options. Overall option E is considered the best performing spatial option for this objective.
- 4.3.4 In terms of climate change mitigation (SA objective 4) is likely that the development proposed under all spatial options would result in mixed effects with regard to climate change mitigation. It is likely that the development proposed under all spatial options would result in mixed effects with regard to climate change mitigation. In comparison, **Spatial Options A, B, C, D, E, G, H and J** could potentially result in positive impacts on climate change mitigation overall, as these options would seek to protect open spaces, limit the loss of greenfield land and/or ensure services and facilities are accessible via sustainable means. Overall option J is considered the best performing spatial option for this objective.
- 4.3.5 In terms of climate change adaptation (SA Objective 5), adverse impacts have been identified under **Spatial Options A1, F1 and F2**, primarily due to the promotion of development in the Green Belt resulting in larger-scale losses of green infrastructure compared to the other options. Overall, **Spatial Options G and J** are considered to result in a neutral impact on this objective, associated with a mixture of positive and negative sustainability impacts. The development under **Spatial Options A, B, C, D, E and H** could potentially result in a minor positive impact on climate change adaptation overall, associated with the protection of open spaces and promotion of higher density development to limit losses of green infrastructure. Spatial Option A is considered the best performing option for this objective.

- 4.3.6 In terms of natural resources (SA Objective 6) adverse impacts have been identified under **Spatial Options A1, F1, F2, and G**, primarily due to the promotion of development in the Green Belt resulting in larger-scale losses of soil and natural resources compared to the other options. Neutral impacts have been identified under **Spatial Options E and J** overall, balancing the mixture of positive and negative sustainability impacts that could be expected from the protection of open spaces alongside development. Positive impacts have been identified under **Spatial Options A, B, C, D and H**. These options would be likely to present the most opportunities out of the eleven to make the best use of natural resources through delivering higher density development and ensuring under-utilised urban spaces are prioritised for development.
- 4.3.7 In terms of pollution (SA Objective 7) overall, adverse impacts are likely to be associated with **Spatial Options A, A1, B, C, D and H**. This is primarily due to these options leading to a larger proportion of development directed to areas with existing pollution issues. Neutral impacts are identified for **Spatial Options F1, F2 and J** because these three options would lead to mixed effects when considering the balance between Green Belt releases and development in existing urban areas. The spatial options with the greatest potential for positive impacts in terms of pollution are considered to be **Options E and G**, as these two options would be likely to provide the most opportunities to protect people from adverse impacts associated with pollution.
- 4.3.8 In terms of waste (SA Objective 8) there is some uncertainty regarding the likely sustainability impacts associated with all spatial options when considering waste generation. Overall, **Options B, C, D, E, F1, F2, G, H and J** are considered likely to result in more adverse impacts on waste generation associated with the large scale of new development and would place pressure on existing waste management systems. Uncertain scores have been identified for **Spatial Options A and A1**, primarily due to the unknown impact on waste associated with the conversion of employment land to residential use. However, overall, these two options are likely to result in less generation of waste compared to the other nine options.
- 4.3.9 In terms of transport and accessibility (SA Objective 9) overall, **Spatial Options A, A1, D, F1 and F2** would be expected to result in a minor negative impact on transport and accessibility, primarily due to the potential for development to be directed towards unsustainable areas or these options increasing the need to travel. A neutral impact has been identified under **Spatial Option G**, associated with the combination of positive and negative impacts from directing some development to a garden village. Positive impacts have been identified in association with **Spatial Options B, C, E, H and J** because these five options would promote the highest proportion of developments to areas with sustainable access to services and employment.
- 4.3.10 In terms of housing (SA Objective 10) negative impacts have been identified for **Spatial Options A, A1, B, D, E, F1 and F2** as these options would be unlikely to deliver enough housing

to meet identified needs. Positive impacts have been identified for **Spatial Options C, G, H and J**, as these four options would be expected to make the greatest contributions towards delivering sustainable housing to meet needs, although there remains some uncertainty as to the housing mix under several options.

- 4.3.11 In terms of equality (SA Objective 11) adverse impacts have been identified, associated with **Spatial Options A, A1, C, D, F1 and F2**, largely due to these options directing growth towards potentially unsustainable locations with reduced access to services, facilities and open space and/or promoting higher density development which could increase the risk of crime and the fear of crime. Positive impacts have been identified under **Spatial Options B, E, G, H and J** due to the more balanced approach within these options providing access to services and facilities as well as open spaces for recreation and community cohesion.
- 4.3.12 In terms of health (SA Objective 12) negative impacts have been identified for **Spatial Options B, C and H**, primarily because these options would be expected to deliver higher density development and reduce accessibility to open space. Negligible/neutral impacts have been identified under **Spatial Options F1, F2 and J**, when considering the mixed effects anticipated with providing open space and lower density development, alongside potential reduced accessibility to healthcare as a consequence. Positive impacts have been identified for **Spatial Options A, A1, D, E and G**, as these five options would be likely to deliver the greatest benefits in terms of accessibility to healthcare and open space.
- 4.3.13 In terms of the economy (SA Objective 13) a major negative impact on the economy has been identified for **Spatial Option A**, because this option would result in a loss of employment land without seeking to replace this elsewhere. Minor negative impacts have been identified for **Spatial Options A1, E, F1, F2 and G**, as these options could lead to employment development in inappropriate locations and would not be expected meet identified needs. Minor positive impacts have been identified for **Spatial Options B, C, D, G and J**, primarily associated with the more considered approaches towards the sustainable location of employment development under these options.
- 4.3.14 In terms of education (SA Objective 14) there is a level of uncertainty with regards to the impact each of the eleven spatial options on education, in terms of accessibility as well as capacity of schools in each area. Overall, adverse impacts would be anticipated under **Spatial Options A, A1, B, D, E, F1 and F2**, due to the reduced access to education, or significant pressure to school capacity, resulting from development in these locations. Positive impacts could be achieved under **Spatial Options C, G, H and J**. This is primarily because these options would be likely to result in the most development being situated in areas with good access to education.

## 4.4 Summary of Sustainability Appraisal for Spatial Options

- 4.4.1 The best performing option has been identified as **Spatial Option J**. This option performs the best across SA Objectives 4 and 9, and second-best across SA Objectives 3, 10, 11 and 13 largely due to the balanced approach to growth under this strategy.
- 4.4.2 This is followed by **Spatial Option E**, which performs best across SA Objectives 1, 3, 7 and 11 but performs poorly under several other objectives, primarily as a result of the lower density development likely to be delivered under this option resulting in benefits to human and ecological health, but wider spread environmental impacts in some contexts.
- 4.4.3 There is little difference in the overall ranking between **Spatial Options G, B, A, H, C and D**. These options would be likely to result in a range of sustainability impacts, performing well under some SA Objectives but poorly under others, and so would be expected to perform worse than balanced growth under **Option J** overall.
- 4.4.4 The highest summed ranks, and as such potentially the least sustainable options, would be **Spatial Options A1, F2 and F1**. These options include larger proportions of development within the Green Belt, and **Options F1 and F2** focus on limiting landscape character and sensitivity impacts rather than delivering growth which is necessarily the most sustainable across all topics.

## 4.5 BCP Preferred Option – Spatial Strategy

- 4.5.1 The overall spatial approach has evolved from consideration of a number of spatial and growth options for development. These have been informed by the evidence base underpinning the Draft BCP and were subjected to SA (see SA **Appendices C to E**). The most sustainable option was considered to be ‘balanced growth’ with the spatial strategy focusing growth within the existing Strategic Centres, Core Regeneration Areas and Town and Neighbourhood Areas in the sub-region and taking advantage of their existing infrastructure capacity, alongside a limited number of new Neighbourhood Growth Areas near to the edge of settlements that takes account of environmental, climate change, accessibility and socio-economic requirements. Overall, this option is considered to perform the best, as it strikes a balance between retaining valuable environmental assets whilst also prioritising development in the most sustainable locations.
- 4.5.2 The Distribution of Growth as proposed in the Development Strategy can be summarised as:
- Strategic Centres (CSP2) - Brierley Hill, Walsall, West Bromwich and Wolverhampton (existing key urban areas).
  - Core Regeneration Areas (CSP2) – Near to urban areas comprising large parcels of employment land across the Black Country. The strategy for the Core Regeneration Areas reflects two key issues arising from the evidence base – firstly, the need to provide for economic growth through the protection and enhancement of sustainable employment land and premises; and secondly,



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

- Neighbourhood Growth Areas (CSP3)- Urban edge housing developments in accessible locations. These areas are sites or clusters of sites that can provide at least 250 homes, creating opportunities to deliver houses of various sizes, types and tenures to meet a variety of needs.
- Towns and Neighbourhood Areas (CSP3) The Towns and Neighbourhoods Areas make up most of the existing urban area and are where the majority of residents live as well as a number of Local Employment Areas. The overall land use-pattern within the Towns and Neighbourhoods Areas is not expected to alter greatly by 2039, but there will be some incremental change through a mix of permitted and allocated sites, windfall developments and town centre regeneration activity.
- Small windfall housing sites (outside strategic centres)
- Exported through Duty to co-operate

#### 4.5.3 Evidence base

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

4.5.4 The details of the spatial strategy are shown on the Spatial Strategy figure in the BCP. Housing and employment allocations for each Black Country authority are provided in Chapter 13 and shown on the Policies Map. The SA of the preferred option (Option J 'Balanced Growth') is provided in **Appendix E**.

## 5 Reasonable Alternative Site Assessments

### 5.1 Preface

5.1.1 The Black Country Call for Sites request opened in July 2017 and this continued until August 2020<sup>119</sup>. Each of the four authorities have carried out a Strategic Housing Land Availability Assessment (SHLAA) of sites within which have the potential to accommodate new housing development and an Employment Development Land Review for sites with potential to accommodate employment development. Some sites have been assessed for both potential uses.

5.1.2 Across the four authorities, a total of 334 'new' housing and employment sites were identified by BCA as reasonable alternatives to be assessed as part of the SA, informed by the Call for Sites process and other studies undertaken as part of the evidence base for the BCP. A total of 288 'carried forward' housing and employment sites were also assessed as part of the SA, comprising sites which have been previously allocated in the adopted Development Plans. 13 GTTS sites have also been assessed.

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

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

- Flood Risk Zone 3
- Site of Special Scientific Interest
- Local Nature Reserve
- Special Area of Conservation
- Site of Importance for Nature Conservation
- Ancient Woodland
- Scheduled Ancient Monuments
- Registered Parks & Gardens
- Burial Grounds
- Existing residential

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<sup>119</sup> Available at <https://blackcountryplan.dudley.gov.uk/t2/p3/> [Accessed 18<sup>th</sup> May 2021].

- Operational sites (education, leisure, utilities, places of worship, canal network, transport infrastructure)
- Open Space not surplus against current standards
- Sites <0.25 ha with no “call for site” submitted
- Local authority land with no “call for site” submitted
- HSE Inner Zone (for residential)
- Landowner has expressed unwillingness

5.1.5 Identification of a site as a reasonable alternative does not imply that the site is not subject to other constraints or indeed that any receptor listed in para 5.1.4 will not in some way be potentially affected by a reasonable alternative site. Further potential constraints are assessed as part of the SA and plan making process for identified reasonable alternatives, using available evidence derived from publicly accessible data sources and information supplied by the BCA.

5.1.6 **Section 5.2** sets out the methodology used to appraise the reasonable alternative sites in the SA process and presents a summary of the appraisal against each SA Objective. The SA findings have been grouped per authority in **Appendix F** (Dudley), **Appendix G** (Sandwell), **Appendix H** (Wolverhampton) and **Appendix I** (Walsall). Reasonable alternative Gypsy and Traveller sites are presented in **Appendix K**.

## 5.2 SA Assessment Methodology

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

5.2.2 The receptors considered for each SA Objective have been discussed within the local context and assumptions set out in **Chapter 2**. The appraisal of reasonable alternative sites should be read in conjunction with this Chapter.

5.2.3 The topic-specific methodologies set out in **Boxes 5.1 to 5.14** below sets out how the likely impact per receptor has been identified in line with the local context and the impact symbols presented in **Table 5.1**.

5.2.4 All distances stated in site assessments are measured ‘as the crow flies’ from the closest point of the site/receptor in question, unless otherwise stated.

**Table 5.1: Presenting likely impacts**

Likely Impact	Description	Impact Symbol
Major Positive Impact	The proposed option contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option contributes to the achievement of the SA Objective to some extent.	+

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

5.2.5 **Appendices F, G, H, I and K** set out the detailed appraisal of each reasonable alternative site proposed. The appraisal evaluates the likely significant effects of each reasonable alternative against the 14 SA Objectives.

5.2.6 The following sections of this report set out the topic-specific methodologies used to appraise the reasonable alternative sites and provides a summary of the likely significant effects of the reasonable alternative sites.

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## 5.3 SA Objective 1: Cultural heritage

5.3.1 **Box 5.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 1: Cultural heritage.

### *Box 5.1: SA Objective 1: Cultural heritage strategic assessment methodology*

Likely Impact		Notes
Grade I Listed Buildings		
--	Development proposal coincides with, is located adjacent to, or could significantly impact the setting of, a Grade I Listed Building.	Grade I Listed Buildings are considered to be those of exceptional interest.  Data for heritage assets <sup>120</sup> , including the Heritage at Risk Register <sup>121</sup> , available from Historic England.
-	Development proposal located within the wider setting of a Grade I Listed Building.	
0	Development proposal is not considered likely to affect the setting or character of a Grade I Listed Building.	
+	Development proposal which could potentially enhance a Grade I Listed Building or its setting.	
Grade II* Listed Buildings		
--	Development proposal coincides with, or could significantly impact the setting of, a Grade II* Listed Building.	Grade II* Listed Buildings are considered to be those of more than special interest.  Data sourced from Historic England as above.
-	Development proposal located within the setting of a Grade II* Listed Building.	
0	Development proposal not considered likely to impact a Grade II* Listed Building or its setting.	
+	Development proposal which could potentially enhance a Grade II* Listed Building or its setting.	
Grade II Listed Buildings		
--	Development proposal coincides with a Grade II Listed Building.	Grade II Listed Buildings are considered to those of special interest.  Data sourced from Historic England as above.
-	Development proposal located within the setting of a Grade II Listed Building.	
0	Development proposal not considered likely to impact a Grade II Listed Building or its setting.	
+	Development proposal which could potentially enhance a Grade II Listed Building or its setting.	
Scheduled Monuments		
--	Development proposal coincides with a SM.	Scheduling is the selection of a sample of nationally
-	Development proposal located within the setting of a SM.	

<sup>120</sup> Historic England (2020) Download Listing Data. Available at: <https://historicengland.org.uk/listing/the-list/data-downloads/> [Date Accessed: 16/06/21]

<sup>121</sup> Historic England (2020) Search the Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/> [Date Accessed: 16/06/21]

Likely Impact		Notes
0	Development proposal not considered to impact an SM or its setting.	important archaeological sites.  Data sourced from Historic England as above.
+	Development proposal which could potentially enhance an SM or its setting.	
Registered Parks and Gardens		
--	Development proposal coincides with an RPG.	The main purpose of the Register is to celebrate designed landscapes of note and encourage appropriate protection.  Data sourced from Historic England as above.
-	Development proposal located within the setting of an RPG.	
0	Development proposal not considered likely to impact an RPG or its setting.	
+	Development proposal which could potentially enhance an RPG or its setting.	
Conservation Areas		
-	Development proposal located within a Conservation Area or considered to be located within the setting of a Conservation Area.	Conservation Area data provided by the BCA.
0	Development proposal not considered to impact a Conservation Area or its setting.	Information available for Dudley <sup>122</sup> , Sandwell <sup>123</sup> , Walsall <sup>124</sup> and Wolverhampton <sup>125</sup> authorities.
+	Development proposals which could potentially enhance the character or setting of a Conservation Area.	
Archaeological Priority Area		
-	Development proposal coincides with an APA.	Archaeology data provided by the BCA and detailed within the HLC report <sup>126</sup> .
0	Development proposal does not coincide with an APA.	
+	Development proposal which could potentially enhance an APA.	
Historic Landscape Characterisation		
-	Development proposal located within an area of high historic landscape or townscape value and/or area designed landscape of high historic value	
0	Development proposal located outside of areas of high historic landscape or townscape value and designed landscapes	

<sup>122</sup> Dudley Metropolitan Borough Council (2021) Conservation Areas. Available at: <https://www.dudley.gov.uk/residents/planning/historic-environment/conservation-areas/> [Date Accessed: 16/06/21]

<sup>123</sup> Sandwell Metropolitan Borough Council (2021) Listed buildings and conservation areas. Available at: [http://www.sandwell.gov.uk/info/200275/planning\\_and\\_buildings/444/listed\\_buildings\\_and\\_conservation\\_areas](http://www.sandwell.gov.uk/info/200275/planning_and_buildings/444/listed_buildings_and_conservation_areas) [Date Accessed: 16/06/21]

<sup>124</sup> Walsall Council (2021) Conservation areas. Available at: [https://go.walsall.gov.uk/conservation\\_areas](https://go.walsall.gov.uk/conservation_areas) [Date Accessed: 16/06/21]

<sup>125</sup> City of Wolverhampton Council (2021) Conservation. Available at: <https://www.wolverhampton.gov.uk/planning/conservation> [Date Accessed: 16/06/21]

<sup>126</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf) [Date Accessed: 16/06/21]

Likely Impact		Notes
+	Development proposal which could potentially enhance historic character.	HLC data provided by the BCA and detailed within the HLC report <sup>127</sup> .

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<sup>127</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf) [Date Accessed: 16/06/21]

## 5.4 SA Objective 2: Landscape

5.4.1 **Box 5.2** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 2: Landscape.

### *Box 5.2: SA Objective 2: Landscape strategic assessment methodology*

Likely Impact		Notes
Cannock Chase AONB		
-	Development proposals which could potentially alter views experienced of or from the AONB and/or alter its setting.	Development within the Black Country would not be anticipated to result in direct adverse impacts on the special qualities of the AONB.  Data available from Natural England <sup>128</sup> .  Further information and specific objectives for the AONB are available within the Cannock Chase AONB Management Plan 2019-2024 <sup>129</sup> .
0	Development proposals are not located in close proximity to the AONB, or the nature of development is determined not to affect the character or setting of the AONB.	
+	Development proposals which would increase the understanding and enjoyment of the special qualities of the AONB.	
Landscape Sensitivity Assessment		
--	Development proposals located within areas of 'moderate-high' or 'high' landscape sensitivity.	Appraisal of sites informed by the Black Country Landscape Sensitivity Assessment <sup>130</sup> .
-	Development proposals located within areas of 'low-moderate' or 'moderate' sensitivity.	
0	Development proposals located within areas of 'low' sensitivity, or those not assessed in the study.	
+	Development proposals which would protect or enhance features of the landscape as identified within the study.	
Views for Local Residents		
-	Development proposals which may alter views of a predominantly rural or countryside landscape experienced by local residents.	Views and proximity to existing residential development have been identified through the use of aerial photography and Google Maps <sup>131</sup> .  Potential positive impacts would be dependent upon the current views, and level of detail of the proposed development.
0	Development proposals are not considered to significantly alter views experienced by local residents.	
+	Development proposals which could potentially improve the views experience by some local residents.	

<sup>128</sup> Natural England (2020) Areas of Outstanding Natural Beauty (England). Available at: <https://data.gov.uk/dataset/8e3ae3b9-a827-47f1-b025-f08527a4e84e/areas-of-outstanding-natural-beauty-england> [Date Accessed: 16/06/21]

<sup>129</sup> Cannock Chase Area of Outstanding Natural Beauty (2020) Cannock Chase Area of Outstanding Natural Beauty Management Plan 2019 – 2024. Available at: <https://cannock-chase.co.uk/wp-content/uploads/2019/10/AONB-Cannock-Chase-Management-Plan-2019-24.pdf> [Date Accessed: 16/06/21]

<sup>130</sup> LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: [https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf) [Date Accessed: 16/06/21]

<sup>131</sup> Google Maps (2021) Available at: <https://www.google.co.uk/maps> [Date Accessed: 16/06/21]



Likely Impact		Notes
Views from the PRow Network		
-	Development proposals which may alter views of a predominantly rural or countryside landscape experienced by users of the PRow network.	PRow data provided by the BCA.  Views have been identified through the use of aerial photography and Google Maps <sup>132</sup> .
0	Development proposals are not considered to significantly alter views experienced by users of the PRow network.	
+	Development proposals which could potentially improve the views experienced from the nearby PRow network.	
Green Belt Harm		
--	Development proposals located within areas of 'moderate-high', 'high' or 'very high' Green Belt harm.	Appraisal of sites informed by the Black Country Green Belt Study <sup>133</sup> .  It should be noted that, as stated in the Green Belt Study, " <i>landscape quality is not a relevant factor in determining the contribution to Green Belt purposes, or harm to those purposes resulting from the release of land</i> ".
-	Development proposals located within areas of 'low-moderate' or 'moderate' Green Belt harm.	
0	Development proposals located within areas of 'very low' or 'low' Green Belt harm, or those not assessed in the study.	
+	Development proposals which would protect or enhance features of the landscape as identified within the study.	

<sup>132</sup> Ibid

<sup>133</sup> LUC (2019) Black Country Green Belt Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced_redacted.pdf) [Date Accessed: 22/06/21]

## 5.5 SA Objective 3: Biodiversity, flora, fauna and geodiversity

5.5.1 **Box 5.3** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 3: Biodiversity, flora, fauna and geodiversity.

### *Box 5.3: SA Objective 3: Biodiversity, flora, fauna and geodiversity strategic assessment methodology*

Likely Impact		Notes
European site e.g. SAC, SPA or Ramsar site		
--	Development proposal coincides with, or is located in close proximity to, a SAC. Likelihood of direct impacts.	Data for SACs from Natural England <sup>134</sup> .  It should be noted that the HRA will provide further detail relating to potential impacts on European sites within and surrounding the Plan area.
-	Development proposal is located within a recognised Zol or similar spatial catchment relative to the European site. Likelihood of direct or indirect impacts.	
+/-	Development located outside of a recognised Zol where, in absence of HRA conclusions, the effect of development is uncertain.	
0	Development not anticipated to result in adverse impacts on SACs.	
+	Development proposals which would be expected to enhance features within a European site.	
SSSI		
--	Development coincides with, or is located adjacent to, an SSSI.	Data for SSSIs and IRZs from Natural England <sup>135</sup> .
-	Within an IRZ which indicates proposed development should be consulted on with Natural England. Likelihood of direct or indirect impacts.	
0	Development within an IRZ which does not indicate the proposed development need to consult with Natural England.	
+	Development proposals which would enhance features of an SSSI.	
NNR		
--	Development coincides with an NNR. Likelihood of direct impacts.	Data for NNRs from Natural England <sup>136</sup> .
-	Development could potentially result in adverse impacts on an NNR. Likelihood of direct or indirect impacts.	
0	Development not anticipated to result in adverse impacts on NNRs.	
+	Development proposals which would enhance or create an NNR.	

<sup>134</sup> Natural England (2019) Special Areas of Conservation (England). Available at: [https://naturalengland-defra.opendata.arcgis.com/datasets/e4142658906c498fa37f0a20d3fdcf0\\_0](https://naturalengland-defra.opendata.arcgis.com/datasets/e4142658906c498fa37f0a20d3fdcf0_0) [Date Accessed: 30/01/20]

<sup>135</sup> Natural England (2019) Natural England's Impact Risk Zones for Sites of Special Scientific Interest, 22 November 2019. Available at: <https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/ssi-impact-risk-zones> [Date Accessed: 21/01/20]

<sup>136</sup> Natural England (2019) National Nature Reserves (England). Available at: <https://data.gov.uk/dataset/726484b0-d14e-44a3-9621-29e79fc47bfc/national-nature-reserves-england> [Date Accessed: 22/01/20]

Likely Impact		Notes
Ancient woodland		
--	Development proposal coincides with a stand of ancient woodland. Likelihood of direct impacts.	Data for ancient woodlands from Natural England <sup>137</sup> .
-	Development proposal anticipated to result in adverse impacts on a stand of ancient woodland. Likelihood of direct or indirect impacts.	
0	Development proposal would not be anticipated to impact ancient woodland.	
+	Development proposals which would enhance ancient woodland.	
SINC		
--	Development proposal coincides with a SINC. Likelihood of direct impacts.	Data for SINCs provided by the BCA.
-	Development proposal anticipated to result in adverse impacts on a SINC. Likelihood of direct or indirect impacts.	
0	Development not anticipated to result in adverse impacts on a SINC.	
+	Development proposals which would enhance or create a SINC.	
LNR		
-	Development proposal could potentially result in adverse impacts on an LNR, such as those which coincide or are located in close proximity. Likelihood of direct or indirect impacts.	Data for LNRs from Natural England <sup>138</sup> .
0	Development proposal not anticipated to result in adverse impacts on an LNR.	
+	Development proposals which would enhance or create an LNR.	
SLINC		
-	Development proposal anticipated to result in adverse impacts on a SLINC, such as those which coincide or are located in close proximity. Likelihood of direct or indirect impacts.	Data for SLINCs provided by the BCA.
0	Development not anticipated to result in adverse impacts on a SLINC.	
+	Development proposals which would enhance or create a SLINC.	
Geological Conservation		
-	Development proposal anticipated to result in adverse impacts on a geological site, due to location or proximity. Likelihood of direct or indirect impacts.	Data for geological sites provided by the BCA and data for underlying

<sup>137</sup> Natural England (2021) Ancient Woodland (England). Available at: <https://data.gov.uk/dataset/9461f463-c363-4309-ae77-fdc7e9df7d3/ancient-woodland-england> [Date Accessed: 16/06/21]

<sup>138</sup> Natural England (2021) Local Nature Reserves (England). Available at: <https://data.gov.uk/dataset/acdf4a9e-a115-41fb-bbe9-603c819aa7f7/local-nature-reserves-england> [Date Accessed: 16/06/21]

Likely Impact		Notes
0	Development proposal not anticipated to result in adverse impacts on a Geological Site.	geological context provided by British Geological Survey.
+	Development proposal anticipated to enhance a geological site.	
Priority Habitat		
-	Development proposal coincides with a priority habitat.	Data for priority habitats from Natural England <sup>139</sup> .
0	Development proposal does not coincide with a priority habitat.	
+	Development proposals which enhance or create a priority habitat.	

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<sup>139</sup> Natural England (2020) Priority Habitat Inventory (England). Available at: <https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england> [Date Accessed: 16/06/21]



## 5.6 SA Objective 4: Climate change mitigation

5.6.1 **Box 5.4** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 4: Climate change mitigation.

**Box 5.4:** SA Objective 4: Climate change mitigation strategic assessment methodology

Likely Impact		Notes
Carbon Emissions		
--	Residential-led development which could potentially result in an increase in CO <sub>2</sub> emissions by 1% or more in comparison to current levels.	<p>Figures calculated using UK local authority CO<sub>2</sub> emissions data<sup>140</sup> and the number of people per dwelling<sup>141</sup>, such that proposals for the following housing numbers are expected to increase carbon emissions by 1% or more in comparison to the current estimates:</p> <ul style="list-style-type: none"> <li>• Dudley – 963 homes;</li> <li>• Sandwell – 1,346 homes;</li> <li>• Walsall – 1,165 homes; and</li> <li>• Wolverhampton – 1,095 homes.</li> </ul> <p>Proposals for the following housing numbers are expected to increase carbon emissions by 0.1% or more in comparison to current estimates:</p> <ul style="list-style-type: none"> <li>• Dudley – 96 homes;</li> <li>• Sandwell – 135 homes;</li> <li>• Walsall – 117 homes; and</li> <li>• Wolverhampton – 110 homes.</li> </ul>
-	Residential-led development which could potentially result in an increase in CO <sub>2</sub> emissions by 0.1% or more in comparison to current levels.	
0	Development would be expected to result in a negligible increase in CO <sub>2</sub> emissions.	
+/-	Non-residential development where the carbon emissions produced as a result of the proposed development is uncertain.	
+	<p>Development proposals which include energy saving or renewable energy technologies.</p> <p>Development proposals which would reduce reliance on personal car use, encourage active travel or the use of public transport.</p>	

<sup>140</sup> UK local authority and regional carbon dioxide emissions national statistics: 2005-2017. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2017> [Date Accessed: 21/01/20]

<sup>141</sup> People per Dwelling has been calculated using the population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>) and dwellings stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

## 5.7 SA Objective 5: Climate change adaptation

5.7.1 **Box 5.5** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 5: Climate change adaptation.

### *Box 5.5: SA Objective 5: Climate change adaptation strategic assessment methodology*

Likely Impact		Notes
Fluvial Flooding		
--	Development proposals which coincide with Flood Zones 3a and/or 3b.	Data for fluvial flooding produced by JBA Consulting as part of the Level 1 Strategic Flood Risk Assessment (SFRA) <sup>142</sup> , such that: <ul style="list-style-type: none"><li>Flood Zone 3b: Functional Floodplain – land where water has to flow or be stored in times of flood;</li><li>Flood Zone 3a: Greater or equal to 1% chance of river flooding in any given year or greater than 0.5% chance of sea flooding in any given year;</li><li>Flood Zone 2: Between 1% and 0.1% chance of river flooding in any given year or 0.5% and 0.1% chance of sea flooding in any given year; and</li><li>Flood Zone 1: Less than 0.1% chance of river and sea flooding in any given year.</li></ul>
-	Development proposals which coincide with Flood Zone 2.	
+	Development proposals which are located wholly within Flood Zone 1.	
Surface Water Flooding		
--	Development proposals which coincide with areas at high risk of surface water flooding.	Based on the Environment Agency surface water flood risk data <sup>143</sup> , such that: <ul style="list-style-type: none"><li>High risk: 3.3+% chance of flooding each year;</li><li>Medium risk: between 1% - 3.3% chance of flooding each year; and</li><li>Low risk: between 0.1% - 1% chance of flooding each year.</li></ul>
-	Development proposals which coincide with areas at low and/or medium risk of surface water flooding.	
0	Development proposals which are not located in areas determined to be at risk of surface water flooding.	
+	Development proposals which include the integration of GI, open space, SUDS or other surface water flood risk alleviating measures	
Indicative Flood Zone		
--	Development proposals which coincide with Indicative Flood Zone 3b.	Data for Indicative Flood Zones produced by JBA Consulting as part of the Level 1 Strategic Flood Risk Assessment (SFRA) <sup>144</sup>
0	Development proposals which do not coincide with Indicative Flood Zone 3b.	

<sup>142</sup> JBA Consulting (2020) The Black Country Authorities Level 1 Strategic Flood Risk Assessment Final Report 25<sup>th</sup> June 2020. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date Accessed: 16/06/21]

<sup>143</sup> Environment Agency (2013) Risk of flooding from surface water. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/297429/LIT\\_8986\\_eff63d.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/297429/LIT_8986_eff63d.pdf) [Date Accessed: 16/06/21]

<sup>144</sup> JBA Consulting (2020) The Black Country Authorities Level 1 Strategic Flood Risk Assessment Final Report 25<sup>th</sup> June 2020. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date Accessed: 16/06/21]

## 5.8 SA Objective 6: Natural resources

5.8.1 **Box 5.6** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 6: Natural resources.

**Box 5.6:** SA Objective 6: Natural resources strategic assessment methodology

Likely Impact		Notes
Previously Developed (Brownfield) Land / Land with Environmental Value		
++	Development proposal located on previously undeveloped land of environmental value comprising 20ha or more.	Assessment of sites comprising previously developed land is in accordance with the definitions in the NPPF <sup>145</sup> .
-	Development proposal located on previously undeveloped land of environmental value comprising less than 20ha.	A 20ha threshold has been used based on Natural England guidance <sup>146</sup> . Assessment of current land use and potential environmental value has been made through reference to aerial photography and the use of Google Maps. It should be noted that this may not reflect the current status of the site, and the nature of development within the site boundary is unknown, so a degree of uncertainty remains.
+	Development proposal located on previously developed land with no environmental value.	
ALC		
-	Development proposals which are situated on Grade 1, 2 or 3a ALC land.	ALC data available from Natural England <sup>147</sup> . Where Grade 3 data is not sub-divided into 3a or 3b, it is assumed that 3a is present.
0	Development proposals located on previously undeveloped land with no environmental value.	
+	Development proposals which are situated on Grade 4 and 5 ALC land, or land classified as ‘urban’ or ‘non-agricultural’.	
Mineral Safeguarding Areas / Areas of Search		
-	Development proposal coincides with an MSA or AOS.	Minerals data provided by the BCA. Produced by wood consultants as part of the Black Country Minerals Study <sup>148</sup> .
0	Development proposal does not coincide with an MSA or AOS.	
+	Development proposals for the extraction of mineral resources.	

<sup>145</sup> Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 15/11/19]

<sup>146</sup> Natural England (2009) Agricultural Land Classification: protecting the best and most versatile agricultural land. Available at: <http://publications.naturalengland.org.uk/publication/35012> [Date Accessed: 22/01/20]

<sup>147</sup> Natural England (2019) Agricultural Land Classification o(ALC) (England). Available at: [https://naturalengland-defra.opendata.arcgis.com/datasets/5d2477d8d04b41d4bbc9a8742f858f4d\\_0?geometry=-3.131%2C52.513%2C-0.667%2C53.094](https://naturalengland-defra.opendata.arcgis.com/datasets/5d2477d8d04b41d4bbc9a8742f858f4d_0?geometry=-3.131%2C52.513%2C-0.667%2C53.094) [Date Accessed: 27/01/20]

<sup>148</sup> wood (2020) Review of the Evidence Base for Minerals to support preparation of the Black Country Plan. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4f/> [Date Accessed: 11/06/21]

## 5.9 SA Objective 7: Pollution

5.9.1 **Box 5.7** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 7: Pollution.

### *Box 5.7: SA Objective 7: Pollution strategic assessment methodology*

Likely Impact		Notes
AQMA		
-	All development proposals in the Black Country are located within an AQMA.	UK AQMA data available from Defra <sup>149</sup> .
Main road		
-	Development proposals located within 200m of a main road.	Road data available from the Ordnance Survey <sup>150</sup> . A 200m buffer distance from main roads (motorways and A-roads) has been used, in line with the Department for Transport guidance <sup>151</sup> .
0	Development proposals located over 200m from a main road.	
+	Development proposals which would help to reduce the number of cars used, promote the use of public transport and active travel and reduce congestion on nearby roads.	
Water quality		
-	Development proposals located within 10m of a watercourse.	Watercourse mapping data available from the Ordnance Survey <sup>152</sup> . A 10m buffer zone from a watercourse in which no works, clearance, storage or run-off should be permitted has been used as per Defra guidance <sup>153</sup> .
0	Development proposals located over 10m from a watercourse.	
+	Development proposal includes integration of GI or the naturalisation of watercourses.	

<sup>149</sup> Department for Environment Food and Rural Affairs (2019) UK Air Information Resource. Available at: <https://uk-air.defra.gov.uk/aqma/maps/> [Date Accessed: 16/06/21]

<sup>150</sup> Ordnance Survey (2019) OS Open Roads. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-roads> [Date Accessed: 16/06/21]

<sup>151</sup> Department for Transport (2019) TAG unit A3 Environmental Impact Appraisal. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf) [Date Accessed: 16/06/21]

<sup>152</sup> Ordnance Survey (2019) OS Open Rivers. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-rivers> [Date Accessed: 16/06/21]

<sup>153</sup> Department for Environment Food and Rural Affairs (2019) Advice and Information for planning approval on land which is of nature conservation value. Available at: <https://www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value> [Date Accessed: 16/06/21]



Likely Impact		Notes
Groundwater SPZ		
-	Development proposal coincides with a groundwater SPZ.	SPZ data available from the Environment Agency <sup>154</sup> .  Groundwater source catchments are divided into three zones <sup>155</sup> : <ul style="list-style-type: none"><li>• Inner Zone (Zone I) – 50-day travel time from any point below the water table to the source;</li><li>• Outer Zone (Zone II) – 400-day travel time; and</li><li>• Total Catchment (Zone III) – within which all groundwater recharge is presumed to be discharged at the source.</li></ul>
0	Development proposal does not coincide with a groundwater SPZ.	
Increase in Air Pollution		
--	Development proposals which could potentially result in a significant increase in air pollution.	It is assumed that development would result in an increase in traffic and thus traffic generated air pollution. Residential sites proposed for the development of between ten and 99 dwellings would therefore be expected to have a minor negative impact on local air pollution <sup>156</sup> .  Residential sites proposed for the development of 100 dwellings or more would be expected to have a major negative impact. Employment sites which propose the development of between 1ha and 9.9ha of employment space would be expected to have a minor negative impact and sites which propose 10ha or more would be expected to have a major negative impact.  Where a site is proposed for the development of nine dwellings or less, or for 0.99ha of employment floorspace or less, a negligible impact on local air quality would be anticipated.
-	Development proposals which could potentially result in a minor increase in air pollution.	
0	Development would be expected to result in a negligible increase in air pollution.	
+/-	The air pollution likely to be generated as a result of development proposals is uncertain.  Residential-led development sites for which the net housing capacity was unknown at the time of writing.	

<sup>154</sup> Environment Agency (2019) Source Protection Zones. Available at: <https://data.gov.uk/dataset/09889a48-0439-4bbe-8f2a-87bba26fbbf5/source-protection-zones-merged> [Date Accessed: 16/06/21]

<sup>155</sup> Environment Agency (2018) Groundwater source protection zones. Available at: <http://apps.environment-agency.gov.uk/wivby/37833.aspx> [Date Accessed: 16/06/21]

<sup>156</sup> Institute of Air Quality Management (2017) Land-Use Planning & Development Control: Planning for Air Quality. Paragraph 5.8.

## 5.10 SA Objective 8: Waste

5.10.1 **Box 5.8** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 8: Waste.

### *Box 5.8: SA Objective 8: Waste strategic assessment methodology*

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

<sup>157</sup> Department for Environment, Food and Rural Affairs (2019) Local Authority Collected Waste Statistics. Available at: <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables> [Date Accessed: 24/01/20]

<sup>158</sup> People per Dwelling has been calculated using the population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>) and dwellings stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

## 5.11 SA Objective 9: Transport and accessibility

5.11.1 **Box 5.9** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 9: Transport and accessibility.

### *Box 5.9: SA Objective 9: Transport and accessibility strategic assessment methodology*

Likely Impact		Notes
Bus Stop		
-	Development proposals are located over 400m from a bus stop	Bus stop data available from Transport for West Midlands <sup>159</sup> .  Target distance of 400m to a bus stop in line with Barton <i>et al.</i> sustainable distances <sup>160</sup> .
+	Development proposals are located within 400m of a bus stop	
Railway or Metro Station		
-	Development proposals are located over 2km from a railway or metro station.	Railway station data available from Transport for West Midlands.  Target distance of 2km to a railway station in line with Barton <i>et al.</i> sustainable distances.
+	Development proposals are located within 2km of a railway or metro station.	
Pedestrian Access		
-	Development proposals located in areas which currently have poor access to the surrounding footpath network.	Assessment of proximity to existing footpaths has been made through reference to aerial photography and the use of Google Maps <sup>161</sup> .
+	Development proposals which are well connected to the existing footpath network and would be expected to provide safe access for pedestrians.	
Road Access		
-	Development proposals located in areas which currently have poor access to the surrounding road network.	Assessment of proximity to existing roads has been made through reference to aerial photography and the use of Google Maps <sup>162</sup> .
+	Development proposals which are adjacent to an existing road.	
Pedestrian Access to Local Services		
-	Development proposals are located over a 15-minute walk to local services.	Data on fresh food centre locations and accessibility modelling (travel

<sup>159</sup> Transport for West Midlands (2021) Transport for West Midlands Data Portal. Available at: <https://data-tfwm.opendata.arcgis.com/> [Date Accessed: 02/02/21]

<sup>160</sup> Barton, H., Grant, M. & Guise, R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

<sup>161</sup> Google Maps (2021) Available at: <https://www.google.co.uk/maps> [Date Accessed: 16/06/21]

<sup>162</sup> Ibid

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

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## 5.12 SA Objective 10: Housing

5.12.1 **Box 5.10** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 10: Housing.

### *Box 5.10: SA Objective 10: Housing strategic assessment methodology*

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

## 5.13 SA Objective 11: Equality

5.13.1 **Box 5.11** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 11: Equality.

### *Box 5.11: SA Objective 11: Equality strategic assessment methodology*

Likely Impact		Notes
Index of Multiple Deprivation		
-	Development proposals within most deprived 10 percent LSOAs in England.  Development proposals would result in the loss of affordable housing, community services or could potentially increase crime/the fear of crime in the area.	UK Indices of Multiple Deprivation (IMD) available from MHCLG <sup>163</sup> .
0	Development proposals outside most deprived 10 percent LSOAs in England.  Development proposals would be expected to have no significant impact on equality.	
+	Development proposals would result in the provision of affordable housing, community services or would reduce crime/the fear of crime in the area.	

<sup>163</sup> Ministry of Housing, Communities and Local Government (2019) Indices of Multiple Deprivation (IMD). Available at: <http://data-communities.opendata.arcgis.com/datasets/indices-of-multiple-deprivation-imd-2019-1?geometry=-2.688%2C52.422%2C-1.456%2C52.714>  
[Date Accessed: 16/06/21]

## 5.14 SA Objective 12: Health

5.14.1 **Box 5.12** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 12: Health.

### *Box 5.12: SA Objective 12: Health strategic assessment methodology*

Likely Impact		Notes
AQMA		
-	All development proposals in the Black Country are located within an AQMA.	UK AQMA data available from Defra <sup>164</sup> .
Main Road		
-	Development proposals located within 200m of a main road.	Road data available from the Ordnance Survey <sup>165</sup> .
+	Development proposals located over 200m from a main road.	A 200m buffer distance from main roads (motorways and A-roads) has been used, in line with the Department for Transport guidance <sup>166</sup> .
NHS Hospital		
-	Development proposals located over 5km from an NHS hospital providing an A&E service.	NHS hospital department data available from the NHS website <sup>167</sup> , and local hospital data provided by the BCA.
+	Development proposals located over 5km from an NHS hospital providing an A&E service.	The target distance of 5km to an NHS hospital with an A&E service has been used in line with Barton et al. sustainable distances <sup>168</sup> .
Pedestrian Access to GP Surgery		
-	Development proposals are located over a 15-minute walk to a healthcare location.	Data on healthcare locations and accessibility modelling (travel time to healthcare) provided by BCA.
+	Development proposals are located within a 15-minute walk to a healthcare location.	

<sup>164</sup> Department for Environment Food and Rural Affairs (2019) UK Air Information Resource. Available at: <https://uk-air.defra.gov.uk/aqma/maps/> [Date Accessed: 16/06/21]

<sup>165</sup> Ordnance Survey (2019) OS Open Roads. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-roads> [Date Accessed: 16/06/21]

<sup>166</sup> Department for Transport (2019) TAG unit A3 Environmental Impact Appraisal. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf) [Date Accessed: 16/06/21]

<sup>167</sup> NHS (2020) NHS hospitals overview. Available at: <https://www.nhs.uk/service-search/other-services/Accident-and-emergency-services/LocationSearch/428> [Date Accessed: 16/06/21]

<sup>168</sup> Barton, H., Grant, M. & Guise, R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

Likely Impact		Notes
Public Transport Access to GP Surgery		
-	Development proposals are located over a 15-minute travel time via public transport to a healthcare location.	Data on healthcare locations and accessibility modelling (travel time to healthcare) provided by BCA.
+	Development proposals are located within a 15-minute travel time via public transport to a healthcare location.	
Access to / Net Loss of Greenspace		
-	Development proposals which coincide with greenspace. Development proposals located over 600m from greenspace.	Assessment of proximity to/net loss of greenspaces based on Ordnance Survey Open Greenspaces <sup>169</sup> . It is assumed that these greenspaces are publicly accessible. The SA has not referred to other locally designated green spaces or recreational facilities due to inconsistency of data availability across the BCA.  The target distance of 600m to a public greenspace has been used in line with Barton <i>et al.</i> sustainable distances <sup>170</sup> .
0	Development proposals do not coincide with greenspace.	
+	Development proposals located within 600m of a greenspace.	
Access to PRow / Cycle Routes		
-	Development proposals which are located over 600m from a PRow and cycle route.	PRow data provided by BCA.  Strategic cycle route data available from Transport for West Midlands <sup>171</sup> . The SA has not referred to other locally designated cycle paths due to inconsistency of data availability across the BCA.  The target distance of 600m to a footpath or cycle path has been used in line with Barton <i>et al.</i> sustainable distances.
+	Development proposals which are located within 600m from a PRow and/or cycle route.	

<sup>169</sup> Ordnance Survey (2018) OS Open Greenspace. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-greenspace> [Date Accessed: 16/06/21]

<sup>170</sup> Barton, H., Grant, M. & Guise, R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

<sup>171</sup> Transport for West Midlands (2021) Transport for West Midlands Data Portal. Available at: <https://data-tfwm.opendata.arcgis.com/> [Date Accessed: 18/06/21]



## 5.15 SA Objective 13: Economy

5.15.1 **Box 5.13** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 13: Economy.

### *Box 5.13: SA Objective 13: Economy strategic assessment methodology*

Likely Impact		Notes
Pedestrian Access to Employment Opportunities		
-	Residential development proposals are located over a 30-minute walk to a key employment location.	Data on key employment locations and accessibility modelling (travel time to employment) provided by BCA.
0	Development proposals for non-residential use.	
+	Residential development proposals are located within a 30-minute walk to a key employment location.	
Public Transport Access to Employment Opportunities		
-	Residential development proposals are located over a 30-minute travel time via public transport to a key employment location.	Data on key employment locations and accessibility modelling (travel time to employment) provided by BCA.
0	Development proposals for non-residential use.	
+	Residential development proposals are located within a 30-minute travel time via public transport to a key employment location.	
Employment Floorspace		
--	Development proposals which result in a significant net decrease in employment floorspace.	Assessment of current land use has been made through reference to aerial photography and the use of Google Maps <sup>172</sup> .
-	Development proposals which result in a minor net decrease in employment floorspace.	
0	Development proposals would not impact employment floorspace.	
+/-	It is uncertain whether the proposed development would result in a net change in employment floorspace.	
+	Development proposals which result in a minor net increase in employment floorspace.	
++	Development proposals which result in a significant net increase in employment floorspace.	

<sup>172</sup> Google Maps (2021) Available at: <https://www.google.co.uk/maps> [Date Accessed: 16/06/21]

## 5.16 SA Objective 14: Education, skills and training

5.16.1 **Box 5.14** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 14: Education, skills and training.

### *Box 5.14: SA Objective 14: Education, skills and training strategic assessment methodology*

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



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## 5.17 Overview of Site Assessments Pre-Mitigation

- 5.17.1 **Appendices F, G H and I** provide an appraisal of each reasonable alternative site considered by the BCA in Dudley, Sandwell, Walsall and Wolverhampton respectively. **Appendix K** provides an appraisal of each reasonable alternative Gypsy and Traveller site considered by the BCA.
- 5.17.2 A summary of the impact matrices for all reasonable alternative site assessments pre-mitigation are presented in **Tables 5.2-5.5**. These impacts should be read in conjunction with the assessment text narratives in **Appendices F-I** and **K** as well as the topic specific methodologies and assumptions presented in **Boxes 5.1 - 5.14**.
- 5.17.3 It should be noted that the site assessments include an overall impact symbol, summarised in **Table 5.1**, for each of the 14 SA Objectives. The appendices document likely impacts on receptors within each SA Objective, which have been included to provide the reader with contextual information that is relevant to each SA Objective. The overall impact symbol in **Tables 5.2-5.5** below for each SA Objective is always represented by the lowest common denominator. It may be possible that positive or negligible receptor impacts are relevant to an SA Objective, however, if one of the receptor impacts is identified as a major negative impact, the SA Objective will be identified as major negative overall.
- 5.17.4 Each appraisal includes a SA impact matrix which provides an indication of the nature and magnitude of impacts **pre-mitigation**. Assessment narratives follow the impact matrices for each site, within which the findings of the appraisal and the rationale for the recorded impacts are described.
- 5.17.5 All assessment information excludes consideration of detailed mitigation i.e. additional detail or modification to the reasonable alternative that has been introduced specifically to reduce identified environmental effects of that site. Presenting assessment findings 'pre-mitigation' facilitates transparency to the decision makers.
- 5.17.6 The appraisal of the 635 reasonable alternative sites demonstrated that all development proposals would be likely to result in a range of sustainability impacts as shown in **Tables 5.2 – 5.5** below.

**Table 5.2: Impact matrix of all sites assessed in this report - Dudley**

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
<b>Dudley Residential Sites</b>														
SA-0001-DUD	0	--	-	0	+	-	-	0	+	+	0	-	+	-
SA-0005-DUD-A	0	--	-	-	--	-	--	-	-	++	0	-	+	-
SA-0005-DUD-B	0	--	--	-	--	-	--	-	-	++	0	-	+	+
SA-0008-DUD	-	--	+/-	0	+	-	-	0	-	+	0	-	+	-
SA-0009-DUD	-	--	+/-	0	--	-	-	0	-	+	0	-	-	-
SA-0010-DUD-A	-	-	-	0	--	-	-	0	-	+	0	-	+	-
SA-0010-DUD-B	-	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0013-DUD	-	--	-	0	+	-	-	0	+	+	0	-	+	+
SA-0015-DUD	-	--	-	-	-	-	--	-	-	++	0	-	+	-
SA-0016-DUD	-	--	+/-	-	-	-	--	-	-	++	0	-	+	-
SA-0017-DUD	-	-	-	-	-	-	--	-	-	++	0	-	+	+
SA-0018-DUD-A	-	--	--	+/-	--	--	-	+/-	-	+/-	0	-	-	-
SA-0018-DUD-B	-	--	-	+/-	-	--	-	+/-	-	+/-	0	-	-	-
SA-0018-DUD-C	-	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0019-DUD	-	--	+/-	0	+	-	-	0	-	+	0	-	-	-
SA-0021-DUD	-	--	-	0	+	-	-	0	-	+	0	-	+	+
SA-0025-DUD	-	--	+/-	-	-	-	--	-	-	++	0	-	+	-
SA-0026-DUD	-	--	-	-	--	-	--	0	+	++	0	-	+	-
SA-0027-DUD	-	--	+/-	-	-	-	--	-	-	++	0	-	+	-
SA-0028-DUD	-	--	-	0	+	-	-	0	-	+	0	-	+	+
SA-0031-DUD-A	-	--	-	-	+	-	--	-	-	++	0	-	+	+
SA-0031-DUD-B	-	--	-	-	+	-	--	-	-	++	0	-	+	-
SA-0033-DUD	-	-	+/-	0	+	-	-	0	-	+	0	-	+	+
SA-0039-DUD	0	-	+/-	0	--	-	-	0	+	+	-	-	+	+
SA-0040-DUD	-	--	+/-	0	-	-	-	0	-	+	0	-	+	-
SA-0041-DUD	0	-	+/-	0	+	-	-	0	-	+	0	-	+	+
SA-0042-DUD	0	-	+/-	0	--	-	-	0	-	+	0	-	+	+
SA-0043-DUD	-	-	-	0	-	-	-	0	+	+	-	-	+	+
SA-0044-DUD	-	-	+/-	0	+	-	-	0	+	+	0	-	+	+
SA-0045-DUD	0	-	-	0	+	-	-	0	-	+	0	-	+	-
SA-0046-DUD	-	-	+/-	0	+	-	-	0	-	+	-	-	+	-
SA-0047-DUD	0	-	+/-	0	-	-	-	0	-	+	0	-	+	+
SA-0050-DUD	0	-	-	-	-	-	--	0	-	++	-	-	+	+
SA-0051-DUD-A	0	-	+/-	0	+	-	-	0	+	+	0	-	+	+
SA-0052-DUD	0	-	-	-	-	-	--	-	-	++	0	-	-	+
SA-0058-DUD	0	--	+/-	0	-	-	-	0	-	+	0	-	+	+
SA-0059-DUD	0	--	-	-	-	-	--	-	-	++	0	-	-	-
SA-0060-DUD	0	--	-	0	--	-	-	0	-	+	0	-	+	+



Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SA-0061-DUD	-	-	-	-	--	-	--	-	-	++	0	-	+	-
SA-0064-DUD-A	-	-	-	0	--	-	-	0	-	+	-	-	+	+
SA-0064-DUD-B	0	-	-	0	-	-	-	0	-	+	0	-	+	+
SA-0068-DUD (south)	0	-	-	0	-	-	-	0	-	+	0	-	+	+
SA-0068-DUD (north)	-	-	-	0	-	-	-	0	-	+	0	-	+	+
SA-0076-DUD	0	--	+/-	-	+	-	--	-	-	++	0	-	+	-
SA-0078-DUD	-	-	-	-	--	-	-	0	-	+	0	-	+	-
SA-0079-DUD	-	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0080-DUD	-	-	+/-	0	-	-	-	0	+	+	0	-	+	+
SA-0081-DUD	--	--	--	+/-	--	--	-	+/-	-	+/-	0	-	+	-
SA-0084-DUD	0	0	+/-	0	-	+	-	0	+	+	0	-	+	+
SA-0091-DUD	-	--	-	0	-	-	-	0	-	+	0	-	-	-
SA-0105-DUD-A	0	--	+/-	-	+	-	--	0	-	++	0	-	+	-
SA-0105-DUD-B	-	--	+/-	+/-	+	-	-	+/-	-	+/-	0	-	+	-
SA-0109-DUD	-	--	-	0	--	-	-	0	-	+	0	-	+	+
SA-0114-DUD	-	-	-	-	--	-	--	-	-	++	0	-	+	-
SA-0126-DUD	0	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0132-DUD	-	0	-	-	-	+	--	-	+	++	-	-	--	+
SA-0134-DUD	-	-	-	0	+	+	-	0	-	+	0	-	-	-
SA-0135-DUD	-	--	--	--	--	--	--	--	-	++	0	-	+	-
SA-0139-DUD	0	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0145-DUD	-	-	--	-	-	-	--	-	-	++	0	-	-	-
SA-0173-DUD	0	-	-	0	+	-	-	0	-	+	0	-	+	+
SA-0174-DUD	0	-	+/-	0	-	-	-	0	-	+	0	-	+	-
SA-0175-DUD	0	-	+/-	0	-	-	-	0	-	+	0	-	+	+
SA-0176-DUD	0	-	+/-	0	+	-	-	0	-	+	-	-	+	+
SA-0181-DUD	0	-	-	0	-	-	-	0	-	+	0	-	+	+
SA-0182-DUD	0	-	-	-	-	-	--	0	+	++	-	-	+	-
SA-0185-DUD	-	-	-	0	--	-	-	0	+	+	0	-	+	+
SA-0186-DUD	0	-	-	-	-	-	--	0	-	++	0	-	+	+
SA-0187-DUD	-	-	+/-	0	-	-	-	0	-	+	0	-	+	+
SA-0188-DUD	0	-	+/-	0	-	-	-	0	+	+	0	-	+	+
SA-0189-DUD	0	-	-	0	--	-	-	0	-	+	-	-	+	+
SA-0191-DUD	0	-	+/-	0	-	-	-	0	+	+	0	-	+	+
SA-0192-DUD	0	-	+/-	0	-	-	-	0	+	+	0	-	+	-
SA-0193-DUD	-	-	-	0	--	-	-	0	-	+	0	-	+	+
SA-0194-DUD	0	-	-	0	+	-	-	0	-	+	0	-	+	-
SA-0196-DUD	0	-	-	0	--	-	-	0	-	+	-	-	+	+
SA-0197-DUD	0	-	-	0	+	-	-	0	-	+	-	-	+	+

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SA-0198-DUD	0	-	-	0	-	-	-	0	-	+	0	-	+	+
SA-0199-DUD	0	-	+/-	0	+	-	-	0	-	+	0	-	+	-
SA-0200-DUD	-	-	+/-	0	-	-	-	0	-	+	-	-	+	+
SA-0202-DUD	-	-	+/-	0	+	-	-	0	-	+	-	-	+	+
SA-0204-DUD	-	-	+/-	0	+	-	-	0	-	+	-	-	+	-
SA-0205-DUD	0	-	-	0	--	-	-	0	-	+	0	-	+	+
SA-0206-DUD	-	-	-	-	-	-	--	0	-	++	0	-	+	+
SA-0208-DUD	-	-	-	0	+	-	-	0	-	+	0	-	+	+
SA-0209-DUD	-	-	-	0	+	-	-	0	-	+	0	-	+	+
SA-0210-DUD	-	-	-	0	+	-	-	0	+	+	0	-	+	-
SA-0214-DUD	--	-	--	-	--	-	--	-	+	++	0	-	+	-
SA-0215-DUD	-	0	-	0	-	+	-	0	-	+	0	-	--	+
SA-0222-DUD	0	-	+/-	0	+	-	-	0	-	+	-	-	-	+
SA-0227-DUD	0	-	+/-	0	--	+	-	0	+	+	-	-	--	+
Dudley Employment Sites														
SA-0001-DUD	0	--	-	+/-	+	-	-	+/-	+	0	0	-	++	0
SA-0008-DUD	-	--	+/-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA-0013-DUD	-	--	-	+/-	+	-	-	+/-	+	0	0	-	++	0
SA-0015-DUD	-	--	-	+/-	-	-	--	+/-	-	0	0	-	++	0
SA-0016-DUD	-	--	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0028-DUD	-	--	-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA-0047-DUD	0	-	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0078-DUD	-	-	-	+/-	--	-	-	+/-	-	0	0	-	++	0
SA-0135-DUD	-	--	--	+/-	--	--	--	+/-	-	0	0	-	++	0
SA-0227-DUD	0	-	+/-	+/-	--	+	-	+/-	+	0	-	-	+/-	0
H16.1	-	0	+/-	+/-	--	-	-	+/-	-	0	-	-	++	0
Dudley Carried Forward Residential Sites														
19	-	-	-	0	-	-	-	0	-	+	0	-	+	+
22	-	-	-	-	--	-	--	-	+	++	0	-	+	+
29	-	-	-	-	--	+	--	-	+	++	-	-	--	+
30	0	-	+/-	0	+	-	-	0	+	+	0	-	+	+
31	-	-	+/-	0	+	-	-	0	+	+	0	-	+	+
32	-	-	-	-	--	-	--	-	-	++	-	-	+	+
35	-	-	+/-	0	-	-	-	0	+	+	-	-	+	+
82a	-	-	+/-	0	+	-	-	0	+	+	0	-	+	-
83	-	-	+/-	0	+	-	-	0	+	+	0	-	-	-
85	0	-	-	0	+	-	-	0	+	+	0	-	+	+
87	0	-	+/-	0	+	-	-	0	-	+	0	-	+	+
91	0	-	-	0	--	-	-	0	+	+	0	-	+	+
94	-	-	+/-	0	-	-	-	0	-	+	0	-	+	+

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
101	-	-	-	0	-	+	-	0	-	+	0	-	+/-	-
138	-	0	+/-	0	+	+	-	0	+	+	0	-	-	+
149 (CFH)	-	0	-	0	-	+	-	0	-	+	0	-	-	+
151	-	-	-	0	+	-	-	0	-	+	-	-	--	+
155	0	0	+/-	0	-	+	-	0	+	+	0	-	-	+
157	0	-	-	0	+	-	-	0	+	+	0	-	-	-
158	0	0	+/-	0	--	+	-	0	+	+	0	-	-	+
159	-	0	-	0	--	+	-	0	+	+	0	-	-	-
162	-	0	-	0	-	-	-	0	+	+	0	-	-	+
164	0	-	+/-	-	--	-	--	0	+	++	0	-	--	-
173	0	0	+/-	0	+	+	-	0	+	+	-	-	--	+
177	0	0	+/-	0	+	+	-	0	+	+	-	-	-	+
178	0	0	+/-	0	+	-	-	0	+	+	-	-	-	+
181	0	-	+/-	0	-	-	-	0	-	+	0	-	+	+
182	-	-	-	0	+	-	-	0	-	+	-	-	+	+
188	-	-	+/-	0	+	-	-	0	+	+	0	-	+	+
189	-	-	+/-	0	-	-	-	0	+	+	0	-	-	+
190	0	-	+/-	0	+	-	-	0	-	+	-	-	-	+
200	0	-	+/-	0	+	-	-	0	-	+	0	-	+	-
202	0	-	+/-	0	-	-	-	0	-	+	-	-	+	+
205	-	-	--	-	--	-	--	-	-	++	0	-	+/-	+
302	-	0	-	0	-	+	-	0	+	+	0	-	-	+
304	-	0	+/-	0	-	+	-	0	+	+	0	-	--	-
305	0	0	+/-	0	-	+	-	0	+	+	0	-	-	+
306	0	-	+/-	0	-	+	-	0	+	+	0	-	+	-
308	0	-	-	0	-	-	-	0	+	+	0	-	+	+
312	0	-	+/-	0	--	-	-	0	-	+	0	-	+	-
318	-	0	-	0	-	+	-	0	+	+	0	-	-	+
321	0	-	+/-	0	+	-	-	0	+	+	0	-	+	-
327	-	-	+/-	0	-	-	-	0	-	+	-	-	+	+
330	0	-	+/-	0	+	-	-	0	-	+	0	-	+	+
331	0	0	+/-	0	-	+	-	0	+	+	0	-	-	-
332	-	-	-	0	-	-	-	0	+	+	0	-	+	-
336	-	-	--	0	+	-	-	0	+	+	0	-	+	+
341	0	-	+/-	0	-	-	-	0	-	+	0	-	+	-
346	0	-	+/-	0	+	+	-	0	-	+	0	-	-	+
347	--	-	--	0	-	-	-	0	-	+	-	-	+	-
350	-	0	-	0	+	+	-	0	-	+	-	-	-	-
352	0	0	+/-	0	+	+	-	0	-	+	0	-	-	+
358	0	-	-	0	--	-	-	0	+	+	0	-	+	+

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
360	-	-	-	0	-	+	-	0	-	+	0	-	--	+
368	-	-	+/-	0	-	+	-	0	+	+	0	-	+	+
370	0	-	+/-	0	+	+	-	0	-	+	0	-	+	+
372	-	-	-	0	--	+	-	0	+	+	0	-	+	+
374	0	-	-	0	+	-	-	0	+	+	0	-	+	-
375	-	-	+/-	0	+	-	-	0	+	+	0	-	+	-
378	-	0	+/-	0	+	+	-	0	-	+	0	-	+	+
382	--	-	-	0	-	-	-	0	-	+	0	-	+	-
383	0	-	-	0	+	-	-	0	-	+	0	-	+	+
384	0	-	-	0	-	-	-	0	-	+	0	-	+	+
H10.4	0	0	-	-	-	-	--	-	-	++	0	-	-	-
H16.1	-	-	-	-	-	-	--	-	+	++	-	-	+/-	-
S9	-	0	-	0	--	+	-	0	+	+	0	-	-	+
SA-0004-DUD	0	-	--	-	--	-	--	-	-	++	0	-	+	+
SA-303	0	-	+/-	0	-	-	-	0	-	+	-	-	--	+
SA-373 (SA-0373-DUD)	-	0	+/-	-	-	+	--	-	-	++	-	-	--	+
<b>Dudley Carried Forward Employment Sites</b>														
104	0	-	+/-	+/-	-	-	-	+/-	+	0	-	-	++	0
122	0	0	+/-	+/-	-	-	-	+/-	-	0	0	-	+/-	0
123a	0	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
123b	0	-	-	+/-	+	-	-	+/-	-	0	0	-	++	0
123c	0	-	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
132	-	0	-	+/-	-	-	-	+/-	-	0	-	-	++	0
135	0	0	+/-	+/-	--	-	-	+/-	-	0	-	-	++	0
136	-	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
137	-	0	-	+/-	-	-	-	+/-	-	0	0	-	++	0
147	0	-	+/-	+/-	-	-	-	+/-	+	0	0	-	++	0
149 (CFE)	-	-	+/-	+/-	-	+	-	+/-	-	0	-	-	++	0
187	0	0	-	+/-	+	-	-	+/-	-	0	0	-	++	0
198	0	0	+/-	+/-	--	-	-	+/-	+	0	0	-	++	0
DY5 Site	-	0	+/-	+/-	--	-	-	+/-	-	0	-	-	++	0



**Table 5.3: Impact matrix of all sites assessed in this report – Sandwell**

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
<b>Sandwell Residential Sites</b>														
SA-0001-SAN	0	-	--	0	-	-	-	0	-	+	0	-	-	+
SA-0002-SAN	0	--	--	+/-	--	-	-	+/-	-	+/-	0	-	+	+
SA-0003-SAN	-	--	--	-	-	--	--	-	-	++	0	-	+	+
SA-0004-SAN	-	--	-	-	-	-	--	-	-	++	0	-	+	-
SA-0006-SAN	0	-	+/-	0	+	+	-	0	+	+	-	-	+	-
SA-0016-SAN	0	-	-	+/-	-	-	-	+/-	-	+/-	0	-	+	-
SA-0020-SAN	-	-	-	0	-	-	--	0	-	++	0	-	+	+
SA-0033-SAN	-	0	-	0	+	+	-	0	-	+	0	-	--	+
SA-0048-SAN	-	0	+/-	0	-	+	-	0	-	+	0	-	-	+
SA-6999	-	-	-	-	--	--	--	-	+	++	0	-	+	+
<b>Sandwell Employment Sites</b>														
SA-0003-SAN	-	--	--	+/-	-	--	--	+/-	-	0	0	-	++	0
SA-0025-SAN	-	0	-	+/-	-	+	-	+/-	+	0	0	-	+/-	0
SA-0026-SAN	-	-	+/-	+/-	-	-	-	+/-	+	0	0	-	++	0
SA-0027-SAN	0	0	+/-	+/-	-	-	-	+/-	+	0	-	-	++	0
SA-0028-SAN	0	-	-	+/-	-	-	-	+/-	+	0	0	-	++	0
SA-0030-SAN-A	-	-	-	+/-	--	+	-	+/-	+	0	-	-	++	0
SA-0030-SAN-B	-	-	-	+/-	-	-	-	+/-	+	0	-	-	++	0
SA-0042-SAN	0	-	+/-	+/-	--	-	-	+/-	-	0	-	-	++	0
SA-0043-SAN	0	0	+/-	+/-	-	-	-	+/-	+	0	0	-	++	0
SA-0044-SAN	0	0	+/-	+/-	-	-	-	+/-	+	0	0	-	++	0
SA-0045-SAN	0	0	+/-	+/-	+	-	-	+/-	+	0	0	-	++	0
223	-	-	+/-	+/-	-	+	-	+/-	+	0	-	-	++	0
<b>Sandwell Carried Forward Residential Sites</b>														
28	0	-	+/-	0	+	+	-	0	+	+	0	-	-	-
744	-	-	-	0	-	-	-	0	-	+	-	-	+	+
764	-	-	+/-	0	+	-	-	0	-	+	0	-	+	+
1170	0	-	-	0	--	-	-	0	+	+	0	-	+	+
1183	0	-	-	0	-	-	-	0	+	+	0	-	-	+
1203	0	-	-	0	--	-	-	0	+	+	-	-	-	+
1376	0	0	+/-	0	-	+	-	0	+	+	0	-	-	+
1449	-	0	+/-	0	-	+	-	0	+	+	-	-	-	+
1451	0	0	+/-	0	-	+	-	0	-	+	-	-	-	+
1459	0	0	+/-	0	+	+	-	0	+	+	0	-	-	+
1463	-	-	+/-	0	-	-	-	0	+	+	0	-	-	+
1546	-	0	+/-	-	--	+	--	-	-	++	-	-	-	+
1994	0	0	+/-	0	--	+	-	0	+	+	0	-	-	+

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
2013	0	-	+/-	0	+	-	-	0	+	+	-	-	+	+
2370	0	0	-	-	--	+	--	-	+	++	-	-	--	+
2371	--	0	-	-	-	-	--	-	+	++	-	-	--	+
2377	0	0	+/-	0	--	+	-	0	+	+	0	-	--	+
2388	0	0	-	-	-	-	--	-	+	++	-	-	--	+
2588	0	0	+/-	-	-	+	--	-	-	++	-	-	--	+
2590	-	0	+/-	0	--	+	-	0	-	+	-	-	--	+
2893	0	-	+/-	0	-	-	-	0	+	+	-	-	+	+
2919	0	0	-	0	-	+	--	0	+	++	0	-	--	+
2940	-	-	-	-	--	-	--	-	-	++	0	-	+	-
2946	0	0	+/-	0	-	+	-	0	+	+	0	-	-	+
2972	0	0	+/-	0	--	+	-	0	+	+	-	-	-	+
2985	0	-	-	-	--	--	--	-	-	++	0	-	-	-
2986	0	0	+/-	0	--	+	-	0	+	+	0	-	--	-
3009	0	0	+/-	0	-	-	-	0	+	+	0	-	--	+
3011	--	0	+/-	0	--	+	-	0	+	+	-	-	--	-
3023	0	0	+/-	0	-	+	-	0	+	+	0	-	-	-
3025	0	-	-	0	-	+	--	0	+	++	0	-	-	-
3041	0	0	+/-	0	+	+	-	0	+	+	0	-	-	+
3049	0	-	-	0	--	-	-	0	-	+	0	-	+	-
3223	-	0	+/-	0	--	-	-	0	-	+	0	-	-	+
6483	0	0	+/-	0	--	+	-	0	-	+	-	-	-	+
6919	0	0	+/-	0	+	+	-	0	-	+	-	-	-	+
6924	0	-	-	0	-	-	-	0	+	+	-	-	+	+
6997	-	0	+/-	0	-	+	-	0	-	+	-	-	-	+
6998	0	0	+/-	0	-	+	-	0	+	+	-	-	--	+
SA-0029-SAN	-	-	-	-	--	-	--	-	-	++	0	-	+	+
<b>Sandwell Carried Forward Employment Sites</b>														
216b	-	-	+/-	+/-	--	-	-	+/-	-	0	0	-	++	0
256	0	0	-	+/-	--	-	-	+/-	-	0	0	-	+/-	0
257a	0	-	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0

**Table 5.4: Impact matrix of all sites assessed in this report – Walsall**

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
<b>Walsall Residential Sites</b>														
SA-0001-WAL	0	0	+/-	0	-	-	-	0	-	+	0	-	+	+
SA-0006-WAL	0	--	-	0	-	-	-	0	-	+	0	-	-	-
SA-0010-WAL	0	--	-	-	--	-	--	-	-	++	-	-	--	-
SA-0012-WAL	-	--	-	-	--	-	--	-	-	++	0	-	+	-
SA-0014-WAL	--	--	-	-	--	--	--	-	-	++	0	-	-	-
SA-0015-WAL	-	--	-	-	--	-	--	-	-	++	0	-	-	-
SA-0016-WAL	0	--	--	0	+	-	-	0	-	+	0	-	+	-
SA-0017-WAL	-	--	-	--	-	--	--	--	-	++	0	-	+	+
SA-0018-WAL	--	--	--	-	-	--	--	-	-	++	0	-	-	-
SA-0019-WAL	-	--	--	-	--	--	--	-	-	++	0	-	+	-
SA-0020-WAL	-	--	-	-	-	-	--	-	-	++	0	-	+	-
SA-0022-WAL	-	--	-	--	--	--	--	--	-	++	0	-	+	-
SA-0029-WAL	-	--	--	-	--	-	--	-	-	++	0	-	+	+
SA-0030-WAL	-	--	-	-	--	-	--	-	-	++	0	-	+	-
SA-0032-WAL	0	--	-	0	-	-	-	0	-	+	0	-	+	+
SA-0034-WAL	0	--	-	-	-	-	--	-	-	++	0	-	+	-
SA-0035-WAL	-	--	-	0	-	-	-	0	-	+	0	-	+	-
SA-0036-WAL	-	--	-	0	--	-	--	-	-	++	0	-	+	-
SA-0037-WAL	-	--	-	-	--	--	--	-	-	++	0	-	+	-
SA-0038-WAL	-	--	-	-	+	-	--	-	-	++	0	-	+	+
SA-0045-WAL	0	--	-	0	--	-	-	0	-	+	0	-	+	+
SA-0047-WAL	-	--	--	--	--	--	--	--	-	++	0	-	+	-
SA-0048-WAL	-	--	-	-	--	--	--	-	-	++	0	-	+	-
SA-0050-WAL	0	--	-	0	-	-	-	0	-	+	0	-	+	-
SA-0051-WAL	-	--	--	0	-	-	-	0	-	+	0	-	+	+
SA-0052-WAL	-	-	-	0	-	-	-	0	-	+	0	-	+	-
SA-0053-WAL	0	--	-	0	-	-	-	0	-	+	0	-	+	-
SA-0054-WAL	-	--	--	-	-	-	--	-	-	++	0	-	+	-
SA-0056-WAL	0	--	-	-	-	-	--	-	-	++	0	-	+	-
SA-0059-WAL	-	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0061-WAL	-	--	--	--	--	--	--	--	-	++	0	-	+	-
SA-0062-WAL	-	--	-	0	+	-	-	0	-	+	0	-	+	+
SA-0064-WAL	-	--	-	0	-	-	-	0	-	+	0	-	-	-
SA-0066-WAL	-	--	--	-	--	--	--	-	-	++	0	-	+	-
SA-0071-WAL	-	--	-	0	--	-	-	0	-	+	0	-	+	-
SA-0078-WAL	-	--	-	-	--	-	--	-	-	++	0	-	-	-
SA-0085-WAL	-	0	-	0	+	+	-	0	+	+	-	-	-	+
SA-0102-WAL	0	--	-	+/-	+	-	-	+/-	-	+/-	0	-	+	-

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SA-0138-WAL	-	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0149-WAL	-	--	-	-	-	-	--	-	-	++	0	-	+	+
SA-0153-WAL	-	--	-	0	+	-	-	0	-	+	0	-	-	-
SA-0163-WAL	0	--	-	0	-	-	-	0	+	+	0	-	+	+
SA-0167-WAL	-	--	-	+/-	+	-	-	+/-	-	+/-	0	-	+	-
SA-0172-WAL	-	-	-	0	-	-	-	0	+	+	0	-	+	+
SA-0174-WAL	0	-	-	0	-	-	-	0	+	+	0	-	+	+
SA-0183-WAL	--	--	+/-	+/-	+	+	-	+/-	-	+/-	0	-	+	-
SA-0186-WAL	-	--	-	-	-	-	--	-	-	++	0	-	+	-
SA-0187-WAL	0	--	+/-	-	--	-	--	-	-	++	0	-	-	-
SA-0188-WAL	-	-	-	0	-	-	-	0	-	+	0	-	+	+
SA-0195-WAL	0	--	--	-	--	-	--	-	-	++	0	-	+	-
SA-0196-WAL	0	--	-	0	+	-	-	0	-	+	0	-	+	+
SA-0197-WAL	0	--	--	-	--	-	--	-	-	++	0	-	+	-
SA-0199-WAL	-	--	-	0	-	-	-	0	-	+	0	-	+	-
SA-0201-WAL	-	--	-	0	-	-	-	0	-	+	0	-	+	-
SA-0202-WAL	-	--	-	--	--	--	--	--	-	++	0	-	+	-
SA-0204-WAL	-	--	-	-	-	--	--	-	-	++	0	-	-	-
SA-0205-WAL	-	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0206-WAL	0	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0207-WAL	0	--	-	0	-	-	-	0	-	+	0	-	+	-
SA-0208-WAL	0	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0211-WAL	-	--	-	-	+	--	--	-	-	++	0	-	+	-
SA-0212-WAL	-	--	-	-	-	--	--	-	-	++	0	-	+	-
SA-0213-WAL	-	--	-	-	+	-	--	-	-	++	0	-	+	+
SA-0215-WAL	-	--	-	-	-	--	--	-	-	++	0	-	+	-
SA-0216-WAL	-	--	-	-	-	-	--	-	-	++	0	-	+	-
SA-0220-WAL	-	--	+/-	0	-	-	-	0	-	+	0	-	+	+
SA-0222-WAL	0	--	-	0	-	-	-	0	-	+	0	-	+	+
SA-0223-WAL	-	--	-	-	-	--	--	-	-	++	0	-	+	-
SA-0224-WAL	0	--	+/-	0	-	-	-	0	-	+	0	-	+	+
SA-0225-WAL	0	--	+/-	0	+	-	-	0	-	+	0	-	+	+
SA-0226-WAL	-	--	-	-	+	-	--	-	-	++	0	-	+	+
SA-0227-WAL	0	--	+/-	0	+	-	-	0	-	+	0	-	+	-
SA-0228-WAL	-	--	--	--	--	--	--	--	-	++	0	-	+	-
SA-0229-WAL	-	--	+/-	-	+	--	--	-	-	++	0	-	+	-
SA-0230-WAL	-	--	+/-	-	+	-	--	-	-	++	0	-	+	-
SA-0231-WAL	-	--	-	-	+	--	--	-	-	++	0	-	+	-
SA-0232-WAL	-	--	-	--	--	--	--	--	-	++	0	-	-	-
SA-0233-WAL	-	--	+/-	0	+	-	-	0	-	+	0	-	+	+



Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SA-0235-WAL	-	--	+/-	-	-	-	--	-	-	++	0	-	-	-
SA-0236-WAL	-	--	-	-	+	--	--	-	-	++	0	-	+	-
SA-0237-WAL	-	--	+/-	--	--	--	--	--	-	++	0	-	-	-
SA-0238-WAL	-	--	-	--	--	--	--	--	-	++	0	-	+	-
SA-0239-WAL	-	--	-	-	+	-	--	-	-	++	0	-	+	-
SA-0240-WAL	-	--	-	-	+	-	--	-	-	++	0	-	+	-
SA-0241-WAL	-	--	-	-	-	-	--	-	-	++	0	-	+	-
SA-0244-WAL	0	--	-	-	+	-	--	-	-	++	0	-	+	-
SA-0245-WAL	0	--	-	0	--	-	-	0	-	+	0	-	+	-
SA-0248-WAL	-	--	-	0	-	-	-	0	-	+	0	-	+	-
SA-0250-WAL	0	-	--	0	-	-	-	0	-	+	0	-	+	-
SA-0251-WAL	-	--	+/-	0	-	-	-	0	-	+	0	-	+	-
SA-0252-WAL	-	--	--	0	+	-	-	0	-	+	0	-	+	-
SA-0257-WAL	-	--	-	0	+	-	-	0	-	+	0	-	+	+
SA-0264-WAL	0	--	-	-	-	-	--	-	-	++	0	-	+	-
SA-0265-WAL	-	--	-	0	-	-	-	0	-	+	0	-	+	-
SA-0266-WAL	-	--	-	-	-	-	--	-	-	++	0	-	+	-
SA-0267-WAL	-	--	-	0	--	-	-	0	-	+	0	-	+	-
SA-0269-WAL	-	--	-	0	--	-	--	-	-	++	0	-	+	-
SA-0272-WAL	0	--	-	0	-	-	-	0	-	+	0	-	+	+
SA-0274-WAL	-	--	-	-	--	-	--	-	-	++	0	-	+	+
SA-0278-WAL	0	--	-	0	--	-	-	0	-	+	0	-	+	-
SA-0280-WAL	0	--	-	0	-	-	-	0	-	+	0	-	+	+
SA-0284-WAL	-	--	-	-	--	-	--	-	-	++	0	-	+	-
SA-0288-WAL	-	--	-	-	--	-	--	-	-	++	0	-	+	-
SA-0289-WAL	0	--	--	-	--	-	--	-	-	++	0	-	-	-
SA-0291-WAL	-	--	-	-	--	-	--	-	-	++	0	-	+	-
SA-0292-WAL	0	--	-	0	--	-	-	0	-	+	0	-	+	-
SA-0294-WAL	-	--	--	0	+	-	-	0	-	+	0	-	+	-
SA-0295-WAL	-	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0296-WAL	-	--	+/-	0	+	-	-	0	-	+	0	-	+	-
SA-0297-WAL	-	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0301-WAL	-	--	-	0	-	-	-	0	-	+	0	-	-	-
SA-0302-WAL	-	--	-	-	-	--	--	-	-	++	0	-	-	-
SA-0304-WAL	-	--	-	0	-	-	-	0	-	+	0	-	+	-
SA-0305-WAL	-	--	+/-	0	+	-	-	0	-	+	0	-	+	-
SA-0309-WAL	0	--	-	0	-	-	--	0	-	++	0	-	+	-
SA-0312-WAL	0	--	-	0	--	-	-	0	-	+	0	-	-	-
SA-0313-WAL	0	--	+/-	0	--	-	-	0	-	+	0	-	+	-
SA-0317-WAL	0	--	-	0	--	-	-	0	-	+	0	-	+	+

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
<b>Walsall Employment Sites</b>														
SA-0001-WAL	0	0	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0007-WAL	-	--	-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0008-WAL	0	--	--	+/-	--	-	-	+/-	-	0	0	-	++	0
SA-0015-WAL	-	--	-	+/-	--	-	--	+/-	-	0	0	-	++	0
SA-0020-WAL	-	--	-	+/-	-	-	--	+/-	-	0	0	-	++	0
SA-0030-WAL	-	--	-	+/-	--	-	--	+/-	-	0	0	-	++	0
SA-0045-WAL	0	--	-	+/-	--	-	-	+/-	-	0	0	-	++	0
SA-0047-WAL	-	--	--	+/-	--	--	--	+/-	-	0	0	-	++	0
SA-0054-WAL	-	--	--	+/-	-	-	--	+/-	-	0	0	-	++	0
SA-0057-WAL	0	-	-	+/-	+	-	--	+/-	-	0	0	-	++	0
SA-0061-WAL	-	--	--	+/-	--	--	--	+/-	-	0	0	-	++	0
SA-0167-WAL	-	--	-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA-0183-WAL	--	--	+/-	+/-	+	+	-	+/-	-	0	0	-	++	0
SA-0186-WAL	-	--	-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0195-WAL	0	--	--	+/-	--	-	--	+/-	-	0	0	-	++	0
SA-0196-WAL	0	--	-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA-0197-WAL	0	--	--	+/-	--	-	-	+/-	-	0	0	-	++	0
SA-0200-WAL	-	--	-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0201-WAL	-	--	-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0202-WAL	-	--	-	+/-	--	--	--	+/-	-	0	0	-	++	0
SA-0204-WAL	-	--	-	+/-	-	--	--	+/-	-	0	0	-	++	0
SA-0205-WAL	-	--	-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA-0211-WAL	-	--	-	+/-	+	--	--	+/-	-	0	0	-	++	0
SA-0212-WAL	-	--	-	+/-	-	--	--	+/-	-	0	0	-	++	0
SA-0213-WAL	-	--	-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA-0215-WAL	-	--	-	+/-	-	--	--	+/-	-	0	0	-	++	0
SA-0216-WAL	-	--	-	+/-	-	-	--	+/-	-	0	0	-	++	0
SA-0223-WAL	-	--	-	+/-	-	--	--	+/-	-	0	0	-	++	0
SA-0227-WAL	0	--	+/-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA-0230-WAL	-	--	+/-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA-0231-WAL	-	--	-	+/-	+	--	--	+/-	-	0	0	-	++	0
SA-0232-WAL	-	--	-	+/-	--	--	--	+/-	-	0	0	-	++	0
SA-0235-WAL	-	--	+/-	+/-	-	-	--	+/-	-	0	0	-	++	0
SA-0237-WAL	-	--	+/-	+/-	--	--	--	+/-	-	0	0	-	++	0
SA-0238-WAL	-	--	-	+/-	--	--	--	+/-	-	0	0	-	++	0
SA-0239-WAL	-	--	-	+/-	+	-	--	+/-	-	0	0	-	++	0
SA-0242-WAL	0	-	--	+/-	--	-	-	+/-	-	0	0	-	++	0
SA-0243-WAL	0	-	--	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0244-WAL	0	--	-	+/-	+	-	--	+/-	-	0	0	-	++	0

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SA-0245-WAL	0	--	-	+/-	--	-	-	+/-	-	0	0	-	++	0
SA-0248-WAL	-	--	-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0257-WAL	-	--	-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA-0274-WAL	-	--	-	+/-	--	-	--	+/-	-	0	0	-	++	0
SA-0275-WAL	0	--	--	+/-	--	-	-	+/-	-	0	0	-	++	0
SA-0276-WAL	0	--	-	+/-	-	-	-	+/-	-	0	-	-	++	0
SA-0284-WAL	-	--	-	+/-	--	-	--	+/-	-	0	0	-	++	0
SA-0286-WAL	-	--	-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0288-WAL	-	--	-	+/-	--	-	--	+/-	-	0	0	-	++	0
SA-0301-WAL	-	--	-	+/-	-	-	-	+/-	-	0	0	-	+/-	0
SA-0302-WAL	-	--	-	+/-	-	--	--	+/-	-	0	0	-	++	0
SA-0304-WAL	-	--	-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0308-WAL	0	--	--	+/-	--	-	--	+/-	-	0	0	-	++	0
SA-0315-WAL	0	0	+/-	+/-	-	+	-	+/-	-	0	0	-	+/-	0
<b>Walsall Carried Forward Residential Sites</b>														
HO0016	-	0	+/-	0	-	+	-	0	-	+	-	-	-	+
HO0020	-	-	+/-	0	--	-	-	0	-	+	-	-	-	+
HO0023b	0	-	+/-	0	-	-	-	0	+	+	0	-	+	+
HO0027	-	-	-	-	-	-	--	-	-	++	-	-	+	-
HO0029	0	-	-	-	-	+	--	-	-	++	-	-	+	+
HO0037	-	-	+/-	0	+	-	-	0	-	+	0	-	+	-
HO0039a	0	-	+/-	0	+	-	-	0	+	+	-	-	+	-
HO0039b	0	-	+/-	0	-	-	-	0	+	+	-	-	+	-
HO0040	0	-	-	0	+	-	-	0	-	+	0	-	+	-
HO0041a	0	-	-	0	+	-	-	0	+	+	-	-	+	+
HO0041b	0	-	-	0	+	-	-	0	+	+	-	-	+	+
HO0043	-	-	-	0	-	-	-	0	-	+	0	-	+	+
HO0044	0	-	-	0	+	-	-	0	-	+	0	-	+	+
HO0046	0	-	-	0	-	-	-	0	-	+	-	-	+	-
HO0053	0	0	-	0	-	+	-	0	-	+	0	-	-	-
HO0060a	-	0	-	0	+	+	-	0	+	+	-	-	-	+
HO0060b	-	0	-	0	+	+	-	0	+	+	-	-	-	+
HO0060c	-	0	-	0	-	-	-	0	+	+	-	-	+	+
HO0060d	-	0	+/-	0	--	+	-	0	+	+	-	-	+	+
HO0062	-	-	-	0	-	-	-	0	+	+	-	-	+	+
HO0065	-	0	+/-	0	-	+	-	0	+	+	-	-	-	+
HO0066b	-	-	+/-	0	+	+	-	0	+	+	-	-	+	+
HO0071	0	-	+/-	0	--	-	-	0	+	+	0	-	+	-
HO0072	-	-	+/-	0	-	-	-	0	+	+	0	-	+	-
HO0093	0	-	-	0	-	-	-	0	+	+	-	-	+	+

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HO0117	0	-	-	0	+	-	-	0	+	+	-	-	+	+
HO0124	0	-	-	0	-	-	-	0	+	+	0	-	+	+
HO0125	0	0	-	0	+	-	-	0	+	+	0	-	-	+
HO0126	0	0	-	0	-	-	-	0	+	+	-	-	-	+
HO0137a	0	0	+/-	0	--	+	-	0	-	+	0	-	+	-
HO0137b	0	0	+/-	0	+	+	-	0	-	+	0	-	+	-
HO0137c	0	0	+/-	0	+	+	-	0	-	+	0	-	+	-
HO0147	0	-	-	0	+	+	-	0	+	+	-	-	+	-
HO0150	0	0	-	0	+	+	-	0	-	+	-	-	+	-
HO0150a	0	0	-	0	+	+	-	0	-	+	-	-	+	-
HO0154	0	0	-	0	+	-	-	0	+	+	-	-	+	-
HO0157a	0	0	-	0	+	-	-	0	-	+	0	-	-	+
HO0157b	0	0	-	0	+	-	-	0	-	+	0	-	-	+
HO0157c	0	-	-	0	+	-	-	0	-	+	0	-	-	+
HO0162a	0	0	+/-	0	+	+	-	0	-	+	-	-	+	+
HO0162b	0	0	+/-	0	+	+	-	0	-	+	-	-	+	+
HO0163	0	0	-	0	+	+	-	0	-	+	0	-	-	+
HO0168a	0	-	-	0	--	-	-	0	-	+	0	-	+	+
HO0168b	0	-	-	0	+	-	-	0	-	+	0	-	+	+
HO0176	0	-	+/-	-	-	-	--	-	-	++	0	-	+	-
HO0180	0	-	-	0	-	-	-	0	-	+	0	-	+	+
HO0181	-	-	-	-	-	-	--	-	+	++	-	-	+	+
HO0185	0	-	+/-	0	-	-	-	0	+	+	0	-	+	+
HO0194	0	0	-	0	+	+	-	0	+	+	0	-	-	+
HO0195	0	0	-	0	-	+	-	0	+	+	-	-	-	+
HO0201	0	-	+/-	0	--	-	-	0	-	+	-	-	+	+
HO0205	0	-	-	0	+	-	-	0	+	+	-	-	+	+
HO0217a	-	0	+/-	0	+	-	-	0	-	+	0	-	+	-
HO0217b	-	-	+/-	0	+	-	-	0	-	+	0	-	+	-
HO0304	-	-	-	0	+	-	-	0	-	+	0	-	+	+
HO0305	0	-	+/-	0	--	-	-	0	-	+	0	-	+	+
HO0307	-	0	-	0	+	-	-	0	+	+	-	-	+	+
HO0308	0	0	+/-	0	-	+	-	0	+	+	0	-	-	+
HO0310	0	-	+/-	0	--	-	-	0	+	+	-	-	+	+
HO0312	0	-	+/-	0	-	+	-	0	+	+	-	-	+	+
HO0313	0	-	-	0	-	-	-	0	+	+	0	-	+	+
HO0316	-	-	+/-	0	+	+	-	0	-	+	0	-	+	+
HO0317	0	-	-	0	+	-	-	0	-	+	-	-	-	+
HO0318	0	-	-	0	-	-	-	0	-	+	0	-	-	+
HO0320	-	0	+/-	0	+	+	-	0	-	+	-	-	-	+



Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HO0321	0	0	+/-	0	-	-	-	0	-	+	0	-	-	+
HO0322a	0	-	+/-	0	-	-	-	0	+	+	0	-	+	+
HO0322b	0	-	+/-	0	-	+	-	0	+	+	0	-	+	-
HO1314	0	-	-	0	-	-	-	0	-	+	0	-	-	+
LC02B	-	0	-	0	-	-	-	0	-	+	0	-	+	+
LC08A	0	0	-	0	+	-	-	0	+	+	-	-	+	-
LC14A	0	-	+/-	0	-	-	-	0	-	+	0	-	-	+
LC18A	0	-	-	0	+	-	-	0	-	+	0	-	-	+
LC30A	-	0	+/-	0	+	+	-	0	+	+	-	-	+	+
LC30C	-	0	+/-	0	+	+	-	0	+	+	-	-	+	+
LC31A	0	-	-	0	--	-	-	0	+	+	-	-	+	+
Walsall Carried Forward Employment Sites														
IN0002.1	0	-	-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0005.1	-	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
IN0009.12	0	0	-	+/-	-	-	-	+/-	-	0	0	-	++	0
IN0009.13	0	0	-	+/-	+	-	-	+/-	-	0	0	-	++	0
IN0009.14	0	0	-	+/-	+	-	-	+/-	-	0	0	-	++	0
IN0010.2	0	-	-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0012.5	0	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
IN0012.6	0	0	-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0012.8	0	0	-	+/-	--	-	-	+/-	-	0	0	-	+/-	0
IN0017.1	0	-	-	+/-	--	+	-	+/-	+	0	-	-	++	0
IN0017.2	0	0	-	+/-	-	-	-	+/-	+	0	-	-	++	0
IN0018.2	0	0	-	+/-	+	+	-	+/-	-	0	-	-	++	0
IN0027.1	0	0	-	+/-	-	-	-	+/-	+	0	-	-	++	0
IN0027.2	0	-	-	+/-	-	-	-	+/-	-	0	-	-	++	0
IN0032.2	-	0	-	+/-	-	-	-	+/-	+	0	-	-	++	0
IN0052.2	0	-	-	+/-	+	-	-	+/-	+	0	-	-	++	0
IN0056.2	0	0	+/-	+/-	--	-	-	+/-	+	0	0	-	++	0
IN0058	0	-	-	+/-	-	-	-	+/-	+	0	0	-	++	0
IN0063	0	0	-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0064	0	0	-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0068.1	0	-	-	+/-	--	-	-	+/-	-	0	-	-	+/-	0
IN0069.3	0	-	-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0069.42	0	0	-	+/-	--	+	-	+/-	-	0	0	-	++	0
IN0070.2	0	-	+/-	+/-	-	+	-	+/-	-	0	0	-	++	0
IN0070.4	0	0	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
IN0071.2	-	-	--	+/-	--	-	-	+/-	-	0	-	-	++	0
IN0072.2	0	-	+/-	+/-	--	-	-	+/-	+	0	-	-	++	0
IN0078.12	0	-	+/-	+/-	+	-	-	+/-	-	0	-	-	++	0

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
IN0078.2	0	0	-	+/-	--	-	-	+/-	+	0	-	-	++	0
IN0084	0	0	-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0093.2	-	0	-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0099.2	0	-	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
IN0103.2	0	0	-	+/-	-	+	-	+/-	-	0	-	-	++	0
IN0104.1	0	0	-	+/-	--	+	-	+/-	-	0	-	-	++	0
IN0104.4	-	0	-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0105	-	-	-	+/-	--	-	-	+/-	-	0	-	-	++	0
IN0109	-	-	+/-	+/-	--	-	-	+/-	-	0	-	-	++	0
IN0110	-	-	-	+/-	--	-	-	+/-	-	0	-	-	++	0
IN0118.2	0	-	+/-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0120.5	-	0	+/-	+/-	+	-	-	+/-	+	0	0	-	+/-	0
IN0122	0	-	-	+/-	-	-	--	+/-	+	0	0	-	++	0
IN0205	-	0	-	+/-	--	-	-	+/-	-	0	-	-	++	0
IN0315	-	0	-	+/-	--	-	-	+/-	-	0	0	-	+/-	0
IN0317	-	0	+/-	+/-	--	+	-	+/-	-	0	0	-	+/-	0
IN0328	0	-	-	+/-	-	-	-	+/-	+	0	-	-	++	0
IN0333	0	-	-	+/-	--	-	-	+/-	-	0	0	-	++	0
IN0341	0	-	-	+/-	--	-	-	+/-	+	0	0	-	++	0

**Table 5.5: Impact matrix of all sites assessed in this report – Wolverhampton**

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
<b>Wolverhampton Residential Sites</b>														
SA-0001-WOL	-	--	-	-	+	-	--	-	-	++	0	-	+	-
SA-0002-WOL	-	--	-	-	+	-	--	-	-	++	0	-	+	-
SA-0003-WOL	-	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0005-WOL	-	--	-	-	+	-	--	-	-	++	0	-	+	-
SA-0007-WOL	-	--	-	+/-	+	-	-	+/-	-	+/-	0	-	+	+
SA-0008-WOL	0	-	+/-	0	-	-	-	0	-	+	0	-	+	+
SA-0009-WOL	0	-	-	0	-	-	-	0	-	+	0	-	+	+
SA-0010-WOL	0	-	-	0	--	-	-	0	-	+	0	-	+	+
SA-0011-WOL	-	--	--	-	-	-	--	-	-	++	0	-	+	+
SA-0012-WOL	0	-	-	0	-	-	-	0	-	+	0	-	+	-
SA-0014-WOL	-	--	+/-	+/-	+	-	-	+/-	-	+/-	0	-	+	+
SA-0015-WOL	0	-	-	0	--	-	-	0	-	+	0	-	+	+
SA-0016-WOL	-	--	+/-	+/-	+	-	-	+/-	-	+/-	0	-	-	+
SA-0018-WOL	0	-	+/-	0	-	-	-	0	-	+	0	-	-	-
SA-0019-WOL	-	--	-	+/-	--	-	-	+/-	-	+/-	0	-	-	-
SA-0020-WOL	-	--	-	+/-	--	-	-	+/-	-	+/-	0	-	-	+
SA-0021-WOL	-	-	+/-	-	+	-	--	-	-	++	0	-	--	+
SA-0024-WOL	0	--	+/-	0	-	-	-	0	-	+	0	-	+	-
SA-0025-WOL	0	-	+/-	0	+	-	-	0	-	+	0	-	+	-
SA-0026-WOL	-	--	-	+/-	+	-	-	+/-	-	+/-	0	-	-	+
SA-0027-WOL	0	-	-	0	+	-	-	0	-	+	0	-	+	+
SA-0028-WOL	0	-	-	0	--	-	-	0	-	+	0	-	+	+
SA-0030-WOL	0	-	-	0	-	-	-	0	-	+	0	-	+	+
SA-0032-WOL	-	0	-	0	-	+	-	0	-	+	-	-	--	+
SA-0040-WOL	0	-	+/-	0	+	-	-	0	-	+	0	-	+	+
SA-0049-WOL	-	--	+/-	+/-	+	-	-	+/-	-	+/-	0	-	-	+
SA-0053-WOL	-	-	-	0	+	+	-	0	-	+	0	-	+	+
SA-0054-WOL	0	0	--	+/-	-	+	-	+/-	-	+/-	0	-	--	-
<b>Wolverhampton Employment Sites</b>														
SA-0034-WOL	-	-	--	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0035-WOL	0	0	+/-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA-0036-WOL	0	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA-0037-WOL	0	0	+/-	+/-	--	+	-	+/-	-	0	0	-	++	0
SA-0039-WOL	-	0	-	+/-	--	+	-	+/-	-	0	0	-	++	0
SA-0041-WOL	0	-	+/-	+/-	--	+	-	+/-	-	0	0	-	++	0
SA-0044-WOL	-	0	-	+/-	-	+	-	+/-	-	0	-	-	++	0
SA-0045-WOL	0	-	+/-	+/-	+	-	-	+/-	-	0	-	-	++	0
SA-0047-WOL	0	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SA-0051-WOL	0	0	+/-	+/-	+	+	-	+/-	+	0	-	-	++	0
SA-0052-WOL	0	-	+/-	+/-	+	-	-	+/-	+	0	0	-	++	0
<b>Wolverhampton Carried Forward Residential Sites</b>														
27372	--	-	+/-	-	-	+	--	-	+	++	-	-	+	+
34400	0	-	-	0	-	-	-	0	+	+	-	-	+	+
36440	0	-	+/-	0	-	-	-	0	-	+	0	-	+	-
36490	0	-	+/-	0	-	-	-	0	-	+	-	-	+	+
36610	-	-	-	0	-	-	--	0	+	++	-	-	+	+
36620	-	0	-	-	-	+	--	-	+	++	-	-	--	+
36630	-	0	-	0	-	+	-	0	+	+	-	-	--	+
36640	-	0	-	0	+	+	-	0	-	+	0	-	--	-
36680	-	0	-	-	-	+	--	-	+	++	-	-	--	+
36690	0	0	+/-	0	-	-	-	0	+	+	0	-	+/-	+
36870	0	0	+/-	0	+	+	--	0	+	++	-	-	+	+
36891/36892	-	-	+/-	0	-	-	-	0	+	+	0	-	+	+
40530	-	-	+/-	0	+	-	-	0	+	+	-	-	+	+
41900	-	0	+/-	-	-	+	--	-	+	++	-	-	-	+
41910	--	0	+/-	0	+	+	-	0	+	+	-	-	+	+
D5a/D5b	0	-	-	-	-	-	--	-	-	++	-	-	+	+
D20	--	-	+/-	0	+	-	-	0	-	+	0	-	+/-	+
D74	0	-	-	0	--	-	-	0	-	+	0	-	+	+
D78	0	-	+/-	0	--	-	-	0	-	+	0	-	-	+
D79	0	-	+/-	0	-	-	-	0	-	+	0	-	+	+
<b>Wolverhampton Carried Forward Employment Sites</b>														
677	-	0	-	+/-	-	-	-	+/-	+	0	0	-	++	0
684	-	0	-	+/-	--	-	-	+/-	-	0	0	-	++	0
690	0	0	+/-	+/-	+	+	-	+/-	-	0	-	-	+/-	0
723/WOL34	-	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
725/WOL5	0	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
726/WOL7	-	0	-	+/-	--	-	-	+/-	+	0	0	-	++	0
727/WOL8	-	0	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
734/WOL22	0	-	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
735/WOL24	0	-	-	+/-	--	-	-	+/-	+	0	-	-	++	0
737/WOL47	-	-	-	+/-	--	-	-	+/-	+	0	-	-	++	0
WOL18a(EDO4)/WOL17	-	0	+/-	+/-	+	-	-	+/-	-	0	-	-	++	0
WOL18b	0	-	+/-	+/-	+	-	-	+/-	-	0	0	-	++	0
WOL19	0	0	+/-	+/-	+	+	-	+/-	-	0	0	-	+/-	0
WOL21	0	0	-	+/-	-	+	-	+/-	-	0	0	-	++	0
WOL23	0	-	+/-	+/-	--	-	-	+/-	-	0	-	-	++	0
WOL39	-	0	-	+/-	-	+	-	+/-	+	0	-	-	+/-	0



Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
WOL40	0	0	-	+/-	--	-	-	+/-	-	0	0	-	++	0
WOL42	0	-	+/-	+/-	-	-	-	+/-	-	0	-	-	++	0
WOL43	0	0	+/-	+/-	+	+	-	+/-	-	0	-	-	+/-	0

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**Table 5.6:** Impact matrix of all sites assessed in this report – Gypsies, Travellers & Travelling Showpeople

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
<b>GTTS Sites</b>														
GT01	0	0	-	+/-	-	-	-	+/-	-	+	0	-	+	-
GT02	-	--	-	+/-	--	+	-	+/-	-	+	0	-	+	-
GT03	-	0	--	+/-	--	-	-	+/-	-	+	0	-	+	-
GT04	-	0	-	+/-	--	-	-	+/-	+	+	-	-	+	+
GT05	0	0	+/-	+/-	+	+	-	+/-	+	+	0	-	+	+
SA-11	-	0	-	+/-	--	+	-	+/-	+	+	0	-	+	-
GT1	-	--	-	+/-	--	+	-	+/-	+	+	-	-	+	+
GT50	0	0	-	+/-	+	-	-	+/-	+	+	-	-	+	+
H028	0	-	-	+/-	-	-	-	+/-	-	+	-	-	+	-
36510	0	-	+/-	+/-	--	-	-	+/-	-	+	-	-	+	+
SA-0049-WAL	0	--	-	+/-	-	+	-	+/-	-	+	0	-	+	+
SA-0310-WAL	0	--	-	+/-	+	-	-	+/-	-	+	0	-	+	-
2583	0	-	+/-	+/-	--	+	-	+/-	-	+	0	-	+	+

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## 5.18 Preferred Options – Sites

- 5.18.1 The proposed draft allocations are described in Chapter 13 of the Draft BCP and shown on the accompanying policies map. These will be subject to consultation as part of the Regulation 18 process.
- 5.18.2 **Chapter 6** gives an overview summary of the BCA reasons for selection and rejection for each of the proposed allocations at this stage (excluding carried forward sites).

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## 6 Selected / Rejected Sites

### 6.1 Overview

- 6.1.1 As outlined in **Section 1.12**, Planning Practice Guidance (PPG) on SEA states that the SA process should outline the reasons why alternatives were selected and the reasons the rejected options were not taken forward. An overview of the reasons for site selection and rejection have been provided by the BCA, as summarised in **Tables 6.1-6.7** for each administrative authority. Reasons for selection and rejection of the sites proposed at this stage in the plan making process have been informed by the detailed site assessment process undertaken by the BCA.
- 6.1.2 **Tables 6.1-6.7** include reasonable alternatives assessed in the SA process. They do not include sites which did not pass the 'gateway' test undertaken by the BCA (see para 5.1.4 in **Chapter 5**).
- 6.1.3 **Tables 6.1-6.7** are intended to provide an overview only. The decision making of the BCA in relation to the sites taken forward, reflects the findings of the evidence base documents prepared to support the preparation of the Local Plan, including the findings of the SA, and have been accompanied by detailed site assessment proformas.



## 6.2 Wolverhampton

**Table 6.1:** *Wolverhampton Selected / Rejected Sites - Housing*

Site Reference	Site Name	Selected/ Rejected	Reason for Selection / Rejection provided by BCA
SA-0001-WOL	Northcote Lane, Bushbury, Wolverhampton	Selected	<p>Agricultural land in the green belt. Whole hedgerow to east, and hedgerow / tree belt running along track within site are proposed for designation as SLINCs (following recent ecological survey), with some TPOs. Track belt would need to be breached to provide an access road to open up the north east part of the site. Beyond the site boundary, there are significant existing / proposed SINC areas to the north and east. Buffers required to all site boundaries and along track belt to preserve value and mitigate potential impacts. Net biodiversity gain, green belt mitigation and open space provision could be secured through improvements to the adjoining Northcote Farm Country Park SINC and improved links from the development to this site, including Council adoption /management of c. 10.4 ha of land along the brook / fish pond, to extend Northcote Farm Country Park.</p> <p>The site falls within an area with very high green belt harm, however it demonstrates moderate landscape sensitivity and forms one of a limited number of larger development opportunities in the Wolverhampton Green Belt.</p> <p>There is a shortage of primary and secondary school places locally, requiring off-site contributions to increase capacity. Access to residential services is satisfactory subject to provision of a potential new primary school on land at Bushbury Lane / Legs Lane immediately to the south and local bus service improvements to secondary schools. Site has access to a wide range of types of open space, therefore on-site open space is not required, subject to investment in and access improvements to adjoining Northcote Farm Country Park.</p> <p>Off-site highways works required to address potential highways impactsSite is suitable for development for 182 homes, subject to retention of existing habitats of value and securing investment for off-site highways works, to increase school place capacity and to significantly improve and extend facilities at the neighbouring Northcote Farm Country Park to address green belt mitigation, net biodiversity gain and open space requirements (see Policy CSA1 for further detail).</p>
SA-0002-WOL	South of Moseley Road, Bushbury, Wolverhampton	Selected	<p>Agricultural land in the green belt. Hedgerow to boundaries, some proposed for SLINC designation following recent ecological survey and including TPO trees. Buffers required to all site boundaries to preserve value and mitigate potential impacts. Net biodiversity gain, green belt mitigation and open space provision could be secured through improvements to the adjoining Northcote Farm Country Park SINC and improved links from the development to this site, including Council adoption /management of c. 10.4 ha of land along the brook / fish pond, to extend Northcote Farm Country Park.</p> <p>The site falls within an area with very high green belt harm, however it demonstrates moderate landscape sensitivity and forms one of a limited number of larger development opportunities in the Wolverhampton Green Belt.</p> <p>There is a shortage of primary and secondary school places locally, requiring off-site contributions to increase capacity. Access to residential services is satisfactory subject to provision of a potential new primary school on land at Bushbury Lane / Legs Lane immediately to the south and local bus service improvements to secondary schools. Site has access to a wide range of types of open space, therefore on-site open space is not required, subject to investment in and access improvements to adjoining Northcote Farm Country Park.</p> <p>Off-site highways works required to address potential highways impacts.</p>

Site Reference	Site Name	Selected/ Rejected	Reason for Selection / Rejection provided by BCA
			Site is suitable for development for 124 homes, subject to retention of existing habitats of value and securing investment for off-site highways works, to increase school place capacity and to significantly improve and extend facilities at the neighbouring Northcote Farm Country Park to address green belt mitigation, net biodiversity gain and open space requirements (see Policy CSA1 for further detail).
SA-0003-WOL	North of Moseley Road, Bushbury, Wolverhampton	Selected	<p>Strip of agricultural land in the green belt, on the edge of Wolverhampton. Small woodland proposed SLINC to east of site and SLINC hedgerow to southern boundary, following recent ecological survey. Net biodiversity gain, green belt mitigation and open space provision could be secured through improvements to the nearby Northcote Farm Country Park SINC and improved links from the development to this site, including Council adoption /management of c. 10.4 ha of land along the brook / fish pond, to extend Northcote Farm Country Park.</p> <p>The site falls within an area with very high green belt harm, however it demonstrates moderate landscape sensitivity and forms one of a limited number of larger development opportunities in the Wolverhampton Green Belt.</p> <p>There is a shortage of primary and secondary school places locally, requiring off-site contributions to increase capacity. Access to residential services is satisfactory subject to provision of a potential new primary school on land at Bushbury Lane / Legs Lane immediately to the south and local bus service improvements to secondary schools. Site has access to a wide range of types of open space, therefore on-site open space is not required, subject to investment in and access improvements to adjoining Northcote Farm Country Park.</p> <p>Upgrading of Moseley Road and other off-site highways works required to address potential highways impacts.</p> <p>The City boundary cuts through the middle of farmland therefore developing this strip in isolation from the larger site could create a less defensible green belt boundary and affect the viability of remaining farmland.</p> <p>Site is suitable for development for 78 homes, subject to: providing a defensible green belt boundary in the form of a landscaped buffer; retention of existing habitats of value; and securing investment for off-site highways works, to increase school place capacity and to significantly improve and extend facilities at the neighbouring Northcote Farm Country Park to address green belt mitigation, net biodiversity gain and open space requirements (see Policy CSA1 for further detail).</p>
SA-0005-WOL	Land at Bushbury Lane/ Legs Lane, Bushbury, Wolverhampton	Selected	<p>Agricultural land in the green belt. Limited areas of small trees/ bushes along road boundaries. Net biodiversity gain could be secured through improvements to the nearby Northcote Farm Country Park SINC and improved links from the development to this site, including Council adoption /management of c. 10.4 ha of land along the brook / fish pond, to extend Northcote Farm Country Park.</p> <p>There is a shortage of primary and secondary school places locally, requiring off-site contributions to increase capacity. Access to residential services is satisfactory subject to provision of a potential new primary school on land at Bushbury Lane / Legs Lane immediately to the south and local bus service improvements to secondary schools. Site has access to a wide range of types of open space, therefore on-site open space is not required, subject to investment in and access improvements to adjoining Northcote Farm Country Park.</p> <p>Off-site highways works required to address potential highways impacts.</p> <p>Site is suitable for development for minimum 148 homes and a potential new primary school, subject to retention of existing habitats of value and securing investment for off-site highways works, to increase school place capacity and to significantly improve and extend facilities at the neighbouring Northcote Farm Country Park to address green belt mitigation, net biodiversity gain and open space requirements (see Policy CSA1 for further detail).</p>

Site Reference	Site Name	Selected/ Rejected	Reason for Selection / Rejection provided by BCA
SA-0009-WOL	Open Space at Grassy Lane, Fallings Park, Wolverhampton	Selected	<p>Public open space in the green belt, within an area demonstrating low-moderate green belt harm and low-moderate landscape sensitivity. There is a shortage of primary and secondary school places locally, requiring off-site contributions to increase capacity. Off-site highways works required to address potential highways impacts.</p> <p>The replacement of this low quality, maintained grassland open space with a 1 ha high quality open space including play facilities to serve new residents (of this site and surrounding sites) is supported by the 2018 Wolverhampton Open Space Strategy and Action Plan. The remaining land is suitable for development for 88 homes, subject to securing investment for off-site highways works, to increase school place capacity and to carry out accessibility, biodiversity and environmental quality improvements to recreational open space at nearby Bushbury Hill green belt area to address green belt mitigation, net biodiversity gain and open space requirements (see Policy CSA2 for further detail).</p>
SA-0010-WOL	Land North of Grassy Lane, Fallings Park, Wolverhampton	Selected	<p>Agricultural land in the green belt, on the edge of Wolverhampton, within an area demonstrating low-moderate green belt harm and low-moderate landscape sensitivity. Trees / hedges along south and north west site boundary and a few mature trees in the centre of the site which could be retained as part of development. The City boundary cuts through the middle of farmland, along a brook/culvert, therefore developing this strip in isolation from the larger site could create a less defensible green belt boundary. There is a shortage of primary and secondary school places locally, requiring off-site contributions to increase capacity. Off-site highways works required to address potential highways impacts. Open space requirements of residents to be met through contributions towards provision of new high quality open space on Open Space at Grassy Lane site.</p> <p>Site is suitable for development for 80 homes, subject to providing a defensible green belt boundary in the form of a landscaped buffer along the brook/culvert and securing investment for off-site highways works, to increase school place capacity and to carry out accessibility, biodiversity and environmental quality improvements to Open Space at Grassy Lane and recreational open space at nearby Bushbury Hill green belt area to address green belt mitigation, net biodiversity gain and open space requirements (see Policy CSA2 for further detail).</p>
SA-0015-WOL	Land at Grassy Lane, Fallings Park, Wolverhampton	Selected	<p>Grazing land with stabling in the green belt on the edge of Wolverhampton, within an area demonstrating low-moderate green belt harm and low-moderate landscape sensitivity. SLINC covering boundary hedgerows is proposed for deletion following recent ecological survey. There is a shortage of primary and secondary school places locally, requiring off-site contributions to increase capacity. Off-site highways works required to address potential highways impacts. Open space requirements of residents to be met through contributions towards provision of new high quality open space on Open Space at Grassy Lane site.</p> <p>Site is suitable for development for 95 homes, subject to securing investment for off-site highways works, to increase school place capacity and to carry out accessibility, biodiversity and environmental quality improvements to Open Space at Grassy Lane and recreational open space at nearby Bushbury Hill green belt area to address green belt mitigation, net biodiversity gain and open space requirements (see Policy CSA2 for further detail).</p>
SA-0030-WOL	Land East of Wood Hayes Road, Wolverhampton	Selected	<p>Agricultural land in the green belt, on the edge of Wolverhampton, within an area demonstrating low-moderate green belt harm and low-moderate landscape sensitivity. Established hedgerow along west boundary and trees to the north and east boundaries could be retained as part of development. The City boundary cuts through the middle of farmland, therefore developing this strip in isolation from the larger site could create a less defensible green belt boundary. The tree line could be strengthened to form a defensible green belt boundary. Given the linear shape of the site, the rural local character and the need to create a defensible green belt boundary, a ribbon development with a density of no more than 25 dph is appropriate, in line with the density of the short ribbon of housing south of the site.</p>

Site Reference	Site Name	Selected/ Rejected	Reason for Selection / Rejection provided by BCA
			<p>There is a shortage of primary and secondary school places locally, requiring off-site contributions to increase capacity. Off-site highways works required to address potential highways impacts. Open space requirements of residents to be met through contributions towards provision of new high quality open space on Open Space at Grassy Lane site.</p> <p>Site is suitable for development for 40 homes at a low density of a design reflecting local character, subject to providing a defensible green belt boundary in the form of a strengthened tree line/landscaped buffer, and securing investment for off-site highways works, to increase school place capacity and to carry out accessibility, biodiversity and environmental quality improvements to Open Space at Grassy Lane and recreational open space at nearby Bushbury Hill green belt area to address green belt mitigation, net biodiversity gain and open space requirements (see Policy CSA2 for further detail).</p>
SA-0018-WOL	Land West of 74 Perton Road, Wightwick, Wolverhampton	Selected	<p>Garden land associated with 74 Perton Road and adjoining paddock located in the green belt. Two willing land owners. The site is located on the edge of Wolverhampton's urban and administrative area, in an area of moderate landscape sensitivity and green belt harm. The site has no significant planning constraints. The scale and location of the site would be a modest and logical extension to the urban area up to the track to the north-west. The track provides a natural boundary to adjoining open farmland and would provide a defensible new green belt boundary, in line with the boundaries of properties to the rear of Perton Grove.</p> <p>Adjacent residential uses are low density large dwellings and large plot sizes. Tettenhall Neighbourhood Plan Policy 12 requires new buildings to respect local character. Therefore site is suitable for 4 homes.</p>
SA-0021-WOL	City of Wolverhampton College (buildings), Paget Road, Compton Park, Wolverhampton	Selected	<p>Operational Wolverhampton College buildings, Activity Centre, hardstanding and landscaping located in the green belt, on the edge of the urban area. Development would fund relocation of the college to a more sustainable location within the City. The majority of the site was identified as a Major Developed Site in the Wolverhampton UDP (2011). National guidance prioritises the release of previously developed sites within the green belt. No environmental constraints affect the site.</p> <p>Development would provide visual enhancement to the area and increase the openness of remaining green belt by removing existing, large-scale, functional education buildings and replacement with a well-designed residential area.</p> <p>Site suitable for a development of 140 homes, subject to green belt mitigation at Smestow Valley LNR, relocation of College and Activity Centre to appropriate sites, appropriate highways access and off-site improvements to local open space.</p>
SA-0024-WOL	South Staffordshire Golf Course Land at Codsall Road, Wolverhampton	Selected	<p>Small part of golf course including mature trees located in the green belt. Reconfiguration of the golf course would be required to retain 18 holes, in accordance with Wolverhampton Playing Pitch Strategy. Low density ribbon development fronting Codsall Road of no more than 8 houses would not harm local character and could be designed to protect any mature trees of value. The new green belt boundary would continue to follow the edge of South Staffordshire Golf Course. Mitigation for green belt loss could be provided through accessibility, biodiversity and environmental quality improvements to South Staffordshire Golf Course.</p> <p>Mature trees cover half of the site, reducing the net developable area. Adjoining housing is of very low density with large rear gardens and new development should reflect this open character and ribbon development with a net density of no more than 20 dph. Therefore site is suitable for development for no more than 8 houses, subject to reconfiguration of golf course to replace hole lost to development and retain high standard of South Staffordshire Golf Course as defined in current Playing Pitch evidence.</p>

Site Reference	Site Name	Selected/ Rejected	Reason for Selection / Rejection provided by BCA
SA-0008-WOL	Oxley Park Golf Club land adjacent to 139 Oxley Moor Road	Selected	<p>Small part of golf course grounds located in green belt, in an area of low-moderate green belt harm and low-moderate landscape sensitivity. Development would fund improvements to golf course. The site falls within an area proposed for designation as a SLINC following recent ecological survey. Mitigation for loss of SLINC, green belt mitigation and net biodiversity gain could be provided through improvements to remaining SLINC.</p> <p>Site suitable for development for 3 homes, subject to accessibility, biodiversity and environmental quality improvements to Oxley Park Golf Course.</p>
SA-0025-WOL	Oxley Park Golf Club land adjacent to 1A Ribbesford Avenue	Selected	<p>Small part of golf course grounds located in green belt, in an area of low-moderate green belt harm and low-moderate landscape sensitivity. Development would fund improvements to golf course. The site falls within an area proposed for designation as a SLINC following recent ecological survey. Mitigation for loss of SLINC, green belt mitigation and net biodiversity gain could be provided through improvements to remaining SLINC.</p> <p>Site suitable for development for 3 homes, subject to accessibility, biodiversity and environmental quality improvements to Oxley Park Golf Course.</p>
SA-0027-WOL	Oxley Park Golf Club land adjacent to 21 Oxley Links Road	Selected	<p>Small part of golf course grounds located in green belt, in an area of low-moderate green belt harm and low-moderate landscape sensitivity. Development would fund improvements to golf course. The site falls within an area proposed for designation as a SLINC following recent ecological survey. Mitigation for loss of SLINC, green belt mitigation and net biodiversity gain could be provided through improvements to remaining SLINC.</p> <p>Site suitable for development for 3 homes, subject to accessibility, biodiversity and environmental quality improvements to Oxley Park Golf Course.</p>
SA-0028-WOL	Oxley Park Golf Club land adjacent to 10 Oxley Links Road	Selected	<p>Small part of golf course grounds located in green belt, in an area of low-moderate green belt harm and low-moderate landscape sensitivity. Development would fund improvements to golf course. The site falls within an area proposed for designation as a SLINC following recent ecological survey. Mitigation for loss of SLINC, green belt mitigation and net biodiversity gain could be provided through improvements to remaining SLINC.</p> <p>Site suitable for development for 4 homes, subject to accessibility, biodiversity and environmental quality improvements to Oxley Park Golf Course.</p>
SA-0032-WOL	Lane Street / Highfields Road, Bradley, Wolverhampton	Selected	<p>Operational industrial site adjoining residential and employment, promoted for housing through the call for sites. The employment land evidence indicates that this site is surplus to employment needs and could be released for housing, subject to re-location of the current land owners who occupy the site and operate a steel stockholding company. The sites falls within an Area of High Historic Townscape Value (AHHTV) in the HLC Study due to the cluster of late 19th and early 20th century industrial buildings surrounding the locally listed Highfield Works building, which also falls within the Bilston Canal Corridor Conservation Area. This building could be suitable for conversion, subject to viability. Carefully designed housing development on adjoining land would not necessarily harm the setting of the Conservation Area.</p> <p>The site is suitable for development for 72 homes, subject to subject to a design which: protects the operation of employment land to the east; retains the locally listed Highfield</p>



Site Reference	Site Name	Selected/ Rejected	Reason for Selection / Rejection provided by BCA
			Works building; respects the setting of this building and the Bilston Canal Corridor Conservation Area within which it falls; and respects the Area of High Historic Townscape Value designation covering the whole site; provision of off-site improvements to local open space to meet recreational open space needs of new residents.
SA-0040-WOL	Moseley Road Open Space (part), Langdale Drive, Bilston	Selected	Part of larger public open space which is majority maintained grassland, with hedge/tree belt buffer to adjoining school playing fields. There is a surplus in quantity of open space in this part of Wolverhampton, as set out in the 2018 Wolverhampton Open Space Strategy and Action Plan, which can support the combined loss of open space at this site and at Dean's Road / Neachells Lane, subject to investment in local open space to improve quality.  Site suitable for development for 85 homes, subject to mitigation and enhancement for loss of open space.
SA-0053-WOL	Former Wolverhampton Environment Centre (buildings), Westacre Crescent, Finchfield	Selected	Previously developed site comprising remains of demolished greenhouses, bungalow and hardstanding associated with former Environment Centre, located in the green belt. Surrounding grounds of Environment Centre have been improved through ERDF funding and are proposed for incorporation into adjoining Smestow Valley Local Nature Reserve (LNR). Site has a recently expired planning permission for 14 houses, subject to securing funding to maintain the area of proposed LNR. National guidance prioritises the release of previously developed sites within the green belt.  The site is suitable for 14 houses, as per the planning permission.
SA-0007-WOL	Former Bushbury Swimming Baths, Sandy Lane	Rejected	Maintained grassland with public access via adjoining public open space located in the green belt. The site is in an area of very high green belt harm and moderate-high landscape sensitivity – the highest level for both ratings. Development of the site would produce a pocket of urban development in a large open space which contributes to the rural character of the area, bounded with roads and removal of the site from the green belt would produce a weak green belt boundary which would not be defensible. The site is located within the existing Bushbury Hill Conservation Area (CA) boundary and is proposed for retention in a reduced CA boundary following consultation on a new CA Appraisal and revised boundary in summer 2021. The CA appraisal highlights the importance of the openness of the area within which this site falls therefore development of the site would have a significant negative effect on the CA.  Development of the site would cause significant harm to the integrity of the remaining green belt, historic value and local character.
SA-0011-WOL	Land at Pennwood Farm, Goldthorn Park (north)	Rejected	Agricultural land and woodland including some areas of SINC and SLINC located in the green belt. The site is in an area of very high green belt harm and moderate-high landscape sensitivity – the highest level for both ratings. The area also forms a key part of the Former Sedgley Park Area of High Historic Landscape Value (AHHLV), as defined in the HLC Study. The AHHLV centres on the Grade II Listed Park Hall Hotel, to the north of the site, and the Park and Ashen Coppice Ancient Woodlands to the south, and includes historic field boundaries and hedgerows and archaeological interest within the SLINC. The site is characterised by historic field boundaries and provides a visual link between the Park Hall Hotel and its setting to the north and the ancient woodland coppices to the south. The site is also on an area of high ground and is visible from a considerable distance.  Therefore, development of the site would cause significant combined harm to the historic value of the AHHLV, to the integrity of remaining green belt and to landscape character, which could not be mitigated.

Site Reference	Site Name	Selected/ Rejected	Reason for Selection / Rejection provided by BCA
SA-0012-WOL	Colton Hills Community School	Rejected	The site forms part of school playing fields located in the green belt. The majority of the site (southern part) has highway constraints which cannot be overcome and would result in the loss of playing fields contrary to the current Wolverhampton Playing Pitch Strategy, which could not be adequately mitigated. The northern part of the site could be suitable for a small housing development, subject to mitigation. However, the site has subsequently been withdrawn by the site promoter.
SA-0014-WOL	Mount Farm, Pennwood Lane	Rejected	<p>Green belt parcel not promoted through the Call for Sites and with no land owner identified.</p> <p>Agricultural land associated with Mount Farm. St Bartholomew's Church Grade II* Listed building is to the west of the site and the site falls within the existing Vicarage Road (Penn) Conservation Area boundary and is likely to be retained within the boundary following consultation on a revised CA boundary in summer 2021. Development of the site would significantly affect the setting of this early village centre, particularly along Pennwood Lane, characterised by low density, rural fringe development. The site also falls within the Penn Historic Settlement Archaeological Priority Area.</p> <p>Development of the site would be harmful to rural character and the setting of the Vicarage Road (Penn) Conservation Area and the setting of the St Bartholomew's Church Grade II* Listed building. Therefore, development would cause significant harm to historic value and local character, which could not be mitigated.</p>
SA-0016-WOL	Land South of Vicarage Road, Penn	Rejected	<p>Agricultural land, currently used for grazing, located in the green belt. Penn Hall Grade II Listed building is opposite the site and the site falls within the existing Vicarage Road (Penn) Conservation Area boundary. Although the site is likely to be removed from the boundary and instead adjoin the CA, following consultation on a revised CA boundary in summer 2021, development of the site would still significantly affect the setting of this early village centre, characterised by low density, rural fringe development and a gap in development west of Penn Hall providing views of the open countryside. A mature hedgerow fronting Vicarage Road would need to be removed to provide access. The transition between the built up urban area to the low density rural fringe is an important characteristic that needs to be maintained.</p> <p>Development of the site would extend the historic Penn Village south-west of Penn Hall, towards Penn Cemetery to the west, in a manner harmful to rural character and the setting of the Vicarage Road (Penn) Conservation Area and the Penn Hall Grade II Listed building. Therefore, development would cause significant harm to historic value and local character, which could not be mitigated.</p>
SA-0019-WOL	Land between 301 and 302 Bridgnorth Road	Rejected	<p>Former agricultural land located in the green belt, comprising neutral semi-improved grassland with strong rural hedgerow to frontage and Smestow Brook along south-east boundary. Site forms part of Smestow Valley SLINC (boundary confirmed in 2018 survey), forms part of an important ecological network connecting urban SINC's (inc Wightwick Manor and Smestow Valley LNR) and watercourses (Smestow Brook, Staffs &amp; Worcs Canal) with the South Staffordshire countryside. One third of site at risk of surface water flooding. Site designated as Natural Area in Tettenhall Neighbourhood Plan - Policy TNP14 requires protection and retention. Site lies between two Conservation Areas - Wightwick Bank and Staffs/ Worcs &amp; Shropshire Union Canal. Rural setting with sparse / low density housing pattern south of Bridgnorth Road.</p> <p>Development would cause significant harm to local wildlife value and local character, which could not be adequately mitigated.</p>
SA-0020-WOL	Wightwick Mill Field, Bridgnorth Road, Compton	Rejected	Formerly grazed grassland located in the green belt, with Smestow Brook to southern boundary and SLINC value hedgerow to northern road frontage, providing a key ecological corridor. Smestow Brook forms part of wider SINC. SLINC hedgerow restricts access. Around one third of

Site Reference	Site Name	Selected/ Rejected	Reason for Selection / Rejection provided by BCA
			<p>site is in flood zone 3 and one third in flood zone 2, leaving a thin strip of land of varying width not affected by flood risk. Rural fringe character on southern side of Bridgnorth Road would limit to low density development.</p> <p>Development would cause significant harm to flood risk, local wildlife value and local character, which could not be adequately mitigated.</p>
SA-0026-WOL	Land off 385 Penn Road and Vicarage Road	Rejected	<p>Grazing paddock associated with 385 Penn Road surrounded by hedgerows and mature trees, located in the green belt. The southern two thirds of the site is proposed for designation as a SLINC following recent survey work and land at Penn Hall to the east is a SINC, therefore development would have a strong negative impact on wildlife value in this location. There are TPO trees in the centre of the site and along Vicarage Road which make a strong positive contribution to the character of the area. Penn Hall Grade II* Listed building lies immediately east of the site and the site falls within the existing Vicarage Road (Penn) Conservation Area boundary. Although the site is likely to be removed from the boundary and instead adjoin the CA (following consultation on a revised CA boundary in summer 2021) development of the site would still significantly affect the setting of this early village centre. The transition between the built-up urban area to the low density rural fringe is an important characteristic that needs to be maintained. This setting is characterised by low density, rural fringe development which ends at Penn Hall, and a significant open countryside gap between Penn Village, Penn Cemetery and Penn Road, which this site forms a part of. Part of a mature hedgerow fronting Vicarage Road would need to be removed to provide access, which would harm wildlife value and the rural character of Vicarage Road in this location.</p> <p>Development of the site is significantly constrained by the proposed SLINC designation, as access would need to be provided through the SLINC, removing part of an important hedgerow. Development would also extend Penn Village west of Penn Hall, towards Penn Cemetery to the west, in a manner harmful to rural character and the setting of the Vicarage Road (Penn) Conservation Area and the Penn Hall Grade II* Listed building. Therefore, development would cause significant harm to wildlife value, historic value and local character, which could not be mitigated.</p>
SA-0049-WOL	Land South of Vicarage Road Cemetery, Penn	Rejected	<p>Green belt parcel not promoted through the Call for Sites and with no land owner identified.</p> <p>Agricultural land in grazing use with hedgerows and mature trees (some TPOs) defining boundaries. Penn Hall Grade II Listed building lies to the east of the site and the site falls within the existing Vicarage Road (Penn) Conservation Area boundary. Although the site is likely to be removed from the boundary and instead adjoin the CA, following consultation on a revised CA boundary in summer 2021, development of the site would still significantly affect the setting of this early village centre, characterised by low density, rural fringe development and a gap in development west of Penn Hall providing views of the open countryside. Site tapers to front of site, so very limited opportunity to reflect ribbon development character.</p> <p>Development of the site would represent an intrusion into the open countryside gap between Penn Village to the east and Penn Cemetery to the west, in a manner harmful to rural character and the setting of the Vicarage Road (Penn) Conservation Area and the Penn Hall Grade II* Listed building. Therefore, development would cause significant harm to historic value and local character, which could not be mitigated.</p>
SA-0054-WOL	Sites at Sutherland Avenue / Cooper Street	Rejected	<p>Sites in employment use within an established industrial area, promoted for housing through the call for sites. The sites are unsuitable for residential development as they are surrounded by unregulated employment uses which are important to protect for employment in line with draft BCP evidence and policies. Development of the sites would cause significant harm to the residential amenity of new residents and prejudice the operational capacity of adjoining employment uses to operate.</p>

**Table 6.2: Wolverhampton Selected / Rejected Sites - Employment**

Site Reference	Site Name	Selected / Rejected <sup>173</sup>	Reason for Selection / Rejection provided by BCA
SA-0034-WOL	Major Street Dixon Street	Selected	Vacant land within industrial area, suitable for employment use, subject to remediation as appropriate to address known ground condition issues.
SA-0035-WOL	Wednesfield 9 (Phoenix Road)	Selected	Vacant land within industrial area, suitable for employment use, with no known constraints.
SA-0036-WOL	Wednesfield 12 (Bentley Bridge Business Park, Well Lane)	Selected	Vacant land within industrial area, suitable for employment use, with no known constraints.
SA-0037-WOL	Glynweds (Pantheon Park - fmr Prime 10, Bentley Bridge)	Selected	Vacant land within industrial area, suitable for employment use, with no known constraints.
SA-0039-WOL	Tata Steel	Selected	Vacant land within industrial area, suitable for employment use, with no known constraints.
SA-0041-WOL	Bowmans Harbour, Planetary Road	Selected	Vacant land within industrial area, suitable for employment use, with no known constraints.
SA-0044-WOL	Millfield Road EDNA	Selected	Vacant land within industrial area, suitable for employment use, with no known constraints.
SA-0045-WOL	Shaw Road (Strykers)	Selected	Vacant land within industrial area, suitable for employment use, with no known constraints.
SA-0047-WOL	Dean's Road/ Neachells Lane	Selected	<p>Part of public open space with a SLINC designation. Site located adjoining high quality employment area with good access to the highways network, subject to junction improvements. There is a surplus in quantity of open space in this part of Wolverhampton, as set out in the 2018 Wolverhampton Open Space Strategy and Action Plan, which can support the combined loss of open space at this site and Moseley Road Open Space (part) , subject to investment in local open space to improve quality.</p> <p>Site suitable for development subject to mitigation and enhancement for loss of open space and SLINC / nature conservation value. Capacity may be constrained by highways access onto Neachells Lane. Further assessment work is underway which will be reflected in the Publication Plan</p>

<sup>173</sup> Please note Wolverhampton have no rejected employment sites.

Site Reference	Site Name	Selected / Rejected <sup>173</sup>	Reason for Selection / Rejection provided by BCA
SA-0051-WOL	Former Starr Road Transport Depot, Dale Street	Selected	Vacant land within industrial area, suitable for employment use, with no known constraints.
SA-0052-WOL	Land behind Keyline Builders Merchants, Willenhall Road	Selected	Vacant land within industrial area, suitable for employment use, with no known constraints.

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## 6.3 Walsall

**Table 6.3: Walsall Selected Sites - Employment**

Site Reference	Site Name	Reason for Selection provided by BCA
SA-0007-WAL	237 Watling Street, WS8 6JR, Brownhills, Walsall & 235 Watling Street, Walsall, WS8 6JR	Any development here would be seen in the context of existing development to the South and West. Although the views from the A5 would be prominent due to the topography the green belt study has not identified the most significant harm and in particular development to the West would have less impact. Transport and noise assessments are required with suitable mitigation to protect adjacent residential uses. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. There are no significant impacts other than whether the site can be delivered within the plan period, on the basis that this question is currently inconclusive the issue is considered to be less than significant, but must be resolved. No access to a primary school, local health centre or food centre, mitigation is required. The site is considered more suitable for employment uses than residential uses and is one of only a few sites identified by EDNA as being suitable for employment.
SA-0200-WAL	Johnsons Farm & Meadow Farm, Lichfield Road and Barracks Lane	Development would alter the character of the area but there are limited if any significant impacts. Footpaths are required along The sustainability of the site and access to services may present issues of viability and deliverability and highway infrastructure improvements would be required, however these improvement can be achieved using land within the parcel and would not be extensive. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for Bedrock Sand and Gravel take place. There are no significant impacts other than whether the site can be delivered within the plan period, on the basis that this question is currently inconclusive the issue is considered to be less than significant, but must be resolved. No access to a primary school, local health centre or food centre would require mitigation. The site is considered more suitable for employment uses than residential uses and is one of only a few sites identified by EDNA as being suitable for employment.
SA-0286-WAL	Land to the South East of Longwood Bridge	Highest green belt and landscape harm. Much is previously developed and it is possible that sympathetic landscaping could minimise any impact of new development, however housing is not part of the character of this area and in isolation would be incongruous with little opportunity to resolve limited access to a primary school, local health centre or food centre. The site is in the highest green belt harm and landscape categories but in all of respects has no other constraints that cannot be mitigation for and is in a sustainable location near to existing employment uses. On balance the site is considered suitable for employment uses and is one of only a few sites identified by EDNA as being suitable for employment.
SA-0308-WAL	Sandown Quarry, Stubbers Green Road, Aldridge, Walsall, WS9 8BL	Taking account of the proximity of existing employment uses, the character of the area and the lack of accessibility for services to residential development the site is best suited for Employment uses having no significant issues which cannot be mitigated for. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel and brick clay shall take place. The site is considered suitable for employment uses and is one of only a few sites identified by EDNA as being suitable for employment.
SA-0057-WAL	Land to the South of Bentley Lane, Willenhall, Walsall, WS2 7LU - Land to the South of Bentley Lane, Willenhall, Walsall	The constraints of the site in particular the past contamination and adjacent motorway would present significant issues to developing the site for housing, an employment uses raises fewer issues. Contamination surveys required and mitigation for ground gas. For these reasons the site is considered more suitable for employment uses than residential uses and is one of only a few sites identified by EDNA as being suitable for employment.

**Table 6.4: Walsall Selected Sites - Housing**

Site Reference	Site Name	Reason for Selection provided by BCA
SA-0006-WAL	Land opposite The Coach House with metal gate, WS9 OPU, Chester Rd, Aldridge, Walsall	On balance it is considered that the impact on visual amenity and the character of Streetly would be less than significant if this site was developed in conjunction with land to the South, there are established trees and ecology constraints which could reduce the developable area by up to half. Speed restrictions may be required on Chester Road. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place. No access to a primary school, local health centre or food centre which requires mitigation.
SA-0012-WAL	Longwood Lane, Walsall - Land off Sutton Road	Some constraints could impact on the developable area, the existing pattern of development and arboricultural features could be used to mitigate any significant harm. A strategy for impact on the SLINC would need to consider mitigation and or compensation. No access to a primary school, local health centre or food centre and mitigation would be required.
SA-0014-WAL	Stafford Road (A3), To the north of Bloxwich, WS3 3PJ - Land at Yieldsfield Farm (sometimes recorded as Yieldfields)	Part of the farm scores a 3a for agricultural land quality and there is a grade 2 listed building within the site. Although significant issues much of the site could still be developed so these issues are not significant in the context of the whole site. Further survey work is required in respect of ground contamination. Development would have some impact on local visual amenity which could be in part mitigation through sensitive landscaping and design which could also limit some wider impacts seen from the North due to the open landscape between Great Wyrley and Bloxwich. New crossing points on the A34 as well as a new vehicular junction would be required. No significant highway barriers, works required to create signal junction would have a bearing on viability. No access to a primary school, secondary school, local health centre or food centre. The issues identified are not considered significant to prevent residential development at this site and can be mitigated for. The SLINC occupies 2.5ha of the site and would reduce the developable area.
SA-0016-WAL	Land at junction of Middlemore Lane West and Bosty Lane, Aldridge - Middlemore Lane West, Aldridge	Likely that mitigation will be required to protect trees and ecology, mitigation also required for potential houses due to noise. Employment uses raised significant issues on the grounds of character and impact on neighbouring amenity. EDNA 2 market attractive assessment deems the site unsuitable for employment. No access to a primary school, local health centre or food centre, mitigation required. Footpath improvements required on Middlemore Lane.
SA-0017-WAL	Land at Queslett Road/ Aldridge Road, Walsall, B74 2DT - Columba Park	The site scores highest green belt and landscape harm, however this is balanced against the other assessment criteria, which raise no significant issues (subject to the recommendations of the conservation area review being implemented) and which demonstrates the site is sustainable, viable and deliverable. The site is prominent from road users and neighbours which directly face the site however the topography and relationship to adjoining land would limit wider impact, the revised plan is considered a significant reduction to the potential visual amenity harm. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. No access to local food store or local health centre which requires mitigation.
SA-0022-WAL	Home Farm, Sandhills, Walsall Wood, Walsall, West Midlands, WS9 9DJ - Home Farm, Sandhills	The site capacity, existing infrastructure and sustainable location would achieve a large housing scheme. Use as employment land would also benefit from this infrastructure but would require noise mitigation measures to safeguard amenities of neighbouring residential buildings. Any development here would have an impact on the character of the area which would be amplified by the topography and could be unacceptable in particular regarding employment uses. SLINC's should be incorporated into any development of the site. There are no obvious significant highway issues, there is scope for mitigation and potential for housing and or employment. No access to a primary school, local health centre or food centre requires mitigation.
SA-0030-WAL	Land at Yorks Bridge, Lichfield Road, Pelsall, Walsall	The submission identifies a number of constraints but proposes mitigation. Retention and enhancement of the SLINC is possible. Potential impact on visual amenity locally and in a wider context, significant access issues, to the East is common land preventing access onto Lime Lane, to the South is the Canal leaving a single point of access onto Pelsall Road. Road widening and junction improvements are required here.

Site Reference	Site Name	Reason for Selection provided by BCA
	- Land at Yorks Bridge	No access to local food store or local health centre which requires mitigation. The potential need to provide an access in another borough could cause issues for deliverability of this site, however it has now been demonstrated that with highway improvements access can be attained in Walsall on Pelsall Lane. It is estimated that approximately 2.8 hectares would not be developable due to constraints, trees, SLINC and common land. Although the Colliers assessment for employment uses concludes there is potential, taking account of the highway infrastructure restrictions for access and proximity to residential, mitigation is not feasible to support employment here.
SA-0034-WAL	Land North of Stonnall Road, Aldridge, Walsall, WS9 8JY - Land north of Stonnall Road, Aldridge	The site has few constraints and limited visual impact due to surrounding uses and topography. Stonnall Road for the extent of the development may need to be widened and further infrastructure works may be required including drainage improvements and or mitigation, however these are not considered to be significant. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. The site is not served by a primary school or health centre and mitigation is required.
SA-0048-WAL	Land at Vicarage Road / Coronation Road, High Heath, Walsall	The flood, tree and public rights of way constraints can be mitigated for. Highway impact cannot be fully assessed especially in a wider context, traffic impact assessment required. Improvements would be required to Mob Lane and Green Lane. If highway capacity is at its limit there is no clear highway solution which would not cross a gateway constraints and for this reason the site may score a 6 after this work is completed. High Heath Common SLINC covers approximately 3.3ha. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel, shall take place. No access to a primary school or local health centre
SA-0052-WAL	Land North of Northfields Way, Clayhanger, Brownhills, Walsall, WS8 7DT (nearest post code) - Land North of Northfields Way	Although the constraints identified by themselves do not appear insurmountable collectively the site could be significantly reduced in capacity to deliver units. Prior to the phase one ecological survey site clearance works took place which prevented any assessment taking place. Since this time the Council has attempted through engagement to restore the site and has requested at the very least proposal for restoration. An ecology report has now been submitted but requires further work to be undertaken which may not be available for review until later in 2021. Because positive progress has been made it is considered that the site should be included in the draft plan for further review. Ecology constraints and improvements could reduce the developable area by up to 0.5ha.
SA-0056-WAL	Land at Mob Lane, Pelsall, Walsall, West Midlands - Mob Lane	The tree constraints can be mitigated for. Highway impact cannot be fully assessed especially in a wider context, traffic impact assessment required. Improvements would be required to Mob Lane and Green Lane, limited number of units could be unviable. Because of the limited size of this site compared with adjacent large sites the housing score can be lower as local highway upgrades may be achievable to provide suitable access here. Highway works require further assessment and there is scope for this to be rescored a 6. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place. No access to a primary school or local health centre
SA-0064-WAL	Former NHS site, Land east of Nether Hall Avenue, Great Barr Walsall	The site is previously developed in the green belt, however an employment use is likely to have a detrimental impact on the amenities of adjoining occupiers. A residential use is limited by the established trees which are required to limit wider visual impact on the surrounding area due to the elevated position of this site. It is estimated that a reduction in developable area by half could provide some development and retain established trees and the SLINC. The access road to the South is not considered accessible by Highways Officers and access should be from the North, however the submission only indicates that access is possible from the South which would need significant enhancement and is lined with TPO trees and by the SLINC designation which would limit any potential to widen the road so that footpaths could be included which represent significant issues. Amended site location plan has been agreed to demonstrate access to the North. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. No access to a primary school

Site Reference	Site Name	Reason for Selection provided by BCA
SA-0078-WAL	Aldridge Road, Walsall - Land at Aldridge Road	Site area may need to be reduced to minimise impact on existing trees, protected species and users of the park. However development can be achieved on this site without causing any significant issues. Employment uses would not be compatible with adjacent uses. No access to a primary school, local health centre or food centre.
SA-0163-WAL	Cartbridge Lane South Open Space	Employment uses are not compatible with the character of the area which is residential and it the topography and relation of the site with the main strategic highway into Walsall means any development here is prominent. There are no significant constraints here to residential development. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. No access to a health centre which requires mitigation.
SA-0172-WAL	Former Reedswood Golf Course, Rayboulds Bridge, Walsall.	Approximately half of the site is not developable due to tree constraints and there are significant access issues which would make mean the site is not selected for allocation, however more survey work is expected and if these issues are resolved there are no other significant issues which would prevent residential uses. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place.
SA-0174-WAL	Former Allens Centre and Hilton Road Amenity Greenspace	There are significant remediation considerations and consultation required about a possible sports pitch, however mitigation is possible and these issues until concluded do not represent significant issues preventing housing development. Employment uses would have significant issues in respect of residential amenity.
SA-0187-WAL	Land to the East of Chester Road, Hardwick, Walsall, WS9 OPH	On balance it is considered that the impact on visual amenity and the character of Streetly would be less than significant if this site was developed, there are no other significant issues which are a barrier to developing this site. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and Superficial Sand and Gravel shall take place. No access to a primary school, local health centre or food centre which requires mitigation.
SA-0199-WAL	Sandfield Farm, Lichfield Road, Brownhills	Only residential is considered acceptable here due to the topography and relationship to the mobile home park adjoining so development could be significantly constrained in design terms, for instance bungalows may be more acceptable than two storey housing to ensure no unacceptable adverse impact in relation to neighbouring uses. Could form an extension to Sandfields. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for Bedrock Sand and Gravel take place. There are no significant impacts other than whether the site can be delivered within the plan period, on the basis that this question is currently inconclusive the issue is considered to be less than significant, but must be resolved. No access to a primary school, local health centre or food centre which needs mitigation.
SA-0207-WAL	Land to the North East of Shire Oak, Lichfield Road	There are no significant barriers to supporting residential here and the site could form part of a comprehensive scheme for housing. In respect of employment uses this would be incompatible with the adjacent nursing home use. Any mitigation would be significant and would severely reduce the viable employment uses. The 2 score for housing is based on this site being combined with the larger adjacent site, assessed in isolation this site would be unsustainable. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel shall take place. No access to a primary school, local health centre or food centre require mitigation.
SA-0208-WAL	Land to the South West of Shire Oak, Lichfield Road	There are no significant barriers to supporting residential here and the site could form part of a comprehensive scheme for housing. In respect of employment use there is little potential support due to the adjacent nursing home. Any mitigation would be significant and would severely reduce the viable employment uses. The 2 score for housing is based on this site being combined with the larger adjacent site, assessed in isolation this site would have significant local visual amenity issues. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place.

Site Reference	Site Name	Reason for Selection provided by BCA
SA-0233-WAL	Former Star Service Station, Queslett Road East, Streetly.	No access to a primary school, local health centre or food centre require mitigation. The parcel is very sensitive in terms of green belt harm and and landscape sensitivity. If the site was considered for release there would be constraints on design, density and a requirement for soft landscaping. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to local food store or local health centre and requires mitigation.
SA-0264-WAL	Barns Farm	Constraints identified would not be barriers to development but could impact on viability, ground investigation surveys and mitigation for gas likely. Should development come forward further survey work should inform the development to mitigate for and enhance ecology. Employment uses not suitable due to proximity to houses but residential uses raise few concerns. In addition the site is within 250m of the access to a permitted minerals working site Atlas Quarry. The main effects of mineral extraction are noise, dust, vibration and quarry traffic and mitigation is required in respect of housing. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sands and gravel and brick clay shall take place. No access to local food store or local health centre which also requires mitigation.
SA-0295-WAL	The Three Crowns	Although in the highest harm categories for both green belt harm and landscape sensitivity the parcel is previously developed and there is now a planning permission for houses on this parcel. No access to a primary school, local health centre or food centre would require mitigation if use was intensified.
SA-0309-WAL	Land at (South of) Stonnall Road, Aldridge, WS9 8JZ	There are no significant impacts here, would benefit from coming forward with adjacent sites due to highway requirements and shared services due to the small size of the site. Footway provision required on development side of the road to improve accessibility. A controlled/uncontrolled pedestrian crossing on Stonnall Road will be required to cross pedestrians onto to NW side of the road. Employment uses would have significant noise impacts on adjoining and adjacent residents. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. Mitigation required for Primary School, Secondary School and Health Centre Access.
SA-0312-WAL	409 Chester Road, Streetly - Pacific Nurseries, WS9 0PH	Employment uses would require significant mitigation and restriction on uses to protect visual and noise amenities to occupiers of houses to the South. Trees to the East should be retained which would reduce the developable area. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel shall take place. No access to primary school, secondary school, local health centre and food centres would require mitigation.
SA-0313-WAL	Land Rear of 91 Wood Lane	The site in relation to residential development has no significant constraints, an employment use would be harmful to existing residential uses, would be out of context with existing surrounding development and constraints of heights and site capacity would limit employment uses. There are established trees which are worthy of retention and would minimise any visual impact from land to the North and West (reduction of at least 0.2ha). The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel shall take place.
SA-0317-WAL	Land to the rear of 114-130 Green Lane	0.5ha of the site would not be developable due to the presence of established trees many of which are worthy of retention due to their quality, visual amenity and ecological value. The site has no significant constraints which would prohibit development. An employment use would have a significant impact on the character and amenities of residents and is not supported. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. No access to local health centre which requires mitigation.



**Table 6.5: Walsall Rejected Sites (Housing/Employment)**

Site Reference	Site Name	Reason for Rejection provided by BCA
SA-0015-WAL	Land to the West of Chester Road, Hardwick, WS9 0PH	Potential to deliver a high number of houses, but would result in significant harm to the mixed urban, rural character of Streetly. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place. No access to a primary school, local health centre or food centre, mitigation is required.
SA-0018-WAL	College Farm, Bosty Lane, Aldridge, Walsall, WS9 0LF. - Land at Bosty Lane, Aldridge, Walsall.	The site covers a large area and the character is considered to change across the site with the Southern section being more rural with residential to the North. Housing could be possible to the North part however there would be a significant impact on the character of this part of Bosty Lane causing high harm to the landscape character and visual amenity. Due to the topography and relationship to existing houses the potential mitigation and restrictions on employment buildings would be unviable these issues combines with the impact on green belt and landscape are significant. No access to a primary school, local health centre or food centre which requires mitigation.
SA-0037-WAL	Land at Chester Road, Streetly, Walsall - Land at Chester Road, Streetly, Walsall	The site is part of a larger area which is characterised by its openness and helps to define Streetly's semi-rural character. Although it is recognised that wider visual amenity impacts are limited due to the development to the South and East, this land forms part of the transition between the urban and the rural so any development here would erode that having a significant visual amenity impact. Although it is recognised that the impact on development here increases from East to West the difference is not significant enough to add additional concern. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. No access to a primary school, local health centre or food centre which would require mitigation.
SA-0038-WAL	Little Aston Road, Aldridge, Walsall, WS9 0NU - Land at Little Aston Road, Aldridge. 168 Little Aston Road. Land Adjacent 170 Little Aston Road	The site scores the highest greenbelt and landscape harm its close proximity to the Conservation Area and its impact on character and visual amenity are significant issues. In addition the site is within 250m of the access to a permitted minerals working site Branton Hill Quarry. The main effects of mineral extraction are noise, dust, vibration and quarry traffic which is a significant barrier to housing development. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. Mitigation required for road noise, road widening, access, pylon and in respect for access to local food store or local health centre.
SA-0045-WAL	Land adjacent to Barr Common Road, Aldridge - Land adjacent to Barr Common Road, Aldridge	The visual impact of the development by virtue of its relationship to the surrounding uses and proximity to public access routes is likely to have significant harm. The Northern boundary to Barr Common Road is the obvious point of access, however this is a busy road and there is a difficult junction opposite, the junction works required may not be viable, a better solution would be for a wider site with access elsewhere. They are significant issues. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. The whole site is a SLINC and mitigation and or compensation would be significant barriers to development. No access to local food store or local health centre.
SA-0047-WAL	Land south of Bosty Lane, Aldridge, Walsall - Land south of Bosty Lane, Aldridge.	Highest Greenbelt and Landscape harm. Significant impact on the visual character of the area which could also have a wider impact. Small area of employment possible to extend the existing employment area. No access to a primary school, local health centre or food centre The whole site is a SLINC and mitigation and or compensation would be significant barriers to development.
SA-0050-WAL	Land east of Longwood Lane, Daisy Bank, Walsall,	The local highway upgrade requirements, the history of untreated limestone, importance for the retention of trees and hedges and the impact on ecology if lost are significant issues. Its green belt harm is recorded in the green belt study as high harm. No access to a primary school, local health centre or food centre which would require mitigation.

Site Reference	Site Name	Reason for Rejection provided by BCA
	WS5 3AT - Land east of Longwood Lane	
SA-0053-WAL	118 Little Hardwick Road, Streetly, WS9 OAF - Land to the rear of 118 Little Hardwick Road	Significant tree planting exists and a tree survey and ecology survey is required recommendations of which could significantly reduce the developable area as remaining trees could have an impact on future occupiers. Any loss of trees could be mitigated in part through replanting as part of a landscaping scheme but all of the issues and solutions are significant and any additional information is unlikely to resolve this. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. No access to a primary school, local health centre or food centre which would require mitigation.
SA-0061-WAL	Bosty Lane, Aldridge, Walsall - Land to the South of Aldridge School	Further assessments in respect of trees, ecology and loss of public open space required. Significant impact on the visual character of the area which could also have a wider impact. Relocation of school here would also have implications, however there could be more scope for mitigation and sympathetic design than for Housing or Employment development. The landscape sensitivity assessment makes the distinction that "Employment Development as large-scale built form" has a moderate-high sensitivity and later explains that sensitivity is reduced by the presence of large-scale commercial buildings and agricultural sheds. A school here would only require a small portion of the site for buildings as there is a need for playing fields so would not be large-scale so can be scored moderate landscape sensitivity in relation to a school with playing fields. For this reason only it is considered that the development of a school here would score a 4 (i). However the need for housing to facilitate the school or any mixed use is a significant barrier to bringing forward this site and it score a 5 for this reason. No access to a primary school, local health centre or food centre which would also require mitigation.
SA-0102-WAL	Sunny Bank Quarry	Open space which the draft open space study did not consider to be surplus
SA-0149-WAL	South of Daniels Lane and east of Erdington Road, Aldridge	Housing development would have significant harm to the purposes of the green belt, and the excessive projection of the parcel into an area of green belt characterised by open fields is significant in terms of visual amenity due to the relationship to adjacent land and prominence because of the topography here. Employment uses do not form any local character and would have greater harm. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. In addition the site is within 250m of the access to a permitted minerals working site Branton Hill Quarry. The main effects of mineral extraction are noise, dust, vibration and quarry traffic which is a significant barrier to housing development.
SA-0167-WAL	Land East of Bosty Lane Farm, Land to the rear of 414 Bosty Lane, Aldridge	Withdrawn, unwilling land owner
SA-0183-WAL	Bosty Lane Farm	Withdrawn, unwilling land owner
SA-0188-WAL	Aldridge School, Tynings Lane, Walsall	The suitability of developing this site hinges on a land swap in relation to land subject to a site assessment SA-0061-WAL and on housing development being supported to the South which are significant issues. The on-site constraints for this are limited provided open space can be mitigated for. No access to local food store or local health centre which would require mitigation.
SA-0211-WAL	Fairview Nurseries, Land between Birch Lane, Chester Road and Back Lane.	The harm to greenbelt purposes, landscape and visual amenity would be significant and detrimental to the existing character of the area, in terms of the parcel and in terms of the adjoining land. The existing highway would need to be upgraded and it would need to be determined what extent this would need to take which could have a significant impact on the viability of development. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel shall take place. No access to a primary school, secondary school, local health centre or food centre would also raise significant issues.
SA-0212-WAL	Nuttalls Farm, Land Between Stonnal	The harm to greenbelt purposes, landscape and visual amenity would be significant and detrimental to the existing character of the area, in terms of the parcel and in terms of the adjoining land. The topography which is higher to the West would have significant visual amenity impacts.

Site Reference	Site Name	Reason for Rejection provided by BCA
	Road & Hobs Hole Lane.	The existing highway would need to be upgraded and it would need to be determined what extent this would need to take which could have a significant impact on the viability of development. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to local food store or local health centre also requires mitigation.
SA-0213-WAL	South of Hobs Hole Lane	The existing topography helps to define the urban areas from the countryside, the loss of this site to development would lose this defined line and represents encroachment which if allowed may be difficult to justify resisting further encroachment, having significant detrimental impacts on the visual amenity. The existing highway would need to be upgraded and it would need to be determined what extent this would need to take which could have a significant impact on the viability of development. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to local food store or local health centre which would also require mitigation.
SA-0215-WAL	South of Druid's Heath Farm & West of Back Lane	The site if developed in isolation would have a significant impact on the green belt, landscape and visual amenities of the area due to the existing semi-rural character and topography of the parcel. Noise from the motocross track is likely to be unacceptable to residential occupiers of potential housing. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to a primary school, local health centre or food centre.
SA-0216-WAL	Land West of Gould Firm Lane	High green belt and landscape harm in combination with residential uses being out of character have significant impacts. The parcel would also require upgraded highway infrastructure and additional land to provide footpaths. In particular employment uses would need significant wider highway upgrades. Residential and employment uses could have a detrimental impact on the existing neighbouring leisure uses. Some limited leisure use here might have more potential. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to a primary school, local health centre or food centre would also require mitigation.
SA-0220-WAL	Land East of Erdington Road, adjacent Knights Hill	High green belt harm combined with significant visual amenity impacts due to topography and which would result in the loss of its existing semi-rural character for which there is no mitigation. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to local food store or local health centre requires mitigation. Employment uses would have a greater impact on character in terms of visual amenity due to the character context and its prominent position due to topography.
SA-0222-WAL	Land rear of houses on Knights Hill West of Erdington Road	The combination of constraints such as tree retention and relationship to any development impacts significantly on the developable area, this combined with the lack of footpaths and the context and character of this part of Erdington Road which forms part of the transition between the urban and the rural are all significant issues. In addition employment uses have significant noise and visual amenity impacts. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to local food store or local health centre would also require mitigation.
SA-0223-WAL	Land South and South West of Shrubbery Cottage	The character of the area and size of the parcel means that development of the parcel would have significant detrimental impacts on the landscape character which cannot be mitigated for and which could impact on the character of Streety as well as this part of Aldridge. In addition the pylons are a significant constraint which would limit any proposed layout for development. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to a primary school, local health centre or food centre would also need mitigation.
SA-0224-WAL	Valley Nurseries Between Erdington Road & Barr Common Road	High green belt and landscape harm and the location is not sustainable, additional footpaths required to link the parcel to the urban area amount to significant issues which cannot be mitigated for or are unviable. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No nearby Health Centre or Food Centre would also require mitigation.
SA-0225-WAL	Land South of Alder Tree Grove, Between	Significant harm to the purposes of the green belt and would be a prominent development out of character with its surroundings, employment use could be detrimental to neighbouring houses and houses would not be sustainably located requiring new footpaths which could be subject to gateway constraints and are at least significant issues. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place.

Site Reference	Site Name	Reason for Rejection provided by BCA
	Erdington Road and Barr Common Road	No access to local food store or local health centre also requires mitigation.
SA-0226-WAL	Land Between Longwood Road & Erdington Road, South of Barr Common Road	The combination of the high greenbelt and landscape harm and the impact on visual amenity due to its steep topography would be very significant and would have wider impacts significantly detrimental to adjacent land. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to local food store or local health centre also requires mitigation.
SA-0227-WAL	Corner of Little Hardwick Road & Erdington Road	Built development would be out of character and have significant visual impact harm, however they may be an opportunity to expand the adjoining cemetery/crematorium uses without leading to significant unacceptable impacts. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to a primary school, local health centre or food centre would require mitigation for some types of development.
SA-0228-WAL	Birch Wood, Potters Wood, Land South of the Dingle	The parcel has protected trees and ecological and amenity value which cannot be mitigated for and which if developed the remaining area would result in high harm green belt and landscape harm combined with significant visual amenity impacts which cannot be mitigated for. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place. No access to a primary school, local health centre or food centre would also require mitigation.
SA-0229-WAL	Land South of Streetly Cemetery and between Little Hardwick Road and Foley Road West	The topography, high green belt and landscape harm combined with significant harm to visual amenity are significant constraints to any development here for which mitigation is not possible. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place.
SA-0230-WAL	Land North of Beacon Hill	The combination of the green belt and landscape harm and significant detrimental harm to visual amenity due to the topography from houses, the highway and Barr Beacon would have significant detrimental consequences for the character of the area and would likely result in little justification for retaining adjoining parcels. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. No access to a primary school, local health centre or food centre would also require mitigation.
SA-0244-WAL	Land Between Back Lane & Chester Road	The land has a high agricultural rating and its topography ensures that there would be significant local and wider visual harm at significantly at odds with the parcels surroundings and existing character in addition the highway works to achieve a safe access are extensive and could be a significant cost barrier. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No nearby bus route and no access to a primary school, secondary school, local health centre or food centre all would require mitigation which may not be viable.
SA-0245-WAL	Land South of Hobs Hole Lane corner of Chester Road	High green belt and landscape harm. Small plot, mainly a pond, mitigation required outside of the parcel, scope to be included with CFS 317 could provide visual and drainage mitigation. On the basis that additional land is required the parcel this is a significant constraint in addition to the high green belt and landscape harm. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to a primary school, local health centre or food centre, mitigation not viable.
SA-0248-WAL	Land adjacent Irish Harp, North of Little Aston Road	The parcel is in a high green belt and landscape harm area and development would cause significant visual amenity harm due to the character of the area and topography, in addition highway constraints are likely to be a financial barrier. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel shall take place. No access to a primary school, local health centre or food centre also requires mitigation.

Site Reference	Site Name	Reason for Rejection provided by BCA
SA-0251-WAL	Between Little Aston Road & Chester Road	High green belt and landscape harm and significant local visual harm to the semi-rural character of the area in respect of residential and a greater impact from employment uses which are also not compatible with adjacent land uses likely to require mitigation and restrictions which make such uses unviable. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel shall take place. No access to a primary school, local health centre or food centre.
SA-0266-WAL	Land South of Little Aston Road and East of Green Lane	Highest green belt harm and landscape sensitivity additional significant constraints include visual harm due to unfavourable topography and lack of suitable highway infrastructure in particular to support employment uses. Residential would be more in character with existing uses, which is why the score is lower. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel shall take place. No access to a primary school, local health centre or food centre also requires mitigation.
SA-0284-WAL	Berryfields Farm	Highest greenbelt harm and landscape sensitivity, in addition it would have significant local and wider visual amenity impacts due to the topography. No access to a primary school, local health centre or food centre also requires mitigation.
SA-0289-WAL	Hay Head Farm North	Highest green belt and landscape harm, untreated limestone reduces the developable area but still some potential for development especially if combined with adjacent sites to form a more comprehensive scheme. However these parcels are further North from Sutton Road and introduce more significant visual amenity harm. No access to a primary school, local health centre or food centre which requires mitigation.
SA-0292-WAL	Land adjacent and to the East of 15 - 17 Longwood Lane	Highest green belt and landscape harm, visual amenity impact and impact on character would be significant. Highway improvement requirements could be considered less than significant if combined with adjacent sites however these too have similar significant issues. No access to a primary school, local health centre or food centre also requires mitigation.
SA-0294-WAL	North of Sutton Road Between Front of Three Crowns	Highest green belt and landscape harm and the parcel is a strong part of the character and transition of the urban to the semi-rural, the narrow strip would prevent the type of housing which defines the character of the area and is a significant constraint. No access to a primary school, local health centre or food centre.
SA-0296-WAL	Corner of Longwood Road and Beacon Hill	Significant constraints including trees and no obvious options to achieve safe access, the shape of the parcel also limits opportunity to accommodate more than a couple of small houses which would not be in keeping with existing residential development here, in a prominent location. Employment use would likely be unviable due to the close proximity of houses. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. No access to a primary school, local health centre or food centre also required mitigation.
SA-0008-WAL	Land off Walsall Road, Walsall Wood, Walsall, Highfields North.	Highest green belt and landscape harm. Impact on Ecology and Trees cannot be mitigated, development likely to lead to increased flooding issues or require significant mitigation. In isolation of other call for site submissions this site would be better suited to employment uses, however constraints are significant. Significant noise mitigation may be required to take account of neighbouring employment uses. In addition the site is within 250m of the access to a permitted minerals working site Highfields North. The main effects of mineral extraction are noise, dust, vibration and quarry traffic which is a significant barrier to housing development. The ecology constraints are considered to amount to a gateway constraint to developing the site for housing. The site is believed to be in agricultural use and is graded 2 which is very good quality. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel, shall take place.
SA-0029-WAL	Off Walsall Wood Road - Land at King Hays Farm	The combination of constraints are significant and considered to severely limit potential redevelopment of the site. A scheme which takes account of the SINC, existing significant trees/hedges, existing flooding issues, impact on visual would severely limit the capacity for the site to deliver housing or employment. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place.



Site Reference	Site Name	Reason for Rejection provided by BCA
		No access to local food store or local health centre which would require mitigation.
SA-0032-WAL	Green Lane, WS9 9BE - Walsall Wood	Ecology impact is a significant barrier to development, whole site is a SLINC and adjacent sites are SLINC's. Also character of development defined by existing houses on Green Lane, part of the site could be delivered for housing subject to Ecology considerations. Employment uses could be limited due to existing local road infrastructure. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel and brick clay shall take place. No access to local food store or local health centre which requires mitigation.
SA-0054-WAL	Land at Castle Hill Road, Walsall, WS9 9DR - Land at Castle Hill Road	The proposal is not comprehensive and if developed on its own would be an incongruous and prominent protrusion into the greenbelt and would have considerable harm the character and visual amenity of the remaining surrounding greenfield parcels. The protected trees, potential flooding implications to adjacent sites and the harm which could arise to the visual amenities of the area would be significant. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel and brick clay shall take place. No access to a primary school, local health centre or food centre would also require mitigation.
SA-0059-WAL	Land at Greenwood Road and Lazy Hill Road, Aldridge, Walsall - Land at Greenwood Road and Lazy Hill Road	Development here could cause significant harm to the visual amenities of the wider area due to the topography surrounding the site which the adjacent bungalows have been designed to take account of. In addition the site scores high green belt and landscape harm. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel shall take place. No access to a primary school or local health centre would also require mitigation.
SA-0062-WAL	Land R/O 10 - 30 Castle Road, WS9 9BY, Walsall Wood - Land R/O 10 - 30 Castle Road	Housing would be subject to noise mitigation and placement of houses to take account of the SINC and protected trees, could impact on the number of units and are significant issues. SUDS required to ensure to increase in flooding to adjacent site. Employment uses would be out of character and could have unacceptable amenity impacts on existing neighbouring residents. The site is to the South of the VIGO Fault and information has been requested to determine whether this issue is a gateway constraint, significant issue or if the site falls outside of the scope of the fault. In the absence of clarification this is also a significant issue. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place.
SA-0186-WAL	Greenwood Road - 1, 2, and 3 Greenwood Road.	The combination of constraints is considered to limit potential redevelopment of the site and are significant issues. A scheme which takes account of the SINC, existing significant trees/hedges, existing flooding issues, impact on visual amenity would impact on the capacity for the site to deliver housing or employment. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place. No access to a primary school or local health centre
SA-0195-WAL	Jockey Fields West of Hall Lane	The parcel has high green belt and landscape harm. If the SLINC was retained and only the remaining 10% of the parcel was developed this area would be to the North. The Western part of this parcel is not large enough to provide an acceptable residential scheme and the area that could be developed too small to allocate in the plan. The ecological context and site designation are significant barriers to developing this parcel. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for Brick Clay shall take place. Existing road capacity is also a significant issue. No access to a primary school or local health centre would also require mitigation.
SA-0197-WAL	Jockey Fields East of Green Lane	The harm to the green belt in particular due to the shape of the parcel and its protrusion into the countryside would be significant and would compromise retention of adjoining land within the greenbelt. The Ecological issues are also likely to be significant and could be a barrier to development if not reason to reduce the developable area. Green Lane is narrow and has no footpaths, Black Cock bridge is single lane and existing junctions already have capacity issues, no clear highway solution due to existing constraints are all significant issues. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for Superficial Sand and Gravel and Brick Clay take place.

Site Reference	Site Name	Reason for Rejection provided by BCA
		No access to a primary school or local health centre would also require mitigation.
SA-0202-WAL	Grange Farm & Railswood Farm, land between Pelsall, Clayhanger and Maybrook Industrial Estate.	Smaller parcels within the site may be achievable tagging onto Clayhanger without having a significant impact on the highway network, however capacity needs to be confirmed and a reliance on adjacent land are significant issues and its proximity to the sewage works is a constraint. Highway Officers consider that to develop the whole site would require significant highway modifications which are considered by the site assessment officer prohibited by gateway constraints outside of the parcel. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for Bedrock Sand and Gravel and Brick Clay take place. No access to local food store or local health centre requires mitigation.
SA-0204-WAL	Gorse Farm, Lazy Hill	In green belt, landscape and especially in terms of visual amenity development of this parcel would have a significant detrimental impact on the character of the area. Much of the site is unsustainable, there is no public transport on Chester Road or nearby food centre and a comprehensive scheme would be required to deliver residential. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel shall take place. Also in addition no access to a primary school or local health centre.
SA-0205-WAL	Land South of Lazy Hill Wood, King's Hayes Fields	There would be significant green belt and landscape sensitivity harm from developing this site. In addition significant impact on the local visual amenities of the area. An employment use in particular would be out of character and have a significant impact on neighbouring residents. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel and brick clay shall take place. No access to a primary school or local health centre would also need mitigation.
SA-0206-WAL	Land North of 154 Lazy Hill Road	The combination of the topography and intrusion into the greenbelt to the North having wide visual impacts is considered significant and unfavourable to releasing the parcel for residential development. Employment here is likely to have additional unacceptable impacts. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel shall take place. No access to a primary school or local health centre
SA-0257-WAL	Land South of 17a The Barn, Northgate, King's Hayes Field.	Highest green belt and landscape harm. Tree retention and ecological mitigation would have a significant impact on site capacity and is likely to be a barrier to development and would not meet the minimum allocation size for inclusion in the Black Country Plan. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place.
SA-0272-WAL	Land North of 3 Ashton Drive	Would provide very limited development and could be to the detriment of high quality agricultural land. Trees are likely to be required to be retained which would be a significant issue to developing this site. Employment use would be incompatible with residential houses here. No access to local health centre which requires mitigation.
SA-0275-WAL	Jockey Fields Rear of Horse and Jockey	The lack of access represent significant insurmountable issues in this assessment, although potential to combine with adjacent sites is considered, these site score poorly for other gateway reasons so are unlikely to be acceptable sites for development. In addition the site is within 250m of the access to a permitted minerals working site Highfields North. The main effects of mineral extraction are noise, dust, vibration and quarry traffic which is a significant barrier to housing development. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel and brick clay shall take place. No access to a primary school also requires mitigation.
SA-0001-WAL	Land At Site Of Former 273 Walsall Road, Darlaston	In this instance acquiring additional land to unlock the potential of a very small site, which would in any case still have a difficult access and could result in a contrived development. No access to local food store. Limited housing development potential. Flats may be possible if additional land is acquired for access off Heath Road.

Site Reference	Site Name	Reason for Rejection provided by BCA
		Proximity to residential houses, the school, the small size of this plot and the difficult access is considered to limit potential of site to be used for employment land. The above issues are significant. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel, shall take place.
SA-0315-WAL	Land at Kendricks Road, Heath Road and Station Street	Already developed employment site with no vacant units, significant constraints for residential development in terms of noise. Loss of employment use a significant constraint and most appropriate use. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place.
SA-0010-WAL	Land at Former Goscote Hospital Site, Goscote Lane, Walsall, WS3 1SJ	Tree constraints are a significant issue to delivering the numbers of residential units proposed. The SLINC could reduce the developable area by 1.4ha. Employment use with the retention of the residential care facility would not be compatible with the surrounding area and restrictions/mitigation unviable amounting to a gateway constraint for such uses.
SA-0276-WAL	Field House Farm	The combination of constraints, trees, ecology, flood risk, noise access, required highway improvements are significant issues especially considering the small size of the parcel and mitigation for all issues unlikely to be achievable. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. No access to local food store also requires mitigation.
SA-0274-WAL	Land adjacent Goscote House Farm	High green belt and landscape harm, significant impact on visual amenity and significant reduction to the developable area due to flood risk which would also be a barrier to the highway infrastructure upgrades required. These are significant constraints which would be difficult to overcome. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. No access to local food store or local health centre also requires mitigation.
SA-0085-WAL	Bloxwich Hospital Reeves Street, Walsall -Bloxwich Hospital	It needs to be determined if a residential use can be accommodated in terms of noise mitigation without harm to the conservation asset. Further information is required. Aside from this outstanding matter the site is already developed and in a sustainable area. However the submission has been submitted on the basis that another location is required for the hospital and this is a significant constraint.
SA-0051-WAL	Chester Road North, WS8 7JR, Brownhills, Walsall - The Rising Sun	Although the opportunities highlight the benefits to redeveloping this site, the extent of the proposed boundary is considered would result in significant harm to the character of the open space and visual amenity. Residential is considered to be more suitable than employment due to the proximity to existing housing and the public open space, however a safe access onto the A5 has not been demonstrated and is also a significant issue. In addition the site is within 250m of the access to a permitted minerals working site Brownhills Common. The main effects of mineral extraction are noise, dust, vibration and quarry traffic which is a significant barrier to housing development. No access to local food store or local health centre
SA-0138-WAL	Watling Street, Land off Hannay Hay Road	In isolation this site if developed would have a significant detrimental impact on local visual amenity, would relate poorly with adjacent undeveloped land and be isolated. Safe access cannot be achieved due to the proximity of the railway bridge and the narrowness of Hannay Hay Road. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for Bedrock sand and gravel shall take place. No access to a primary school, local health centre or food centre
SA-0200-WAL	Johnsons Farm & Meadow Farm, Lichfield Road and Barracks Lane	Development would alter the character of the area but there are limited if any significant impacts. Footpaths are required along The sustainability of the site and access to services may present issues of viability and deliverability and highway infrastructure improvements would be required, however these improvement can be achieved using land within the parcel and would not be extensive. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for Bedrock Sand and Gravel take place.

Site Reference	Site Name	Reason for Rejection provided by BCA
		There are no significant impacts other than whether the site can be delivered within the plan period, on the basis that this question is currently inconclusive the issue is considered to be less than significant, but must be resolved. No access to a primary school, local health centre or food centre would require mitigation.
SA-0201-WAL	Land adj 92, Land off Hanney Hay Road, Land to the rear of 116, Land to the East of 116.	The site is not sustainable developed in isolation and would require highway upgrades, the railway bridge is also a significant constraint for pedestrian access to Chasetown. Speed reduction and island improvements are also significant highways constraints. Significant amenity mitigation may also be required from the railway and the A5. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for Bedrock Sand and Gravel take place. No access to a primary school, local health centre or food centre require mitigation.
SA-0242-WAL	Stevies Stables, Pelsall Road, Brownhills, WS8 7DL	Residential would be out of character and offer a poor environment for any occupants due to the neighbouring uses. An employment use could be acceptable subject to mitigation in relation to ground contamination, however the parcel is too limited to justify allocation in the plan. No access to a primary school, local health centre or food centre.
SA-0243-WAL	Land South of Stevies Stables, Pelsall Road.	Residential would be out of character and offer an unacceptable environment for any occupants due to the neighbouring employment uses. An employment use could be acceptable subject to mitigation in relation to ground contamination. No access to a primary school, local health centre or food centre which require mitigation in relation to residential. The site is below the threshold for allocation in the Black Country Plan.
SA-0020-WAL	Land north of Park Hall Road, Walsall - Land north of Park Hall Road, Walsall	There are the following significant constraints: Potential loss of established trees, impact of the development on the conservation area, loss of ecology, Visual amenity impact, the site provides a visual buffer between Bar Beacon and the urban area, potential the loss of best and most versatile (BMV) agricultural land. In addition potential highway work would be significant and could have capacity restrictions for number of units on site and viability. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place. No access to a primary school or local health centre which requires mitigation.
SA-0035-WAL	Skip Lane Walsall	Loss of protected trees and ecology SLINC status are significant constraints to developing this site, in addition the site is within the conservation area. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place. No access to a primary school or local health centre
SA-0304-WAL	The Skip	There are established trees the loss of which would be a significant issue and the retention of any would likely result in the developable area being reduced below the threshold required for the Black Country Plan. The site is therefore reliant on adjacent sites being acceptable but which have other additional significant issues. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay take place. No access to local food store or local health centre which requires mitigation.
SA-0305-WAL	Land to the East of 113 Park Hall Road	High green belt and landscape harm combined with high ecological value and a number of established trees worthy of retention are all significant issues. The parcel is not suitable for employment uses due to the proximity to houses. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay take place. No access to local health centre would also require mitigation. Adjacent sites also have significant issues if the site was combined to make a more comprehensive site.
SA-0071-WAL	Land off Allen's Lane, Pelsall - Land off Allen's Lane, Pelsall, West Midlands.	The site area which could be developed is significantly reduced by gateway constraints. The impact of development on the visual amenities of the area in a local or wider context would be significant due to the existing openness and unfavourable topography which offer views of the site from a wide area. There would be a high greenbelt harm and moderate high harm in relation to landscape sensitivity. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel, shall take place. No access to local food store which would require mitigation.

Site Reference	Site Name	Reason for Rejection provided by BCA
SA-0196-WAL	Leyland's Farm North of Wolverhampton Road	The combination of issues including high green belt and landscape harm, including in particular the merging of Pelsall and Goscote/Little Bloxwich, and taking account of the impact development would have on the character of the area and visual amenity, all raise significant issues. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for Superficial Sand and Gravel take place. No access to local food store or local health centre would also require mitigation.
SA-0250-WAL	Land Rear of 76 to 84, Fairburn Crescent	The loss of public amenity would require significant mitigation which is likely to reduce the developable area or require additional land, the impact on visual amenities of adjacent residents and users of rights of way and the canal would be significant. Employment use access cannot be achieved. No access to local food store or local health centre would need mitigation.
SA-0278-WAL	Goscote Wedge	The combination of flood risk, loss of trees and habitat in an area of high ecological value, ground contamination constraints and impact on visual amenity when taking account of the small size of the parcel are significant constraints to residential development, an employment use would have an unacceptable impact on residents. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place.
SA-0036-WAL	Skip Lane, WS5 3NB	The SLINC status, requirement for extra land to provide access, existing tree planting and potential Ecology considerations are significant constraints to developing the site for which not all could be mitigated. The relationship of the site to existing residential combined with the potential highway requirements here are barrier to employment uses. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place. No access to a primary school, local health centre or food centre which would require mitigation.
SA-0153-WAL	Former Queslett School	The site would likely be constrained due to the retention of trees, protection of Ecology and unfavourable topography to the South which are significant issues for housing. Its position near to housing are a barrier to employment uses. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. No access to a primary school which requires mitigation.
SA-0232-WAL	North of Barr Lakes Lane	The scale of the development may justify a road linking Sutton Road to Birmingham Road which is a significant constraint taking account that there are gateway constraints which would prevent this. No access to a primary school, local health centre or food centre. Subdivision of the parcel is considered however any development within the parcel contributes to the erosion of the distinct semi-rural character part of the Barr Beacon landscape which is a significant issue which cannot be mitigated. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place.
SA-0235-WAL	Beacon Farm	The impact on green belt and landscape harm, significant impact on visual amenity due to proximity with Barr Beacon combined with the highway constraints and character constraints cannot be completely mitigated for and could all have wider issues which would also cause significant harm. Road infrastructure requires significant upgrades. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel and brick clay shall take place. No access to a primary school, local health centre or food centre.
SA-0237-WAL	Land associated with Beacon Farm and Crook Cottage	High green belt and landscape harm, significant visual amenity harm from local and wider context especially taking account of the views from Barr Beacon. Road infrastructure requires significant upgrades. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place. No access to a primary school, local health centre or food centre requires mitigation.
SA-0238-WAL	Pastures South of Barr Lakes Lane to Chapel Lane.	High green belt and landscape harm and significant visual amenity harm in wider context especially taking account of the views from the Beacon. Road infrastructure requires significant upgrades. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place. No access to a primary school, local health centre or food centre which would also require mitigation.
SA-0239-WAL	Beacon Dairy Farm	High greenbelt and landscape harm and significant visual amenity harm in local and wider context. Road infrastructure requires significant upgrades.



Site Reference	Site Name	Reason for Rejection provided by BCA
		The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. No access to a primary school, local health centre or food centre also requires mitigation.
SA-0240-WAL	Foxhills Farm	High green belt and landscape harm and significant visual amenity harm in local and wider context. Road infrastructure requires significant upgrades. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. No access to a primary school or local health centre which would require mitigation.
SA-0241-WAL	Old Hall Farm	High green belt and landscape harm and significant visual amenity harm in local and wider context. Road infrastructure requires significant upgrades. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place. No access to a primary school or local health centre which would require mitigation.
SA-0291-WAL	Brookside Farm, Longwood Lane	Highest green belt and landscape harm, visual amenity impact and impact on character would be significant. Highway improvement requirements could be considered less than significant if combined with adjacent sites however these too have similar significant issues. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. No access to a primary school, local health centre or food centre also requires mitigation.
SA-0297-WAL	Amenity Land Between Sutton Road adjacent The Three Crowns	Highest Green Belt harm and high landscape harm and significant impact on visual amenity which cannot be mitigated for, due to the small size of the parcel. Employment uses in addition would have significant noise and disturbance impacts which also cannot be fully mitigated for. No access to a primary school, local health centre or food centre.
SA-0301-WAL	Orchard Hills, Daisy Bank & other houses	Green belt and landscape harm are in the highest categories. There is no suitable access without acquiring additional land and any residential use would require design which accommodates the existing case use which would be a significant issue. No access to a primary school or local health centre also requires mitigation.
SA-0302-WAL	Beacon Farm Land to the West	The parcel is in the highest green belt and landscape harm, in addition there would be a significant detrimental impact on the visual amenities of users of Barr Beacon and the lack of suitable highway infrastructure and its remoteness to services are all significant constraints to development here. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for brick clay shall take place. No access to a primary school, local health centre or food centre also requires mitigation.
SA-0252-WAL	Linley Farm South of 34 Bosty Lane.	Highest green belt and high landscape harm combined with significant noise and ground stability issues mean that this parcel has some significant constraints for residential development and employment uses are not considered compatible with adjacent uses.
SA-0265-WAL	Land South of Manor Farm Buildings	Very high green belt harm and landscape sensitivity combined with limestone issues, access and noise mitigation and restrictions. Residential would be more in character with existing uses, which is why the score is lower than employment however the impact on the character of the open space would be significant too. No access to a primary school, local health centre or food centre also requires mitigation.
SA-0267-WAL	Land South of Lady Pool	It is high harm green belt and landscape sensitivity and the land level difference and access restrictions are significant, especially for commercial which are insurmountable. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. No access to a primary school or local health centre.
SA-0280-WAL	Land rear of houses on Barns Lane and Lichfield Road	Although residential in some form could be achieved with mitigation there is no access and potential is limited due to existing development and gateway constraints around the parcel, if houses on Barns Lane were removed to facilitate development it is likely that only the same number as those lost can be achieved. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place.
SA-0019-WAL	Land at Stencils Farm, Aldridge Road	The site has a number of constraints which would need to be incorporated into any housing scheme. There would be a significant visual impact if the site was developed.

Site Reference	Site Name	Reason for Rejection provided by BCA
	(A454), Walsall, WS4 2JW - Land at Stencils Farm, Walsall	No access to a primary school, local health centre or food centre which requires mitigation. The assessments referred to in the submission would also be relevant, however the significant impacts already raise significant issues.
SA-0066-WAL	Land at Stencil's Farm, Aldridge Road, Walsall, WS4 2JW	The site has a number of constraints which would need to be incorporated into any housing scheme. However there would be a significant visual impact due to the topography and proximity of the site near to areas of space which are accessible to the public. In addition there is no mitigation for these significant impacts. The assessments referred to in the submission would also be relevant. No access to a primary school, local health centre or food centre.
SA-0269-WAL	Land North of Harpur Close, Rushall Hall Farm	Highest green belt harm and high landscape sensitivity harm, flood risk mitigation would reduce the developable area, air quality and ground contamination mitigation likely required, significant visual amenity impact and no obvious access. A combination of high harm and significant constraints, employment use would have further amenity and character impacts which are insurmountable. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for superficial sand and gravel shall take place. No access to a primary school or local health centre also need mitigation.
SA-0288-WAL	Land East of Longwood Cottage, Calderfields.	Highest green belt and landscape harm, potential to overcome some or all of these especially if combined with adjacent sites to form a more comprehensive scheme however both have significant visual amenity harm due to the existing semi-rural character. No access to a primary school, local health centre or food centre also requires mitigation.
SA-0231-WAL	Land West of Aldridge Road	Although development on this lower parcel has less visual amenity impact than the higher Western portion its prominence and impact in combination with the high greenbelt and landscape harm would still be significant. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel, shall take place. No access to a primary school, local health centre or food centre also requires mitigation.
SA-0236-WAL	Blue House Farm	The site scores highest green belt and landscape harm in addition it is considered that the topography is unfavourable compared to land to the South making the site significantly more prominent and resulting in development closer to Barr Beacon than the Pheasey estate. This relationship would result in significant visual amenity harm. The site is in a MSA and requires mitigation. Where practical and environmentally feasible prior extraction for bedrock sand and gravel shall take place. No access to a primary school, local health centre or food centre would also need mitigation.

## 6.4 Sandwell

**Table 6.6: Sandwell Selected / Rejected Sites**

Site Ref	Site	Selected/ Rejected	Reason for Selection/Rejection provided by BCA
SA-0045-SAN	Legacy 43, Ryder Street, West Bromwich	Selected for employment	<p>Site was identified as having potential for employment land through the EDNA review. It concluded that the site would be suitable for employment uses.</p> <p>The site assessment assessed the site for employment use and found that the area is mainly industrial and the introduction of further employment land into the area would be acceptable. Given the existing industrial uses in the area, I do not foresee how the site could come forward for redevelopment other than employment land</p>
SA-0025-SAN	Land off Overend Road, Cradley Heath Business Park	Selected for employment	<p>The site was put forward through the Call for Site process for employment use and was assessed as part of the BEAR and has been allocated as a EMP3 - Local employment site.</p> <p>The site assessment assessed the site for employment use and found that the site has permission for industrial uses the most recent in 2017 which is now almost complete. The site is 80% occupied by industrial uses with the River Stour acting as a buffer between residential to south. The site is allocated for local employment and given the nature of the northside of Overend Road (i.e. predominantly industrial) residential use of this land is not appropriate and should be safeguarded for employment</p>
SA-0026-SAN	Land at Coneygre, Newcomen Drive, Sandwell	Selected for employment	<p>The site was submitted through the Call for Sites process for employment use. The EDNA found that although the site is currently allocated for residential use it has potential for B2/B8 use due to residential viability issues.</p> <p>The site assessment assessed the site for employment use and identified the site as being vacant land within an industrial estate. It had constraints due to mining legacy but was suitable for employment use.</p>
SA-0027-SAN	Land at Birchley Island, Junction 2 of M5, Oldbury, Sandwell	Selected for employment	<p>The site was submitted through the Call for Sites process for employment use and assessed through the EDNA, this found that it is potentially suitable for high quality employment space and is a site that should be prioritised for development due to the location, size and potential massing opportunity on site.</p> <p>The site assessment assessed the site for employment use and found that the site is allocated for high quality employment and has historically benefited from permission for office uses/casino/hotel uses the most recent in 2015 for a restaurant/public house use expired in October 2018. The proximity of the M5 junction 2 which is known to be a high air quality area, pollution and noise are key environmental considerations.</p> <p>The site is allocated for high quality employment and given the constraints regarding pollution should be safeguarded for employment use.</p>
SA-0030-SAN	Whitehall Road, Tipton	Selected for employment	<p>The site was identified through the EDNA process and was assessed for employment use only. The EDNA found the site was potentially suitable for development in the light of market interest.</p> <p>The site assessment assessed the site for employment use and found that the site lies within Tennants Distribution inner zone, making it unsuitable for residential development.</p>
SA-0044-SAN	British Gas, Land off Dudley Rd, Oldbury	Selected for employment	<p>Site was assessed as part of the EDNA process for employment use. THE EDNA found that the site would suit a smaller scale local business/ operator. The area is well linked to the wider motorway network and envisage it will be attractive to the market. It concluded that it was suitable for B1 light industrial use.</p> <p>The site assessment assessed the site for employment use and found mineshafts and pipelines are considerable obstacles to development. The ecological condition of the site is unknown, but the presence of many semi-mature trees indicates that the site</p>

Site Ref	Site	Selected/ Rejected	Reason for Selection/Rejection provided by BCA
			has been untouched for many years and may well now contain protected species. The immediate road network is not suitable for safe cycling. The surrounding uses would be compatible with this site as employment land.
SA-0042-SAN	Land Adj To Asda Wolverhampton Road Oldbury	Selected for employment	Site was submitted through the Call for Sites process for employment use and assessed through the EDNA process. It found that the site was potentially suitable for B2/B8 use subject to addressing the issues raised through the recent refusal of a planning application for B2, B8 uses.
			The site was subsequently assessed for both employment and residential use. There are no red ratings associated with an employment use on this site, the site is already allocated for such a use, however the recent refusal of the employment use has indicated that the site has constraints which need to be mitigated to protect residential amenity, provide appropriate access and ensure that a future scheme does not cause severe congestion on an already busy highway network. Potential red ratings associated with a residential use on this site for access and traffic generation, but would depend on the size of the development. As the site owners proposed employment and is therefore available for that use and the site assessment and EDNA both found that use suitable, it was proposed to allocate for employment use.
SA-0043-SAN	Rounds Green Road/Shidas Lane, Oldbury	Selected for employment	The site was identified through ENDA which found that it was potentially suitable for B2/B8 industrial use and as it is currently designated for employment use this should be retained.
			The site assessment assessed the site for employment use and found that the site currently has no valid planning approval since the previous land use as a lagoon associated with an industrial premise ceased. The lagoon itself has been infilled with inert material and the ground reclaimed in accordance with approvals DC/04/42934 and DC/10/52117. Three mineshafts have been identified near to the centre of the site. Surrounding uses all being commercial in nature would be compatible with an employment land use of the site. The site is allocated as a Potential High Quality Emp Land Allocation within the Black Country Core Strategy. Given the surrounding uses are all commercial in nature and the site has good connectivity to Oldbury Town Centre and junction 2 of the M5, the site would be suitable for an employment development.
SA-0028-SAN	Roway Lane, Oldbury, B69 3AY	Selected for employment	Site identified through Call for Sites for employment use. The EDNA work found that it was potentially suitable for B2/B8 industrial use, subject to a layout being configured to create a scheme that is deliverable and utilises as much of the site as economically possible. .
			The site assessment assessed the site for employment use and found amber ratings for land conditions but was suitable for employment use.
SA-6999	Brandhall Golf Course	Selected for employment	This was not assessed as had been to Cabinet and agreed as surplus to requirement and publicly consulted on for development options which all included a residential element, consultants have also been employed to undertake a masterplan exercise for the site. Site selected for housing.
223	Seven Stars Road, Oldbury	Selected for employment	This site has been selected for employment, it was assessed in the BEAR and its score reflected that it should be an EMP3 site and so selected for employment.

Site Ref	Site	Selected/ Rejected	Reason for Selection/Rejection provided by BCA
SA-0001-SAN	Tanhouse Avenue	Selected for housing	Site submitted through the Call for Sites process for residential use. The site assessment assessed the site for residential use and found there are three red ratings for this site relating to views, loss of accessible greenspace and greenfield. This loss could be outweighed by the public benefits of development. Amber ratings relating to loss of public open space and habitat can be overcome through viable mitigation off site. Amber ratings could be overcome by appropriate mitigation measures and planning conditions. The site is suitable for release from the green belt for residential use.
SA-0006-SAN	Charlemont Community Centre, Beaconview Road, West Bromwich	Selected for housing	Site was submitted through the Call for Sites process for residential use. The site assessment assessed the site for residential use and found there are no red ratings for this site. The only amber ratings relate to possible issues with access arrangements. The site is suitable for release from the green belt for residential use.
SA-0020-SAN	Painswick Close Sub Station (b)	Selected for housing	The site was identified through the assessment of Green Belt parcels and was assessed for both residential and employment use. Site assessed for residential and employment use. Part of site was found suitable for residential development with appropriate mitigation from noise/air quality issues arising from proximity to M5/M6 interchange and flood alleviation. The other part of the parcel – SA-0019-SAN was operational land and discounted. Employment land not considered appropriate due to access issues and proximity to existing housing..
SA-0033-SAN	Dudley Road East /	Selected for housing	Site was identified through the BEAR process, however further investigation found it to be a low value employment site. The site assessment assessed the site for both residential and employment use and found it is adjacent to a site allocated for local employment land and is adjacent to a SLINC and Wildlife corridor which follows the existing canal on two boundaries. The site falls within the major consultation zone for a gas pipeline. Although the site is allocated for local employment land, subject to a new site being found for the relocation of businesses, the site suitable for a residential development subject to a consultation with the Health and Safety Executive.
SA-0048-SAN	Brades Road	Selected for housing	The site was identified through the Call for Sites process for residential use. The site assessment assessed the site for residential use and found that the site has limited constraints that could be resolved with mitigation measures. The site is currently interspersed with residential property and commercial and poor quality vacant land, a comprehensive residential scheme could provide opportunity to address the canal frontage and improve access to the canal. The industrial to the west is severed by the canal and there is an existing robust boundary with established trees adjacent the works on Brades Road which would address amenity issues. The site whilst partially constrained by the presence of a gas pipeline, which may impact on the density but this is unlikely to be overly restrictive given that the site falls within a middle zone.
SA-0029-SAN	Edwin Richards Quarry	Selected or housing	Site was submitted through the Call for Sites process. The site was not assessed as it already has planning permission for residential use and therefore the site has already been found suitable and the land owners submitting it as a call for sites demonstrates that the site is available and deliverable for residential use.
SA-0002-SAN	Wilderness Lane, B43 7TB	Rejected	The site was identified through the assessment of Green Belt parcels and was assessed for both residential and employment use. There are five red ratings for this site including parts of the site being a designated SINC and SLINC. Furthermore, the site is adjoined by an area of land of potential significance for nature conservation. The designated allocations may not be outweighed by the public benefits of residential development. Amber ratings are also identified particularly in relation to the proximity of the site to an elevated section of the motorway, although it is accepted that there are existing residential developments as close to the motorway as the proposed site. The site is unsuitable for release from the green belt for homes due to the SINC. It is not suitable for employment as the area is residential in nature and employment would be wholly out of character with the area.



Site Ref	Site	Selected/ Rejected	Reason for Selection/Rejection provided by BCA
SA-0003-SAN	Land off Birmingham Road, Great Barr	Rejected	Site was submitted through the Call for Sites process for residential and employment use. The site assessment assessed the site for both residential and employment use. Constraints for this site relate to the SINC allocation and highways. The site is not suitable for consideration for release from the green belt for housing due to the gateway constraint of the SINC allocation, it also has high historic landscape value.
SA-0004-SAN	Wilderness Lane - Land surrounding Q3	Rejected	The site was identified through the assessment of Green Belt parcels and was assessed for both residential and employment use. There are hard constraints relating to SINC (south) and other constraints relating to loss of school sports pitches, SLINC (north-east) and other constraints on the land. The whole of site is not considered suitable for release. There are very substantial negative effects and development of the area would prejudice the impact of the visual landscape given that land slopes down towards the north west (Walsall Borough Boundary).
SA-0016-SAN	Tamebridge Parkway Station North of Train Station(a)	Rejected	The site was identified through the assessment of Green Belt parcels and was assessed for both residential and employment use. The site was originally assessed as part of a larger parcel and has been reduced in size to reflect the findings of the assessment. The site has a number of constraints owing to the River Thame, the motorway corridor and existing Rail Station (Tamebridge Parkway). The land to the east is also used for residential amenity. The site has too many constraints given its proximity to the motorway, partial flood zone 2 and the existing Tambridge Parkway to be suitable for residential use, this would be incompatible with station due to 24/7 operation and infrastructure to facilitate the development. The site has too many constraints to the east, namely the existing residential area and the motorway and limited access for employment, however the land to the south west (SA-0018-SAN) adjacent to the canal could form part of a small business park given the adjacent Tamebridge Parkway but this would require access off the roundabout serving existing access to the Parkway and motorway maintenance. A separate parcel was created to reflect the part that was suitable for employment SA-0018-SAN. The remaining parts of the parcel not suitable for residential or employment.

## 6.5 Dudley

**Table 6.7: Dudley Selected / Rejected Sites**

Site Reference	Site Name	Selected/ Rejected	Reason for Selection/Rejection provided by BCA
SA-0001-DUD	Gorge Road	Rejected	Suitability – Bounded by a SLINC, HET assets and trees.
SA-0005-DUD	Himley Road	Rejected	Suitability – Impact to the sites Biodiversity and Geodiversity due to the sites location within both a SINC and SLINC. Concerns relating to impact on Heritage Assets, Air Quality, Noise, Infrastructure and Highway Access.
SA-0008-DUD	Lye Close Lane	Rejected	Suitability – Green Belt and greenfield site used as agricultural grazing land (sheep) that has SLINC status. The site has considerable rural character despite being adjacent to the M5 and a dual carriageway (Manor Way) as it is set at a high level than both and it is also, in the main, shielded visually tree belts. The site is located within an Area of High Historic Landscape Value, it is therefore sensitive in landscape terms.
SA-0009-DUD	Norton Road	Rejected	Suitability – Garden land surrounded by four trees with TPOs. Isolated site.
SA-0010-DUD(A)	Worcester Lane North	Selected	Suitability- The Green Belt and Landscape Sensitivity Assessment considers this land to provide a moderate contribution to preventing encroachment on the countryside as it is open land contiguous with the wider countryside. The railway line along its western edge and Worcester Lane to the east provide distinct boundaries with the neighbouring housing developments. However, the release of land here would not weaken the integrity of the broader Green Belt to the south.
SA-0010-DUD(B)	Worcester Lane Central	Selected	Suitability - The site would be capable of development in association with the adjacent site to the north (SA-0010-DUD-A) there is housing on either side and the southern hedgerow could provide a defensible boundary. Its removal from the Green Belt would have limited impact on the openness of the wider Green Belt. The Green Belt and Landscape Sensitivity Assessment considers it to be moderately sensitive.
SA-0013-DUD	Tipton Road/Setton Drive	Rejected	Suitability – Located within the Bat Migration Corridor
SA-0015-DUD	Lapal Lane South	Rejected	Suitability – Green Belt and greenfield site used as agricultural grazing land (sheep) that has SLINC status. The site has considerable rural character despite being adjacent to the M5 and a dual carriageway (Manor Way) as it is set at a high level than both and it is also, in the main, shielded visually tree belts. The site is located within an Area of High Historic Landscape Value, it is therefore sensitive in landscape terms.
SA-0016-DUD	Land off Bromwich Lane	Rejected	Suitability – Within Landscape Heritage Area and it is Grade 1 agricultural land. Access issue.
SA-0017-DUD	Holbeache	Selected	Suitability- It is considered that Holbeache Lane would form a more permanent and logical boundary to the northern extent of residential development at this point. At the moment it is marked only by the rear/side of houses.
SA-0018-DUD	Land off Racecourse Lane	Rejected	Suitability/Deliverability – Existing golf course comprises roughly half SINC and half SLINC status. Landscape Heritage Area. Heavily treed with some group and individual TPO's and a couple of possible veteran trees.
SA-0019-DUD	Land East of Ounty John Lane	Rejected	Suitability – Within a Landscape Heritage Area. No defensible GB boundary. No direct vehicular access to adjacent road.
SA-0021-DUD	Viewfield Crescent	Selected	Suitability - some development whilst not weakening the wider Green Belt. The Green Belt and Landscape Sensitivity Assessment judged the area to be of moderate landscape sensitivity to residential development.
SA-0025-DUD	The Triangle	Selected	Suitability - some development whilst not not weakening the wider Green Belt. The Green Belt and Landscape Sensitivity Assessment judged the area to be of moderate landscape sensitivity to residential development.

Site Reference	Site Name	Selected/Rejected	Reason for Selection/Rejection provided by BCA
SA-0026-DUD	Bilston Street/Whites Drive	Rejected	Suitability - Limited development possible without harm to relevant trees or to habitat of SINC/SLINC value.
SA-0027-DUD	West of Foxcote Farm	Rejected	Suitability
SA-0028-DUD	Turls Hill Road	Rejected	Suitability - Located within the Bat Migration Corridor
SA-0031-DUD	Land off Pedmore Lane	Rejected	Suitability - Within Landscape Heritage Area and it is Grade 1 agricultural land. Access issue.
SA-0033-DUD	Land adjacent Holbeache House	Rejected	Suitability - Concern over access and impact on Holbeache House.
SA-0039-DUD	Lewis Road	Selected	Suitability - Greenfield Land surrounded by residential.
SA-0040-DUD	South of Cradley Town FC	Rejected	Suitability - Site is mostly within Green Belt. The site occupies a prominent elevated location when viewed from open countryside to the south. Loss of trees. Current access arrangement would not work without acquiring additional land or demolishing DMBC stock or coming through the allotment, football access. Loss of small area of allotments. Potential conflict with football ground use.
SA-0041-DUD	High Farm Road	Rejected	Suitability - Site is currently POS and appears to be used. A number of mature trees. Potential ransom strip to one access. There would be a shortfall of Amenity Greenspace within this part of the borough if this site were to be developed as there are no other such sites within a 400m straight line walking distance.
SA-0042-DUD	Lapwood Avenue	Selected	Suitability - Greenfield Land surrounded by residential.
SA-0043-DUD	Playing Field off Cradley Road	Rejected	Suitability - Potential loss of playing field. The access to the site is considered inadequate.
SA-0044-DUD	Bowling Green Road	Rejected	Suitability - significant constraints regarding access, trees, badgers and potential loss of playing fields.
SA-0045-DUD	Seymour Road	Selected	Suitability - Greenfield site surrounded by residential
SA-0046-DUD	Bent Street	Selected	Suitability - Amenity greenspace surrounded by residential
SA-0047-DUD	Balfour Road	Rejected	Suitability - Noise issues from the industrial area from residential occupants further away than the area in question. Contrived site.
SA-0050-DUD	Bryce Road	Selected	Suitability - It occupies a position between the existing built up area.
SA-0051-DUD	Envile Street	Rejected	Suitability - Loss of playing fields
SA-0052-DUD	Kingswinford Youth Centre	Rejected	Suitability - Loss of Public Open space, Playing Pitch and impacts on ecology including SLINC. Very difficult to mitigate against either on or offsite.
SA-0058-DUD	Wollaston Farm	Selected	Suitability - This is a narrow wedge of Green Belt land that is currently used for horse grazing. It occupies a position on the extreme edge of the conurbation with the whole of the western boundary also forming the borough boundary.
SA-0059-DUD	Lower Gornal Sewage Works	Rejected	Achievability - concerns over viability and deliverability.
SA-0060-DUD	Guys Lane	Selected	Suitability - It occupies a position between the existing built up area and the adjacent sewage works.
SA-0078-DUD	Eve Lane	Rejected	Suitability - Located within the Bat Migration Corridor
SA-0079-DUD	Wynall Lane	Rejected	Suitability - Green Belt land within a Landscape Heritage Area and situated in a prominent, elevated location, which would be severely affected, particularly the setting of Clent and Wychbury Hill (part of the Black Country Geo Park) and views from them. The site is a SLINC and therefore development has the potential to adversely affect its ecological value.
SA-0081-DUD	Foxcote Farm	Rejected	Suitability - High quality landscape (Area of High Historic Landscape Value) on a prominent elevated site which would be severely affected, particularly the setting of Clent and Wychbury Hill and views from them. Views from PROWs would be adversely affected.

Site Reference	Site Name	Selected/ Rejected	Reason for Selection/Rejection provided by BCA
			Forms important green wedge which can be seen from the north that runs between the built-up area of Cradley southwards to the open countryside. Parts of site affected by nature conservation designations including a SINC and three separate SLINCs (one of which are hedgerows). these designations have the potential to be adversely affected by development.
SA-0105-DUD	Clent View Road	Rejected	Suitability – Site is long and narrow and, if developed in isolation to the land in South Staffordshire, would not have a defensible boundary as it cuts through the centre of the grazed fields. There is a high-pressure gas pipeline running north south along Sandy Lane the zone of influence of which effectively covers the majority of the site.
SA-0114-DUD	Greater Holbeache	Rejected	Suitability – Grade Agricultural land. Concern over access and impact on Holbeache House.
SA-0126-DUD	Roman Road	Rejected	Suitability - The site already has an existing defensible eastern boundary. If developed a defensible boundary would not exist. A high-pressure gas main cuts diagonally through the site which would affect the layout and the density of the site would be reduced as there is an undevelopable area.
SA-0132-DUD	Marriott Road	Selected	Viability - It scored 19 in the BEAR survey which is below the required level for retention as a Local Employment Area. It is therefore considered to be suitable for housing.
SA-0134-DUD	VB at Old Wharf Road	Selected	Viability - The site forms part of the larger mixed-use development allocation ref H11B.16 within the Dudley Borough Development Strategy. BEAR confirms that it can be released from its current employment use to housing.
SA-0135-DUD	Uffmoor	Rejected	Suitability – This area contains the head waters of the River Stour and is predominantly in agricultural use. Very sensitive site in visual terms. Site is located within an Area of High Historic Landscape Value containing large areas of surviving ridge and furrow earthworks. In terms of ecology there are three linear SLINC's which cross the site/ Uffmoor Wood, an area of Ancient Woodland, forms the boundary with a significant section of the south and western boundaries of the site. There is also a small area of Ancient Woodland in the south eastern part of the site.
SA-0139-DUD	74, Cinder Road	Rejected	Suitability – Would represent back land development, resulting in the sub-division of an existing plot not in keeping with the settlement plan and the character of the area. Inappropriate form of development within a residential garden, out of character with its immediate surroundings.
SA-0198-DUD	Standhills	Selected	Suitability – Greenfield surrounded by residential
SA-0199-DUD	Corbyns Hall	Selected	Suitability – Greenfield surrounded by residential
SA-0214-DUD	New Hawne Colliery	Rejected	Suitability – With the exception of the buildings and their immediate environs the site has SINC status and the extensive woodland is covered by an All Inclusive Tree Preservation Order.
SA-0215-DUD	Brockmoor Foundry	Selected	Suitability: An industrial site with adjacent to two existing housing allocations.
SA-0222-DUD	Dawson Brothers Timber	Rejected	Suitability – access issues.
SA-0373-DUD	Nuttalls	Selected	Suitability – Urban area with no longer employment use
SA-0061-DUD	Land off Tenacre Lane, Lower Gornal, DY3 1XH	Rejected	Site withdrawn
SA-0064-DUD-A	Pensnett Road, Pensnett	Rejected	Site withdrawn
SA-0064-DUD-B	Pensnett Road	Rejected	Suitability – Located within a high quality employment area

Site Reference	Site Name	Selected/ Rejected	Reason for Selection/Rejection provided by BCA
SA-0068-DUD	Brierley Hill Road/Cooper Avenue, Brierley Hill, BHU	Rejected	Site withdrawn
SA-0076-DUD	Three Fields, Dunsley Road, Norton, DY8 3LR	Rejected	Site withdrawn
SA-0080-DUD	Land off Timmis Road, Lye	Rejected	Site withdrawn
SA-0084-DUD	Land off Cradley Road, DY2 9SW	Rejected	Site withdrawn
SA-0091-DUD	Hayley Green Farm	Rejected	Suitability – The release of the green belt in this location would enable built development to encroach further into this area of land which is readily visible to open countryside to the east and south east.
SA-0109-DUD	Land adj to Ashwood Park Primary	Rejected	Suitability – A primary school and its playing fields occupy part of the site. The river Stour and its wooded banks are located in the southern part of the site
SA-0145-DUD	Land South of Racecourse Lane	Rejected	Suitability – Geological and woodland SINC
SA-0173-DUD	Dobbins Oak Flats	Rejected	Suitability - The site provides amenity greenspace for the residents of the flatted development and should therefore be retained.
SA-0174-DUD	Merrick Close Playing Fields	Rejected	Suitability - As the site is within a Community Forum Area that falls below the quantity standard of public open space the site should be retained and improved with perhaps the provision of a children's play area and some tree planting
SA-0175-DUD	Sensal Road Bank	Rejected	Suitability - The steep topography of the site and the mature tree cover/ecology are the key considerations for this site. If
SA-0176-DUD	Highfields Park, Highfields Lane, Halesowen	Rejected	Suitability - This is a Community Park that is located in close proximity to Halesowen Town Centre and to high density residential estates
SA-0181-DUD	Shavers End Road Open Space	Rejected	Suitability – This is an area of Amenity Greenspace. The topography of the majority of the site is very challenging and may make development very difficult.
SA-0182-DUD	Central Drive Open Space	Rejected	Suitability – This site represents a significant area of useable Amenity Greenspace within a Community Forum Area that has a deficiency of open space. If removed it is considered that there would be insufficient coverage for this typology within the vicinity of the site as the other areas nearby are much smaller and are less useable due to topography and access constraints.
SA-0185-DUD	Porlock Road Open Space	Rejected	Suitability – This site is a narrow green parcel of land that forms a buffer of linear open space between industry off Mill Race Lane and housing to the east. The southern section is in close proximity to the River Stour and both share SLINC status. In conjunction, they are likely to be used by wildlife as a north-south corridor.
SA-0186-DUD	Land of Coombs Road	Rejected	Suitability – The site is not suitable for housing given its location within a High Quality Employment Area (HQEA) where there is potential for conflict, noise nuisance and air quality issues. The site is very challenging in topographical terms.
SA-0187-DUD	High St Wordsley Open Space	Rejected	Suitability – This is an elongated piece of attractive Amenity Greenspace that occupies a prominent location at the junction of High Street/Brierley Hill Road. The eastern section is too narrow to develop. The central section provides pedestrian access and outlook for Nos 24 to 40 Brierley Hill Road. The western section is heavily wooded and the trees are protected by a Woodland Order.



Site Reference	Site Name	Selected/ Rejected	Reason for Selection/Rejection provided by BCA
SA-0188-DUD	Bristol Road open Space	Rejected	Suitability – The topography of this site is challenging. It is the site of a former coal pit, containing areas of coal mining high risk related to two mineshafts located on the western elevated part of the site. There is significant tree cover on the site. The site is in close proximity to the Mousesweet Brook SLINC and acts as a green corridor between the brook, via residential gardens and the school playing fields to the north. Footpaths cross the site which provide off-road routes to school between houses to the south and Netherbrook Primary School to the north of the site.
SA-0189-DUD	Hawbush Road Open Space	Rejected	Suitability – The site is mostly wooded and forms part of a valuable green corridor between the Stourbridge Canal to the east and land to the north. In the main, the site has an elevated position with steep slopes with respect to Hawbush Road and the tree lined bank forms a prominent feature for surrounding housing to the west. The Hawbush Road frontage is the only reasonably level part of the site. The loss of this elevated small area woodland would be visually detrimental to the surrounding area
SA-0191-DUD	Magpie Close Open Space	Rejected	Suitability – If this area were to be cleared of trees, motorists would overlook the houses which are at a much lower level and the existing residents would be more exposed to road noise and traffic fumes. If the site were to be developed for housing, due to the elevated nature of the site it would be difficult to prevent overlooking and for the new development not to look overbearing with respect to existing houses. The restricted width of the site and limited options for new access points would likely result in new development facing the road junction and thereby exposing the new residents to elevated noise levels and air pollution.
SA-0192-DUD	Brooksbank Drive Open Space	Rejected	Suitability – It is heavily wooded and forms a buffer between the residential estate and industrial buildings to the south.
SA-0193-DUD	Halesowen Open Space	Rejected	Suitability – The whole site is located within an area of Linear Open Space and forms part of the Dudley Canal wildlife corridor which widens at this point
SA-0194-DUD	Orchard St Island	Rejected	Suitability – The site is located within an established residential area and forms an area of open Amenity Greenspace within the estate.
SA-0196-DUD	Fullwood Crescent	Rejected	Suitability – Topography presents significant access difficulties and developable area of site and access. Capacity is further reduced by linear nature of site, trees, mineshafts and the PROW.
SA-0197-DUD	Mullett Park	Rejected	Suitability – The site contains goal posts and therefore if the pitch were to be lost from the site it is a requirement that Sport England is consulted.
SA-0200-DUD	Waverley Open Space	Rejected	Suitability – appears to be a playing field.
SA-0202-DUD	Grey Stone St Dudley	Rejected	Suitability – Partly with conservation area – impact on key views to conservation area
SA-0204-DUD	Alton Grove Dudley	Rejected	Suitability – Adjoining NSNG has no apparent public access. Access to land is not possible without third party land.
SA-0205-DUD	The Spinney B'Hill	Rejected	Suitability – Site is very steep and wooded and part SLINC
SA-0206-DUD	Abbey St, Gornal	Rejected	Suitability – Part of site is a SLINC Trees to SLINC/southern boundary Gornal Stone Wall to southern boundary
SA-0208-DUD	Bramble Green Dudley	Rejected	Suitability – Within a AHHTV – greens are characteristic of estate Layout allows for supervised play
SA-0209-DUD	Hazelwood Road	Rejected	The wider estate is designated an Area of High Historic landscape value due to the distinctive greens which are characteristic of the 1950s estate. The loss of the green(s) would have harmful impact on character.

Site Reference	Site Name	Selected/ Rejected	Reason for Selection/Rejection provided by BCA
SA-0210-DUD	Wellsbourne Drive Coseley	Rejected	Suitability – Adjoins conservation area Trees reduce available capacity Lane to north has a rural character.
SA-0227-DUD	Bott Lane Lye	Rejected	Suitability – The site lies within the DY5 Enterprise Zone. The DY5 Enterprise Zone was designated to promote employment land use within the proposed designated Enterprise Zone boundary, and incentives are aimed at attracting business with reduced business rates and skills training etc.
H16.1	Bean Road, Coseley	Selected	Suitability – Located in build up residential area.

DRAFT

## 7 Policy Assessments

### 7.1 Preface

7.1.1 The Draft BCP aims to achieve a balance between conserving the Black Country's landscapes, heritage and environmental assets whilst securing the necessary infrastructure to support development and housing and employment needs.

7.1.2 The Draft Plan sets out a series of strategic and development management policies, that aim to support the delivery of the vision for the Black Country.

7.1.3 The policies that form the Draft BCP have been individually assessed against each of the 14 SA Objectives contained within the SA Framework. This chapter contains the results of these assessments.

### 7.2 Methodology

7.2.1 **Appendix J** sets out the detailed appraisal of each policy proposed within the Draft BCP. The appraisal evaluates the likely significant effects of each policy against the 14 SA Objectives.

*Table 7.1: Presenting likely impacts*

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

7.2.2 Strategic housing allocations have been proposed by the BCA through the following policies WSA1-WSA9, DSA1-3 CSA1-2.

7.2.3 The sites which comprise the strategic housing allocations have been assessed in **Appendices F-I** (pre mitigation) and in **Appendix J** (taking into account the details specified in these strategic site allocation policies and any mitigation proposed).

## 7.3 Overview of Policies Assessment

7.3.1 The impact matrices for all policy assessments are presented in **Table 7.2**. These impacts should be read in conjunction with the assessment text narratives in **Appendix J**, as well as the topic-specific methodologies and assumptions presented in **Chapter 1**.

*Table 7.2 Summary of policy assessments*

Policy Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP1	0	+/-	+/-	+	0	+	-	--	+	+	+	+	+	+
CSP2	0	+	+	+	0	+	0	0	+	+	+	+	+	0
CSP3	0	-	+/-	0	0	-	0	0	+	+	+	+	+	0
CSP4	+	+	+	+	+	0	+	0	+	0	+	+	0	0
CSP5	+	+	0	+	0	0	0	0	+	0	+	+	+	0
GB1	+/-	-	-	+/-	+/-	-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
GB2	0	0	0	0	0	0	0	0	0	0	+	0	+	0
DEL1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DEL2	0	0	0	0	0	+	0	0	+	+	0	0	+	0
DEL3	0	0	0	+	0	0	0	0	+	0	+	0	+	0
HW1	0	+	+	+	+	0	+	0	+	+	+	++	+	+
HW2	0	0	0	+	0	0	+	0	+	0	+	++	0	0
HW3	0	0	0	+	0	0	+	0	+	0	+	++	0	0
HOU1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-
HOU2	0	0	0	+	0	0	+	0	+	+	+	+	0	0
HOU3	0	0	0	0	0	0	0	0	0	+	+	+	0	0
HOU4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+	+	+	+/-	+
HOU5	0	0	0	+	0	0	+	0	+	0	0	+	+	++
HOU6	0	0	0	0	0	0	0	0	+	+	+	+	0	0
EMP1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-
EMP2	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-
EMP3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-
EMP4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+	+/-
EMP5	0	0	0	0	0	0	0	0	0	0	+	+	+	+
CEN1	+/-	+/-	+/-	+	+/-	+	+/-	+/-	+	+/-	+	+	+	+/-
CEN2	0	0	0	0	0	0	0	0	+	0	+	+	+	+
CEN3	0	0	0	0	0	+	0	0	+	0	+	+	+	0
CEN4	0	0	0	0	0	0	0	0	+	0	+	0	+	0
CEN5	0	0	0	0	0	0	+	0	+	0	+	+	+	0
CEN6	0	0	0	+	0	0	+	0	+	0	0	+	+	0
TRAN1	0	0	0	+	0	0	+	0	++	0	0	+	0	0
TRAN2	0	0	0	0	0	0	0	0	+	0	0	0	0	0
TRAN3	0	0	0	+	0	0	0	0	+	0	0	0	0	0
TRAN4	0	0	-	0	0	0	0	0	+	0	0	0	+	0

Policy Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN5	0	0	0	0	0	0	0	0	++	0	+	+	0	0
TRAN6	0	0	0	+	0	0	+	0	+	0	0	0	0	0
TRAN7	0	0	0	0	0	0	0	0	+	0	0	0	+	0
TRAN8	0	0	0	+	0	0	+	0	+	0	0	0	0	0
ENV1	0	+	++	+	+	0	+	0	0	0	0	+	0	0
ENV2	0	0	++	+	0	0	+	0	0	0	0	+	+	0
ENV3	0	+	++	+	+	0	+	0	0	0	0	+	0	0
ENV4	+	+	+	+	+	+	+	0	0	0	0	+	0	0
ENV5	++	+	+	0	0	0	0	0	0	0	+	0	+	0
ENV6	+	+	+	0	0	0	0	0	0	0	0	0	+	+
ENV7	+	+	+	0	0	0	+	0	+	+	0	+	+	0
ENV8	+	+	+	+	+	0	+	0	+	0	+	++	0	0
ENV9	+	+	+	+	+	+	+	0	+	0	+	+	0	0
CC1	+	+	+	++	+	+	+	0	+	0	0	+	0	0
CC2	0	0	0	+	+	0	+	0	0	0	0	+	0	0
CC3	0	0	+	+	+	0	+	0	0	0	0	0	0	0
CC4	0	0	+	+	0	0	++	0	+	0	0	+	+	0
CC5	0	0	+	0	++	0	+	0	0	0	0	+	0	0
CC6	0	0	0	0	+	0	0	0	0	0	0	0	0	0
CC7	0	0	0	+	0	0	+	0	0	0	0	0	0	0
W1	0	0	0	0	0	0	0	++	0	0	0	0	0	0
W2	0	0	0	0	0	0	0	+	0	0	0	0	0	0
W3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0
W4	0	0	0	0	0	0	0	+	0	0	0	0	0	0
W5	0	0	0	0	0	+	0	++	0	0	0	0	0	0
MIN1	0	0	0	0	0	+	0	0	0	0	0	0	+	0
MIN2	0	0	0	0	0	+	0	0	0	0	0	0	0	0
MIN3	0	+/-	+/-	0	0	+	+/-	0	0	0	0	0	+	0
MIN4	0	0	0	0	0	+	0	+	0	0	0	0	0	0
DSA1	0	-	+/-	+	0	-	-	-	+	++	0	+	+	+
DSA2	-	-	0	+	0	--	-	-	+	++	0	+	+	+
DSA3	0	-	+/-	+	0	-	-	-	+	++	0	+	+	+
CSA1	-	-	+/-	+	0	-	-	-	+	++	0	+	+	++
CSA2	0	-	+/-	+	0	-	-	-	+	++	0	+	+	+
WSA1	-	--	+/-	+	0	--	0	-	+	++	0	++	+	++
WSA2	-	--	+/-	+/-	0	--	0	-	+/-	++	0	++	+	++
WSA3	0	--	+/-	+/-	0	-	0	-	+/-	++	0	+	+	+
WSA4	-	--	+/-	+/-	0	--	0	-	+/-	++	0	++	+	++
WSA5	-	--	+/-	+/-	0	--	0	-	+/-	++	0	++	+	++
WSA6	-	--	+/-	+	0	-	0	-	+	++	0	+	+	+
WSA7	-	--	+/-	+	0	-	0	-	+	++	0	++	+	++



Policy Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
WSA8	-	--	+/-	+/-	0	-	0	-	+/-	++	0	++	+	++
WSA9	0	--	+/-	+/-	0	-	0	-	+/-	++	0	++	+	++

7.3.2 The policies contained within the BCP are anticipated to optimise sustainability performance and minimise adverse sustainability impacts. The policies help to avoid, reduce or compensate adverse effects wherever possible. Opportunities for enhancement may also be secured through policies in the BCP. Where there are opportunities to improve the sustainability performance of draft policies these have been identified in **Appendix J**.

7.3.3 Any further mitigation will be identified as part of a next stage of the assessment process and following the Regulation 18 consultation process. A summary of mitigating effects of these policies on proposed allocations will be provided in the Regulation 19 report.

## 8 Next steps

### 8.1 Summary

- 8.1.1 This Regulation 18 SA Report is subject to consultation alongside the Draft BCP.
- 8.1.2 This report represents the latest stage of the SA process. The SA process will take on-board any comments on this report and use them to furnish the next report with greater detail and accuracy.
- 8.1.3 Once the BCA have consulted on the Regulation 18 Draft Plan, preparation of an Environmental Report will begin, also known as a full SA report. This Environmental Report will include all of the legal requirements set out in Annex 1 of the SEA Directive and accompany the Pre-Submission Plan at the Regulation 19 stage of the plan making process.

### 8.2 Consultation of the Regulation 18 SA Report

- 8.2.1 This Regulation 18 SA Report will be published by the BCA for consultation. Consultation findings will be used to inform subsequent stages of the SA process.
- 8.2.2 All responses on this consultation exercise should be sent to:

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

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

Email: [blackcountryplan@dudley.gov.uk](mailto:blackcountryplan@dudley.gov.uk)

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

# Glossary

Term	Definition
Accessibility	This is the ability for people to travel around an area and reach facilities or locations. This includes the elderly, young, disabled or those carrying luggage.
Adoption	The official confirmation of a Development Plan or Local Development Document as having statutory status by a Local Planning Authority.
Agricultural Land Classification (ALC)	The Department for Environment, Food and Rural Affairs (DEFRA's) system of classifying agricultural land quality. Soil is graded from best to worst, numbered 1 to 5, with Grade 3 divided into two sub-grades (3a and 3b).
Air Quality Management Area (AQMA)	An area which is declared by a Local Authority where it is unlikely that Air Quality Objectives will be achieved.
Amenity	Positive elements that contribute to the character and sense of place of a location.
Ancient Woodland	Woodland that has existed in a consistent state since 1600 or earlier in England, Wales and Northern Ireland (1750 in Scotland).
Area of Outstanding Natural Beauty (AONB)	Sites in England, Wales and Northern Ireland designated to conserve and enhance the natural beauty of the area which comprises the area's distinctive landscape character, biodiversity, geodiversity, historic and cultural environment.
Best and Most Versatile Land (BMV)	Land in Grades 1, 2 and 3a of the Agricultural Land Classification.
Biodiversity	The variability among living organisms from all sources, including terrestrial, marine and other aquatic ecosystems, and the ecological complexes of which they are part. It includes diversity within and between species, and between ecosystems.
Buffer Zone	An area or zone that helps to protect a habitat from damage, disturbance or pollution.
Carbon Sink	A natural or artificial reservoir viewed in terms of its ability to absorb carbon-containing compounds, such as carbon dioxide.
Change of Use	A change in the way the building or land is currently managed or used. Planning permission is usually required in order to change from one use to another.
Character	Relating to the appurtenance of a location in terms of its landscape, layout of streets or open spaces, or historic environment.
Climate Change	A change in the climate of a region over time due to natural forces or human activity. In the context of the UN Framework Convention on Climate Change, it is the change in climate caused by higher levels of greenhouse gases in the atmosphere due to human activities as well as natural climate changes.
Climate Change Adaptation	Changes to natural or human systems in response to actual or estimated climatic factors or their effects, such as increased rainfall and temperatures.
Climate Change Mitigation	Actions used to reduce the impact of human activity on the climate, such as reducing greenhouse gas emissions.
Coalescence	The merging of separate towns or villages due to development.

Term	Definition
Community Infrastructure Levy	A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.
Connectivity	Term to express how a landscape is configured and how it allows species to move through its different elements. A high degree of connectivity is generally linked to low fragmentation.
Conservation Area	Areas of special architectural or historic interest, the character of which should be preserved. These are designated by the local planning authority.
Contaminated Land	Land that has been polluted and is therefore unsafe for development unless the contamination is removed.
Corridor	A strip of land of a particular type that differs from the adjacent land on both sides (corridors have several important functions, including conduit, barrier and habitat).
Country Park	Country Parks are statutorily declared and managed by local authorities in England and Wales under the Countryside Act. They are primarily intended for recreation and leisure opportunities close to population centres and do not necessarily have any nature conservation importance.
Cycle Network	A network located both on and off roads to facilitate safer travel by bicycle.
Density	In terms of residential development, the number of dwellings (or rooms) per hectare.
Design Statement	Made at the pre-planning application stage by developers to indicate the design principles upon which a proposal is to be based.
Development Plan Document (DPD)	Development Plan Documents are prepared by local planning authorities and outline the key development goals of the local development framework.
Duty to Cooperate	The Duty to Cooperate was created in the Localism Act 2011 and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.
Ecological Network	Linkages between biodiversity features and habitats.
Ecosystem	A community of living organisms (biotic components), including plants, animals and microorganisms, and their physical environment (abiotic components) that interact as a functional unit.
Ecosystem Services	Benefits that people obtain from ecosystems or their direct and indirect contributions to human well-being.
Emissions	In the context of the atmosphere, gases or particles released into the air that can contribute to global warming or poor air quality.
Energy Efficiency	Actions to save fuels, for example better building design, changing production processes, developing better transport policies, using better road vehicles and improving insulation and double glazing in homes.
Environmental Report (ER)	A document prepared as part of the Strategic Environmental Assessment process that presents findings, identifies options for mitigating adverse effects and opportunities for enhancing or improving the overall sustainability of the environment assessed.
Flood Plain	Where water flows in times of flood, or would flow but for the presence of flood defences.
Fragmentation	The breaking up of a habitat or ecosystem into smaller parcels with a consequent impairment of functioning.

Term	Definition
Geodiversity	The range of rocks, minerals, fossils, soils and landforms.
Green Belt	An area of land, largely rural in character, which is adjacent to the main urban areas and which is protected from development by permanent restrictions on building.
Green Infrastructure (GI)	A strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services.
Green Network	The linking together of natural, semi-natural and man-made open spaces to create an interconnected network. This may include (but is not limited to) designated biodiversity sites, Local Green Spaces, waterways, and public greenspaces.
Green Space	A patch of vegetated land within the urban fabric for predominantly recreational use.
Greenfield	Land on which no development has previously taken place unless the previous development was for agriculture or forestry purpose or, the remains of any structure or activity have blended into the landscape.
Greenhouse Gas (GHG)	A gas in an atmosphere that absorbs and emits radiation within the thermal infrared range, usually water vapour, carbon dioxide, methane, nitrous oxide, ozone chlorophluorocarbons and hydrophluorocarbons.
Groundwater	Water which is below the surface of the ground and in direct contact with the ground or subsoil.
Habitat Regulations Assessment (HRA)	A Habitats Regulations Assessment (HRA) refers to the several distinct stages of Assessment which must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it.
Heritage Asset	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).
Historic Environment	All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.
Infrastructure	Basic services necessary for development, such as, roads, electricity, sewerage, water, education and healthcare facilities.
Land Use	Describes the social and economic purposes for which land is managed.
Landscape	The traits, patterns and structure of a specific geographic area, including its biological composition, its physical environment and its anthropogenic or social patterns. An area where interacting ecosystems are grouped and repeated in a similar form.
Landscape Character	The recognisable and consistent pattern of features in a certain landscape, distinguishing one landscape from another, giving a locality its sense of place.
Landscape Sensitivity	A combination of landscape character sensitivity and landscape visual sensitivity.
Landscape Value	Calculated through the combination of importance, rarity and potential for substitution of landscape features.
Listed Building	A protected structure recorded on the Statutory List of Buildings of Special Architectural or Historic Interest. Graded I (highest quality), II* or II, which are listed in a national register.



Term	Definition
Local Development Framework	The Local Development Framework (LDF) is a non-statutory term used to describe a folder of documents, which includes all the local planning authority's local development documents.
Local Development Scheme	The local planning authority's scheduled plan for the preparation of Local Development Documents.
Local Nature Reserve (LNR)	Local Nature Reserves (LNRs) are a statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949 by principal local authorities. Parish and Town Councils can also declare LNRs, but they must have the powers to do so delegated to them by a principal local authority.
Local Plan	Local plans are prepared by the Local Planning Authority (LPA), usually the Council or the national park authority for the area. The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.
Local Planning Authority (LPA)	The body responsible for carrying out statutory planning functions.
Local Wildlife Site (LWS)	Sites which have a local designation for their nature conservation value.
Mineral Safeguarding Area (MSA)	Areas designated by Minerals Planning Authorities which cover known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development.
Mitigation	Measures taken to reduce adverse impacts, e.g. the provision of suitable planting to screen a development.
National Character Area (NCA)	An area of England characterised by distinctive natural features, based on a combination of landscape, biodiversity, geodiversity and economic activity. Refers to the broad landscape character areas described by the former Countryside Agency's Character Map of England.
National Nature Reserve (NNR)	A National Nature Reserve (NNR) is the land declared under the National Parks and Access to the Countryside Act 1949 or Wildlife and Countryside Act (1981) as amended. These are protected and managed areas which are nationally designated as key places for wildlife and natural features.
National Park	Areas of relatively undeveloped and scenic landscape that are designated under the National Parks and Access to the Countryside Act (2016).
National Planning Policy Statement (NPPF)	Updated in June 2019, this document sets out the government's planning policy guidance on various topics that can constitute a material consideration in determining planning applications.
National Trail	Long distance routes for walking, cycling and horse riding.
Natural Capital	The extension of the economic notion of capital (manufactured means of production) to environmental goods and services. Natural capital is the stock of natural ecosystems that yields a flow of valuable ecosystem goods or services into the future.
Open Space	An area of undeveloped land or water that may offer important opportunities for sport and recreation and can act as a visual amenity.

Term	Definition
Plan area	The geographic area covered by the plan. This generally covers local government jurisdictional boundaries.
Planning Practice Guidance (PPG)	The National Planning Practice Guidance adds further context to NPPF, and it is intended that the two documents should be read together.
Pollution	The introduction of contaminants into the natural environment that cause adverse change.
Precautionary Principle	Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.
Previously Developed Land (PDL)	Land which is, or has been, occupied by a permanent (non-agricultural) structure and associated infrastructure, including the area of land attached to a structure as well as the structure itself.
Public Greenspace	Areas of undeveloped landscape within a settlement, that are partially or wholly covered with grass, trees, shrubs or other vegetation.
Public Rights of Way (PRoW)	Paths within England and Wales on which the public have a legally protected right to pass and re-pass.
Ramsar Sites	Ramsar sites are designated under the Convention on Wetlands of International Importance, agreed in Ramsar, Iran, in 1971. Originally intended to protect sites of importance especially as waterfowl habitat, the Convention has broadened its scope over the years to cover all aspects of wetland conservation and wise use, recognising wetlands as ecosystems that are extremely important for biodiversity conservation in general and for the well-being of human communities.
Receptor	Any ecological or other defined feature (e.g. human beings) that is sensitive to, or has the potential to be affected by, an impact.
Registered Parks and Gardens	A national designation by Historic England of a park or garden of special historic interest. Graded I (highest quality), II* or II, which are listed in a national register.
Ribbon Development	Development which extends along one or both sides of a road but is not extended in depth.
Ridge and Furrow	Fields which still exhibit remnant ridges and furrows created by a Saxon or Medieval form of ploughing in shared open fields.
Rural Exception Site	Small sites for affordable residential development in perpetuity, where sites would not normally be allocated for housing. The sites seeks to address the housing needs of the local community.
Scheduled Monument (SM)	Archaeological remains of national importance which are legally protected by the Ancient Monuments and Archaeological Areas Act 1979 and listed on a schedule.
Secondary Impacts	Impacts that could potentially occur indirectly following the implementation of the Local Plan.
Sequential Test	A planning principle that seeks to identify, allocate or develop certain types or locations of land before others.
Setting	The place in which something is set, particularly in terms of the surroundings of a Listed Building.
Site of Special Scientific Interest (SSSI)	A conservation designation denoting a protected area of land in the UK. Sites can be protected for their biological/ecological interest (Biological SSSIs) and/or their geological interest (Geological SSSIs).

Term	Definition
Source Protection Zone (SPZ)	The Environment Agency identifies Source Protection Zones to protect groundwater (especially public water supply) from developments that may damage its quality.
Special Area of Conservation (SAC)	SACs are designated under the EC Habitats Directive. SACs are areas which have been identified as best representing the range and variety within the European Union of habitats and (non-bird) species listed on Annexes I and II to the Directive.
Special Protected Area (SPA)	SPAs are classified by the UK Government under the EC Birds Directive. SPAs are areas of the most important habitat for rare (listed on Annex I to the Directive) and migratory birds within the European Union.
Stakeholder or Interested Party	Any person, group or business that has an interest or will potentially be affected by a particular activity, plan or project.
Statutory Body	A government-appointed body set up to give advice and be consulted for comment upon development plans and planning applications affecting matters of public interest. This includes Historic England, Environment Agency and Natural England.
Strategic Environmental Assessment (SEA)	A process that is a requirement under certain plans and programmes under the SEA Directive and associated Environmental Assessment of Plans and Programmes Regulations 2004. The Directive seeks to ensure that environmental considerations are taken into account alongside economic and social considerations in the development of a plan / programme.
Submission	When a Development Plan Document, such as a Local Plan, is submitted to the Secretary of State for independent examination.
Supplementary Planning Document (SPD)	This document defines the standards that local authorities seek to achieve when involving and consulting local communities in the preparation of Local Development Documents and development control decisions. These often add further detail to policies within the Local Plan.
Surface Water (Pluvial) Flooding	Flooding caused by rainfall which occurs due to water ponding on, or flowing over, the surface before it reaches a drain or watercourse
Sustainability Appraisal (SA)	A systematic process required by the Planning and Compulsory Purchase Act 2004 and incorporating the requirements of the SEA Directive, aimed at appraising the social, environmental and economic effects of plan strategies and policies and ensuring that they accord with the objectives of sustainable development.
Sustainable Development	One of the core principles underpinning planning. It can be described as development which meets the needs of the present without compromising the ability of future generations to meet their own needs.
Sustainable Drainage Systems (SuDS)	A sequence of management practices and control measures designed to mimic natural drainage processes by allowing rainfall to infiltrate, and by attenuating and conveying surface water runoff slowly at peak times.
Synergistic impacts	When two separate impacts combine to form a third impact. These may be greater than the sum of the individual impacts.
Tranquillity	Remote from the visual or audible intrusion of development and/or traffic and unspoilt by urban surroundings.
Urban Fringe	The area located on the periphery of a city. It represents the transition zone between the built-up area and the countryside.
Urban Heat Island Effect	An urban area being significantly warmer than the surrounding rural areas caused by human activity.

Term	Definition
Urban Sprawl	The unplanned and uncontrolled growth of urban areas into the surrounding countryside.
Windfall Site	Sites that have unexpectedly become available for development and have therefore not be included within the Local Plan.
World Heritage Site (WHS)	A place that is listed by the United Nations Educational, Scientific and Cultural Organization (UNESCO) as of special cultural or physical significance.

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Habitat Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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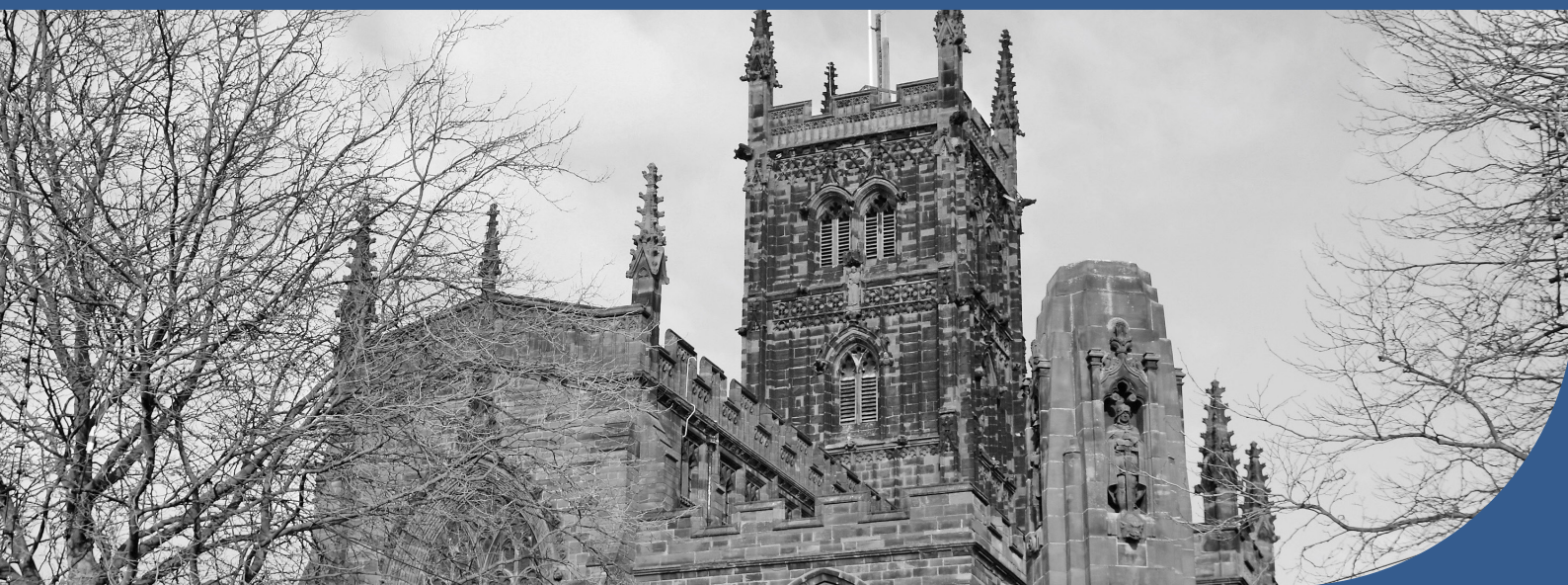
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