

Appendix J: Policy Assessments

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J.1 Overview

J.1.1 Introduction

- J.1.1.1 This appendix provides an assessment of draft policies proposed by the Black Country Authorities (BCA) at the Regulation 18 stage of the preparation of the Black Country Plan (BCP).
- J.1.1.2 Lepus provided an assessment of draft BCP policies in September 2020 as part of the iterative plan making process.
- J.1.1.3 The policy assessments within this report are based on policies within version 4.3 of the Draft BCP, dated 10th May 2021 and subsequently updated with the Draft BCP Consultation Draft dated 14th June 2021.
- J.1.1.4 Each policy appraised in this report has been assessed for its likely impacts on each SA Objective of the SA Framework (see Appendix A) and are in accordance with the methodology as set out in the SA Main Report.
- J.1.1.5 For ease of reference the scoring system is summarised below.

Table J1.1: Presenting likely impacts

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

J.1.1.6 Each appraisal in the following sections of this report includes an SA impact matrix that provides an indication of the nature and magnitude of effects. Assessment narratives follow the impact matrices for each policy, within which the findings of the appraisal and the rationale for the recorded impacts are described.

J.1.2 Overview of Policy Assessments

J.1.2.1 The impact matrices for all draft policy assessments are presented in Table J.1.2 below. These impacts should be read in conjunction with the assessment text narratives which follow in the subsequent sections of this appendix.

J.1.2.2 Within these policy assessments, where relevant, some recommendations for enhancement or improvement of the draft policies have been suggested. Further detailed recommendations are presented in Table J.14.1.

Table J.1.2: Summary of policy assessments

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

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP5	0	0	0	0	0	0	0	0	0	0	+	+	+	+
CEN1	+/-	+/-	+/-	+	+/-	+	+/-	+/-	+	+/-	+	+	+	+/-
CEN2	0	0	0	0	0	0	0	0	+	0	+	+	+	+
CEN3	0	0	0	0	0	+	0	0	+	0	+	+	+	0
CEN4	0	0	0	0	0	0	0	0	+	0	+	0	+	0
CEN5	0	0	0	0	0	0	+	0	+	0	+	+	+	0
CEN6	0	0	0	+	0	0	+	0	+	0	0	+	+	0
TRAN1	0	0	0	+	0	0	+	0	++	0	0	+	0	0
TRAN2	0	0	0	0	0	0	0	0	+	0	0	0	0	0
TRAN3	0	0	0	+	0	0	0	0	+	0	0	0	0	0
TRAN4	0	0	-	0	0	0	0	0	+	0	0	0	+	0
TRAN5	0	0	0	0	0	0	0	0	++	0	+	+	0	0
TRAN6	0	0	0	+	0	0	+	0	+	0	0	0	0	0
TRAN7	0	0	0	0	0	0	0	0	+	0	0	0	+	0
TRAN8	0	0	0	+	0	0	+	0	+	0	0	0	0	0
ENV1	0	+	++	+	+	0	+	0	0	0	0	+	0	0
ENV2	0	0	++	+	0	0	+	0	0	0	0	+	+	0
ENV3	0	+	++	+	+	0	+	0	0	0	0	+	0	0
ENV4	+	+	+	+	+	+	+	0	0	0	0	+	0	0
ENV5	++	+	+	0	0	0	0	0	0	0	+	0	+	0
ENV6	+	+	+	0	0	0	0	0	0	0	0	0	+	+
ENV7	+	+	+	0	0	0	+	0	+	+	0	+	+	0
ENV8	+	+	+	+	+	0	+	0	+	0	+	++	0	0
ENV9	+	+	+	+	+	+	+	0	+	0	+	+	0	0

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
CC1	+	+	+	++	+	+	+	0	+	0	0	+	0	0
CC2	0	0	0	+	+	0	+	0	0	0	0	+	0	0
CC3	0	0	+	+	+	0	+	0	0	0	0	0	0	0
CC4	0	0	+	+	0	0	++	0	+	0	0	+	+	0
CC5	0	0	+	0	++	0	+	0	0	0	0	+	0	0
CC6	0	0	0	0	+	0	0	0	0	0	0	0	0	0
CC7	0	0	0	+	0	0	+	0	0	0	0	0	0	0
W1	0	0	0	0	0	0	0	++	0	0	0	0	0	0
W2	0	0	0	0	0	0	0	+	0	0	0	0	0	0
W3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0
W4	0	0	0	0	0	0	0	+	0	0	0	0	0	0
W5	0	0	0	0	0	+	0	++	0	0	0	0	0	0
MIN1	0	0	0	0	0	+	0	0	0	0	0	0	+	0
MIN2	0	0	0	0	0	+	0	0	0	0	0	0	0	0
MIN3	0	+/-	+/-	0	0	+	+/-	0	0	0	0	0	+	0
MIN4	0	0	0	0	0	+	0	+	0	0	0	0	0	0

J.2 Spatial Strategy

J.2.1 Policy CSP1 – Development Strategy

Policy CSP1- Development Strategy

- 1) To support sustainable economic growth and meet people's needs, the Councils, working with local communities, partners and key stakeholders, will:
 - a) Deliver at least 47,837 net new homes and create sustainable mixed communities that are supported by adequate infrastructure.
 - b) Deliver the development of at least 353ha of employment land.
 - c) Ensure that sufficient physical, social, and environmental infrastructure is delivered to meet identified needs.
- 2) The spatial strategy seeks to deliver this growth and sustainable patterns of development by:
 - a) Delivering the majority of development in the existing urban area.
 - b) Supporting and enhancing the sustainability of existing communities through the focussing of growth and regeneration into the Strategic Centres and Core Regeneration Areas;
 - c) Protecting and enhancing the quality of existing Neighbourhood Areas and re-balancing the housing stock by delivering homes supported by jobs and local services;
 - d) Delivering a limited number of Town and Neighbourhood Growth Areas in highly sustainable locations on the edge of the Urban Area;
 - e) Protecting the openness of the Black Country Green Belt by resisting inappropriate development;
 - f) Protecting the Black Country's character and environmental assets including heritage assets, natural habitats and open spaces;
 - g) Minimising and mitigating the likely effects of climate change

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP1	0	+/-	+/-	+	0	+	-	--	+	+	+	+	+	+

J.2.1.1 Policy CSP1 provides the overarching spatial strategy for the Black Country, setting out the scale and distribution of new development for the plan period to 2039. The overall spatial approach has evolved from consideration of a number of spatial and growth options for development. These have been informed by the evidence base underpinning the Draft BCP and were subjected to SA (see SA **Appendices C to E**). The most sustainable option was considered to be 'balanced growth' with the spatial strategy focusing growth within

the existing Strategic Centres, Core Regeneration Areas and Town and Neighbourhood Areas in the sub-region and taking advantage of their existing infrastructure capacity, alongside a limited number of new Neighbourhood Growth Areas near to the edge of settlements that takes account of environmental, climate change, accessibility and socio-economic requirements. Overall, this option is considered to perform the best, as it strikes a balance between retaining valuable environmental assets whilst also prioritising development in the most accessible locations.

- J.2.1.2 Part 2(a) of Policy CSP1 sets out that the majority of development will be located within the existing urban areas (i.e. the Strategic Centres, Core Regeneration Areas and existing Town and Neighbourhood Areas). For housing growth it is understood that approximately 40,117 homes of the total projected housing need of 76,076 homes would be located in the existing urban areas. Approximately 7,720 homes within the plan period to 2039 would be located on greenfield land^[1] the majority of which comprises green belt release land located in a limited number of Neighbourhood Growth Areas on the edge of settlements (CPS1 Part 2(d)).
- J.2.1.3 For employment growth approximately 307 ha of the projected employment land requirements of 565 ha would be met within the existing built-up areas and approximately 48 ha via greenbelt release. Policy CSP1 supports the redevelopment of brownfield land within the BCA which represents an efficient use of land in accordance with the NPPF by locating the majority of housing within the existing urban areas. A smaller proportion of growth would be located in open countryside at the edge of settlements which could lead to the loss of ecologically, and potentially agriculturally, important soils and sterilisation of mineral resources. Mixed positive and negative impacts could therefore be experienced in terms of natural resources (SA objective 6), with a minor positive impact assessed on balance owing to the overall distribution of growth between brownfield and greenbelt land.
- J.2.1.4 For housing growth, approximately 63% (47,835 homes) of the overall projected housing need of 76,076 homes for the plan period up to 2039 would be met within the Black Country administrative authorities, leaving a shortfall of 37% which would need to be explored through potential contributions through Duty to Co-operate. For employment growth, approximately 63% of the 565 ha of identified employment land requirements would be provided within the Black Country authority administrative areas, with a shortfall of 211 ha or 37% of employment land which would need to be explored via a Duty to Co-operate, particularly where there is a strong existing or potential functional economic relationship with the Black Country, for example in terms of migration patterns, commuting links and / or connectivity through physical infrastructure such as rail and motorway. A minor positive impact is therefore predicted in relation to Housing (SA Objective 10) and

^[1] A further housing capacity of 1,715 homes has been identified post 2039 (beyond the plan period) on two large green belt release sites, due to housing market delivery constraints. These sites have still been subject to sustainability appraisal.

- the Economy (SA Objective 13) as the proposed options would lead to achievement of these SA objectives to some extent, but are subject to constraints in terms of meeting the total identified local need.
- J.2.1.5 The balanced approach to growth proposed in Policy CSP1 would be likely to have a minor positive impact on equality (SA Objective 11) in terms of accessibility to key services and facilities, employment opportunities and access to housing, including affordable housing, distributed in an inclusive manner across the BCA area.
- J.2.1.6 The BCA are aiming to utilise land efficiently through the use of previously developed land, vacant properties and surplus industrial land, and maximising housing densities where appropriate, but there is a shortage of deliverable sites to meet housing and economic growth needs. In order to help meet objectively assessed needs for housing and employment land development, exceptional circumstances to alter green belt boundaries need to be established.
- J.2.1.7 The BCA have undertaken an extensive Green Belt and landscape sensitivity assessment to identify land that, if developed, would cause the least harm to the purposes of the Green Belt and to landscape character, as identified through the site assessment process. The overall effect of this strategy as set out in Para 3.17 is that *"most housing growth and employment land development will be located in the existing built-up area; this will include approximately 40,117 new homes and 307 ha of employment land. An additional 7,720 homes and 48 ha of employment land are allocated on sites that have been removed from the Green Belt. The majority of these homes are provided in the Neighbourhood Growth Areas and the remainder on smaller sites at the edge of the Towns and Neighbourhoods Area in the form of rounding-off or through the redevelopment of previously developed land."* A further housing capacity of 1,715 homes has been identified post 2039 (beyond the plan period) on two large green belt release sites, due to housing market delivery constraints. These sites have still been subject to sustainability appraisal.
- J.2.1.8 The spatial strategy seeks to protect green spaces within the Black Country, the extensive green belt on the edges of the urban area and the 'wedges' of open land providing both valuable open breaks between settlements and access to the wider countryside, including for wildlife and vegetation. These provisions are encapsulated in CPS1 Part 2 (e) and (f). On balance, it is considered that mixed effects on the landscape (SA Objective 2) would be achieved through this policy.
- J.2.1.9 Development in the urban areas would help to minimise the overall vegetation cover lost to development. Nevertheless, the development of new Neighbourhood Growth Areas would result in a loss of previously undeveloped land, would involve the loss of natural habitat and soil resources which provide an important ecosystem service. The extent of impacts on habitats, species and habitat connectivity will depend on location and contextual factors. The construction of a new dwellings would be expected to result in

the loss of some biodiversity features, however adhering to net gain principles and a commitment could also deliver positive effects in the long term. The development strategy also provides opportunities to benefit biodiversity and geodiversity due to the protection of sensitive features, and delivery of development in the existing urban area. Mixed effects are therefore recorded on SA Objective 3 overall.

- J.2.1.10 With the addition of 49,552 homes (including 1,715 homes likely to be delivered after 2039) this policy would be expected to increase waste generation. Overall, a major negative impact on waste would be expected (SA Objective 8). It is however noted that waste generation would be likely to increase with any population increases (either in existing or new homes) and also if development was to be exported elsewhere. Provisions for waste management are set out in other policies of the BCP.
- J.2.1.11 The addition of 47,835 homes and 354 ha of employment land would be expected to increase carbon emissions through construction and operation. The construction, occupation and operation of development would be expected to exacerbate air pollution, including greenhouse gas (GHG) emissions and particulate matter (PM). However, by directing development towards the Strategic Centres and Town and Neighbourhood Areas, Policy CSP1 would be likely to facilitate more sustainable communities, by locating residents in close proximity to services, facilities and public transport. This could potentially help to improve the sustainability of development (in terms of carbon footprint) in some locations through reducing the need to travel by private car. In determining potential allocations, sites have been assessed in terms of their accessibility by all modes of transport as part of the evidence base for the draft BCP. This strategy is expected to have a minor positive impact on climate change mitigation overall (SA objective 4) and transport and accessibility (SA Objective 9). A minor negative impact is also identified in terms of pollution (SA Objective 7), taking the balance of these considerations into account.
- J.2.1.12 By directing development toward existing urban areas and at the edge of urban areas, this policy would be likely to locate new residents in areas with good access to existing health care facilities, including hospitals and GP surgeries. The proposed new developments would also potentially provide new healthcare facilities as part of the development, increasing the provision and accessibility of these health facilities across the Plan area. Part 2(f) of this policy also aims to ensure residents retain good access to natural habitats and open spaces, with benefits to mental wellbeing. Therefore, this policy would be expected to have a minor positive impact on human health overall (SA Objective 8). Whilst higher density development in urban areas would help to minimise effects on natural resources, this needs to be carefully planned and designed to ensure that there are no adverse impacts on health and wellbeing. The ratio of greenspace per capita is important and some expansion into greenbelt would also help to strike a balance in ensuring new

development is of an appropriate density and residents have access to greenspaces for mental and physical wellbeing.

- J.2.1.13 By directing the majority of development towards existing urban settlements, it would be expected that a large proportion of new residents would be situated in close proximity to a choice of educational facilities, with potential for new provision where need is identified within the new Neighbourhood Growth Areas. In addition, there would be expected to be opportunities to provide sustainable transport modes to assist travelling to these facilities compared to a more dispersed spatial approach. Overall, a minor positive impact on education would be expected (SA Objective 11).
- J.2.1.14 Neutral effects on the cultural heritage resource of the Black Country (SA Objective 1) and climate change adaption (SA Objective 5) have been identified on balance where it is considered that the proposed distribution of development would help to avoid or mitigate harm to the historic environment and locate development in lower areas of flood risk, as identified through the Flood Risk Assessment and subsequent policies in the Draft BCP.

J.2.2 Policy CSP2 – The Strategic Centres and Core Growth Areas

Policy CSP2 – The Strategic Centres and Core Growth Areas

- 1) The Growth Network, consisting of the Strategic Centres and Core Regeneration Areas, is the primary focus for regeneration and infrastructure investment to support the delivery of regionally significant growth and promote wider benefits to Black Country communities.
- 2) The Strategic Centres and Core Regeneration Areas are the primary focus for new development, regeneration, and infrastructure investment.
- 3) The Strategic Centres of Brierley Hill, Walsall, West Bromwich and Wolverhampton will provide:
 - a) Re-energised core commercial areas providing a rich mix of uses and facilities, set in a high quality built and natural environment;
 - b) The principal locations for major commercial, cultural, leisure, entertainment and community facilities, providing the widest possible range of such facilities appropriate for their catchments;
 - c) 9,561 new homes¹ of mixed type and tenure - the majority built at high densities as part of mixed-use developments;
 - d) Excellent public transport links, making the centres highly accessible to their catchment areas;
 - e) Green infrastructure
- 4) The Core Regeneration Areas Linking the Strategic Centres will provide:
 - a) The principal concentrations of strategic employment areas. These are high-quality employment areas that will be safeguarded and enhanced for manufacturing and logistics activity to support the long-term success of the Black Country's economy (see Policy EMP2);
 - b) The main clusters of local employment land that are vital in providing for local jobs (see Policy EMP3);
 - c) The principal locations for new industrial and logistics development - providing 192ha of developable employment land to meet growth needs;

Policy CSP2 – The Strategic Centres and Core Growth Areas

- d) 11,208 new homes in sustainable communities well-supported by community services and local shops, set within and linked by comprehensive networks of attractive green infrastructure with cycling and pedestrian routes;
- e) The focus for investment in existing, new, and improved transportation infrastructure with a focus on public transport routes and hubs which will maximise use of the public transport network by residents, workers and visitors;
- f) Strong links with the surrounding communities and the network of centres and spread the regeneration benefits by knitting together old and new to create a richer, varied, and integrated sense of place;
- g) Green infrastructure.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP2	0	+	+	+	0	+	0	0	+	+	+	+	+	0

J.2.2.1 The Growth Network – made up of the four Strategic Centres Brierley Hill, Walsall, West Bromwich and Wolverhampton and Core Regeneration Areas is the primary focus for co-ordinated and sustained regeneration and infrastructure investment to support the delivery of regionally significant growth and promote wider benefits to local communities. The Growth Network is the focus for the delivery of these objectives and contains the majority of areas where regeneration and land-use change will be concentrated over the plan period. Although the Draft BCP does not make development allocations within the Strategic Centres, it sets out deliverable development targets for each centre, based on up-to-date evidence, which will be met through other Local Plan documents to be prepared alongside or immediately following adoption of this plan.

J.2.2.2 The Draft BCP sets out that the strategy for the Core Regeneration Areas reflects two key issues arising from the evidence base – firstly, the need to provide for economic growth through the protection and enhancement of sustainable employment land and premises; and secondly, delivering housing growth through the release of poor quality and underused land to support the ongoing regeneration of the Black Country.

J.2.2.3 It is anticipated that Policy CSP2 would have a minor positive effect on Housing (SA Objective 10) and the Economy (SA Objective 13) as the Strategic Centres and Core

Regeneration Areas will accommodate the highest proportion of housing, employment and job growth and have been designed to respond to locally identified needs and encourage continued investment, taking into account the findings of the Black Country Economic Development Needs Assessment (EDNA) and Black Country Employment Area Review (BEAR).

- J.2.2.4 A minor positive effect is anticipated in terms of natural resources (SA Objective 6) and landscape (SA Objective 2), owing to the primary focus on regeneration of existing urban areas and high-quality design.
- J.2.2.5 The four Strategic centres and the Core Regeneration Areas are already served by an extensive transport system and therefore provide the most suitable locations for economic and housing growth, although improvements are required to enhance connectivity, accessibility and environmental quality. Part 3(d) of this policy states that this will be delivered through *"Excellent public transport links, making the centres highly accessible to their catchment areas"* in the Strategic Centres and Parts 4(d) and 4(e) of Policy CPS 2 sets out the vision for the Core Regeneration Areas in providing *"...sustainable communities well-supported by community services and local shops, set within and linked by comprehensive networks of attractive green infrastructure with cycling and pedestrian routes"* and a *"focus for investment in existing, new, and improved transportation infrastructure with a focus on public transport routes and hubs which will maximise use of the public transport network by residents, workers and visitors."* By placing a large proportion of new residents in these areas, it would be expected that residents would have good access to employment by foot, bike or public transport. A minor positive effect on Transport and Accessibility (SA Objective 9), Health (SA Objective 12) and Climate Change Mitigation (SA Objective 4) is therefore considered likely under these provisions of Policy CPS2.
- J.2.2.6 Policy CSP2 seeks to provide *"cultural, leisure, entertainment and community facilities, providing the widest possible range of such facilities appropriate for their catchments"* and *"Strong links with the surrounding communities and the network of centres and spread the regeneration benefits by knitting together old and new to create a richer, varied, and integrated sense of place."* This is anticipated to have a positive impact on Equality (SA Objective 11) through increased employment opportunities, access to services and community cohesion.
- J.2.2.7 Reference is made to the provision of Green Infrastructure through parts 3(e) and 3(g) of this policy, which is anticipated to have a minor positive impact on biodiversity (SA Objective 3), however this could be strengthened through further specification of GI measures in this policy, links to other relevant policies and / or GI strategies, potentially in the supporting text.
- J.2.2.8 A neutral effect is recorded for the remaining SA objectives under Policy CSP2.

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J.2.3 Policy CSP3 – Towns and Neighbourhood Areas and the Green Belt

Policy CSP3 – Towns and Neighbourhood Areas and the Green Belt

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

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP3	0	-	+/-	0	0	-	0	0	+	+	+	+	+	0

- J.2.3.1 The Draft BCP notes that the Towns and Neighbourhoods Areas make up most of the existing urban area and are where the majority of residents live. The overall land use-pattern within the Towns and Neighbourhoods Areas is not expected to alter greatly by 2039, but there will be some incremental change through a mix of permitted and allocated sites, windfall developments and town centre regeneration activity.

- J.2.3.2 The development of new housing and employment sites would be expected to result in the loss of previously undeveloped land and result in the loss of soil (and potentially mineral) resources. Therefore, this policy would be likely to result in a minor negative impact on the Plan area's natural resources (SA Objective 6). Similarly, the loss of greenfield land would be likely to have an adverse effect on biodiversity to some extent. The supporting text to this policy notes that the site selection process has sought to identify sites that can be delivered without adverse impacts on Sites of Importance for Nature Conservation or other significant high-quality habitat areas. The extent of impacts on biodiversity features is dependent on the development location and ecological characteristics of the area in question, as well as the potential for mitigation to avoid or minimise impacts as well as enhancement. This option does however have the potential to deliver strategic GI alongside development although the extent to which this may be achieved is uncertain at this stage. Part (e) of Policy CPS3 makes provision for "*a strong network of green infrastructure, centres, and community facilities*". Overall, mixed positive and negative effects are therefore identified in relation to biodiversity (SA Objective 3). Neutral effects are identified in relation to climate change adaptation (SA Objective 5) due to the approach to avoiding areas at significant risk from fluvial flooding in the site selection process.
- J.2.3.3 The Draft BCP seeks to provide strong links between the Growth Network and the Towns and Neighbourhoods Areas, through high-quality design and transport investment. By supporting "*access and design improvements to spread regeneration benefits and ensure integration of existing and new communities*" this Policy would be expected to improve residents' access to services and facilities. In addition, this policy aims to promote "a strong network of green infrastructure, centres, and community facilities." Overall, this policy would be expected to have minor positive impacts in regard to Transport and Accessibility, Equality and Health (SA Objectives 9, 11 and 12).
- J.2.3.4 Policy CSP3 would lead to some loss of open countryside and therefore a degree of adverse impacts on existing landscape resources are likely, although there is some potential to integrate development into the existing built form and to locate development in areas of lower landscape sensitivity where-ever possible, taking a balance of sustainability considerations into account. Such areas have been identified through the Landscape Sensitivity Study. Strategic site allocations for housing (i.e. new Neighbourhood Growth Areas) are set out in Policies WSA1-WSA9, DSA1-4, CSA1-2 in Chapter 13 of the Draft BCP and discussed in greater detail at the end of this Appendix. Employment allocations are not subject to individual site allocation policies and are covered under the 'umbrella' of Policy E2 (Strategic Employment Areas) as well as the overarching Spatial Strategy Policies (CSP1-5, GB1-2) and Employment Policies.
- J.2.3.5 A number of the proposed strategic housing allocations are located within areas predicted to have a negligible or minor adverse effect on landscape sensitivity (including sites SA-

0004-DUD, SA0017-DUD, SA-0025-DUD, SA-0014-WAL, SA-0022-WAL, SA-0048-WAL, SA-0187-WAL, SA-0009-WOL, SA-0010-WOL, SA-0015-WOL, SA-0030-WOL), which relate to areas of low, low-moderate or moderate landscape sensitivity as identified in the Landscape Sensitivity Study. A number of the proposed strategic allocations are located within areas predicted to have a negligible or minor impact on the Greenbelt (including sites SA-0004-DUD, SA-0017-DUD, SA-0009-WOL, SA-0010-WOL, SA-0015-WOL, SA-0030-WOL). Many of the proposed strategic housing allocations in Walsall (in addition to a high proportion of other identified reasonable alternatives) are located in more sensitive areas with respect to landscape sensitivity and greenbelt harm which needs to be weighed in the planning balance. In taking forward development plans, it is envisaged that opportunities would be sought to integrate high quality multi-functional GI into the designs and strengthen a wider GI network for all developments. This would also be beneficial to the local landscape by providing distinctive views of green space and natural features, which help to define local character whilst also delivering benefits to mental health and wellbeing. The provision of new open and green spaces can also help create attractive places to live and strengthen sense of place. Policy provision 1(e) of Policy CPS3 seeks to facilitate "A strong network of green infrastructure, centres, and community facilities." And Policy provision 1(g) of Policy CPS3 seeks to provide "*A strong Green Belt to promote urban renaissance within the urban area and provide easy access to the countryside for local residents; the landscape, nature conservation and agricultural land will be protected and enhanced where practical and possible.*" A minor adverse impact on landscape resources (SA objective 2) is predicted, taking the balance of these considerations into account overall.

J.2.4 Policy CSP4 - Achieving well-designed places

Policy CSP4 - Achieving well-designed places

- 1) The Black Country's ongoing transformation will be supported by the development of places and buildings providing a range of functions, tenures, facilities and services, intended to support the needs of diverse local communities. The design of spaces and buildings will be influenced by their context; development should enhance the unique attributes of the Black Country's character and heritage whilst responding to locally identified community needs, changes in society and cultural diversity.
- 2) Building designs will be sought that are appropriate to the Black Country, of a size, scale and type to integrate into their neighbourhood. Wherever possible, development proposals will employ sustainable modern technologies to help climate change mitigation and adaptation. The use of carbon-based products, energy and non-renewable resources will be minimised through the efficient design of buildings, choice of materials, layout and site orientation.
- 3) All development will be required to demonstrate a clear understanding of the historic character and local distinctiveness of its location and show how proposals make a positive contribution to Black Country place-making and environmental improvement.

Policy CSP4 - Achieving well-designed places

- 4) The Black Country will move through a permeable street network that gives maximum freedom of movement and a choice of means of transport, including ongoing support for the provision and extension of walking and cycling infrastructure. To facilitate this, transport proposals of a high design quality and utility will be sought. These should, among other aspects, include connections to and between transport hubs, ensure that interventions make a positive contribution to place-making and increase accessibility and connectivity.
- 5) The Black Country will be a safe and secure place to live and work in, through organising the urban environment in ways that encourage people to act in a civil and responsible manner. Development proposals will be required to provide active frontages, well-located, safe and accessible pedestrian and cycle infrastructure and an appropriate intensity of use in centres and elsewhere. Designs should promote natural surveillance and defensible spaces.
- 6) An integrated and well-connected multifunctional open space network will be pursued throughout the Black Country, including through the design and layout of new residential and employment developments. This will deliver opportunities for sport and recreation and will help establish and support a strong natural environment. Properly designed and well-located open spaces will help mitigate flood risk, provide space for wildlife and encourage informal recreation for local people.
- 7) The protection and enhancement of the Black Country's historic canal network and the area's natural waterways will be sought wherever possible through the design and layout of appropriately located housing and employment development and wherever possible by the integration of waterways into those proposals to create attractive waterside development. This will act as a unifying characteristic within the Black Country's urban structure and landscape.

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
CSP4	+	+	+	+	+	0	+	0	+	0	+	+	0	0

- J.2.4.1 Policy CSP4 seeks to ensure that all new developments within the Plan area are of high-quality design and have regard for the natural, built and historic environment.
- J.2.4.2 Policy CSP4 states that *"all development will be required to demonstrate a clear understanding of the historic character and local distinctiveness"*. The policy also seeks to *"enhance the unique attributes of the Black Country's character and heritage"* and ensure the *"protection and enhancement of the Black Country's historic canal network"*. The implementation of high-quality design would help to ensure that new development does not have an adverse impact on, and where possible enhances, any surrounding

- heritage assets. Therefore, a minor positive impact on cultural heritage would be expected (SA Objective 1).
- J.2.4.3 This policy seeks to ensure *"building designs will be sought that are appropriate to the Black Country, of a size, scale and type to integrate into their neighbourhood"* and protect *"local distinctiveness"*. This would be likely to help reduce potential adverse impacts of new development and ensure development is in keeping with the existing landscape character. A minor positive impact in relation to landscape would be expected (SA Objective 2).
- J.2.4.4 The policy seeks to support *"the protection and enhancement of the Black Country's historic canal network and the area's natural waterways"*. This would be likely to help protect biodiversity features associated with the canals. The policy would also *"provide space for wildlife"* through the promotion of a multifunctional open space network alongside development. Overall, a minor positive impact on biodiversity would be expected (SA Objective 3).
- J.2.4.5 This policy would be likely to encourage climate change resilience and help reduce carbon emissions associated with development, due to the promotion of energy efficient design. The use of modern and sustainable technologies would be likely to have minor positive impacts on carbon emissions and flood risk (SA Objectives 4 and 5).
- J.2.4.6 Under this policy, well-connected layouts would be provided, ensuring *"freedom of movement"* throughout neighbourhoods. The policy also seeks to encourage use of public transport, which would be likely to help reduce personal car use, having benefits to carbon emissions, air pollution and congestion. This would be expected to result in a minor positive impact on climate change mitigation, pollution, transport and accessibility (SA Objectives 4, 7 and 9).
- J.2.4.7 The policy seeks to ensure the Black Country is a *"safe and secure place"* and *"designs should promote natural surveillance and defensible spaces"*. This policy would be expected to help reduce the fear of crime and encourage social interaction within the local community. Therefore, a minor positive impact on equality would be expected (SA Objective 11).
- J.2.4.8 The policy seeks to support the provision of pedestrian and cycling routes within developments, and *"an integrated and well-connected multifunctional open space network"*. The policy would be likely to facilitate active travel and provide open space for outdoor exercise and personal reflection. Furthermore, the policy's focus on providing high quality development and incorporating climate change adapted buildings could potentially result in improved living conditions with benefits to human health. Policy CSP4 would help to encourage residents to live healthy lifestyles, and therefore, a minor positive impact on health would be expected (SA Objective 12).

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J.2.5 Policy CSP5 – Cultural Facilities and the Visitor Economy

Policy CSP5 – Cultural Facilities and the Visitor Economy

Development proposals

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

The Visitor Economy

- 6) Improvement and further development of visitor attractions will be supported where appropriate, to ensure that accessibility is maximised and to continue to raise the quality of the visitor experience throughout the Black Country. This can be achieved by: -
 - I. enhancing / extending current attractions,
 - II. providing inclusive access, particularly within centres,
 - III. enhancing the visitor experience, and
 - IV. delivering necessary infrastructure.
- 7) Links should be made to centres and those parts of the Black Country and beyond that are well-connected by public transport, considering the needs of business as well as leisure visitors, to encourage more local use of cultural and tourist attractions.
- 8) The canal network is also a significant visitor attraction for the Black Country, providing waterway links to Birmingham, Staffordshire, Worcestershire and beyond. Facilities adjoining and serving the canal network should be maintained and expanded to help provide a network of linked amenities and visitor hubs (see also Policy ENV7 - Canals).

Policy CSP5 – Cultural Facilities and the Visitor Economy

- 9) Physical and promotional links to visitor attractions close to the Black Country will be enhanced and encouraged, particularly in relation to Birmingham as a Global City and a business economy destination.

Cultural facilities and events

- 10) The Black Country has a significant cultural history of performance art, especially in relation to live music. To ensure it remains a fertile and thriving location for associated cultural and economic growth opportunities, the retention and protection of venues providing performance spaces, recording facilities and practice amenities will be sought. The provision of new venues and facilities will also be welcomed and supported, particularly within centres.
- 11) In cases where adjacent new development would prejudice the ongoing operation of a successful cultural / performance venue, the “agents of change” principle will be applied³. This will protect the amenities of incoming residents while at the same time it will preserve and protect the existing adjacent use / activity.
- 12) The promotion and protection of attractions and events that represent and celebrate the wide cultural and ethnic diversity across the Black Country will be encouraged, including spectator sports such as football and other activities. This will include the protection of valuable cultural and religious buildings and the promotion of cultural, religious and community festivals on a Black Country-wide basis in a range of suitable locations.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP5	+	+	0	+	0	0	0	0	+	0	+	+	+	0

J.2.5.1 This policy aims to provide for the protection, enhancement, promotion and expansion of cultural, tourist and leisure facilities within the Black Country. Policy CSP5 would be likely to have a minor positive impact on the economy through the safeguarding and promotion of such sites and by enhancing the tourism potential of the Black Country. Provisions in Part 3 of Policy CSP5 seeks to ensure that adjacent amenities, including residential amenity and business activities are not adversely impacted which would help to minimise potential impacts in relation to Pollution (SA Objective 7).

J.2.5.2 A minor positive impact on Climate Change Mitigation, Transport and Accessibility and Health (SA objectives 4, 9 and 12) would be anticipated through provisions in Part 6 and Part 7 of this policy which include reference to maximising accessibility and securing necessary supporting infrastructure, facilitating linkages to “centres and those parts of the Black Country and beyond that are well-connected by public transport, considering the needs of business as well as leisure visitors, to encourage more local use of cultural and

tourist attractions" and "maintaining and expanding facilities to the canal network to help provide a network of linked amenities".

J.2.5.3 The policy text states that development proposals should *"enhance existing cultural and tourist facilities and that contribute to the attractiveness of the Black Country"*. This would be likely to help ensure development are of high-quality design, create attractive areas, and promote the use of the local canals. Therefore, Policy CSP5 would be likely to have minor positive impacts in relation to landscape (SA Objective 2). In addition, this policy aims to ensure cultural facilities are protected and enhanced in a way that could potentially facilitate engagement and local awareness of the areas heritage resources and cultural history. This would be likely to have a minor positive impact on cultural heritage (SA Objective 12).

J.2.5.4 Alongside the delivery of highly accessible facilities and provision of local employment opportunities, various provisions within this policy would be expected to have benefits to the community and promote social inclusion. These include *"promotion and protection of attractions and events that represent and celebrate the wide cultural and ethnic diversity across the Black Country", "protection of valuable cultural and religious buildings" and "the promotion of cultural, religious and community festivals on a Black Country-wide basis in a range of suitable locations."* A minor positive impact on equality would therefore be expected (SA Objective 11).

J.2.6 Policy GB1 - The Black Country Green Belt

Policy GB1 - The Black Country Green Belt

- 1) The boundary of the Black Country Green Belt (within the four Black Country authorities of City of Wolverhampton, Dudley, Sandwell, and Walsall) is as defined on the Policies Map for each authority.
- 2) For sites that are removed from the Black Country Green Belt and allocated to meet housing, employment, or other needs through this Plan (as listed in Chapter 13):
 - a) the design of development will include physical features that define the new green belt boundary in a readily recognisable and permanent way; and
 - b) compensatory improvements to the environmental quality, biodiversity and accessibility of remaining green belt land will be secured to offset the impact of removing the land from the green belt, in accordance with national policy.
- 3) The Black Country Green Belt will be preserved from inappropriate development so that it continues to maintain its openness and serve its key functions.
- 4) Opportunities will be taken to enhance the value and function of the green belt, including through improving footpath and cycleway networks, and retaining and enhancing landscapes, visual amenity, biodiversity and protecting tranquil areas.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
GB1	+/-	-	-	+/-	+/-	-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-

- J.2.6.1 Policy GB1 sets out criteria for housing and employment allocations within the Green Belt. Paragraph 133 of the NPPF¹ states *"The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence"*.
- J.2.6.2 Development within the Green Belt is likely to result in the loss of previously undeveloped land and the permanent and irreversible loss of ecologically valuable soils, to some extent. The majority of the Black Country is identified as 'urban' Agricultural Land Classification (ALC), however, some areas of the Black Country Green Belt have been identified as Grade 3 ALC, which could potentially represent some of the Black Country's 'best and most versatile' (BMV) agricultural land (as current broad-scale regional mapping does not distinguish between Grade 3a and Grade 3b land). At present, the quantity of development that would be directed to BMV land or any Green Belt land is unknown. Furthermore, the allocation of land previously designated as Green Belt could include land that has been identified as being of low value or could contain previously developed land. Nevertheless, as Policy GB1 would direct some development to the Green Belt and would be expected to result in the loss of some previously undeveloped land and associated soils, a minor negative impact would be anticipated (SA Objective 6).
- J.2.6.3 Biodiversity and landscape value do not form part of the reasons for Green Belt designation under national policy (NPPF paragraph 134), however it is considered development of green belt land would be likely to lead to adverse impacts on biodiversity and landscape to some extent. The extent of these impacts will vary depending on site characteristics as well as the nature, scale and design of development proposed. Biodiversity features such as trees, hedgerows and field margins could potentially be impacted upon by development and proposals should have regard to the objectives set out in the Birmingham and Black

¹ MHCLG (2019) National Planning Policy Framework. Available at:
<https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 19/08/20]

Country Nature Recovery Network². Policy GB1 states that “*compensatory improvements to the environmental quality, biodiversity and accessibility of remaining green belt land will be secured to offset the impact of removing the land from the green belt, in accordance with national policy*”. This phrasing in terms of ‘compensatory measures’ under this policy derives from the NPPF Para 138. Compensatory measures under this policy would not be expected to fully prevent the loss of biodiversity features on site or result in biodiversity net gain which will be guided by other policy provisions in the BCP and emerging national policy. A minor negative impact on biodiversity is therefore anticipated overall (SA objective 3). It is considered that there is potential to strengthen this policy in terms of the compensatory measures that may be required to compensate for Green Belt loss.

- J.2.6.4 The Black Country Green Belt primarily comprises open countryside surrounding the urban area. The loss of Green Belt under this policy could potentially result in adverse impacts on the surrounding landscape and alter existing views. Development to the edge of the urban area in the Green Belt could also potentially increase the risk of coalescence between settlements. The policy text states that “*The Black Country Green Belt will be preserved from inappropriate development so that it continues to maintain its openness and serve its key functions.*” In addition, the policy provides that “*Opportunities will be taken to enhance the value and function of the green belt, including through improving footpath and cycleway networks, and retaining and enhancing landscapes, visual amenity, biodiversity and protecting tranquil areas.*” This would likely provide a degree of mitigation as well as enhancements, including access to areas which may currently not be accessible to the public. Overall it is considered likely that development under this policy would have a minor negative impact on the landscape to some extent (SA Objective 2).
- J.2.6.5 At present, an uncertain impact has been identified on the remaining (SA Objectives 1, 4, 5, 7, 8, 9, 10, 11, 12, 13 and 14). The extent of impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics.

² Wildlife Trust for Birmingham and Black Country (2017) Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017 – 2022. Available at: <https://www.bbcwildlife.org.uk/sites/default/files/2018-10/NIA%20Ecological%20Strategy%202017-22%20Summary.pdf> [Date Accessed: 26/08/20]

J.2.7 Policy GB2 - Extensions and Replacement Buildings in the Green Belt

Policy GB2 - Extensions and Replacement Buildings in the Green Belt

- 1) When considering proposals for proposed alterations and additions to buildings within the green belt, in addition to the relevant provisions of the NPPF, regard should be had to the following considerations:
 - a) Within the Black Country a number of commercial, educational and community uses that provide local employment opportunities or important community facilities are located in the green belt. To allow for their continued operation, limited, small-scale development will be permitted providing the following criteria are met:
 - (1) Proposals for redeveloping existing uses within the green belt will only be permitted if very special circumstances can be demonstrated or the proposal meets the criteria set out in national planning policy.
 - (2) Extensions to buildings or new freestanding buildings within an existing developed site and extensions or alterations to existing dwellings may be appropriate where:
 - i. Extensions are not disproportionately over and above the size of the existing building(s) as originally constructed;
 - ii. The scale, materials and general design are in keeping with the character of the buildings and their surroundings; and
 - iii. It does not lead to a major increase in the developed proportion of the site.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
GB2	0	0	0	0	0	0	0	0	0	0	+	0	+	0

J.2.7.1 Paragraph 145 of the NPPF³ states "a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are ... c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; d) the

³ MHCLG (2019) National Planning Policy Framework. Available at:
<https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 19/08/20]

replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces". In accordance with the NPPF, Policy GB3 would support the extension or replacement of existing buildings in the Green Belt where appropriate. Extension should be of the same scale and design of the surrounding built environment and in keeping with the local character.

- J.2.7.2 The policy seeks to ensure that commercial, educational and community uses located within the Green Belt can continue grow and support the local community and economy. As local businesses and facilities with value to the community would be supported under this policy, including opportunities for their extension or renewal, minor positive impacts would be likely in relation to equality of the local community and the local economy (SA Objectives 11 and 13).
- J.2.7.3 The policy also states that development under these circumstances should ensure "*the scale, materials and general design are in keeping with the character of the buildings and their surroundings*". Development under this policy would not be expected to adversely impact the local landscape or historic environment due to the small scale of development proposed. Therefore, negligible impacts in regard to cultural heritage and landscape would be expected (SA Objectives 1 and 2).

J.3 Delivery

J.3.1 Policy DEL1 – Infrastructure Provision

Policy DEL1 - Infrastructure

- 1) All new developments should be supported by the necessary on and off-site infrastructure to serve its needs, mitigate its impacts on the environment and ensure that it is sustainable and contributes to the proper planning of the wider area.
- 2) Unless material circumstances or considerations indicate otherwise, development proposals will only be permitted if all necessary infrastructure improvements, mitigation measures and sustainable design requirements and proposals are provided and /or can be phased to support the requirements of the proposed development. These will be secured through planning obligations, the Community Infrastructure Levy, planning conditions or other relevant means or mechanisms, to an appropriate timetable that is prioritised, resourced, managed, delivered and co-ordinated across the sub-region, where appropriate.
- 3) The BCA will set out in Development Plan Documents, Infrastructure Delivery Plans, Supplementary Planning Documents, and where appropriate, masterplans:
 - a) The infrastructure that is to be provided or supported;
 - b) The prioritisation of and resources for infrastructure provision;
 - c) The scale and form of obligation or levy to be applied to each type of infrastructure;
 - d) Guidance for integration with adjoining local authority areas;
 - e) The procedure for maintenance payments and charges for preparing agreements;
 - f) The defined circumstances and procedure for negotiation regarding infrastructure provision.
- 4) The BCP has been subject to a Viability Assessment to ensure the policies are deliverable. In the exceptional circumstances where site-specific issues generate viability concerns, applicants should discuss these with the relevant Council at the earliest possible stage in the development process.
- 5) Proposals that are unable to comply with BCP policies on viability grounds must be accompanied by a detailed Financial Viability Assessment.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DEL1	0	0	0	0	0	0	0	0	0	0	0	0	0	0

J.3.1.1 Policy DEL1 states that *"all new developments should be supported by the necessary on and off-site infrastructure to serve the development, mitigate its impacts on the environment, and ensure that the development is sustainable and contributes to the proper planning of the wider area"*. This policy seeks to ensure development proposals do not result in adverse impacts on environmental features and are situated in sustainable locations. However, this is a vague statement which does not provide specific details of how development proposals will meet these criteria. Therefore, whilst this policy would not be expected to result in any direct positive impacts on any of the SA objectives, this policy would prevent development proposals resulting in adverse impacts. Overall, negligible impacts would be likely for all of the SA objectives.

J.3.2 Policy DEL2 –Balance between employment land and housing

Policy DEL2 - Balance between employment land and housing

- 1) Development of housing or employment (E(g) (ii) (iii), B2 or B8 uses) on previously developed land that is not allocated for these uses ("windfall sites") will be permitted where the proposals accord with the other BCP and local plan policies and strategic priorities, and subject to meeting all the following criteria:
 - a) They are in sustainable locations and that are suitable for the proposed use;
 - b) They must demonstrate a comprehensive approach, by making best use of available land and infrastructure;
 - c) Incremental development will only be allowed where it would not prejudice the master planning of the wider area; and
 - d) Proposals for new development must take account of existing adjacent activities where the proposed development could have an adverse effect on or be affected by neighbouring uses. Mitigation of the impact of noise and other potential nuisances will need to be demonstrated.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DEL2	0	0	0	0	0	+	0	0	+	+	0	0	+	0

J.3.2.1 Policy DEL2 aims to support the development of windfall sites on previously developed land. This policy would be likely to have a minor positive impact on the provision of housing and employment land within the Black Country (SA Objectives 10 and 13).

J.3.2.2 Development directed toward brownfield land would be classed as an efficient use of land and would help to prevent the unnecessary loss of soil within the Black Country.

Therefore, Policy DEL2 would be likely to have a minor positive impact on natural resources (SA Objective 6).

- J.3.2.3 In accordance with Policy DEL2, windfall development should be situated in sustainable locations, and therefore, this would be expected to ensure site end users have good access to sustainable transport options. This would be likely to have a minor positive impact in relation to transport and accessibility (SA Objective 9).

J.3.3 Policy DEL3 – Promotion of Fibre to the Premise and 5G Networks

Policy DEL3 - Promotion of Fibre to the Premise and 5G Networks

Fibre to the Premise

- 1) Fibre to the Premise (FTTP) is essential infrastructure and vital to the delivery of sustainable development. Therefore, all major developments, which provide 10 or more new homes or more than 1,000 sqm of non-residential floorspace, will be required to deliver FTTP to all individual properties. This requirement will only be reduced where it can be clearly demonstrated that it is not practical or viable to deliver FTTP.
- 2) Where FTTP cannot be delivered, non-Next Generation Access technologies that can provide speeds in excess of 30MB per second should be provided as an alternative.
- 3) All eligible proposals should be supported by an FTTP Statement which details how FTTP will be provided to serve the development and confirms that FTTP will be available at first occupation.

5G Networks

- 4) Any proposals for infrastructure to support the delivery of 5G networks will be supported in principle, subject to meeting the requirements of other local policies and national guidance.
- 5) Proposals should be sensitively sited and designed to minimise impacts on the environment, amenity and character of the surrounding area. Proposals should not have an adverse impact on areas of ecological interest, areas of landscape importance, heritage assets or conservation areas. Proposals should demonstrate that proper regard has been given to location and landscaping requirements, including the potential for innovative solutions complimentary to the immediate surroundings.
- 6) Operators proposing 5G network infrastructure are strongly recommended to enter into early discussions with the relevant local planning authority.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DEL3	0	0	0	+	0	0	0	0	+	0	+	0	+	0

- J.3.3.1 Policy DEL3 supports the provision of Fibre to the Premise (FTTP) for development of ten or more dwellings and 5G networks in principle. The promotion of such infrastructure would be likely to help ensure that development proposals can meet the needs of current and future populations.
- J.3.3.2 With the development of FTTP and 5G within the Black Country under this policy, residents would be likely to have greater access to essential services from home and the workplace. This would provide increased opportunities to work from home and access to a wider range of employment opportunities, resulting in a minor positive impact on the local community and economy (SA Objective 13). By ensuring all development of ten or more homes incorporates FTTP, this policy would be likely to ensure the majority of new residents across the Plan area have access to this service, with a likely minor positive impact on equality (SA Objective 11).
- J.3.3.3 In addition, with improved access to online facilities and home working, this policy could potentially help to reduce reliance on personal car use such as for commuting to workplaces, and in turn, reduce local congestion. This would be expected to have a minor positive impact on climate change and transport, due to reduced emissions and congestion associated with less traffic (SA Objectives 4 and 9).

J.4 Health and Wellbeing

J.4.1 Policy HW1 – Health and Wellbeing

Policy HW1 – Health and Wellbeing

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

Policy HW1 – Health and Wellbeing

live, which are accessible by means of inclusive, active and environmentally sustainable forms of travel as set out in Policy HOU5;

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

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HW1	0	+	+	+	+	0	+	0	+	+	+	++	+	+

J.4.1.1 Policy HW1 outlines the strategic approach to promoting health and wellbeing across all new development proposed within the BCP.

J.4.1.2 The policy aims to "*protect, enhance, and provide new green and blue infrastructure* " and provide development which is "*inclusive, safe and attractive, with a strong sense of place*". These measures would be expected to have a minor positive impact on the quality and

- character of the landscape (SA Objective 2). Furthermore, the protection and enhancement of green and blue spaces would be likely result in a minor positive impact in regard to biodiversity through the potential provision of wildlife habitats and improved connectivity (SA Objective 3).
- J.4.1.3 Enhanced green and blue infrastructure can have many benefits in helping communities adapt to the changing climate. This can include mitigation of extreme temperatures and flooding, as well as carbon storage and filtration of pollutants due to enhanced vegetation coverage. Therefore, the policy could potentially result in a minor positive impact on climate change adaptation (SA Objective 5).
- J.4.1.4 The policy seeks to ensure future developments are *"energy efficient and achieve affordable warmth; provide good standards of indoor air quality and ventilation; are low carbon; mitigate against climate change; and are adapted to the effects of climate change"*. If all new homes are energy efficient, the implementation of this policy would decrease the volume of greenhouse gases (GHGs) emitted, including carbon, and as such, have a minor positive impact on climate change mitigation (SA Objective 4).
- J.4.1.5 The policy seeks to improve the health of residents by reducing the impact of *"noise; ground and water contamination; vibration; and poor indoor and outdoor air quality"* on new development. This policy would be likely to help reduce exposure to pollution of this nature within the Black Country, and therefore, a minor positive impact would be expected (SA Objective 7).
- J.4.1.6 The policy also seeks to promote active travel for site end users and encourage the use sustainable transport options. This would help to reduce reliance on personal car use, and subsequently, reduce transport-associated air pollution. This would be likely to have minor positive impacts in relation to climate change, pollution and transport (SA Objectives 4, 7 and 9).
- J.4.1.7 The policy states that development should *"provide a range of housing types and tenures"* and *"self-build"* opportunities. This would be likely to have a minor positive impact on housing across the Black Country (SA Objective 10).
- J.4.1.8 *Policy HW1 aims to "encourage social interaction; and provide for all age groups and abilities" and "reduce health inequalities"*. The policy would seek to bring residents together and promote community cohesion. The policy also seeks to ensure development proposals provide *"affordable warmth"*, which would help reduce fuel poverty and facilitate *"digital inclusion"*, ensuring site end users have access to all digital services. Therefore, this policy would be likely to have a minor positive impact for equality (SA Objective 11).
- J.4.1.9 This policy would be likely to provide residents with access to a diverse range of natural habitats. Access to open and natural spaces would be expected to have benefits to mental and physical wellbeing. Facilitating active travel would be expected to encourage residents

to live healthier lifestyles and provide opportunities for outdoor exercise, resulting in benefits to health and wellbeing. This policy would be likely to reduce air and noise pollution, and as such, could potentially help to protect residents within the Black Country from health problems associated with pollution. Overall, a major positive impact in relation to human health would be expected (SA Objective 12).

- J.4.1.10 The policy states that development should “*provide a range of quality employment opportunities for all skillsets and abilities along with ... education and training*” in combination with protecting and enhancing social infrastructure including education facilities. In addition, the policy seeks to provide high quality broadband for all development. This would ensure site end users have good internet access. Home broadband would be likely to have benefits to the local economy, by enabling home working. Further collective benefits to the economy could potentially be achieved by facilitating a healthier workforce and by promoting an attractive urban environment, leading to improvements in productivity. These factors would be expected to result in a minor positive impact in relation to the economy and education (SA Objectives 13 and 14).

J.4.2 Policy HW2 - Healthcare Infrastructure

Policy HW2 - Healthcare Infrastructure

- 1) New health care facilities should be:
 - a) Well-designed and complement and enhance neighbourhood services and amenities;
 - b) Well-served by public transport infrastructure, walking and cycling facilities and directed to a centre appropriate in role and scale to the proposed development, and its intended catchment area, in accordance with Policies CEN1, CEN2, CEN3 and CEN4. Proposals located outside centres must be justified in terms of relevant BCP policies such as CEN5 and CEN6, where applicable;
 - c) Wherever possible, located to address accessibility gaps in terms of the standards set out in Policy HOU2, particularly where a significant amount of new housing is proposed;
 - d) Where possible, co-located with a mix of compatible community services on a single site.
- 2) Existing primary and secondary healthcare infrastructure and services will be protected, and new or improved healthcare facilities and services will be provided, in accordance with requirements agreed between the Local Planning Authorities and local health organisations, which will be contained in local development documents.
- 3) Proposals for major residential developments of ten units or more must be assessed against the capacity of existing healthcare facilities and/or services as set out in local development documents. Where the demand generated by the residents of the new development would have unacceptable impacts upon the capacity of these facilities, developers will be required to contribute to the provision or improvement of such services, in line with the requirements and calculation methods set out in local development documents.
- 4) Where it is not possible to address such provision through planning conditions, a planning agreement or planning obligation may be required.

Policy HW2 - Healthcare Infrastructure

- 5) In the first instance, infrastructure contributions will be sought to deal with relevant issues on the site or in its immediate vicinity. Where this is not possible, however, or the sequential test is not met by the site, an offsite (commuted) contribution will be negotiated. Other contributions may include for offsite provision of health or related services.
- 6) The effects of the obligations on the financial viability of development may be a relevant consideration.
- 7) For strategic sites, the likely requirement for on-site provision for new health facilities is set out in Chapter 13.

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

- J.4.2.1 Policy HW2 seeks to ensure that all new healthcare facilities are well designed and accessible, with a particular focus on ensuring facilities are accessible by public transport. The policy also aims to protect existing health facilities, and details how larger residential developments of ten or more homes should be assessed against the capacity of surrounding facilities and new facilities should *"be located to address accessibility gaps"*. These factors would be expected to help ensure all new residents have good access to healthcare facilities, and as such, a major positive on health would be expected (SA Objective 12).
- J.4.2.2 By identifying and addressing accessibility gaps, this policy would also be expected to promote equal access to healthcare and could potentially help to reduce health inequalities; therefore, a minor positive impact on equality would be expected (SA Objective 11).
- J.4.2.3 This policy seeks to ensure that all healthcare developments are located in areas with good public transport access for residents, and that where possible, healthcare facilities are co-located alongside other community services to serve nearby residential development. This policy could potentially reduce the need to travel and reduce the volume of visitors arriving at facilities via personal car, with subsequent benefits in terms of reducing local congestion and transport-associated emissions. Therefore, due to the focus on sustainable transport and accessibility, this policy could potentially have a minor positive impact on climate change mitigation, pollution and transport (SA Objectives 4, 7 and 9).

J.4.3 Policy HW3 - Health Impact Assessment (HIA)

Policy HW3 - Health Impact Assessment (HIA)

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

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

J.4.3.1 This policy ensures that development proposals as specified within each Local Authorities' local development documents are required to undertake a Health Impact Assessment (HIA). This would help to ensure that opportunities for promoting healthy lifestyles are maximised. This would be likely to result in benefits such as creating engaging public spaces that facilitate social interaction and encourage walking and cycling. This would be expected to have a major positive impact on the health and wellbeing of local residents (SA Objective 12).

J.4.3.2 By requiring some developments to submit an HIA, this policy would help to ensure development proposals do not have direct adverse impacts on: residents' physical or mental health; social, economic and environmental living conditions; demand for or access to health and social care services; or an individual's ability to improve their own health and wellbeing. Therefore, this policy would also be likely to have minor positive impact in relation to equality (SA Objective 11).

J.4.3.3 In addition, Policy HW3 could potentially have a minor positive impact on transport and accessibility within the Plan area by promoting walking and cycling over the use of personal vehicles, and as such, encouraging people to engage in higher levels of daily physical

activity (SA Objective 9). This could also result in consequent benefits in terms of reducing the emission of road transport-associated pollutants which can be harmful to health, potentially leading to minor positive impacts regarding climate change mitigation and pollution (SA Objectives 4 and 7).

DRAFT

J.5 Housing

J.5.1 Policy HOU1 – Delivering Sustainable Housing Growth

Policy HOU1 – Delivering Sustainable Housing Growth

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

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

Source of Supply		Total	2020-2029	2029-2034	2034-2039
CURRENT SUPPLY as of April 2020	Sites Under Construction	5,258	5,258	0	0
	Sites with Planning Permission or Prior Approval [▲]	7,380	7,244	136	0
	Sites with Other Commitment (as set out in 2020 SHLAAs) [⌘]	3,802	2,002	986	814
	Existing Housing Allocations in Strategic Centres [⌘] (not subject to review through the Black Country Plan)	4,973	1,708	1,795	1,470
HOUSING ALLOCATIONS IN BLACK COUNTRY PLAN⁵	Occupied Employment Land [◆]	3,091	616	1,228	1,247
	Sites released from the Green Belt	7,720	2,398	3,173	2,149
	Other [⌘]	6,921	4,308	1,487	1,126
	Small sites (<10 homes / 0.25 ha)	7,651	2,661	2,495	2,495

⁵ Excluding some sites with planning permission which have been allocated in the BCP to ensure they are not lost to other uses

Policy HOU1 – Delivering Sustainable Housing Growth

WINDFALL ALLOWANCES	Wolverhampton City Centre upper floor conversions	812	232	290	290
ADDITIONAL SITE CAPACITY IN STRATEGIC CENTRES (to be allocated in Local Plans)	Wolverhampton City Centre	750	0	250	500
	Walsall Town Centre	0	0	0	0
	Brierley Hill Town Centre	350	0	175	175
	West Bromwich Town Centre	200	0	100	100
TOTAL GROSS HOMES		48,908	26,427	12,115	10,366
TOTAL LOSS HOMES	Dudley Estimated Housing Renewal Demolitions	- 323	- 323	0	0
	Small-scale demolition windfalls	- 748	- 328	- 210	- 210
TOTAL NET HOMES		47,837	25,776	11,905	10,156

▲ discounted by 5%

⌘ discounted by 10%

◆ discounted by 15%

Table 4 Sources of Housing Land Supply and Phased Housing Targets for each Black Country Authority (2020-39)

Source of Supply (net new homes)		Dudley	Sandwell	Walsall	Wolverhampton
CURRENT SUPPLY as of April 2020	Sites Under Construction	978	624	1,255	2,401
	Sites with Planning Permission or Prior Approval ▲	1,867	2,577	1,105	1,831
	Sites with Other Commitment (as set out in 2020 SHLAAs)⌘	833 ⁶	102	2,691 ⁷	176
	Existing Housing Allocations in Strategic Centres⌘ (not subject to review through the Black Country Plan)	2,506	201	18	2,248
HOUSING ALLOCATIONS IN BLACK COUNTRY PLAN*	Occupied Employment Land◆	732	1,882	0	477
	Sites released from the Green Belt	1,117	171	5,418 ⁸	1,014
	Other⌘	2,739	2,013	1,402	767
WINDFALL ALLOWANCES	Small sites (<10 homes / 0.25 ha)	2,816	1,728	1,455	1,652
	Wolverhampton City Centre upper floor conversions				812
	Brierley Hill Town Centre	350			

⁶ including mixed use allocations which include centre uses and so are not subject to review through the Black Country Plan

⁷ including 833 homes on identified sites in Walsall Town Centre

⁸ Excludes 1,715 homes which it is estimated will be delivered after 2039

Policy HOU1 – Delivering Sustainable Housing Growth

ADDITIONAL SITE CAPACITY IN STRATEGIC CENTRES (to be allocated in Local Plans)	West Bromwich Town Centre		200		
	Walsall Town Centre			0	
	Wolverhampton City Centre				750
TOTAL GROSS HOMES		13,938	9,498	13,344	12,128
TOTAL LOSS HOMES	Estimated Housing Demolitions 2020-39	- 703	- 340	0	- 28
TOTAL NET HOMES (per annu⁹)		13,235 (696)	9,158 (482)	13,344 (702)	12,100 (637)
HOUSING TARGETS (NET)	2020-2029	6,264	4,338	6,318	5,730
	2029-2034	3,480	2,410	3,510	3,185
	2034-2039	3,480	2,410	3,510	3,185

▲ discounted by 5%

⌘ discounted by 10%

◆ discounted by 15%

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

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
HOU1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-

J.5.1.1 Policy HOU1 would be expected to deliver a high quantum of residential development of 47,837 net new homes over the plan period in the Black Country. However, this policy would not be expected to fully meet the identified housing needs of the Black Country. Overall, a minor positive impact on housing provision would be expected (SA Objective 10).

J.5.1.2 An uncertain impact has been identified on the remaining SA Objectives as the extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics. These are assessed in the SA process through the assessment of reasonable alternatives, as documented in this SA report and supporting appendices.

⁹ Rounded down

J.5.2 Policy HOU2 – Housing Density, Type and Accessibility

Policy HOU2 – Housing Density, Type and Accessibility

- 1) The density and type of new housing provided on any housing site should be informed by:
 - a) The need for a range of types and sizes of accommodation to meet identified sub-regional and local needs;
 - b) The level of accessibility by sustainable transport to residential services, including any improvements to be secured through development, as set out in Table 5;
 - c) The need to achieve high-quality design and minimise amenity impacts, considering the characteristics and mix of uses in the area where the proposal is located.
- 2) Each authority will aim to provide an overall mix of house types over the plan period, tailored to best meet local and sub-regional needs.
- 3) Developments of ten homes or more should provide a range of house types and sizes that will meet the accommodation needs of both existing and future residents, in line with the most recently available information.
- 4) All developments of ten homes or more should achieve the minimum net density set out below, except where this would prejudice historic character and local distinctiveness as defined in Policy ENV5:
 - a. 100 dwellings per hectare where Table 5 accessibility standards for very high-density housing are met and the site is located within a Strategic Centre or Town Centre.
 - b. 45 dwellings per hectare where Table 5 accessibility standards for high density housing are met;
 - c. 40 dwellings per hectare where Table 5 accessibility standards for moderate density housing are met.
- 5) Chapter 13 provides details of the appropriate density and, where appropriate, house type mix, to be sought on each housing allocation site, in accordance with the requirements set out in this Policy. Further details of design requirements for housing developments may be set out in Supplementary Planning Documents.

Table 5 Black Country Housing Accessibility Standards

Density (homes per hectare net)	Very High: 100 + Only appropriate within a Strategic Centre or Town Centre	High: 45 +	Moderate: 40 +
Indicative proportion of flats	100%	>15%	0 – 15%
Indicative amount of housing suited to families	low	medium	high
Accessibility (by either walking or public transport, unless stated)			
Employment - Strategic Centre or other employment area	20 mins	20 mins	30 mins
Health - Primary Care e.g. GP Surgery or Health Centre	10 mins	10 mins	15 mins

Policy HOU2 – Housing Density, Type and Accessibility				
Fresh Food - Centre or food store	N/a	10 mins	15 mins	
Education - Primary School (walking distance only)	N/a	15 mins	10 mins	
Education - Secondary School	N/a	25 mins	20 mins	

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU2	0	0	0	+	0	0	+	0	+	+	+	+	0	0

- J.5.2.1 An appropriate mix of housing is required across the Plan area to help to ensure that the varied needs of current and future residents are met. In particular, this may include an increased number of smaller homes which would be likely to help provide appropriate accommodation for the elderly and first-time buyers entering the market.
- J.5.2.2 Policy HOU2 aims to ensure that residential developments meet the local housing need, supporting the current and future requirements of the population in terms of housing type and size, as well as ensuring new residents have good access to sustainable transport options. The policy sets out criteria for accessibility standards, which would be expected to ensure housing is provided in sustainable locations which results in a reduced need to travel, encourages local shopping and promotes social inclusion in the community. This would be likely to have a minor positive impact on local accessibility, housing provision and equality (SA Objectives 9, 10 and 11).
- J.5.2.3 Due to the requirement to ensure that the density and type of housing development is informed by the level of accessibility via sustainable transport, this policy could potentially help to reduce emission of road transport associated GHGs and air pollutants. Therefore, a minor positive impact would be anticipated on climate change mitigation and pollution (SA Objectives 4 and 7).
- J.5.2.4 By providing a suitable mix of housing types and tenure, this policy would be expected to meet the varying needs of residents, and as such, have a minor positive impact on health and wellbeing (SA Objective 12).

J.5.3 Policy HOU3 – Delivering Affordable, Wheelchair Accessible and Self Build / Custom Build Housing

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

Affordable Housing

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

National Wheelchair Accessibility Standards

- 4) All developments of ten homes or more should provide a proportion of wheelchair accessible housing, where this is financially viable. The minimum proportion that should be provided is:
 - a) On all brownfield sites* and on greenfield sites* in lower value zones: 20% of homes to meet the optional Building Regulations Requirement M4(2): Accessible and Adaptable Dwellings¹⁰;
 - b) On greenfield sites* in medium or higher value zones: 15% of homes to meet the optional Building Regulations Requirement M4(3): Wheelchair User Dwellings¹¹ and all remaining homes to meet the optional Building Regulations Requirement M4(2): Accessible and Adaptable Dwellings¹².
- 5) Other than for reasons of financial viability, these requirements will only be reduced where it can be demonstrated that any of the following apply:
 - a) it is not practically achievable given the physical characteristics of the site, or
 - b) site specific factors mean that step-free access to the dwelling cannot be achieved, or
 - c) the homes are located on the first floor or above of a non-lift serviced multi-storey development.

Self-Build and Custom Build Plots

- 6) On developments of 100 homes or more, where there is currently a need for self-build and custom build plots identified in the self-build and custom build register for the local authority where the site is located,

¹⁰ Or any subsequent national equivalent standard

¹¹ Or any subsequent national equivalent standard

¹² Or any subsequent national equivalent standard

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

at least 5% of plots should be made available for self-build or custom build, or sufficient to match the current number on the register if lower. Any plots that have not been sold after 12 months of appropriate marketing will revert to the developer to build.

Financial Viability Assessments

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

** or parts of sites*

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU3	0	0	0	0	0	0	0	0	0	+	+	+	0	0

- J.5.3.1 Policy HOU3 seeks to ensure an appropriate mix of affordable and accessible homes are delivered across the Plan area, as well as the opportunity for self-build homes. The policy also sets out requirements for developments where the criteria for affordable, accessible and self-build homes on site are not viable.
- J.5.3.2 The policy would help to ensure that, throughout the Plan area, the BCP delivers an appropriate mix of affordable housing that meets the varied needs of current and future residents. This policy sets out the requirements for affordable housing for development of ten dwellings or more, to ensure that suitable residential development is provided to meet the social and economic needs of the population.
- J.5.3.3 Future residential development needs to consider accessibility requirements for the elderly, as well as families with young children and those with specific needs. Policy HOU3 would

be likely to help ensure residential developments allow for the safe and convenient access for all residents, including older people and wheelchair users.

J.5.3.4 This policy also seeks to meet the needs of those wishing to build their own homes. The policy aims to secure a 5% of major developments of 100 or more units to be available for self-build housing. This would help to ensure that new housing delivered across the Plan area can accommodate the diverse requirements of residents within the Black Country.

J.5.3.5 Overall, Policy HOU3 would be anticipated to result in minor positive impacts in relation to housing, equality and human health (SA Objectives 10, 11 and 12).

J.5.4 Policy HOU4 – Accommodation for Gypsies and Travellers and Travelling Showpeople

Policy HOU4 – Accommodation for Gypsies and Travellers and Travelling Showpeople

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

Policy HOU4 – Accommodation for Gypsies and Travellers and Travelling Showpeople

including, in the case of travelling show people, sufficient level space for outdoor storage and maintenance of equipment;

- e) The site should be served or capable of being served by adequate on-site services for water supply, power, drainage, sewage and waste disposal (storage and collection).
- 5) The location, design and facilities provided on new sites will be determined in consultation with local gypsies and travellers and travelling show people and will also consider / reflect any available national guidance.
- 6) Existing traveller sites will be safeguarded and their redevelopment or use for other purposes will be opposed, unless there is evidence either that a suitable replacement with equivalent capacity has been provided elsewhere or that the existing site is no longer required to meet identified need.

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

Table 5 Black Country Indicative Gypsy, Traveller and Travelling Showpeople Accommodation Targets: 2020-2039¹³

Source: Black Country GTAA 2020

		Dudley		Sandwell		Walsall		Wolverhampton		Black Country
		2016-26	2026-36	2016-26	2026-36	2016-26	2026-36	2016-26	2026-36	2016-36
Gypsy and Traveller Pitches	Target	10	9	8	2	15	9	18	8	79
	Permissions / Allocations	2	0	10	0	23	0	12	0	47
Plots for Travelling show people	Target	6	4	4	2	21	14	0	0	51
	Permissions / Allocations	0	0	0	0	0	0	0	0	0

1	2	3	4	5	6	7	8	9	10	11	12	13	14
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¹³ Pitch targets exclude those living in housing and with a psychological aversion to housed accommodation.

Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+	+	+	+/-	+

- J.5.4.1 In accordance with the planning policy for traveller sites¹⁴, Gypsies and Travellers are defined as *"persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such"*.
- J.5.4.2 Travelling Showpeople are defined as *"Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above"*¹⁵.
- J.5.4.3 This policy would be expected to meet the identified pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit accommodation needs as set out in the Gypsy and Traveller Accommodation Assessment. Therefore, this policy would be likely to have a minor positive impact on housing (SA Objective 10).
- J.5.4.4 The policy would also be expected to have a minor positive impact on equality, as the provision of Gypsy and Traveller pitches and plots helps to ensure that a diverse range of residents in the Black Country have access to appropriate accommodation to suit their needs (SA Objective 11).
- J.5.4.5 The criteria set out in Policy HOU4 requires all development proposals for Gypsy, Traveller and Travelling Showpeople pitches and plots to have good access in accordance with Policy HOU2, integrate with neighbouring communities, include play areas and access roads, and have adequate access to on site services including water supply, power, drainage, sewage and waste disposal. These requirements would be expected to result in minor positive impacts in regard to transport and accessibility, equality, health and education (SA Objectives 9, 11, 12 and 14).

¹⁴ MHCLG (2015) Planning policy for traveller sites. Available at: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites> [Date Accessed: 19/08/20]

¹⁵ Ibid

- J.5.4.6 An uncertain impact has been identified on the remaining SA Objectives as the extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics. These are assessed in the SA process through the assessment of reasonable alternatives, as documented in this SA report and supporting appendix (Appendix K).
- J.5.4.7 The policy does state that in order to meet the gypsy and traveller accommodation need, some sites have been removed from the Green Belt in Walsall. This could potentially have adverse impact on the surrounding environment, such as landscape, biodiversity and natural resources, as Green Belt sites are likely to be previously undeveloped land.

J.5.5 Policy HOU5 – Education Facilities

Policy HOU5 – Education Facilities

- 1) New nursery, school and further and higher education facilities should be:
 - a) Well-designed and complement and enhance neighbourhood services and amenities;
 - b) Well-served by public transport infrastructure, walking, and cycling facilities, particularly in centres, and located to minimise the number and length of journeys needed in relation to its intended catchment area;
 - c) Wherever possible, located to address accessibility gaps in terms of the standards set out in Policy HOU2, particularly where a significant amount of new housing is proposed.
- 2) New and improved facilities will be secured through a range of funding measures. Where a housing development of ten or more homes would increase the need for education facilities to the extent that new or improved facilities would be required to meet this need, planning obligations or Community Infrastructure Levy will be secured sufficient to meet the need, where this is financially viable. For strategic allocations, the likely requirement for on-site provision of new schools is set out in Chapter 13: Site Allocations. Where land is provided for a new school as part of a housing development, the financial contribution made by that development towards education facilities will be reduced accordingly.
- 3) On sites where the education facility requirement is proven not to be viable, the maximum proportion of funding will be sought that will not undermine the viability of the development, subject to securing other planning obligations necessary for the development to gain planning permission. A financial viability assessment will be required to be submitted, meeting the requirements set out in Policy HOU3.
- 4) New and redeveloped education facilities should include maximum provision for wider community use of sports and other facilities, where appropriate.
- 5) The existing network of education facilities will be protected and enhanced. The physical enhancement and expansion of higher and further educational facilities and related business and

Policy HOU5 – Education Facilities

research will be supported where it helps to realise the educational training and research potential of the Black Country. Proposals involving the loss of an education facility will be permitted only where adequate alternative provision is available to meet the needs of the community served by the facility.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU5	0	0	0	+	0	0	+	0	+	0	+	+	+	++

- J.5.5.1 Policy HOU5 seeks to support the development or expansion of education facilities secured through a range of funding measures, including s.106 agreements. New facilities would be required to be in accordance with the criteria set out in the policy, such as being situated in areas with good public transport access. The policy also aims to protect and enhance existing facilities. This policy would therefore be expected to have a major positive impact on education (SA Objective 14).
- J.5.5.2 Improved access to education would also be likely to have benefits to the local economy, by ensuring a greater proportion of residents have skills desirable in many employment opportunities. The policy seeks to address accessibility gaps and ensure all residents have good access to educational facilities via public transport. Therefore, this policy would be likely to have a minor positive impact on transport and accessibility, equality and the local economy (SA Objectives 9, 11 and 13).
- J.5.5.3 The policy also states that new education facilities should be “*Well-served by public transport infrastructure, walking, and cycling facilities, particularly in centres, and located to minimise the number and length of journeys needed in relation to its intended catchment area.*” This could potentially result in a minor positive impact on climate change mitigation and pollution, by reducing reliance on travel via car and consequently reducing emission of GHGs and harmful pollutants (SA Objectives 4 and 7).
- J.5.5.4 In addition, this policy seeks to ensure that “*new and redeveloped education facilities should include maximum provision for community use of sports and other facilities*”. This would be expected to have a minor positive impact on the health of local residents (SA Objective 12).

J.5.6 Policy HOU6 – Houses in Multiple Occupation

Policy HOU6 – Houses in Multiple Occupation

- 1) Proposals for the creation of Houses in Multiple Occupation, including the conversion of buildings or sub-division of dwellings, will be permitted provided that:
 - a) the development would not result in the loss of family-sized dwellings in areas where there is a proven demand for such accommodation;
 - b) the development is unlikely to be detrimental to the amenities of the occupiers of adjoining or neighbouring properties by way of noise, overlooking, general disturbance, or impact on visual amenity;
 - c) The development would not have a significant adverse impact on the character and appearance of the area, including the historic and natural environment;
 - d) provision for off- and on-street car and cycle parking is sufficient and appropriately incorporated and would not have an adverse impact on the surrounding area by way of increased on-street parking, impaired highway safety or impeding proper access to the area;
 - e) the site is in an area that has good access by walking and public transport to residential services, as set out in Policy HOU2;
 - f) the development meets Nationally Described Space Standards as set out in Policy ENV9 and provides a satisfactory standard of living accommodation, to ensure that the occupiers have adequate floor space and the internal layout is shown to be suitable for the number of units proposed in terms of daylight, outlook and the juxtaposition of living rooms and bedrooms;
 - g) adequate provision is made for the storage and disposal of refuse and recycling; and
 - h) adequate provision of residential amenity is made, including outdoor amenity space for sitting out, play and drying clothes and for external storage space, including cycle storage.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU6	0	0	0	0	0	0	0	0	+	+	+	+	0	0

- J.5.6.1 A dwelling is classed as a house in multiple occupation (HMO) if at least three tenants live there and share a toilet, bathroom or kitchen. Policy HOU6 supports the development of HMOs, providing the proposal is in accordance with the criteria set out in the policy. This would be likely to provide a range of housing options to residents of the Black Country, and therefore, would be likely to have a minor positive impact on housing and equality

(SA Objectives 10 and 11). In addition, the policy seeks to ensure the development of any HMOs would not significantly impact cultural heritage, landscape or biodiversity features.

- J.5.6.2 This policy seeks to ensure development proposals are located in an area which has "*good access by walking and public transport to residential services*". This would be expected to have a minor positive impact on transport and accessibility and could potentially encourage outdoor exercise and active travel, with benefits to human health and wellbeing (SA Objectives 9 and 12).

J.6 The Black Country Economy

J.6.1 Policy EMP1 - Providing for Economic Growth and Jobs

Policy EMP1 - Providing for Economic Growth and Jobs

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

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
EMP1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-

- J.6.1.1 The BCP allocates 354 ha of employment land for the period between 2020 - 2039 and provides for a further 69ha of development to come forward through the redevelopment of existing employment land and premises. Further land is provided on other sites which have planning permission for employment development. This will therefore accommodate 63% of forecast needs arising within the Black Country. 37% of employment land need arising in the Black Country cannot be met solely within the Black Country.
- J.6.1.2 Minor positive impacts are considered likely as the policy would deliver a significant quantity of employment land, however, would not meet the full identified needs for the Black Country (SA Objective 13).
- J.6.1.3 An uncertain impact has been identified on the remaining SA Objectives as the extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics. These are assessed in the SA process through the assessment of reasonable alternatives, as documented in this SA report.

J.6.2 Policy EMP2 – Strategic Employment Land

Policy EMP2 – Strategic Employment Land

- 1) The Strategic Employment Areas are shown on the Policies Map. They are characterised by excellent accessibility, high-quality environments and clusters of high technology growth sector businesses. These areas will be safeguarded for manufacturing and logistics uses within Use Classes E(g)(ii), E(g)(iii)), B2 and B8.
- 2) Within Strategic Employment Areas, high-quality development or redevelopment of sites and premises will be required, and planning applications that prejudice or dilute the delivery of appropriate employment activity, or deter investment in such uses, will be refused.
- 3) Strategic Employment Areas will be safeguarded from redevelopment for other non-manufacturing / logistics uses.
- 4) Some ancillary employment-generating non-Class E(g)(ii), E(g)(iii)), and Class- B2 and B8 uses, such as childcare facilities and small-scale food and drink outlets, may also be permitted in Strategic Employment Areas, where they can be shown to strongly support, maintain or enhance the business and employment function and attractiveness of the area, and meet sequential and other national or local policy tests (particularly Policies CEN5 and CEN6) relating to appropriate uses as necessary.

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

EMP2	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-
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- J.6.2.1 Policy EMP2 seeks to allocate Strategic Employment Land within the Black Country. The Strategic Employment Areas correspond to areas of highest market demand and be characterised by “*clusters of high technology growth*”. This would be likely to have benefits to the local economy, as employment land would be located in desirable areas and would provide technology to enable businesses to thrive.
- J.6.2.2 The policy states that Strategic Employment Areas will be characterised by “*excellent accessibility*”, which would be expected to ensure residents have good access to employment opportunities and surrounding services via sustainable transport modes. Therefore, a minor positive impact in relation to transport and accessibility would be likely (SA Objective 9).
- J.6.2.3 At present, an uncertain impact has been identified for the remaining SA objectives (SA Objectives 1, 2, 3, 4, 5, 6, 7, 8, 10, 11, 12 and 14).

J.6.3 Policy EMP3 – Local Employment Areas

Policy EMP3 – Local Employment Areas

- 1) Local Employment Areas are shown on the Policies Map. They are characterised by a critical mass of industrial, warehousing and service activity with good access to local markets and employees.
- 2) These areas will provide for the needs of locally-based investment and will be safeguarded for the following uses;
 - a) Industry and warehousing (E(g)(ii), E(g)(iii)), B2 and B8 use)
 - b) Motor trade activities, including car showrooms and vehicle repair
 - c) Haulage and transfer depots
 - d) Trade, wholesale retailing and builders’ merchants
 - e) Scrap metal, timber and construction premises and yards
 - f) Waste collection, transfer and recycling uses as set out in Policy W3.
- 3) Not all areas will be suitable for all uses.
- 4) Some ancillary employment-generating non-Class E(g)(ii), E(g)(iii)) and B uses such as childcare facilities and food and drink outlets may also be permitted in Local Employment Areas where they can:
 - a) be shown to strongly support, maintain or enhance the business and employment function of the area; and
 - b) meet sequential and other national or local policy tests (particularly Policies CEN5 and CEN6) relating to appropriate uses, as necessary.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-

J.6.3.1 Policy EMP3 seeks to allocate Local Employment Areas to support the provision of industrial, logistics and commercial activities which would be likely to result in benefits for the local economy and provision of local employment opportunities. This policy would therefore be likely to have a minor positive impact on the economy (SA Objective 13).

J.6.3.2 Policy EMP3 also seeks to safeguard areas for "*waste collection, transfer and recycling uses*". This policy would therefore be expected to have a minor positive impact on waste, by supporting the efficient disposal of waste (SA Objective 8).

J.6.3.3 An uncertain impact has been identified on the remaining SA Objectives to site specific contextual factors (SA Objectives 1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12 and 14).

J.6.4 Policy EMP4 – Other Employment Sites

Policy EMP4 – Other Employment Sites

- 1) For employment areas that are not designated as either Strategic Employment Areas or Local Employment Areas on the Policies Map, but comprise existing occupied employment land within the BC, development will be supported for:
 - a) new industrial employment uses or extensions to existing industrial employment uses, or
 - b) housing or other non-ancillary non-industrial employment uses.
- 2) Development or uses under 1(b) will only be supported where there is robust evidence to demonstrate to the satisfaction of the relevant authority, that:
 - a) The site is no longer required for industrial employment purposes, including the possible relocation of displaced employment uses from other parts of the Black Country;
 - b) The site is no longer viable for such uses;
 - c) There are satisfactory arrangements in place for the relocation of existing occupiers of the employment uses on the site, if suitable sites are available in the local area;
 - d) The site could be brought forward for housing in a comprehensive manner and would not lead to piecemeal development;
 - e) Residential development would not adversely affect the ongoing operation of existing or proposed employment uses on the site or nearby; and

Policy EMP4 – Other Employment Sites

The site is suitable for housing or other non-ancillary non-employment uses in accordance with local or national policies relating to these uses.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+	+/-

- J.6.4.1 The policy supports “*new employment uses or extensions to existing employment uses*” which would be likely to increase the provision of employment floorspace across the Black Country. A minor positive impact on employment opportunities and the economy would be expected (SA Objective 13).
- J.6.4.2 This policy would support the redevelopment of some employment sites to housing or other non-employment uses, where the employment site is no longer required for employment purposes. Therefore, this could potentially result in a minor positive impact on local housing provision (SA Objective 10).
- J.6.4.3 At present, the location of these allocations is unknown. It is therefore unknown what impact Policy EMP4 would have on the remaining SA Objectives, and as a result, an uncertain impact has been identified (SA Objectives 1, 2, 3, 4, 5, 6, 7, 8, 9, 11, 12 and 14).

J.6.5 Policy EMP5 – Improving Access to the Labour Market

Policy EMP5 – Improving Access to the Labour Market

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

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP5	0	0	0	0	0	0	0	0	0	0	+	+	+	+

J.6.5.1 Policy EMP5 aims to support proposals for new employment development, so long as the employment opportunities are accessible, in particular for disadvantaged people and residents in the most deprived areas of the Black Country. The development of new employment sites would be expected to have a minor positive impact on the economy (SA Objective 13), whilst ensuring the associated employment opportunities are available for all residents within the Plan area would have a minor positive impact in relation to equality (SA Objective 11).

J.6.5.2 The policy seeks to ensure that provision is made *"to assist those with physical or mental health disabilities to access employment opportunities"*. The provision of improved

accessible employment opportunities across the Black Country would be expected to have a minor positive impact on health and wellbeing (SA Objective 12).

- J.6.5.3 Furthermore, this policy would be likely to have benefits to education, by ensuring a diverse range of residents have access to training opportunities to increase their skills and employability. Therefore, a minor positive impact on education would be likely (SA Objective 14).

J.7 The Black Country Centres

J.7.1 Policy CEN1 – The Black Country Centres

Policy CEN1 – The Black Country Centres

- 1) The priority for the Black Country's Centres is to ensure they remain focused on serving the needs of their communities, through performing a well- balanced diversity of commercial, business and service functions. This includes retail provision and an increasing mix of leisure, office, residential and other appropriate, complementary uses that are accessible by a variety of sustainable means of transport. This will enable centres to make a key contribution to regeneration, tackling climate change, fostering healthy communities, and creating pleasant, safe public spaces to increase social interaction and cohesion.
- 2) The Black Country's defined centres comprise the hierarchy set out in Table 7, which are identified on the Centres Key Diagram (Figure 8). This hierarchy will be supported and protected by ensuring that development in centres is facilitated in a manner that reflects their scale, role, and function, and resisting proposals that would undermine this strategy.
- 3) Proposals for 'Centre Uses' (paragraph 8.3b) that are 'in-centre' (within the relevant boundaries / Primary Shopping Areas of defined centres) are subject to specific policy requirements, as set out in Table 7 and policies CEN2 - CEN4, as well as relevant policies in Local Development Plans.
- 4) Proposals for 'Centre Uses' that are not 'in-centre' (are not within the relevant boundaries / Primary Shopping Areas of a defined centre but are in edge-of- centre or out-of-centre locations), must meet the sequential test and other relevant requirements, such as impact tests (as set out in Table 7 and policies CEN5 –CEN6), as well as relevant policies in Local Development Plans.
- 5) Future growth in the Black Country, particularly housing and employment development identified in Policies HOU1 and EMP1 and allocations set out in Chapter 13, should have their service needs met by, and contribute to the regeneration of, the existing network of centres (see paragraph 8.17).
- 6) Where planning permission is granted, or Local Development Plan policies and allocations are made, effective planning conditions and policy wording must be used (see paragraph 8.12)
- 7) A land use approach will be adopted with appropriate degrees of flexibility as necessary to suit local circumstances, to encourage regeneration and to meet the challenges facing centres, particularly as little retail capacity has been identified to support additional floorspace, through supporting:
 - a) diversifying and repurposing of centres enhanced by appropriate complementary uses, particularly residential, education, health and community uses and supporting the evening economy;
 - b) the consolidation and reconfiguration of vacant floorspace into a mix of uses, especially the use of upper floors, and / or extensions to existing floorspace, with any new development being well-integrated with existing provision;
 - c) enhancing the health, accessibility and sustainability of centres, including maximising public realm, open space, provision of suitably- located and accessible pedestrian and cycle networks, and provision of green infrastructure and vehicle charging points.

Table 7: Black Country Hierarchy of Centres

Local Authority		Dudley	Sandwell	Walsall	Wolverhampton	Relevant Centres Policies and Test Thresholds		
Tier	Type					Location		
						In-centre	Edge-of-centre	Out-of-Centre

Policy CEN1 – The Black Country Centres								
One	Strategic Centre	Brierley Hill	West Bromwich	Walsall Town Centre	Wolverhampton City Centre	Policy CEN1 Policy CEN2	Policy CEN1 Policy CEN2 Policy CEN5 (if any unit size <280sqm) Policy CEN6 Sequential Test Impact Tests (if total size of proposal >280sqm)	Policy CEN1 Policy CEN5 (if any unit size <280sqm) Policy CEN6 Sequential Test Impact Tests (if total size of proposal >280sqm)
Two	Town Centres (including Walsall's District Centres)	Dudley Stourbridge Halesowen	-Blackheath -Cradley Heath -Great Bridge -Oldbury - Wednesbury -Cape Hill -Bearwood	-Bloxwich -Brownhills -Aldridge -Willenhall -Darlaston	-Bilston -Wednesfield	Policy CEN1 Policy CEN3	Policy CEN1 Policy CEN3 Policy CEN5 (if any unit size <280sqm) Policy CEN6 Sequential Test Impact Tests (if total size of proposal >280sqm)	
Three	District & Local Centres	-Kingswinford - Lye - Sedgley - Amblecote - Cradley / Windmill Hill - Gornal Wood - Netherton - Pensnett - Quarry Bank - Roseville - Shell Corner - The Stag - Upper Gornal - Wall Heath - Wollaston - Wordsley - Hawne - Oldswinford	-Smethwick High Street - Owen Street, Tipton - Scott Arms - Carter's Green - Quinton - Princes End - Old Hill - Stone Cross - Langley - Hamstead - Rood End - Queens Head - Bristnall	- Caldmore - Stafford Street - Pleck - Pelsall - Leamore - Palfrey - High St - Walsall Wood - Rushall - Blakenall - Lane Head - Streetly - Queslett - Lazy Hill - New Invention - Bentley - Park Hall	- Stafford Road (Three Tuns) - Cannock Road (Scotlands) - Tettenhall Village - Whitmore Reans / Avion Centre - Broadway - Bushbury Lane - Showell Circus - Wood End - Stubby Lane - Heath Town - Parkfield - Spring Hill - Penn Manor	Policy CEN1 Policy CEN4	Policy CEN1 Policy CEN4 Policy CEN5 (if any unit size <280sqm) Policy CEN6 Sequential Test Impact Tests (if total size	

Policy CEN1 – The Black Country Centres									
				- Smethwick High Street (Lower)	- Moxley - Fullbrook - Collingwood Dr, Pheasey - Birchills - Coalpool/Ryecroft - Beechdale - The Butts - Spring Lane, Shelfield - Beacon Road, Pheasey - Brackendale - Woodlands - Shelfield - South Mossley - Dudley Fields - Streets Corner - Buxton Road, Bloxwich - Coppice Farm - Turnberry Road, Bloxwich	- Upper Penn - Penn Fields - Bradmore - Merry Hill - Castlecroft - Finchfield - Tettenhall Wood - Newbridge - Aldersley - Pendeford Park - Fallings Park - Ashmore Park - Compton Village - Warstones Road - Dudley Road (Blakenhall) - Chapel Ash		of proposal >280sqm)	

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN1	+/-	+/-	+/-	+	+/-	+	+/-	+/-	+	+/-	+	+	+	+/-

1.7.1.1 Policy CEN1 aims to ensure centres in the Black Country provide residents with services and facilities that meet the local needs in regard to retail, leisure, commercial, residential, community and civic services. The four strategic centres (Tier One) in the Black Country are Brierley Hill, West Bromwich, Walsall Town Centre and Wolverhampton City Centre. There are 17 town centres (Tier Two): Dudley; Stourbridge; Halesowen; Blackheath; Cradley Heath; Great Bridge; Oldbury; Wednesbury; Cape Hill; Bearwood; Bloxwich; Brownhills; Aldridge; Willenhall; Darlaston; Bilston; and Wednesfield.

- J.7.1.2 The retail hierarchy as set out under this policy would be likely to ensure a range of facilities are provided at these locations which are appropriate to meet the local need. This would be expected to have benefits to the local community, ensuring all residents have access to essential services, and the local economy, through encouraging economic regeneration. Therefore, Policy CEN1 would be likely to have minor positive impacts in relation to equality and the economy (SA Objectives 11 and 13).
- J.7.1.3 The policy seeks to ensure development proposals within centres facilitate "*healthy communities*" and are "*accessible by a variety of sustainable means of transport*", in particular public transport, walking and cycling. This policy would be likely to encourage residents to live healthy lifestyles by supporting active travel. Residents would also be encouraged to use public transport, which would subsequently reduce the number of cars on the road network, with likely benefits for carbon emissions, congestion and air quality (SA Objectives 4, 9 and 12).
- J.7.1.4 The policy supporting text states that "*bringing vacant floorspace back into use*" will be a supported under this policy. This would be likely to have a minor positive impact in relation to natural resources, by encouraging the efficient use of previously developed land and reducing the quantity of greenfield land that would be lost to development (SA Objective 6).
- J.7.1.5 The type, scale and quantity of development that may be directed to each of the identified centres under this policy is currently not known as this policy sets out the strategic context, priorities and approach to the Black Country's centres. Little future capacity for centre uses have been identified, there is uncertainty about the impact and recovery of centres in the light of the C-19 pandemic and more detailed policies and proposals will come forward in future tier-two plans. This policy, together with more detailed set out in policies CEN2-6, sets out the clear priority and criteria for development to be directed to, and served by, centres. Therefore, the impact development proposals may have on the remaining SA objectives is unknown. At present, uncertain impacts have been identified (SA Objectives 1, 2, 3, 5, 7, 8, 10 and 14).

J.7.2 Policy CEN2 – Strategic Centres

Policy CEN2 – Tier 1: Strategic Centres

Diversification and Flexibility of Uses

- 1) It is a priority for Strategic Centres to serve the identified BCP housing and employment growth aspirations (Policy CEN1 part 5). The diversification of Strategic Centres to provide a re-purposed well-balanced mix of appropriate uses cited in paragraph 8.3b will be supported, in particular:
 - a) Residential provision will be maximised, to increase and strengthen communities, with indicative housing capacity identified for each strategic centre in Chapter 13 (see paragraph 8.27)

Policy CEN2 – Tier 1: Strategic Centres

- b) Complementary uses as set out in paragraph 8.3bii, particularly community, health and education uses (see also Policy HOU5 and Policy HW2)

Centre Uses

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

Retail

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

Leisure

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

Office

- 5) Office provision, particularly that of high quality, will be supported, especially as strategic centres are important places of work, with it being a priority to. Identify and maintain a suitable portfolio of sites available to meet future demand (see paragraphs 8.24 and 8.26).
- 6) Proposals in edge-of-centre and / or out-of-centre locations (paragraph 8.9) will have to meet the relevant requirements set out in Policies CEN1 Table 7, CEN5 and CEN6 (paragraph 8.28).

Sustainability:

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

Policy CEN2 – Tier 1: Strategic Centres

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

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	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN2	0	0	0	0	0	0	0	0	+	0	+	+	+	+

J.7.2.1 Policy CEN2 aims to support development and diversification within the four Strategic Centres of the Black Country: Brierley Hill; West Bromwich; Walsall Town Centre; and Wolverhampton City Centre. Development proposals which would increase retail provision, jobs and services would be supported under this policy. Policy CEN2 seeks to ensure that development within Strategic Centres include a *"well-balanced mix of uses (e.g. including education)"*. The policy seeks to *"support leisure uses"* including cinemas to particularly contribute to the evening economy.

J.7.2.2 The specifications of Policy CEN2 would be likely to provide improved employment opportunities and retail developments to boost the local economy as well as human health and equality, by helping to ensure all residents have good access to a range of services and facilities, including education, by providing community uses within centres. Overall, this policy would be likely to have minor positive impact in relation to accessibility, equality, health, economy and education (SA Objectives 9, 11, 12, 13 and 14).

J.7.3 Policy CEN3 – Tier Two Centres

Policy CEN3 –Tier Two Centres

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

Policy CEN3 –Tier Two Centres

- 5) Proposals in edge-of-centre and/ or out-of-centre locations (paragraph 8.9) must meet the relevant requirements set out in Policies CEN1 Table 7, CEN5 and CEN6 (paragraph 8.35).
- 6) In making planning decisions further guidance (such as frontage policy) is set out in Local Development Plans.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN3	0	0	0	0	0	+	0	0	+	0	+	+	+	0

J.7.3.1 The aim of Policy CEN3 is to help direct appropriate development to the Town Centres as identified under Policy CEN1. The policy seeks to support the development of “retail, office, leisure, residential, community, education and cultural facilities” with the Town Centres. This would be expected to ensure there is adequate supply of employment opportunities within these areas. In addition, this policy would be likely to support a diverse range of services and facilities within town centres, ensuring good accessibility for existing local residents and promoting community cohesion. The policy could potentially direct some residential development to these town centres, further ensuring that new residents would also have good access to services and boosting the local economy. This would be expected to have minor positive impacts in relation to accessibility, housing, equality, health and the economy (SA Objectives 9, 10, 11, 12 and 13).

J.7.3.2 Policy CEN3 also seeks to help reduce the quantity of greenfield land needed for development. Minor positive impacts in relation to natural resources would therefore be expected (SA Objectives 6 and 10).

J.7.4 Policy CEN4 – Tier Three Centres

Policy CEN4 – Tier Three Centres

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

Policy CEN4 – Tier Three Centres

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

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN4	0	0	0	0	0	0	0	0	+	0	+	0	+	0

J.7.4.1 Policy CEN4 seeks to support development within district or local centres that would serve communities, including food stores and day-to-day services. This could potentially help to encourage social interaction and community cohesion, and help to meet the needs of the community within the local area, reducing the need to travel. This would be likely to have a minor positive impact in relation to local accessibility and equality (SA Objectives 9 and 11).

J.7.4.2 By supporting development within district and local centres and providing job opportunities, this policy would also be likely to have a minor positive impact on the local economy (SA Objective 13).

J.7.5 Policy CEN5 – Proposals of Small-Scale Local Facilities

Policy CEN5 – Provision of Small-Scale Local Facilities

- 1) Proposals subject to planning control for small-scale local facilities (centre uses and complementary uses set out in paragraph 8.3b), in edge or out-of- centre locations (paragraph 8.9) that have a proposed unit floorspace of up to 280sqm (gross) (paragraph 8.48) will only be permitted if all the following requirements are met:
 - a) The proposal does not unduly impact on the health and wellbeing of the community it is intended to serve.
 - b) The proposal is of an appropriate scale and nature to meet the specific day-to-day needs of a population within convenient, safe walking distance for new or improved facilities.
 - c) Local provision could not be better met by investment in a nearby centre (which for centre uses identified in paragraph 8.3b, is the sequential test as set out in national guidance).

Policy CEN5 – Provision of Small-Scale Local Facilities

- d) Existing facilities that meet day-to-day needs will not be undermined.
- e) Access to the proposal by means other than by car can be demonstrated and will be improved; this will be evidenced by the proposal being within convenient, safe walking distance of the community it will serve.
- 2) Development involving the loss of a local facility, particularly a convenience shop, pharmacy, community facility or post office, will be resisted where this would result in an increase in the number of people living more than a convenient, safe walking distance from alternative provision
- 3) In making planning decisions further guidance is set out in Local Development Plans.
- 4) Where planning permissions are granted, effective planning conditions and / or planning obligations will be required to support the regeneration strategy and minimise impacts (Policy CEN1 point 6 and paragraph 8.12).
- 5) Proposals where total floorspace exceeds 280sqm (gross) will also have to meet the requirements of Policy CEN6 (see paragraphs 8.49 – 8.50).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN5	0	0	0	0	0	0	+	0	+	0	+	+	+	0

J.7.5.1 Policy CEN5 aims to support the development of small-scale centre-uses outside of centres to meet the needs of community, where proposals meet a number of criteria outlined in the policy. These small development proposals would be expected to have benefits to the local economy and the local population by encouraging community cohesion, social inclusion and ensuring residents have good access to essential services in close proximity to their homes. The policy also seeks to retain existing services such as a “convenience shop, pharmacy or post office”. Therefore, a minor positive impact in regard to equality and economy would be expected (SA Objectives 11 and 13).

J.7.5.2 The policy also seeks to ensure proposals are located “within convenient, safe walking distance for new or improved facilities” for residents. The policy would be likely to ensure good access, whilst encouraging active travel and reduce reliance on personal car, with subsequent benefits to local air quality. This would be likely to have a minor positive impact on transport and accessibility and health (SA Objectives 7, 9 and 12).

J.7.6 Policy CEN6 – Edge-of-Centre and Out-of-Centre Development

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

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

Sequential Test

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

Impact Tests

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

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN6	0	0	0	+	0	0	+	0	+	0	0	+	+	0

J.7.6.1 This policy sets out criteria for the development of edge-of-centre and out-of-centre proposals for centre uses. This could potentially have benefits to the local economy, by encouraging development in centres which are highly sustainable locations. A minor positive impact on the economy would be expected (SA Objective 13).

J.7.6.2 This policy encourages development in centres which are highly sustainable locations. All development proposals under this policy would be required to be assessed for accessibility

via public transport, walking and cycling. This would be expected to ensure all residents and visitors have safe access to these facilities. By supporting access via walking and cycling, this policy could potentially encourage active travel and facilitate healthy lifestyles. If there is adequate access via public transport, there could potentially be a reduction in car use, having benefits to the climate, air pollution and congestion. Therefore, as the policy prioritises development in centres and assuming the assessments outlined in the policy would ensure sustainable access to out-of-centre developments is prioritised, this policy would be likely to have minor positive impacts in relation to climate change, transport and health (SA Objectives 4, 9 and 12).

J.8 Transportation and Accessibility

J.8.1 Policy TRAN1 – Priorities for the Development of the Transport Network

Policy TRAN1 – Priorities for the Development of the Transport Network

- 1) Land needed for the implementation of priority transport projects will be safeguarded to allow for their future delivery.
- 2) All new developments must provide adequate access for all modes of travel, including walking, cycling and public transport. Residential development will be expected to meet the accessibility standards set out elsewhere in this Plan
- 3) Key transport corridors will be prioritised through the delivery of infrastructure to support active travel (walking, cycling), public transport improvements, traffic management (including localised junction improvements) and road safety.
- 4) Key transport priorities identified for delivery during the lifetime of the BCP currently include (but are not limited to) the following²¹:
 - a) Motorways:
 - i. M6 Junction 10
 - ii. M5 Improvements (Junctions 1 and 2 and new Smart Motorway Section)
 - iii. M54 - M6 / M6 (Toll) Link Road
 - b) Rail: -
 - i. Wolverhampton - Walsall – Willenhall – Aldridge Rail Link
 - ii. Midlands Rail Hub
 - iii. Wolverhampton – Shrewsbury Line Improvements
 - c) Rapid Transit:
 - i. Wednesbury – Brierly Hill
 - ii. A34 Walsall Road Sprint Corridor
 - iii. Wolverhampton – New Cross Hospital
 - iv. Walsall – Stourbridge corridor tram-train extensions
 - d) Key Road Corridors¹⁶
 - i. A454 City East Gateway Upgrade
 - ii. A4123 Corridor Upgrade
 - iii. A449 Stafford Road Corridor Upgrade
 - iv. A461 Black Country Corridor
 - e) Interchanges:
 - i. Dudley Town Centre Interchange
 - ii. Dudley Port Integrated Transport Hub
 - iii. Walsall Interchange

¹⁶ Schemes to improve general reliability, public transport, cycling and walking

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN1	0	0	0	+	0	0	+	0	++	0	0	+	0	0

- J.8.1.1 Policy TRAN1 outlines the priorities for the Black Country's transport network during the Plan period, covering a wide range of transport modes including the strategic road network, rail, rapid transit and interchanges. The transport projects identified within this policy would all be expected to contribute towards improving the delivery of sustainable transport options, improving the integration of different modes of transport, reducing issues with congestion and improving traffic flows. Overall, a major positive impact on transport would be expected (SA Objective 9).
- J.8.1.2 The policy states that "*all new developments must provide adequate access for all modes of travel, including walking, cycling and public transport*" in accordance with the identified accessibility standards. The promotion of active travel and public transport improvements within key transport corridors would be likely to encourage the uptake of sustainable transport and could potentially help to reduce reliance on travel via car. A modal shift away from personal car use towards public transport and active travel would be expected to result in a reduction in transport-associated emission of GHGs and other air pollutants. Therefore, Policy TRAN1 could potentially result in a minor positive impact on climate change mitigation and pollution (SA Objectives 4 and 7).
- J.8.1.3 Furthermore, by encouraging the uptake of active travel and ensuring development is accessible via walking and cycling, Policy TRAN1 could potentially improve the physical and mental wellbeing of residents. Ensuring that road safety and pedestrian access are considered when designing new development would be likely to encourage more people to choose these forms of travel, encouraging physical exercise and social interaction. A minor positive impact on health would be anticipated (SA Objective 12).

J.8.2 Policy TRAN2 – Safeguarding the Development of the Key Route Network

Policy TRAN2 – Safeguarding the Development of the Key Route Network

- 1) The four Black Country Highway Authorities will, in conjunction with Transport for West Midlands (TfWM), identify capital improvements and management strategies to ensure the Key Route Network meets its designated function of serving the main strategic demand flows of people and freight across the

metropolitan area, providing connections to the national strategic road network, serving large local flows which use main roads and providing good access for businesses reliant on road based transport .

- 2) Land needed for the implementation of improvements to the KRN will be safeguarded in order to assist in their future delivery.
- 3) Where new development is expected to result in adverse impacts on the KRN, appropriate mitigation measures will need to be identified through transport assessments and provided through planning obligations.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN2	0	0	0	0	0	0	0	0	+	0	0	0	0	0

J.8.2.1 New development within the Black Country as proposed within the BCP would be expected to result in an increased number of vehicles on the local road network, adding more pressure to road infrastructure and travel corridors. An increased volume of traffic on the road can have implications for a variety of issues such as congestion, road safety and air quality as well as resulting in longer journey times. Policy TRAN2 seeks to ensure that the West Midlands Key Route Network (KRN) is effectively managed in order to support the level of growth proposed in the BCP over the Plan period.

J.8.2.2 The policy states that suitable mitigation measures will be identified and put in place, to ensure that any potential adverse impacts on the road network would be avoided. Furthermore, the policy would help to ensure that transport connectivity is improved, through requiring liaison between each authority and Transport for West Midlands. Policy TRAN2 could potentially encourage coordination and streamlining of transport systems including public transport such as rapid transit and bus routes. Overall, a minor positive impact on transport would be anticipated (SA Objective 9).

J.8.3 Policy TRAN3 – Managing Transport Impacts of New Development

Policy TRAN3 – Managing Transport Impacts of New Development

- 1) Planning permission will not be granted for any proposals that are likely to have significant transport implications, unless accompanied by mitigation schemes that demonstrate an acceptable level of accessibility and safety can be achieved using all modes of transport to, from and through the

development. Mitigation schemes must address in particular access by walking, cycling, public transport and car sharing.

- 2) These proposals should be in accordance with an agreed Transport Assessment, where required, and include the implementation of measures to promote and improve such sustainable transport facilities through agreed Travel Plans and similar measures.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN3	0	0	0	+	0	0	0	0	+	0	0	0	0	0

- J.8.3.1 The policy states that “*Planning permission will not be granted for any proposals that are likely to have significant transport implications, unless accompanied by mitigation schemes that demonstrate an acceptable level of accessibility and safety can be achieved using all modes of transport to, from and through the development. Mitigation schemes must address in particular access by walking, cycling, public transport and car sharing.*” Overall, a minor positive impact on transport and climate change would be anticipated through the provisions in Policy TRAN3 (SA Objectives 4 and 9).

J.8.4 Policy TRAN4 – The Efficient Movement of Freight

Policy TRAN4 – The Efficient Movement of Freight

- 1) The movement of freight by sustainable modes of transport such as rail and waterways will be encouraged. Road-based freight will be encouraged to use the Key Route Network whenever practicable.
- 2) Junction improvements and routeing strategies will be focussed on those parts of the highway network evidenced as being of particular importance for freight access to employment sites and the motorway network.
- 3) Proposals that generate significant freight movements will be directed to sites with satisfactory access to the Key Route Network.
- 4) Existing and disused railway lines¹⁷ will be safeguarded for rail-related uses.
- 5) Sites with existing and potential access to the rail network for freight will be safeguarded for rail-related uses.

¹⁷ As shown on the Transport Key Diagram.

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	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN4	0	0	-	0	0	0	0	0	+	0	0	0	+	0

- J.8.4.1 Policy TRAN4 sets out guidelines for the movement of freight, and the prioritisation of sustainable modes of transport where possible. Road transport is a major source of air pollution and GHG emissions in the UK¹⁹. Transporting freight via rail and waterways would be expected to result in lower emissions and higher energy efficiency compared to road transport using heavy goods vehicles (HGVs)²⁰.
- J.8.4.2 By encouraging the movement of freight via rail and waterways, Policy TRAN4 could potentially help to relieve road congestion issues and result in more sustainable freight transport across the Plan area. Therefore, a minor positive impact on transport would be expected (SA Objective 9).
- J.8.4.3 Furthermore, this policy could potentially result in more cost-effective and efficient movement of freight, which would help to improve economic productivity. As such, this policy could potentially result in a minor positive impact on the economy (SA Objective 13).
- J.8.4.4 The policy states that “*existing and disused railway lines will be safeguarded for rail-related uses*” and seeks to encourage the use of waterways for freight transport. In the Black Country, canals and disused railway lines often form part of the ecological network in an otherwise heavily urbanised area, for example, the ‘Wyrley and Essington Canal’ Site of Importance for Nature Conservation (SINC), ‘Stourbridge Canal’ Site of Local Importance for Nature Conservation (SLINC) and the ‘Dudley to Priestfield Disused Railway’ SLINC amongst others. The conversion of these routes back into regular use for freight transport could potentially result in a minor negative impact on biodiversity through the increased disturbance of important wildlife corridors (SA Objective 3).

¹⁹ ONS (2019) Road transport and air emissions. Available at: <https://www.ons.gov.uk/economy/environmentalaccounts/articles/roadtransportandairemissions/2019-09-16> [Date Accessed: 15/02/21]

²⁰ Government Office for Science (2019) Understanding the UK freight transport system. Available at: <https://www.gov.uk/government/publications/future-of-mobility-the-uk-freight-transport-system> [Date Accessed: 15/02/21]

J.8.5 Policy TRAN5 – Creating Coherent Networks for Cycling and Walking

Policy TRAN5 – Creating Coherent Networks for Cycling and Walking

- 1) Joint working between the four local authorities will ensure that the Black Country can create and maintain a comprehensive cycle network based on the four local cycle networks, including the use of common cycle infrastructure design standards.
- 2) Creating an environment that encourages sustainable travel requires new developments to link to existing walking and cycling networks. The links should be safe, direct and not impeded by infrastructure provided for other forms of transport.
- 3) Where possible, existing links including the canal network should be enhanced and the networks extended to serve new developments.
- 4) New developments should have good walking and cycling links to public transport nodes and interchanges.
- 5) Cycle parking facilities should be provided at all new developments and should be in convenient locations with good natural surveillance, e.g. near to main front entrances for short stay visitors or under shelter for long stay visitors.
- 6) The number of cycle parking spaces required in new developments and in public realm schemes will be determined by local standards set out in supplementary planning documents.
- 7) The design of cycle infrastructure should be in accordance with the principles and standards contained in the West Midlands Cycle Design Guidance (TfWM 2021).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN5	0	0	0	+	0	0	0	0	++	0	+	+	0	0

J.8.5.1 Policy TRAN5 seeks to ensure that walking and cycling infrastructure networks are developed and maintained across the Black Country to encourage sustainable travel choices.

J.8.5.2 The policy requires the development of cycle and walking links which are “*safe, direct and not impeded by infrastructure provided for other forms of transport*” and states that “*cycle parking facilities should be provided at all new developments and should be in convenient locations with good natural surveillance*”. These factors would be likely to encourage more people to consider cycling and walking as alternative forms of travel, reducing reliance on personal car use. Therefore, a major positive impact on transport would be expected (SA Objective 9). This would also be expected to contribute towards a reduction in GHG

emissions, and as such, positive impacts have been identified for climate change mitigation (SA Objectives 4).

J.8.5.3 Furthermore, through facilitating active travel, this policy could potentially encourage outdoor exercise and result in benefits to mental and physical wellbeing. A minor positive impact on health would be likely (SA Objective 12).

J.8.5.4 Policy TRAN5 seeks to ensure that walking and cycling networks are safe, and bicycle storage is in "*convenient locations with good natural surveillance*", which could help to reduce crime and the fear of crime. Therefore, this could potentially result in a minor positive impact on equality (SA Objective 11).

J.8.6 Policy TRAN6 – Influencing the Demand for Travel and Travel Choices

Policy TRAN6 – Influencing the Demand for Travel and Travel Choices

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

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN6	0	0	0	+	0	0	+	0	+	0	0	0	0	0

J.8.6.1 Policy TRAN6 promotes the holistic management of traffic across the Black Country and wider area and seeks to encourage a modal shift towards more sustainable travel options, in accordance with the Traffic Management Act 2004 (TMA). The aim of the TMA is to

“tackle congestion and disruption on the road network ... [and] places a duty on local authorities to make sure traffic moves freely and quickly”²¹.

J.8.6.2 Through requiring the BCA to identify “appropriate strategic and local Park and Ride sites” and to work together with neighbouring authorities, this policy would be expected to encourage the development of better-connected public transport systems and deliver more widespread changes to the transport network. The promotion of public transport and development of additional strategic and local sites for delivery would be likely to reduce reliance on personal car use and consequently reduce the emission of GHGs and other air pollutants. Overall, a minor positive impact would be expected in relation to climate change mitigation, pollution and transport (SA Objectives 4, 7 and 9).

J.8.7 Policy TRAN7 – Parking Management

Policy TRAN7 – Parking Management

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

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN7	0	0	0	0	0	0	0	0	+	0	0	0	+	0

²¹ Department for Transport (2015) Traffic management Act 2004 overview. Available at: <https://www.gov.uk/government/collections/traffic-management-act-2004-overview> [Date Accessed: 15/02/21]

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- J.8.7.1 Policy TRAN7 sets out the approach to parking management in the Black Country, including the type, location and standards for parking in or near to town centres. By regulating the types of parking available in different locations, and ensuring these standards are applied consistently across the Plan area, this policy would be expected to encourage people to choose more sustainable travel modes where possible. The policy also aims to ensure that the efficiency of traffic flows in and around town centres is improved. Overall, a minor positive impact on transport would be anticipated (SA Objective 9).
- J.8.7.2 The policy seeks to ensure that the type of parking is appropriate to the location, for example ensuring that *"long stay parking is removed near to town centres, to support parking for leisure and retail customers"*. Furthermore, the policy states that the control of parking should not be used *"as a tool for competition between centres"*. Therefore, this could potentially help to support local shops and businesses and result in a minor positive impact on the economy (SA Objective 13).

J.8.8 Policy TRAN8 – Planning for Low Emission Vehicles

Policy TRAN8 – Planning for Low Emission Vehicles

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

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN8	0	0	0	+	0	0	+	0	+	0	0	0	0	0

- J.8.8.1 Policy TRAN8 promotes development proposals which would support low emission vehicles (LEV). The term LEV can be used to refer to motorised vehicles which emit lower levels of emissions than traditional petrol- or diesel-powered cars or use low carbon technologies, including pure electric vehicles and plug-in hybrid vehicles²².
- J.8.8.2 This policy would help to encourage the use of LEVs within the Black Country, by ensuring the appropriate infrastructure such as electric vehicle charging points are incorporated within new developments and appropriate public locations. The policy also encourages the exploration of alternative low emission vehicle technologies. Overall, this would be expected to result in a minor positive impact on sustainable transport (SA Objective 9). Furthermore, encouraging the use of LEVs could potentially help to reduce the emission of GHGs and other air pollutants, resulting in a minor positive impact on climate change mitigation and pollution (SA Objectives 4 and 7).

²² SMMT (2020) Ultra Low Emission Vehicles (ULEVs). Available at: <https://www.smmmt.co.uk/industry-topics/technology-innovation/ultra-low-emission-vehicles-ulevs/> [Date Accessed: 15/02/21]

J.9 Environmental Transformation

J.9.1 Policy ENV1 – Nature Conservation

Policy ENV1 – Nature Conservation

- 1) Development within the Black Country will safeguard nature conservation, inside and outside its boundaries by ensuring that:
 - a. Development will not be permitted where it would, alone or in combination with other plans or projects, have an adverse impact on the integrity of an internationally designated site, including Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites;
 - b. Development is not permitted where it would harm nationally (Sites of Special Scientific Interest and National Nature Reserves) or regionally (Local Nature Reserves and Sites of Importance for Nature Conservation) designated nature conservation sites;
 - c. Locally designated nature conservation sites (Sites of Local Importance for Nature Conservation), important habitats and geological features are protected from development proposals that could negatively impact upon them;
 - d. The movement of wildlife within the Black Country and its adjoining areas, through both linear habitats (e.g. wildlife corridors) and the wider urban matrix (e.g. stepping stone sites) is not impeded by development;
 - e. Species that are legally protected, in decline, are rare within the Black Country or which are covered by national, regional or local Biodiversity Action Plans will not be harmed by development.
- 2) Adequate information must be submitted with planning applications for proposals which may affect any designated site or any important habitat, species or geological feature to ensure that the likely impacts of the proposal can be fully assessed. Where the necessary information is not made available, there will be a presumption against granting permission.
- 3) Where, exceptionally, the strategic benefits of a development clearly outweigh the importance of a local nature conservation site, species, habitat or geological feature, damage must be minimised. Any remaining impacts, including any reduction in area, must be fully mitigated. Compensation will only be accepted in exceptional circumstances. A mitigation strategy must accompany relevant planning applications.
- 4) Over the plan period, the BCA will update evidence on designated nature conservation sites and Local Nature Reserves as necessary in conjunction with the Local Sites Partnership and Natural England and will amend existing designations in accordance with this evidence. Consequently, sites may receive new, or increased, protection over the Plan period.
- 5) All appropriate development should positively contribute to the natural environment of the Black Country by:
 - a. Extending nature conservation sites;
 - b. Improving wildlife movement; and / or

<p>c. Restoring or creating habitats / geological features that actively contribute to the implementation of Biodiversity Action Plans (BAPs) and / or Geodiversity Action Plans (GAPs) at a national, regional or local level.</p> <p>6) Details of how improvements (which are appropriate to the location and scale) will contribute to the natural environment, and their ongoing management for the benefit of biodiversity and geodiversity, will be expected to accompany planning applications.</p> <p>7) Local authorities will provide additional guidance on this in Local Development Documents and SPDs where relevant .</p>														
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	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV1	0	+	++	+	+	0	+	0	0	0	0	+	0	0

- J.9.1.1 Policy ENV1 aims to protect, conserve and enhance biodiversity assets, from internationally designated to locally protected sites. The policy also aims to ensure protected or rare species are not harmed by future development. The policy states that *"development within the Black Country will safeguard nature conservation, inside and outside its boundaries"*. In addition, the policy requires *"adequate information"* to be provided alongside planning applications which have the potential to adversely impact *"any designated site or any important habitat, species or geological feature"*. All future development should also *"positively contribute"* to the local natural environment. Therefore, a major positive impact on biodiversity would be expected (SA Objective 3).
- J.9.1.2 Biodiversity assets, such as Local Nature Reserves (LNRs) and Sites of Importance for Nature Conservation (SINCs), are often key features of local landscapes. By protecting and potentially enhancing biodiversity assets, it is likely that some key landscape features would also be protected and potentially enhanced, with benefits to local character and visual amenity. Therefore, this policy would be expected to have a minor positive impact on the local landscape (SA Objective 2).
- J.9.1.3 Vegetation provides several ecosystem services to the Plan area, including carbon storage (climate change mitigation), flood risk reduction (climate change adaptation) and filtering air pollutants (pollution). The protection and enhancement of biodiversity features provided by this policy would be likely to help protect and enhance the provision of these essential ecosystem services. This policy could potentially result in minor positive impact on these three SA Objectives (SA Objectives 4, 5 and 7).

- J.9.1.4 The protection and enhancement of the natural environment would be likely to result in benefits to the health of local residents. Access to natural and diverse outdoor spaces is known to have benefits for mental wellbeing, whilst also encouraging physical activity and providing opportunities for community cohesion. This would therefore be expected to have a minor positive impact on health and wellbeing (SA Objective 12).

J.9.2 Policy ENV2 – Development Affecting Special Areas of Conservation

Policy ENV2 – Development Affecting Special Areas of Conservation

Cannock Chase SAC

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

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV2	0	0	++	+	0	0	+	0	0	0	0	+	+	0

- J.9.2.1 Policy ENV2 details the Councils' approach to the protection of SACs, including Cannock Chase SAC, against future development. Any development within 15km of Cannock Chase SAC which would result in a net increase in residential units will be required to undertake an appropriate assessment under this policy. The appropriate assessment will indicate if the development would be likely to result in an adverse impact on the integrity of the SAC, and if so, the developer will be required to ensure sufficient measures are in place to avoid or mitigate the identified impact. The requirements set out in Policy ENV2 would be expected to protect Cannock Chase SAC from inappropriate future development, and therefore, a major positive impact on biodiversity would be expected (SA Objective 3).
- J.9.2.2 Future development which could potentially increase nitrous oxide (NO_x) deposition, and as such impact the integrity of a SAC, would be required to undertake an appropriate

assessment, which may require developers to ensure sufficient measures are in place to avoid or mitigate the impact. This would be likely to benefit the integrity of SACs within and surrounding the Black Country, whilst also having a minor positive impact on pollution by helping to improve local air quality (SA Objective 7). Furthermore, the mitigation of impacts arising from NO_x deposition within this policy could potentially help to combat the causes of climate change. A minor positive impact would be expected in relation to climate change mitigation (SA Objective 4).

- J.9.2.3 Cannock Chase SAC is a popular tourist destination, with activities including mountain biking, camping and 'Go Ape' adventure park. Although the SAC itself is located some 7.5km to the north of the Black Country boundary, protecting the SAC from inappropriate development could potentially have benefits in relation to tourism in the wider area and have a minor positive impact on the local economy (SA Objective 13). The SAC also forms part of the wider green infrastructure network, providing space for outdoor recreation and exercise for the Black Country's residents and visitors. By preserving and enhancing this site, the policy could potentially have a minor positive impact on physical and mental health (SA Objective 12).

J.9.3 Policy ENV3 – Nature Recovery Network and Biodiversity Net Gain

Policy ENV3 – Nature Recovery Network and Biodiversity Net Gain

- 1) All development shall deliver the Local Nature Recovery Network Strategy in line with the following principles:
 - a) Take account of where in the Local Nature Recovery Network the development is located and deliver benefits appropriate to that zone;
 - b) Follow the mitigation hierarchy of avoidance, mitigation and compensation, and provide for the protection, enhancement, restoration and creation of wildlife habitat and green infrastructure;
 - c) Follow the principles of Making Space for Nature and recognise that spaces are needed for nature and that these should be of sufficient size and quality and must be appropriately connected to other areas of green infrastructure, to address the objectives of the Black Country Nature Recovery Network Strategy.
- 2) All development shall deliver a minimum 10% net gain in biodiversity value when measured against baseline site information.
- 3) Losses and gains as a result of proposed development will be calculated using the national Biodiversity Metric.
- 4) Development that is likely to have an impact on biodiversity will be considered in accordance with the mitigation hierarchy set out in the NPPF.
- 5) Biodiversity net gain shall be provided in line with the following principles:
 - a) A preference for on-site habitat provision / enhancement wherever practicable, followed by improvements to sites within the local area, and then other sites elsewhere within the Black Country;
 - b) The maintenance and where possible enhancement of the ability of plants and animals (including pollinating insects) to move, migrate and genetically disperse across the Black Country;
 - c) The provision / enhancement of priority habitats identified at national, regional, or local level, having regard to the scarcity of that habitat within the Black Country;

- 6) Exemptions to the need to provide biodiversity net gain on all development will be as set out in the relevant legislation and national guidance.
- 7) Compensation will only be accepted in exceptional circumstances. Provision of off-site compensation should not replace or adversely impact on existing alternative / valuable habitats in those locations and should be provided prior to development.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV3	0	+	++	+	+	0	+	0	0	0	0	+	0	0

- J.9.3.1 Paragraph 170 of the NPPF states that "*Planning policies and decisions should contribute to and enhance the natural and local environment by ... minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures*". Mandatory requirements for delivering at least 10% biodiversity net gain, maintained for at least 30 years, is expected to come into force after the Environment Bill receives royal assent.
- J.9.3.2 Policy ENV3 requires all development to deliver a minimum of 10% biodiversity net gain as part of development proposals. This would provide opportunities to enhance the quality and quantity of habitats and improve connectivity for flora and fauna, and as such, improve the biodiversity value of the Plan area. Therefore, this policy would be expected to have a major positive impact on biodiversity (SA Objective 3).
- J.9.3.3 Biodiversity net gain would be expected to contribute towards improved air quality due to the increased uptake of carbon dioxide and filtration of pollutants associated with road transport, which could potentially help to reduce residents' exposure to air pollution. Furthermore, due to this enhanced carbon storage capacity, this policy could potentially help to mitigate anthropogenic climate change. A minor positive impact on the climate change mitigation and pollution objectives would therefore be expected (SA Objectives 4 and 7).
- J.9.3.4 Increased biodiversity and green cover would be expected to help reduce water runoff rates and as such, reduce the risk of both fluvial and pluvial flooding. Improvements to the quality and quantity of the green network would also be likely to enhance natural water storage and flow functions. Connectivity between habitats, including stepping-stone habitats, is particularly important when considering global climatic trends as they provide

opportunities for the movement of species and adaptation to climate change. Overall, a minor positive impact on water and flooding would be expected (SA Objective 5).

J.9.3.5 Enhanced biodiversity and green cover across the Black Country would be likely to have positive impact on residents' wellbeing through providing increased access to a diverse range of natural habitats, which is known to be beneficial for mental and physical health. A minor positive impact on human health and wellbeing would therefore be expected (SA Objective 12).

J.9.3.6 Furthermore, the enhancement of the green network could potentially provide opportunities to safeguard and improve the character and appearance of local landscapes and townscapes and create more pleasant outdoor spaces for both people and wildlife. This would be likely to result in a minor positive impact on the local landscape quality (SA Objective 2).

J.9.4 Policy ENV4 – Provision, Retention and Protection of Trees, Woodlands and Hedgerows

Policy ENV4 – Provision, Retention and Protection of Trees, Woodlands and Hedgerows

Retention and protection of trees and woodland

- 1) Development that would result in the loss of or damage to ancient trees, ancient woodland or veteran trees will not be permitted. Development adjacent to ancient woodland will be required to provide an appropriate landscaping buffer, with a minimum depth of 15m and a preferred depth of 50m.
- 2) Provision should also be made for the protection of individual veteran or ancient trees likely to be impacted by development, by providing a buffer around such trees of a minimum of 15 times the diameter of the tree. The buffer zone should be 5m from the edge of the tree's canopy if that area is larger than 15 times its diameter.
- 3) There will be a presumption against the removal of trees that contribute to public amenity and air quality management unless sound arboricultural reasons support their removal²³. Where removal is unavoidable, the BCA will expect replacement trees to be provided to compensate for their loss, on a minimum basis of three for one.
- 4) The planting of new, predominantly native trees and woodlands will be sought, in appropriate locations, to increase the extent of tree cover in the Black Country by around 18% over the period to 2039.
- 5) Tree preservation orders will be used to protect individual(s) or groups of trees that are in a safe condition, that contribute to visual amenity and / or the character of an area and that are under threat of damage or removal.

²³ The tree is a clearly identified and immediate threat to human safety; disease is significantly impacting the trees longevity and safety; the tree is causing clearly evidenced structural damage to property where remedial works cannot be undertaken to alleviate the problem; The tree is creating a clearly identified danger or causing significant damage to the adopted highway / footpath network.

Policy ENV4 – Provision, Retention and Protection of Trees, Woodlands and Hedgerows

Habitat Creation

- 6) All available data on extant tree cover and associated habitat²⁴ will be considered when making decisions on the proposed loss of trees and woodland to accommodate infrastructure and other development proposals. In areas where evidence demonstrates that current levels of tree cover are low (in comparison to the rest of the ward), proposals that incorporate additional tree planting will be considered positively, as part of the wider contribution to biodiversity net gain.
- 7) A majority of native tree species able to withstand climate change should be used in landscaping schemes or as replacement planting, to maximise habitats for local wildlife / species and maintain and increase biodiversity. In circumstances where non-native tree species are also considered to be appropriate, a mix of native and non-native species should be provided, to help maintain a healthy and diverse tree population.
- 8) Opportunities for increasing tree provision through habitat creation and the enhancement of ecological networks, including connecting up areas of ancient woodland, will be maximised, in particular by means of the biodiversity net gain and nature recovery network initiatives (see Policy ENV3).

Trees and development

- 9) An arboricultural survey, carried out by an accredited arboriculturalist, should be undertaken prior to removal of any vegetation or site groundworks and used to inform a proposal's layout at the beginning of the detailed design process.
- 10) Development should be designed around the need to incorporate trees already present on site, using sensitive and well-designed site layouts to maximise their retention.
- 11) Existing mature trees²⁵, trees that are ecologically important, ancient / veteran trees, must be retained and integrated into the proposed landscaping scheme, recognising the important contribution of trees to the character and amenity²⁶ of a development site and to local green infrastructure networks.
- 12) In addition to meeting the requirements for replacement trees on sites and ecological net gain, new tree planting should be included in all new developments and other significant proposals²⁷, such as street trees or as part of landscaping schemes. Development proposals should use large-canopied species where possible, which provide a wider range of health, biodiversity and climate change mitigation and adaptation benefits because of their larger surface area and make a positive contribution to increasing overall canopy cover²⁸.

²⁴ E.g. from the local ecological records centre

²⁵ Health and status as assessed in a report produced by an accredited arboriculturist

²⁶ National planning guidance identifies trees worthy of retention on amenity grounds (through use of a TPO) as those that are visible in part or whole from a public place and / or those with individual, collective and wider impact (in terms of size, form, future potential, rarity, cultural / historic value, landscape contribution and / or contribution to a conservation area). Other factors such as value for nature conservation and climate change may also be considered.

²⁷ E.g. new infrastructure, non-residential development, town centre regeneration and other similar schemes

²⁸ The area of ground covered by trees when seen from above.

Policy ENV4 – Provision, Retention and Protection of Trees, Woodlands and Hedgerows

- 13) New developments should make a minimum contribution of 20% canopy cover and a recommended contribution of 30% canopy cover across the development site²⁹.
- 14) New houses and other buildings must be carefully designed and located to prevent an incompatible degree of shade³⁰ being cast by both existing and new trees that might result in future pressure for them to be removed.
- 15) The positioning of trees in relation to streets and buildings should not worsen air quality for people using and living in them. Care should be taken to position trees and / or design streets and buildings in a way that allows for street-level ventilation to occur, to avoid trapping pollution between ground level and tree canopies (see also Policy CC4 – Air Quality).
- 16) Where planning permission has been granted that involves the removal of trees, agreed replacement trees of a suitable species must be provided onsite. Where sufficient and suitable onsite replacements cannot be provided, off-site planting or woodland enhancement, including support for natural regeneration, in the near vicinity of the removed tree(s) must be provided, in line with the mitigation hierarchy set out in Policy ENV3. Appropriate planning conditions will be used to secure timely and adequate alternative provision and ongoing maintenance.
- 17) Replacement trees located off-site should not be planted where they would impact on areas designated as ecologically important, unless this has been specifically agreed with the relevant authority and its ecological officers / advisers.
- 18) Trees proposed for removal during development should be replaced at a ratio of at least three for one. The species, size and number of replacement trees will be commensurate with the size, stature, rarity or public amenity of the tree(s) to be removed. Where trees to be replaced form a group of amenity value (rather than individual specimens), replacement must also be in the form of a group of trees of appropriate species and quality and must be in a position that will mitigate the loss of the visual amenity associated with the original group³¹.
- 19) Trees on development sites must be physically protected during development. Care must be taken to ensure that site engineering / infrastructure works, the storage of plant and machinery, excavations and new foundations do not adversely impact their continued retention, in line with current arboricultural and Building Regulation requirements.
- 20) New trees on development sites should be planted in accordance with arboricultural best practice, including the use of suitably sized planting pits, supporting stakes and appropriate protective fencing during the construction phase.
- 21) Appropriate conditions will be included in planning permissions to ensure that new trees that fail on development sites are replaced within a specified period by trees of a suitable size, species and quality.
- 22) Where proposed development will impact on the protection, safety and / or retention of a number of trees, or on the character and appearance of trees of importance to the environment and landscape, the

²⁹ Emergency Tree Plan for the UK – The Woodland Trust 2020

³⁰ This will be in the context of the requirements outlined in policies elsewhere in this plan on the role of trees in mitigating climate change and providing appropriate levels of shade and cooling.

³¹ That is, as close as possible to the site of the removed trees.

Policy ENV4 – Provision, Retention and Protection of Trees, Woodlands and Hedgerows

use of an arboricultural clerk of works will be required, to be made subject to a condition on the relevant planning permission.

- 23) A presumption should be applied that replacement trees are UK and Ireland sourced and grown, to help limit the spread of tree pests and diseases, while supporting Black Country nurseries.

Hedgerows

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

- 25) Hedgerow retention will be of particular importance where hedgerows form part of an established ecological network enabling the passage of flora and fauna into and out of rural, suburban and urban areas. Site layouts and landscape proposals should incorporate them as features of interest; if removal is required to accommodate a high-quality site layout, replacement hedgerow planting will be required.

- 26) Protection of hedgerows before and during development will be required. This will include: the provision of landscape buffers where appropriate; protective fencing; and careful management of plant and materials on site to avoid damage to the hedgerow(s) and its root system.

- 27) New hedgerows will be sought as part of landscaping schemes. Ways to incorporate the planting of new hedgerow, even short lengths, should be incorporated.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV4	+	+	+	+	+	+	+	0	0	0	0	+	0	0

- J.9.4.1 Policy ENV4 aims to create, retain and protect trees, woodlands and hedgerows, including ancient trees, ancient woodlands and veteran trees across the Plan area. Where the loss of a tree is unavoidable, this policy requires the planting of three appropriate native trees in replacement of every tree lost. This policy requires an arboricultural survey to be carried out prior to removal of any vegetation or site groundworks. Ecological surveys will also be required to identify the ecological importance of hedgerows. This would be expected to help prevent the inappropriate loss of vegetation. The policy also states that Tree Preservation Orders (TPOs) will be used to protect individual or groups of trees that contribute to the character of the local area. Policy ENV4 also encourages habitat creation and biodiversity net gain. Trees, woodlands and hedgerows support a vast array of

important flora and fauna and can serve as useful connecting habitats to facilitate the movement of species. Therefore, this policy would be expected to result in a minor positive impact on biodiversity (SA Objective 3).

J.9.4.2 The retention and enhancement of trees and woodland supported under this policy would be likely to boost the natural carbon sink and air filtration ecosystem services provided by trees and vegetation. This could also potentially help to reduce residents' exposure to air pollution, for example through the filtration or buffering of emissions associated with road transport. Furthermore, due to the enhanced carbon storage capacity tree planting would provide, this policy could potentially help to mitigate anthropogenic climate change. A minor positive impact on the climate change mitigation and pollution objectives would therefore be expected (SA Objectives 4 and 7). = This could also help to improve the respiratory health of residents and provide opportunities for integrating green spaces amongst development for recreation. Access to a diverse range of natural habitats is also expected to benefit mental wellbeing. Therefore, a minor positive impact would also be expected in terms of human health (SA Objective 12).

J.9.4.3 Trees serve an important role in protecting soil from erosion as a result of rainfall and surface water runoff, due to the stabilisation provided by roots and interception of rainfall by foliage. Through conserving and enhancing tree coverage across the Plan area, this policy would therefore be likely to help preserve soils and have a minor positive impact on natural resources (SA Objective 6). By reducing water runoff rates this would also be expected to enhance natural water storage and help to reduce the risk of fluvial and pluvial flooding. A minor positive impact would be expected in terms of reducing flood risk (SA Objective 5).

J.9.4.4 Furthermore, trees, woodlands and hedgerows can be a useful tool to help integrate new development into the existing landscape character, for example, in terms of protecting or enhancing views, or providing visual interest. Additionally, the protection of ancient and veteran trees, hedgerow and woodland would be expected to help protect and enhance historic character. Therefore, this policy could potentially result in minor positive impact to cultural heritage and the local landscape (SA Objectives 1 and 2).

J.9.4.5 It is recommended that this policy is expanded to ensure tree planting considers the species of tree, as well as their location within the development following a site-specific ecological survey.

J.9.5 Policy ENV5 – Historic Character and Local Distinctiveness of the Black Country

Policy ENV5 – Historic Character and Local Distinctiveness of the Black Country

- 1) All development proposals within the Black Country should sustain and enhance the locally distinctive character and distinctiveness of the area in which they are to be sited, whether formally recognised as a

Policy ENV5 – Historic Character and Local Distinctiveness of the Black Country

designated heritage asset or as a non-designated heritage asset. They should respect and respond to its positive attributes in order to help maintain The Black Country's cultural identity and strong sense of place.

- 2) Development proposals will be required to preserve and enhance local character and those aspects of the historic environment - together with their settings - which are recognised as being of special historic, archaeological, architectural, landscape or townscape quality.
- 3) Physical assets, whether man-made or natural which contribute positively to the local character and distinctiveness of the Black Country's landscape and townscape, should be retained and, wherever possible, enhanced and their settings respected.
- 4) The specific pattern of settlements (urban grain), local vernacular and other precedents that contribute to local character and distinctiveness should be used to inform the form, scale, appearance, details and materials of new development.
- 5) New development in the Black Country should be designed to make a positive contribution to local character and distinctiveness and demonstrate the steps that have been taken to achieve locally responsive design. Proposals should therefore demonstrate that:
 - a) all aspects of the historic character and distinctiveness of the locality, including any contribution made by their setting, and where applicable, views into, from, or within them, have been fully assessed and used to inform proposals; and
 - b) they have been prepared with full reference to the Black Country Historic Landscape Characterisation Study (BCHLCS) (October 2019), the Historic Environment Record (HER), and to other relevant Historic Landscape Characterisation documents, Supplementary Planning Documents (SPD's) and national and local design guides where applicable.
- 6) All proposals should aim to sustain and reinforce special character and conserve the historic aspects of locally distinctive areas of the Black Country, for example:
 - a) The network of now coalesced but nevertheless distinct small industrial settlements of the former South Staffordshire Coalfield, such as Darlaston & Netherton;
 - b) The civic, religious and commercial cores of the principal settlements of medieval origin such as Wolverhampton, Dudley, Wednesbury & Walsall;
 - c) Surviving pre-industrial settlement centres of medieval origin such as Halesowen, Tettenhall, Aldridge, Oldbury and Kingswinford;
 - d) Rural landscapes and settlements including villages/hamlets of medieval origin, relic medieval and post-medieval landscape features (hedgerows, holloways, banks, ditches, field systems, ridge and furrow), post-medieval farmsteads and associated outbuildings, medieval and early post-medieval industry (mills etc) and medieval and post-medieval woodland. The undeveloped nature of these areas means there is also the potential for evidence of much earlier activity that has largely been lost in the urban areas.
 - e) Areas of Victorian and Edwardian higher density development which survive with a high degree of integrity including terraced housing and its associated amenities;
 - f) Areas of extensive lower density suburban development of the mid-20th century including public housing and private developments of semi-detached and detached housing;

Policy ENV5 – Historic Character and Local Distinctiveness of the Black Country

- g) Public open spaces, including Victorian and Edwardian municipal parks, often created from earlier large rural estates or upon and retaining elements of relict industrial landscape features;
 - h) The canal network and its associated infrastructure, surviving canal-side pre-1939 buildings and structures together with archaeological evidence of the development of canal-side industries and former canal routes (see Policy ENV7);
 - i) Buildings, structures and archaeological remains of the traditional manufacturing and extractive industries of the Black Country including glass making, metal trades (such as lock making), manufacture of leather goods, brick making, coal mining and limestone quarrying;
 - j) Geosites of geological, historic, cultural, and archaeological significance within the UNESCO Black Country Geopark (see Policy ENV6);
 - k) The Beacons and other largely undeveloped high prominences lying along the Sedgley to Northfield Ridge (including Sedgley Beacon and Wrens Nest), Castle Hill and the Rowley Hills (Turners Hill), and the Queslett to Shire Oak Ridge (including Barr Beacon) and views to and from these locations.
- 7) In addition to designated heritage assets³², attention should be paid to the following non-designated heritage assets³³ including the Historic Environment Area Designations (HEADS) described and mapped in the Black Country Historic Landscape Characterisation Study (BCHLCS, 2019 – see evidence section for link):
- a) Areas of High Historic Townscape Value (AHHTV) that exhibit a concentration of built heritage assets and other historic features that, in combination, make a particularly positive contribution to local character and distinctiveness;
 - b) Areas of High Historic Landscape Value (AHLHV) that demonstrate concentrations of important wider landscape elements of the historic environment such as areas of open space, woodland, watercourses, hedgerows and archaeological features, that contribute to local character and distinctiveness;
 - c) Designed Landscapes of High Historic Value (DLHHV) that make an important contribution to local historic character but do not meet the criteria for inclusion on the national Register for Parks and Gardens;
 - d) Archaeology Priority Areas (APA) that have a high potential for the survival of archaeological remains of regional or national importance that have not been considered for designation as scheduled monuments, or where there is insufficient data available about the state of preservation of any remains to justify a designation;
 - e) Locally Listed buildings/structures and archaeological sites;
 - f) Non-designated heritage assets of archaeological interest;

³² NPPF 2019 Annex 2 Designated heritage asset: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

³³ NPPF 2019 Annex 2 Heritage asset: A building monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

Policy ENV5 – Historic Character and Local Distinctiveness of the Black Country

- g) Any other buildings, monuments, sites, places, areas of landscapes identified as having a degree of significance³⁴.
- 8) Development proposals that would potentially have an impact on the significance of any of the above distinctive elements, including any contribution made by their setting, should be supported by evidence that the historic character and distinctiveness of the locality has been fully assessed and used to inform proposals. Clear and convincing justification should be provided, either in Design and Access Statements, Statements of Heritage Significance, or other appropriate report.
- 9) In some instances, local planning authorities will require developers to provide detailed Heritage Statements and/or Archaeological Desk-based Assessments to support their proposals.
- 10) For sites with archaeological potential, local authorities may also require developers to undertake Field Evaluation to support proposals.

³⁴ NPPF Annex 2 Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

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Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV5	++	+	+	0	0	0	0	0	0	0	+	0	+	0

- J.9.5.1 This policy would be expected to help ensure that heritage assets are conserved in a manner appropriate to their significance, in line with national policy, and that the setting and special character of heritage assets are not adversely impacted by development. Where development proposals could potentially affect the significance of an asset, this policy requires an accompanying statement to be produced, in order to ensure that impact can be adequately assessed. The policy seeks to enrich the historic environment, stating that development proposals should enhance local distinctiveness, retain and enhance built assets and their settings, historic townscape value and archaeological potential. Overall, this policy would be expected have a major positive impact on cultural heritage (SA Objective 1).
- J.9.5.2 As the policy states that "*local character and distinctiveness should be used to inform the form, scale, appearance, details and materials of new development*", this would be expected to benefit the character, appearance and distinctiveness of local landscapes and townscapes. This policy seeks to protect and enhance urban landscape features and encourage the appropriate re-use of historic buildings, and therefore, have a minor positive impact on the local landscape (SA Objective 2).
- J.9.5.3 Furthermore, the policy seeks to ensure that development proposals "*help maintain the Black Country's cultural identity and strong sense of place*" and have regard to locally distinctive features including public open spaces and local landmarks. This could potentially benefit the local community by encouraging a sense of belonging and promoting social inclusion, and therefore, a minor positive impact on equality would be expected (SA Objective 11). Furthermore, the conservation and enhancement of heritage assets and historic townscapes can have benefits to the economy including through encouraging tourism and attracting investment³⁵. The policy could potentially result in a minor positive impact on the economy (SA Objective 13).

³⁵ Historic England (2020) Heritage and the Economy 2020. Available at: <https://historicengland.org.uk/research/heritage-counts/heritage-and-economy/> [Date Accessed: 17/02/21]

- J.9.5.4 Policy ENV5 seeks to protect “*landscape elements of the historic environment such as areas of open space, woodland, watercourses [and] hedgerows*” and states that development should conserve and enhance “*Geosites of geological, historic, cultural, and archaeological significance within the UNESCO Black Country Geopark*”; therefore, a minor positive impact on biodiversity and geodiversity could be expected (SA Objective 3).

J.9.6 Policy ENV6 – Geodiversity and the Black Country UNESCO Global Geopark

Policy ENV6 – Geodiversity and the Black Country UNESCO Global Geopark

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

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV6	+	+	+	0	0	0	0	0	0	0	0	0	+	+

- J.9.6.1 Policy ENV6 would be expected to help protect and enhance geodiversity sites across the Black Country. Of particular importance is the Black Country UNESCO Global Geopark. Development proposals which could potentially result in an adverse impact on geodiversity sites of international or national importance will be resisted. This policy would be likely to have a minor positive impact on local geodiversity (SA Objective 3). Sites of geological importance are often strongly linked to the surrounding local landscape and historic features, including the industrial heritage within the Black Country. By protecting the local

geodiversity, this policy would also be expected to have a minor positive impact on cultural heritage and the local landscape (SA Objectives 1 and 2).

- J.9.6.2 The protection and enhancement of geologically important sites including the UNESCO Global Geopark would be likely to have benefits to tourism in the area, and therefore, have a minor positive impact on the local economy (SA Objective 13). Furthermore, sustainable tourism, outdoor learning and education are major themes of the Geopark³⁶. Policy ENV6 states that the BCA should “*establish clear goals for the management of identified sites ... to promote public access, appreciation and the interpretation of geodiversity*” which could potentially have a minor positive impact on education (SA Objective 14).

J.9.7 Policy ENV7 - Canals

Policy ENV7 - Canals

- 1) The Black Country canal network comprises the canals and their surrounding landscape corridors, designated and undesignated historic assets, character, settings, views and interrelationships. The canal network provides a focus for future development through its ability to deliver a high-quality environment and enhanced accessibility for pedestrians, cyclists and other non-car-based modes of transport.
- 2) All development proposals likely to affect the canal network must:
 - a) safeguard the continued operation of a navigable and functional waterway;
 - b) ensure that any proposals for reinstatement or reuse would not adversely impact on locations of significant environmental value where canals are not currently navigable;
 - c) protect and enhance its special historic, architectural, archaeological and cultural significance, including potential to record, preserve and restore such features;
 - d) protect and enhance its nature conservation value including habitat creation and restoration along the waterway and its surrounding environs;
 - e) protect and enhance its visual amenity, key views and its setting;
 - f) protect and enhance water quality in the canal.
 - g) reinstate and/or upgrade towpaths and link them into high quality wider pedestrian and cycle networks, particularly where they can provide links to transport hubs, centres and opportunities for employment.
- 3) Where opportunities exist, all development proposals within the canal network must:
 - a) enhance and promote its role in providing opportunities for leisure, recreation and tourism activities;
 - b) enhance and promote opportunities for off road walking, cycling and boating access, including for small scale commercial freight activities;
 - c) Preserve and enhance the historical, geological and ecological value of the canal network and its associated infrastructure.
 - d) Positively relate to the opportunity presented by the waterway by promoting high quality design, including providing active frontages onto the canal and by improving the public realm;

³⁶ Black Country Geopark (2021) Black Country Geopark – Education, Events & Sustainable Tourism. Available at: <https://blackcountrygeopark.dudley.gov.uk/education/> [Date Accessed: 16/02/21]

Policy ENV7 - Canals

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

Residential Canal Moorings

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

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV7	+	+	+	0	0	0	+	0	+	+	0	+	+	0

J.9.7.1 Policy ENV7 aims to protect and enhance the Black Country's canal network. The policy requires all development proposals to *"safeguard the continued operation of a navigable and functional waterway"*. The policy also requires development proposals to seek to reinstate and/or upgrade towpaths and link them into high-quality, wider pedestrian and cycle networks. This would be expected to ensure the canal network remains functional across the Plan area, with minor positive impacts in regard to transport and accessibility (SA Objective 9). Furthermore, enhancing the canal towpath network for use by

pedestrians and cyclists could potentially encourage outdoor exercise and active travel, resulting in a minor positive impact on physical and mental health (SA Objective 12).

J.9.7.2 Policy ENV7 requires development proposals to protect and enhance the canals "*special historic, architectural, archaeological and cultural significance*", "*nature conservation value including habitat creation and restoration*", "*visual amenity, key views and its setting*" and "*water quality*". These requirements would be likely to result in minor positive impacts in relation to cultural heritage, landscape, biodiversity and pollution (SA Objectives 1, 2, 3 and 7).

J.9.7.3 The policy states that where the opportunity exists, future development should aim to improve leisure, recreation and tourism activities. This would be likely to have a minor positive impact on the local economy (SA Objective 13).

J.9.7.4 This policy would support the development of residential moorings within the Black Country. This policy could potentially have benefits by providing increased provision of accommodation. Therefore, this policy would have a minor positive impact on the overall accommodation provision (SA Objective 10).

J.9.8 Policy ENV8 – Open Space, Sport and Recreation

Policy ENV8 – Open Space, Sport and Recreation

- 1) All development proposals should recognise the values and functions of open space as set out in Government Policy and Guidance and also the following functions of open space that are of particular importance in the Black Country:
 - a) Improving the image and environmental quality of the Black Country;
 - b) Defining and enhancing local distinctiveness;
 - c) Preserving and enhancing industrial, geological, archaeological and architectural heritage, including canals;
 - d) Enhancing visual amenity;
 - e) Providing buffer zones between incompatible uses;
 - f) Mitigating the effects of climate change, through reducing potential urban heat island effects and providing opportunities for additional landscaping and tree planting;
 - g) Preserving and enhancing diversity in the natural and built environment and preventing the fragmentation of habitat networks;
 - h) Strengthening (through extension, increased access and enhanced value) and providing components of a high quality, multifunctional green space and greenway network;
 - i) Providing outdoor sport and physical activity facilities, including footpath and cycle networks and areas for informal recreation and children's play;
 - j) providing opportunities for people to grow their own food on allotments and encouraging urban horticulture;
 - k) Enhancing people's mental and physical health and well-being.

Policy ENV8 – Open Space, Sport and Recreation

- 2) Development that would reduce the overall value of the open space, sport and recreation network in the Black Country will be resisted. Development that would increase the overall value of the open space, sport and recreation network will be supported, especially in areas of proven deficiency against adopted quantity, quality and accessibility standards.
- 3) Each Local Authority will set out, in their Local Plans and on Policies Maps, proposals for specific open space, sport and recreation facilities and planning requirements for open space, sport and recreation, in order to:
 - a) Move towards the most up-to-date local open space, sport and recreation standards for each Local Authority, in terms of quantity, quality and access. In order to balance achievement of these standards, in some cases a loss in quantity of open space or facilities may be acceptable if compensatory gains in quality and / or accessibility of other open spaces / facilities can be secured that would be of a greater value in the local area;
 - b) Address the priorities set out in the Birmingham and Black Country Nature Recovery Network Strategy;
 - c) Make more efficient use of urban land by:
 - i. creating more multifunctional open spaces;
 - ii. protecting the existing greenway network for recreation and biodiversity and taking opportunities to strengthen and expand the network;
 - iii. significantly expanding community use of open space, sport, play and recreation facilities provided at places of education (see Policy HOU5);
 - iv. providing opportunities to increase accessible public open space, sport and recreation use of the Green Belt;
 - v. making creative use of land exchanges and disposing of surplus assets to generate resources for investment;
 - vi. increasing access to open space, sport and recreation facilities for all, including people with disabilities and other target groups with limited access at present; and
 - vii. where there is a cross-boundary impact, identifying the most appropriate location to maximise community access and use of new facilities.
- 4) The existing network of built sports facilities will be protected and enhanced. Proposals involving the loss of a built sports facility will be permitted only where adequate alternative provision is available to meet the needs of the community served by the facility.
- 5) New built sports facilities should be:
 - a) Well designed, including through the provision of high quality landscaping and public realm enhancements, and well related to neighbourhood services and amenities;
 - b) Well linked to public transport infrastructure and footpath and cycleway networks, and directed to a Centre appropriate in role and scale to the proposed development and its intended catchment area. Proposals located outside Centres must be justified in terms of relevant national policy.
- 6) Where a housing development would increase the need for built sports facilities to the extent that significant new or improved facilities would be required to meet this need, proportionate planning obligations or Community Infrastructure Levy will be secured to help address this need, where this is financially viable and appropriate, long term management arrangements can be secured and funded.

Policy ENV8 – Open Space, Sport and Recreation

- 7) Where land is provided for a new built sports facility as part of a housing development the financial contribution made by that development towards built sports facilities will be reduced accordingly.

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	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV8	+	+	+	+	+	0	+	0	+	0	+	++	0	0

J.9.8.1 Policy ENV8 seeks to ensure that open space, sport and recreation facilities throughout the Plan area will be protected, managed and enhanced, in order to provide safe and accessible community facilities for existing and future residents. Open space has multiple benefits within an area. This includes physical and mental health benefits associated with residents' access to a diverse range of natural habitats, alongside the facilitation of outdoor recreation.

J.9.8.2 Access to sports, recreation and leisure facilities is essential for residents to be able to pursue healthy and active lifestyles. This policy would be expected to support the development of new sports, recreation and leisure facilities within the Plan area. This could potentially help to meet the identified need for additional leisure centres in some areas of the Black Country. This policy would be expected to improve current facilities, contribute to the development of new facilities and ensure residents have good access to outdoor space. Therefore, this policy would be expected to have a major positive impact on the health and wellbeing of residents (SA Objective 12). This policy also encourages the development of footpath and cycle networks, with benefits to local accessibility (SA Objective 9).

J.9.8.3 Furthermore, through "*increasing access to open space, sport and recreation facilities for all, including people with disabilities and other target groups with limited access at present*" this policy would be expected to help fill gaps in accessibility for vulnerable or disadvantaged groups, providing more equitable access to these important facilities. Therefore, a minor positive impact on equality would be expected (SA Objective 11).

J.9.8.4 Open space is beneficial to the local biodiversity network by providing an increased number of natural habitats and the opportunity to create green links within urban areas. This could also benefit the local landscape by creating attractive open spaces within the area. This policy aims to improve visual amenity and contribute towards the preservation and enhancement of archaeological heritage and diversity in the natural and built environment. As a result, it would be expected that Policy ENV8 would have a minor positive impact on local cultural heritage, landscape and biodiversity (SA Objectives 1, 2 and 3).

- J.9.8.5 Potential new or enhanced open spaces, and associated green infrastructure, would be expected to contribute towards improved air quality due to the increased uptake of carbon dioxide. Due to this enhanced carbon storage capacity, this policy could potentially contribute towards the mitigation anthropogenic climate change. Green infrastructure could also potentially provide natural filtration to reduce residents' exposure to air pollution, for example from emissions associated with road transport. Furthermore, this policy encourages active travel, which would be expected to reduce the reliance on personal car use. A minor positive impact on the climate change and pollution would therefore be expected (SA Objectives 4 and 7). Enhanced open space and green infrastructure could also potentially help to reduce water runoff rates, and as such, have a minor positive impact by reducing the risk of flooding (SA Objective 5).

J.9.9 Policy ENV9 – Design Quality

Policy ENV9 – Design Quality

- 1) Development proposals must demonstrate that the following aspects have been addressed, through design and access statements that reflect their Black Country context:
 - a) Implementation of the principles of the National Design Guide³⁷ to ensure the provision of a high-quality network of streets, buildings and spaces;
 - b) Implementation of the principles of "Manual for Streets"³⁸ to ensure urban streets and spaces are designed to provide a high-quality public realm and an attractive, safe and permeable movement network;
 - c) Use of the Building for a Healthy Life³⁹ criteria (or subsequent iterations) for new housing developments, to demonstrate a commitment to achieve the highest possible design standards, good place-making and sustainable development, given local circumstances;
 - d) Consideration of crime prevention measures and Secured by Design principles, in addition to the requirements of Part Q of the Building Regulations or any successor legislation.
 - e) Accordance with the agent of change⁴⁰ principle in relation to existing uses adjacent to proposed development sites, as the Black Country has a strong tradition of providing live music and entertainment and this aspect of its character and economy should be protected.
2. Development will be designed to the highest possible standards, creating a strong sense of place. Development proposals must address as appropriate:
 - a) the townscapes of the Black Country;

³⁷ <https://www.gov.uk/government/publications/national-design-guide>

³⁸ To be supplemented by Manual for Streets 2 in 2022 - <https://www.ciht.org.uk/knowledge-resource-centre/resources/revising-manual-for-streets/>

³⁹ <https://www.udg.org.uk/publications/othermanuals/building-healthy-life>

⁴⁰ Paragraph 182 of the NPPF (July 2019) states that both planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (e.g. places of worship, pubs, music venues and sports clubs). Unreasonable restrictions should not be placed on existing businesses because of development permitted after they were established.

Policy ENV9 – Design Quality

- b) the need to maintain strategic gaps and views;
 - c) the built and natural settings of development and the treatment of 'gateways';
 - d) the Black Country's industrial architecture and links with the wider rural hinterland;
 - e) the need to ensure development has no harmful impacts on key environmental assets (see Policies ENV1 and ENV3).
3. New residential development (including conversions from non-residential properties) and houses in multiple occupation will be required to meet water efficiency standards⁴¹ of 110 litres per person per day, as set out in Part G2 of current Building Regulations 2010 or any successor legislation.
4. All new residential development (including the conversion of buildings) and the creation of houses in multiple occupation will be required to meet the Nationally Described Space Standards (NDSS)⁴², except where it can be clearly evidenced that the implementation of the NDSS would cause harm to the significance of a heritage asset. The space standards will apply to all tenures.
5. Major development proposals should contribute to the greening of the Black Country by:
- a) including urban greening as a fundamental element of site and building design;
 - b) incorporating measures such as high-quality landscaping (including trees), other soft landscaping and planting, green roofs, green walls and sustainable drainage and conserving existing green spaces and natural resources;
 - c) optimising the use of multi-functional green infrastructure (including water features, green roofs and planting) for urban cooling, local flood risk management and to provide access to outdoor space and shading.
6. Development should reflect National Design Guide principle H1 in delivering functional, healthy and sustainable homes and buildings, particularly in relation to creating healthy, comfortable and safe internal and external environments.
7. Development must not cause a detrimental impact on the living environment for occupiers of existing residential properties or unacceptable living conditions for future occupiers of new residential properties, in terms of:
- a) Privacy and overlooking
 - b) Access to sunlight and daylight;
 - c) Artificial lighting;
 - d) Vibration;
 - e) Dust and fumes;
 - f) Smell;
 - g) Noise;
 - h) Crime and safety;
 - i) Wind, where the proposals involve new development of more than eight storeys.

⁴¹ <https://www.gov.uk/government/publications/sanitation-hot-water-safety-and-water-efficiency-approved-document-gov>

⁴² <https://www.gov.uk/guidance/housing-optional-technical-standards#internal-space-standards>

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Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV9	+	+	+	+	+	+	+	0	+	0	+	+	0	0

- J.9.9.1 Effective design codes can help to ensure new developments are integrated effectively into the local landscape, reinforcing local distinctiveness and conserving cultural and heritage assets. Good design can enhance the quality of life for residents, strengthen the sense of place, improve the attractiveness of a location and create safer places to live and work.
- J.9.9.2 The National Design Guide⁴³ sets out the characteristics of well-designed places and aims to demonstrate good design. The Manual for Streets⁴⁴ guidance sets out how to effectively design, construct, adopt and maintain new and existing residential streets. Building for Life 12⁴⁵ is a government endorsed design quality indicator for well-designed developments. This policy also refers to the Building Regulations⁴⁶, which contains general guidance on the performance of building work expected, and practical solutions on how to achieve compliance. These guides should be used by local authorities to help guide design codes within the Plan area.
- J.9.9.3 The Nationally Described Space Standards⁴⁷ help to ensure that all development satisfies the requirement for internal space, in particular, ensuring more affordable homes still

⁴³ Ministry of Housing, Communities and Local Government (2019) National Design Guide: Planning practice guidance for beautiful, enduring and successful places. Available at: <https://www.gov.uk/government/publications/national-design-guide> [Date Accessed: 21/05/20]

⁴⁴ Department for Transport (2007) Manual for Streets. Available at: <https://www.gov.uk/government/publications/manual-for-streets> [Date Accessed: 21/05/20]

⁴⁵ D. Birkbeck and S. Kruczkowski (2015) Building for Life 12. Available at: <https://www.designcouncil.org.uk/resources/guide/building-life-12-third-edition> [Date Accessed: 21/05/20]

⁴⁶ Ministry of Housing, Communities and Local Government (2016) Building Regulations: Approved Documents. Available at: <https://www.gov.uk/government/collections/approved-documents> [Date Accessed: 21/05/20]

⁴⁷ Ministry of Housing, Communities and Local Government (2015) Technical housing standards – nationally described space standards. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf [Date Accessed: 21/05/20]

- provide residents with enough internal space. It is thought that the greater the internal space within a property, the better the standard of living for residents.
- J.9.9.4 High-quality design would help to ensure that new development does not have an adverse impact on any surrounding heritage assets. This policy sets out criteria to help ensure future development proposals do not result in *"harm to the significance of a heritage asset"* and that the townscapes of the Black Country are protected. Therefore, a minor positive impact on the historic environment would be expected (SA Objective 1).
- J.9.9.5 The policy requires development proposals to create a *"strong sense of place"*, *"maintain strategic gaps and views"* and include high-quality landscaping. This would be likely to result in a minor positive impact on the local landscape, by helping to ensure that future development does not adversely affect the existing landscape character and where appropriate, enhances visual amenity and sense of place in the area (SA Objective 2).
- J.9.9.6 This policy states that *"major development proposals should contribute to the greening of the Black Country"*. This provision of green infrastructure would be likely to deliver additional habitats for wildlife and present opportunities to better connect biodiversity features. This policy would therefore be likely to have a minor positive impact on biodiversity (SA Objective 3).
- J.9.9.7 This policy would be likely to encourage climate change resilience and help reduce carbon emissions associated with development, due to the promotion of energy efficient design. Therefore, a minor positive impact on climate change mitigation would be expected (SA Objective 4).
- J.9.9.8 Policy ENV9 aims for development proposals to optimise green infrastructure and local flood risk management where appropriate. Green infrastructure can have benefits such as enhancing natural water storage and flow functions. In addition, this policy promotes the use of flood management, including SuDS, which would be expected to have a beneficial impact on local surface water flooding issues. This would be likely to have a minor positive impact on climate change adaptation (SA Objective 5).
- J.9.9.9 Future development must meet the water efficiency requirements as stated in the Building Regulations. The efficient use of water and energy would be expected to have a minor positive impact on natural resources (SA Objective 6).
- J.9.9.10 The policy states that future development must not result in detrimental impact on the living environment in regard to artificial lighting, vibrations, dust, fumes, smell and noise. Urban greening encouraged within this policy would also be expected to help to buffer developments against these pollutants. This would be likely to have a minor positive impact in relation to pollution (SA Objective 7).

- J.9.9.11 Policy ENV9 seeks to ensure that development proposals follow the 'Manual for Streets' to provide an attractive, safe and permeable movement network. This would be likely to have benefits for local accessibility and have a minor positive impact in relation to transport (SA Objective 9).
- J.9.9.12 This policy would be likely to make a positive contribution to reducing crime and fear of crime in the local area. This would be expected to create safe and cohesive communities and help to improve quality of life for residents. As such, this policy would be likely to have a minor positive impact on equality (SA Objective 11).
- J.9.9.13 An increased amount of residential space facilitates an improved standard of living, leading to a more comfortable and higher quality life. Residents with more space, and therefore better qualities of life, are likely to be part of a more vibrant and interactive community, and as such, a minor positive impact on the wellbeing of residents would be expected (SA Objective 12).

J.10 Climate Change

J.10.1 Policy CC1 - Increasing Efficiency and Resilience

Policy CC1 - Increasing Efficiency and Resilience

- 1) Development should be designed to mitigate climate change impacts and provide adaptations that will help communities and individuals to continue to avoid or mitigate adverse effects on human health. Proposals for development will need to demonstrate how they have been designed to maximise resistance and resilience to climate change through addressing the following requirements: -
 - a) Wherever feasible, new buildings will be orientated to maximise opportunities for both natural heating and ventilation and to reduce exposure to wind and other elements.
 - b) Development proposals that include and / or impact on transport infrastructure and / or which generate a significant number of person trips will need to meet the needs of all sections of the community by including a range of sustainable and low carbon transport modes as alternatives to private car use (see also Policy TRAN6).
 - c) Use of trees and other planting in landscaping schemes will be required throughout the Black Country, to provide for the shading of amenity areas, buildings and streets, mitigate against poor air quality and help connect fragmented habitats and protect and support biodiversity networks.
 - d) Landscaping schemes should be designed using a mix of native tree species and plants where appropriate and should also use species that are able to adapt to changing climate conditions (see also Policy ENV4 Trees, Woodland and Hedgerows).
 - e) All development will need to minimise the impact of surface water runoff through the design of proposed drainage systems, including where possible grey water recycling and rainwater collection, and the use of permeable surfaces. Schemes should also make provision for sustainable drainage infrastructure, which should be built into landscaping schemes/ open space provision as appropriate (see Policies CC5 and CC6).
 - f) Development will be required to incorporate mitigation and resilience measures designed to reduce the risk of river and surface water flooding (see Policies CC5 and CC6).
 - g) The conversion of non-domestic buildings to residential use will be expected to employ high environmental standards, incorporating improved thermal insulation, appropriate levels of natural ventilation and measures to improve water efficiency.
 - h) Proposals for increasing the energy efficiency and resilience to climate change of designated heritage assets will be supported only where this will not cause demonstrable harm to the historic fabric, character, setting or appearance of the asset.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC1	+	+	+	++	+	+	+	0	+	0	0	+	0	0

- J.10.1.1 Policy CC1 aims to ensure that development proposals seek opportunities for adaptation to, and mitigation of, climate change. This would help to promote sustainable development throughout the Plan area and help to protect the environment.
- J.10.1.2 This policy supports the development of energy efficient technologies associated with historic assets as long as the development *"will not cause demonstrable harm to the historic fabric, character, setting or appearance of the asset"*. Therefore, a minor positive impact on cultural heritage would be anticipated (SA Objective 1).
- J.10.1.3 The policy requires development proposals to *"protect and support biodiversity networks"*, to incorporate *"landscaping schemes"* and to be designed *"using a mix of native tree species and plants where appropriate"*. This policy could potentially help to protect and enhance, and therefore have a minor positive impact in relation to, biodiversity and landscape character (SA Objectives 2 and 3).
- J.10.1.4 In addition to increased green cover, the policy states that *"all development will need to minimise the impact of surface water runoff through the design of proposed drainage systems, including where possible grey water recycling and rainwater collection, and the use of permeable surfaces"*. These requirements will provide mitigation for potential fluvial or pluvial flood events. Therefore, a minor positive impact on climate change adaptation would be expected (SA Objective 5). In addition, these requirements will benefit water efficiency, and have a minor positive impact on natural resources (SA Objective 6).
- J.10.1.5 Enhanced green cover alongside amenity areas, buildings and streets could potentially help to promote natural air filtration, and as such, reduce residents' exposure to transport-associated air pollution. Furthermore, providing a more attractive local area could potentially encourage walkable neighbourhoods and facilitate outdoor exercise. Policy CC1 also requires development proposals to consider accessibility via *"a range of sustainable and low carbon transport modes as alternatives to private car use"*. This would be likely to reduce reliance on personal car use, reducing local GHG emissions, as well as improving access via walking and cycling to encourage the uptake of active travel. This policy states that new development should incorporate natural heating and ventilation, wherever possible. This would be expected to ensure that living conditions are of a high quality.

Overall, a minor positive impact on local air quality, accessibility and human health would be expected (SA Objectives 7, 9 and 12).

- J.10.1.6 The incorporation of green cover, minimisation of flood risk, use of greywater recycling and promotion of natural heating systems would be expected to help reduce the Plan area's contributions to the causes of climate change. By requiring adaptation and mitigation measures to ensure that development proposals are resilient in the face of climate change, this policy would be expected to have a major positive impact on climate change mitigation (SA Objective 4).
- J.10.1.7 Whilst more applicable to project level Environmental Impact Assessment (EIA), it is noted that the changes to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 introduce wider scope for the inclusion of topics such as climate change mitigation and adaptation to be assessed and reported on in the Environmental Statement, where a project is subject to EIA and has the potential to give rise to significant effects in terms of climate change. This process is subject to separate regulatory mechanisms that would be determined in respect to individual planning applications and (where relevant) the scoping stage for EIA developments.

J.10.2 Policy CC2 – Energy Infrastructure

Policy CC2 – Energy Infrastructure

Decentralised energy and communal heating provision

- 1) Any development including ten homes or more, or non-residential floorspace of 1,000 sq m or more must include opportunities for decentralised energy provision within the site, unless it can be demonstrated that the development is not suitable, feasible or viable for decentralised heat or power networks.
- 2) Where there is existing decentralised energy provision available close to the site, the development will be expected to link into it or should be designed to accommodate a subsequent connection if a source has not yet become operational. Information on this linkage should be included in a design and access or planning statement, which should also explain how access to a decentralised network can be achieved in the future if it is not currently operational or available.
- 3) Where developers can demonstrate to the satisfaction of the relevant BCA that a link to a decentralised energy source is not viable, the local authority will support the provision of alternative carbon reduction measures that can be incorporated into the scheme (see Policy CC7).

Onsite energy provision

- 4) Developers should engage with relevant energy companies and bodies at an early stage in the development process to establish the likely future energy and infrastructure requirements arising from large-scale development proposals including 100 homes or more, or non-residential floorspace of 10,000 sq m or more. Proposals for addressing energy provision on such sites, should be developed and agreed between the local planning authority and developer(s) to establish the most

Policy CC2 – Energy Infrastructure

sustainable and effective energy supply provision. Information to support the preferred solution(s) should identify and address:

- a) Current and future major sources of demand for heat (e.g. sites such as universities, large-scale sporting or leisure development, hospitals and social housing);
 - b) demands for heat from existing buildings that can be connected to future phases of a heat network;
 - c) major heat supply plant;
 - d) possible opportunities to utilise energy from waste;
 - e) opportunities for heat networks;
 - f) opportunities for private wire electricity supply;
 - g) possible land for energy centres and / or energy storage;
 - h) possible heating and cooling network routes;
 - i) infrastructure and land requirements for electricity and gas supplies;
 - j) implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector.
- 5) The BCAs' local plans will, where applicable:
- a) identify any necessary energy infrastructure requirements, including upgrades to existing infrastructure;
 - b) identify existing heating and cooling networks and opportunities for expanding existing networks and establishing new ones.

Heating / hot water systems

- 6) Heat sources for a communal heating system should be chosen to minimise likely emissions and to make best use of any local decentralised networks, in preference to other solutions.
- 7) Where a communal heating system is provided, development proposals must provide evidence to show that any emissions related to energy generation will be equivalent to or lower than those of an ultra-low NOx⁴⁸ gas boiler.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC2	0	0	0	+	+	0	+	0	0	0	0	+	0	0

⁴⁸ Ultra-low NOx boiler Standard specified in the Black Country Air Quality Supplementary Planning Document.

- J.10.2.1 Policy CC2 aims to encourage the use of decentralised energy sources within development proposals and, where appropriate, the use of communal heating systems to reduce GHG emissions. More efficient energy infrastructure will lead to a decrease in the amount of energy needed, and consequently, a decrease in GHG emissions released through the generation of energy. Policy CC2 would therefore have a minor positive impact in relation to climate change mitigation (SA Objective 4). By identifying and improving heating and cooling networks and considering future requirements, this policy could also potentially result in a minor positive impact on climate change adaptation (SA Objective 5).
- J.10.2.2 In addition, through improved energy efficiency, this policy would be likely to result in health benefits. This is due to a reduction in GHG emissions, which can cause poor air quality and impact human health, primarily due to particulate matter pollution. Therefore, this policy would have a minor positive impact in regard to pollution and human health (SA Objectives 7 and 12).

J.10.3 Policy CC3 – Managing Heat Risk

Policy CC3 – Managing Heat Risk

- 1) Development proposals⁴⁹ should minimise both internal heat gain and the impacts of urban heat islands⁵⁰ by using appropriate design, layout, orientation and materials.
- 2) Development proposals will be expected to demonstrate how their potential for overheating and reliance on artificial cooling systems will be reduced, in accordance with the following cooling hierarchy:
 - a) minimise internal heat generation through energy-efficient design;
 - b) reduce the amount of heat entering a building through orientation, shading, albedo⁵¹, fenestration, insulation and the provision of green roofs and walls (see also Policy ENV10 - Design);
 - c) manage heat within a building through exposed internal thermal mass⁵² and high ceilings;
 - d) provide passive ventilation;
 - e) provide mechanical ventilation;
 - f) provide active cooling systems⁵³.

⁴⁹ Excluding domestic extensions.

⁵⁰ Caused by extensive built-up areas absorbing and retaining heat.

⁵¹ The reflectivity of a surface. A high albedo surface reflects the sun's heat back into the atmosphere; Low albedo surfaces absorb it. Pale coloured surfaces have a high albedo and can help to minimise heat gain.

⁵² 'Thermal mass' is a material's capacity to absorb, store and release heat.

⁵³ Systems using energy to provide cooling. They circulate a coolant (gas, fluid) to transfer heat from one place to another.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC3	0	0	+	+	+	0	+	0	0	0	0	0	0	0

J.10.3.1 Efficient design and building of development proposals can help to reduce the risk of heat gain and the urban heat island effect (UHI). UHI refers to an urban area which is significantly warmer than the surrounding rural areas, caused primarily by human activity. This could potentially be an issue within the Black Country due to the predominantly urban area, tall buildings and large population. The policy states that "*energy-efficient design*", "*passive ventilation*" and "*active cooling systems*" will be required within developments. This would be expected to help reduce heat gain and the UHI effect, reduce the amount of energy needed to cool environments and reduce heat lost to the environment. This policy would therefore be likely to have minor positive impacts in relation to climate change mitigation, climate change adaptation and pollution (SA Objectives 4, 5 and 7).

J.10.3.2 Furthermore, Policy CC3 encourages "*provision of green roofs and walls*" which could potentially help to support wildlife networks and opportunities for habitat creation amongst the urban areas. Therefore, this policy could result in a minor positive impact on biodiversity and climate change adaptation (SA Objectives 3 and 5).

J.10.4 Policy CC4 – Air Quality

Policy CC4 – Air Quality

Strategic Approach

- 1) The BCP will promote a diverse approach to addressing the issue of poor air quality across the Black Country, including:
 - a) requiring development and other land use proposals to promote the integration of cycling, walking, and electric charging points as part of their transport provision;
 - b) promoting and supporting (including through continued joint working with authorities outside the Black Country) a modal shift from private vehicles to clean, fast and accessible public transport alternatives such as rail, the Metro and bus transport networks;
 - c) requiring the provision and protection of green open spaces and significant additional tree cover;
 - d) ensuring the sustainable location of new residential and employment development to minimise commute times; and
 - e) as part of an integrated low emission public transport system, promoting and requiring the use of sustainable technologies, greener fleet vehicles, design and materials and providing new or

Policy CC4 – Air Quality

extended bus services to meet demand when development of a strategic nature is planned and constructed.

- 2) New development must be at least air quality neutral. Planning permission for new development or changes of use will be refused where data assessment indicates that development will:
 - a) lead to deterioration of existing poor air quality,
 - b) create any new areas that exceed air quality objectives, or
 - c) delay compliance being achieved in areas that are currently in exceedance of legal limits, unless sufficient mitigation can be achieved.

Improving air quality

- 3) Residential or other sensitive development such as schools, hospitals and care facilities should be sited in areas where air quality already meets national objectives, or where compliance with those objectives can be achieved with suitable mitigation proposed as part of the development proposal and verified as being achieved before occupation of the development.
- 4) Developments that will have a moderate air quality impact, and which can be dealt with through standard mitigation measures, will not require an air quality assessment.
- 5) Whenever development is proposed in locations where air quality does not / will not meet national objectives, or where significant air quality impacts are likely to be generated onsite or elsewhere by the development itself or its subsequent use / activities, an appropriate Air Quality Assessment (AQA) will be required to demonstrate that the proposed development will improve air quality in order that it will meet air quality objectives once the development is completed and occupied / operational:
 - a) The assessment must take into consideration the potential cumulative impact on air quality of all extant planning permissions in the locality, for both large / strategic and small schemes;
 - b) the impact of point source emissions of pollutants to air on the scheme (pollution that originates from one place) must also be considered;
 - c) The assessment must take into consideration the types of pollutant emissions likely to be generated by the development and its future use / associated activities that will have an impact on human health;
 - d) Where assessments show that a development is likely to result in exposure to pollutant concentrations that exceed national objectives, a mitigation plan will be required to determine that the development will improve air quality, in order that it will meet air quality objectives once it is complete and occupied / operational.
 - e) Adequate and satisfactory mitigation measures that are capable of implementation, including the planting of additional and replacement trees in appropriate locations, must be identified, submitted as part of an application and made subject to appropriate conditions before planning permission is granted.
- 6) Developments should not include materials or be positioned or ventilated in a way that would result in poor indoor air quality. Guidance will be provided to detail how such issues should be addressed.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC4	0	0	+	+	0	0	++	0	+	0	0	+	+	0

- J.10.4.1 Air pollution is a significant concern internationally and locally. The four authorities within the Black Country: Dudley; Sandwell; Walsall; and Wolverhampton, are designated as Air Quality Management Areas (AQMAs). Development within an AQMA would make it more difficult to meet national air quality objectives within the AQMA, whilst also exposing new residents to existing poor air quality.
- J.10.4.2 Policy CC4 requires development proposals to promote the use of pedestrian and cycle routes, access to rail, the Metro and bus transport networks, plus provide electric car charging points. These measures would be expected to support a modal shift to the use of public transport and more sustainable travel options. In terms of air quality, electric vehicles are an effective alternative to petrol or diesel-powered vehicles as they emit fewer, or zero, air pollutants. By discouraging the use of the private car, this policy would be expected to help reduce transport-associated emissions and have a positive impact on local air quality.
- J.10.4.3 Where a development proposal is situated in a location that does not currently meet national objectives, the policy requires an appropriate Air Quality Assessment (AQA) to be carried out to demonstrate that the proposed development will meet air quality objectives once the development is completed. Overall, Policy CC4 would be expected to have a major positive impact on air pollution (SA Objective 7).
- J.10.4.4 The requirements set out in Policy CC4 could potentially help to minimise the Plan area's contributions to climate change by offering alternative, lower emission and more sustainable means of transport. A minor positive impact would therefore also be expected for climate change mitigation (SA Objective 4).
- J.10.4.5 As well as contributing towards the improvement of local air quality, encouraging the provision of sustainable transport methods and electric car charging points would be expected to have a minor positive impact on transport and accessibility (SA Objective 9).
- J.10.4.6 Policy CC4 aims to encourage active travel by integrating pedestrian and cycle routes into development proposals. In addition, the policy aims to increase the provision of green and open spaces across the Black Country. This would be likely to facilitate healthy lifestyles, through promoting outdoor exercise and benefiting mental wellbeing of residents. Overall, this policy would be likely to have a minor positive impact in regard to human health (SA Objective 12).
- J.10.4.7 Some habitats are sensitive to air pollution in the form of atmospheric nitrogen deposition. This policy would help to prevent deterioration of air quality and thereby help to protect sensitive habitats from elevated rates of atmospheric nitrogen deposition. Therefore, this policy could potentially have a minor positive impact on biodiversity (SA Objective 3).
- J.10.4.8 In addition, this policy requires development proposals to be situated in a sustainable location to minimise commuter distance and time. This would be likely to situate residents

in close proximity to a range of job opportunities, and therefore, have a minor positive impact on the local economy (SA Objective 13).

J.10.5 Policy CC5 – Flood Risk

Policy CC5 – Flood Risk

- 1) The Black Country Authorities will seek to minimise the probability and consequences of flooding by adopting a strong risk-based approach to site allocations and the granting of planning permission, in line with the National Planning Policy Framework.
- 2) The Sequential Test⁵⁴ will:
 - a) be applied to all developments to ensure that development takes place in areas with the lowest flood risk.
 - b) take account of the most up to date, available information on river (fluvial) flooding and all other sources of flooding, making use of the information provided in the 2020 Strategic Flood Risk Assessment SFRA).
 - c) consider the impact of climate change over the lifetime of that development.
- 3) Developers should apply the Sequential Test to all development sites, unless the site is:
 - a) A strategic allocation and the test has already been carried out by the LPA, or
 - b) A change of use (except to a more vulnerable use), or
 - c) A minor development (householder development, small non-residential extensions with a footprint of less than 250m²), or
 - d) A development in flood zone 1 unless there are other flooding issues in the area of the development (i.e. surface water, ground water, sewer flooding). The SFRA can be used to identify where there are flooding issues from sources others than rivers.
- 4) Developers should provide evidence to the LPA that they have considered all reasonably available alternative sites that are at a lower risk of flooding prior to determining the suitability of the chosen site for the proposed development type, in relation to all sources of flood risk on it.
- 5) For all developments the vulnerability of the development type to flooding should be considered with regard to the most up to date Flood Zone information in accordance with the NPPF, as set out below
- 6) Flood Zone 3
 - a) Where the site is in Flood Zone 3b (Functional Floodplain), all development other than essential infrastructure (subject to the Exception Test) will be refused (including extensions and intensification of use and changes of use) and opportunities to relocate development out of the floodplain should be sought.
 - b) Where the site is in Flood Zone 3a (High Probability), new homes can only be permitted subject to the Exception Test.
- 7) Flood Zone 2
 - a) Where the site is in Flood Zone 2 (Medium Probability), most development can be permitted, subject to a site-specific Flood Risk Assessment.

⁵⁴ NPPF (2019), paragraph 158

Policy CC5 – Flood Risk

- b) Highly vulnerable developments, such as caravans, mobile homes and park homes with permanent residential use can be permitted, subject to the Exception Test.
 - c) Where the site is Low Probability (Flood Zone 1), the information in the 2019 SFRA should be used to assess if a development is at risk from other sources of flooding and/ or if there is an increased risk of flooding in the future due to climate change. If this site is shown to be at risk, a site-specific Flood Risk Assessment should accompany a planning application.
- 8) To pass the Exception Test, developments will need to:
- a) Provide a demonstrable benefit to the wider sustainability of the area. Matters such as biodiversity, green infrastructure, historic environment, climate change adaptation, flood risk, green energy, pollution, health, transport should be considered.
 - b) Applicants should detail the sustainability issues the development will address and how doing so will outweigh the flood risk concerns for the site⁵⁵
 - c) Prove that the development will be safe from flooding for its lifetime, taking account of the vulnerability of its users,
 - d) Prove that the development can be achieved without increasing flood risk elsewhere, and, where possible, will result in a reduced flood risk overall.
- 9) All new developments in the following locations should be accompanied by a Flood Risk Assessment and Surface Water Drainage Strategy that sets out how the development will provide a betterment in flood risk terms i.e. help to reduce flood risk both on and off site:
- a) Where any part of the site is within Flood Zone 2 or Flood Zone 3
 - b) Where the site is greater than 1 hectare and is within Flood Zone 1
 - c) Where the site is a minerals or waste development
 - d) Where the site is within 5m of an Ordinary Watercourse
 - e) Where the site is within 20m of a known flooding hotspot
 - f) Where the site is within the 1 in 100-year flood extent based on the Risk of Flooding from Surface Water Map
- 10) Surface Water Drainage Strategies are also required for all major developments. These should take into account all sources of flooding to ensure that future development is resilient to flood risk and does not increase flood risk elsewhere.

Groundwater Source Protection Zones

- 11) No development will be permitted within a groundwater Source Protection Zone 1 which would physically disturb an aquifer, and no permission will be granted without a risk assessment demonstrating there would be no adverse effect on water resources.

Watercourses and flood mitigation

- 12) Developments should, where possible naturalise urban watercourses (by reinstating a natural, sinuous river channel and restoring the functional floodplain) and open up underground culverts, to provide biodiversity net gain as well as amenity improvements.

⁵⁵ e.g. by facilitating wider regeneration of an area, providing community facilities, infrastructure that benefits the wider area etc.

Policy CC5 – Flood Risk

- 13) Developers should set out how their mitigation designs will ensure that there is no net increase to fluvial flood risk downstream and where practicable how the development could help mitigate against downstream fluvial flood risk.
- 14) Development should not take place over culverted watercourses.
- 15) There should be no built development within 5m of an Ordinary Watercourse and within 8m of the top of the bank of a main river⁵⁶. This is for the preservation of the watercourse corridor, wildlife habitat, flood flow conveyance and future watercourse maintenance or improvement.
- 16) Where there is a known or suspected culverted watercourse either on or immediately downstream of a site, where the SFRA highlights there may be a risk of flooding, developers should:
 - a) Confirm the location and presence of a watercourse (or otherwise) through ground truthing strategic datasets and undertaking an assessment of the culvert extent and condition;
 - b) Confirm by survey, modelling and mapping, the flood extents of the watercourse(s), as many of the flood outlines associated with such watercourses have been carried out at a broad scale level and may not take into specific local features, such as culverts, bridges and detailed topographical survey;
 - c) Design the development to accommodate the floodplain of the watercourse and mitigate against flooding to properties on site. This should include a consideration of residual flood risk e.g. if a culvert were to block downstream.
- 17) All developments should seek to provide wider betterment by demonstrating in site-specific Flood Risk Assessments and Surface Water Drainage Strategies (where required) what measures can be put in place to contribute to a reduction in overall flood risk downstream. This may be by provision of additional storage on site e.g. through oversized SuDS, natural flood management techniques, green infrastructure and green-blue corridors and/or by providing a Partnership Funding contribution towards wider community schemes (both within the Black Country and in shared catchments with Southern Staffordshire and Birmingham). Consultation on the site-specific requirements should be undertaken with the Councils, the Environment Agency and Severn Trent Water (where this is a sewer flooding issue) at the earliest opportunity.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC5	0	0	+	0	++	0	+	0	0	0	0	+	0	0

⁵⁶ Top of bank should be defined by a site-specific survey

- J.10.5.1 Policy CC5 seeks to manage the risk of flooding throughout the Plan area and ensure that measures are in place within new developments to promote resilience to flooding.
- J.10.5.2 The policy sets out criteria requiring development proposals to carry out a Flood Risk Assessment and Surface Water Drainage Strategy. The Sequential Test will be applied to all development proposals to ensure that development takes place in areas with the lowest flood risk. This, and other requirements as set out in the policy, would be expected to ensure that all future development proposals would not place new residents at risk of flooding or exacerbate flood risk in areas surrounding the development. The policy states that all development proposals should incorporate SuDS to help reduce the risk of surface water flooding and seek to provide wider flood risk betterment. Overall, a major positive impact on climate change adaption would be anticipated (SA Objective 5).
- J.10.5.3 Flooding can pose a number of risks to human health and wellbeing, including physical and mental trauma, disease and disruption to power and water supplies⁵⁷. Providing new development which is flood resilient and results in flood risk betterment in surrounding areas would therefore be expected to have benefits to human health (SA Objective 12).
- J.10.5.4 Surface water run-off can lead to flooding and a decrease in water quality. The incorporation of SuDS into developments would be expected to benefit water quality, biodiversity and amenity interest through the integration into the wider green and blue infrastructure networks and promoting natural management of flood water. Developments should, where possible, naturalise urban watercourses and open up underground culverts *"to provide biodiversity net gain as well as amenity improvements"*. This would be likely to benefit biodiversity and provide opportunities for habitat connectivity and the filtration of pollutants. Therefore, Policy CC5 would be likely to have a minor positive impact on biodiversity and pollution (SA Objectives 3 and 7).

⁵⁷ Public Health England (2014) Flooding and the public's health: looking beyond the short-term. Available at: <https://publichealthmatters.blog.gov.uk/2014/01/06/flooding-and-the-publics-health-looking-beyond-the-short-term/>
[Date Accessed: 17/02/21]

J.10.6 Policy CC6 – Sustainable Drainage and Surface Water Management (SuDS)

Policy CC6 – Sustainable Drainage and Surface Water Management (SuDS)

- 1) All new developments should incorporate SuDS and all development proposals should provide details of adoption, ongoing maintenance, and management of SuDS.
- 2) SuDS shall be designed in line with the Black Country Local Standards for SUDS. Preference will be given to systems that contribute to the conservation and enhancement of biodiversity and green infrastructure in the wider area.
- 3) For all major developments, surface water flows must be reduced back to equivalent greenfield rates. If greenfield runoff rates are not considered to be feasible for viability reasons, then the developer must submit evidence demonstrating what the constraints to achieving this are and how their development will accommodate runoff rates that are as close as reasonably possible to greenfield rates.
- 4) Under no circumstances will post-development runoff rates that are greater than pre-development runoff rates be permitted.
- 5) Surface water drainage strategies are required for all major developments, regardless of their size and the flood zone and catchment they are in to meet the requirements of the Lead Local Flood Authority(s). These should take into account all sources of flooding to ensure that future development is resilient to flood risk and does not increase flood risk elsewhere.
- 6) A hydrogeological risk assessment is required where infiltration SuDS is proposed for anything other than clean roof drainage in a SPZ1.

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC6	0	0	0	0	+	0	0	0	0	0	0	0	0	0

- J.10.6.1 Policy CC6 sets out guidelines for future development with respect to Sustainable Drainage and Surface Water Management. The policy requires developments to incorporate SuDS designed in line with the Black Country Local Standards for SUDS which would be anticipated to help reduce the risk of surface water flooding. The policy further states that "Surface water drainage strategies are required for all major developments, regardless of their size and the flood zone and catchment they are in to meet the requirements of the Lead Local Flood Authority(s). These should take into account all sources of flooding to ensure that future development is resilient to flood risk and does not increase flood risk elsewhere." This policy would be expected to have a minor positive impact on Climate Change Adaptation (SA Objective 5).

J.10.7 Policy CC7 – Renewable and Low Carbon Energy and BREEAM Standards

Policy CC7 – Renewable and Low Carbon Energy and BREEAM Standards

Renewable and Low Carbon Energy

- 1) Proposals involving the development of renewable or low carbon energy sources will be permitted where the proposal accords with local and national guidance and would not significantly harm the natural, historic or built environment or have a significant adverse effect on the amenity of those living or working nearby, in terms of visual, noise, odour, air pollution or other effects. The potential for inland waterways to promote low carbon technologies is recognised and supported.
- 2) Small developments creating between one and nine homes or non-residential floorspace of less than 1,000 sqm gross (whether new build or conversion) must incorporate generation of energy from renewable or low carbon sources sufficient to off-set at least 10% of the estimated residual energy demand⁵⁸ of the development on completion.
- 3) Major developments creating 10 or more homes or non-residential floorspace of 1,000 sqm gross or more (whether new build or conversion) must:
 - a) Achieve a 19% carbon reduction improvement upon the requirements within Building Regulations Approved Document, Part L 2013, or achieve any higher standard than this that is required under new national planning policy or Building Regulations; and, in addition
 - b) Incorporate generation of energy from renewable or low carbon sources sufficient to off-set at least 20% of the estimated residual energy demand of the development on completion.
- 4) A variety of renewable and low carbon energy sources and generation methods should be assessed and costed, including on-site and off-site sources where appropriate, and the use of combined heat and power facilities should be explored for major developments. An energy assessment must be submitted with the planning application to demonstrate that these requirements have been met.
- 5) The renewable energy target may be reduced only if it can be demonstrated that achievement of the target would:
 - a) make the proposal unviable through submission of an independently assessed financial viability appraisal; or
 - b) would not be feasible due to practical constraints.

BREEAM Standards

- 6) All new build non-residential developments, student housing and care homes of 1,000 sqm gross or more should achieve the following standards of BREEAM New Construction certification, including full credits for category Wat 01 (water efficiency) in line with Policy ENV9:

⁵⁸ Residual energy demand means that the estimated energy demand for the operational development after allowance has been made for the full range of energy efficiency measures required under Building Regulations (at the time of construction) and the 19% carbon reduction improvement required for major developments under policy CC7.

Policy CC7 – Renewable and Low Carbon Energy and BREEAM Standards

Size	Standard	Year
1,000-5,000 sqm gross:	BREEAM Very Good	up to 2029*
	BREEAM Excellent	2029-2039*
>5,000 sqm gross:	BREEAM Excellent	

* Year refers to date planning permission is granted

- 7) BREEAM requirements may be varied if it can be demonstrated that achievement of the standard would make the proposal unviable, through submission of an independently assessed financial viability appraisal.

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

- J.10.7.1 The promotion of on-site renewable or low carbon technologies incorporated within new development in the Black Country would help to decrease reliance on energy that is generated from unsustainable sources, such as fossil fuels. A reduction in the use of fossil fuels would help to reduce the volume of GHGs that are emitted into the atmosphere. This in turn would reduce the Plan area's contribution towards the causes of climate change. Policy CC7 requires all non-residential development of 1,000 sqm gross or more to be in accordance with the BREEAM New Construction Technical Standards⁵⁹. The policy states that development proposals should in particular achieve full credits for category Wat 01 (water efficiency).
- J.10.7.2 This policy would be likely to have a minor positive impact on climate change mitigation by helping to ensure development proposals are more energy efficient and seek opportunities to utilise renewable and low carbon energy sources (SA Objective 4).

⁵⁹ BREEAM (2018) New Construction Technical Standards. Available at: <https://www.breeam.com/discover/technical-standards/newconstruction/> [Date Accessed; 26/05/20]

- J.10.7.3 Although this policy would help to ensure that major development within the Plan area meets the 19% carbon reduction target and that 20% of energy used is from renewable sources, only a 10% renewable energy target is set for development between one and nine dwellings. This policy could potentially be further expanded to help to ensure future development within the Black Country aims to reach higher energy efficient targets from renewable and low carbon technologies.
- J.10.7.4 The promotion of alternative renewable and low carbon technologies would be likely to result in reduced emission of pollutants. This would be expected to have a minor positive impact on pollution in the Plan area (SA Objective 7).
- J.10.7.5 Furthermore, by ensuring that development proposals "*would not significantly harm the natural, historic or built environment or have a significant adverse effect on the amenity of those living or working nearby*" the policy would be expected to reduce the potential for adverse impacts on cultural heritage, landscape, biodiversity and human health. Therefore, negligible impacts would be likely against these objectives (SA Objectives 1, 2, 3 and 12).

J.11 Waste and Minerals

J.11.1 Policy W1 – Waste Infrastructure: Future Requirements

Policy W1 – Waste Infrastructure: Future Requirements

- 1) Proposals for relevant, major development shall evidence how its operation will minimise waste production, as well as facilitating the re-use and recovery of waste materials including, for example, through recycling, composting and energy from waste.
- 2) Proposals for waste management facilities to deal with waste arisings will be encouraged based upon the following principles;
 - a) Managing waste through the waste hierarchy in sequential order. Sites for the disposal of waste will only be permitted where it meets a need which cannot be met by treatment higher in the waste hierarchy.
 - b) Promoting the opportunities for on-site management of waste where it arises and encouraging co-location of waste developments that can use each other's waste materials.
 - c) Ensuring that sufficient capacity is located within the Black Country to accommodate forecast waste arisings of all types during the Plan period and reducing the reliance on other authority areas.
 - d) Facilitating the development of recycling facilities across the Black Country including civic amenity sites and ensure that there is enough capacity and access for the deposit of municipal waste for re-use, recycling and disposal.
 - e) Waste must be disposed of or be recovered in one of the nearest appropriate facilities, by means of the most appropriate methods and technologies, to ensure a high level of protection for the environment and public health.
 - f) Ensuring new waste management facilities are located and designed to avoid unacceptable adverse impacts on the environment, human health and well-being, wildlife, heritage assets and amenity.
 - g) Working collaboratively with neighbouring authorities with responsibilities for waste and other local authorities with responsibilities where waste import and export exist. This will ensure a co-operative cross boundary approach to waste management is maintained.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W1	0	0	0	0	0	0	0	++	0	0	0	0	0	0

- J.11.1.1 Policy W1 sets out the strategy for waste management within the Black Country. The policy also sets out the levels of new waste management capacity likely to be needed to support the proposed growth across the Plan period.
- J.11.1.2 Policy W1 supports the *"minimisation of waste production and the re-use and recovery of waste materials"* and aims to encourage development proposals *"managing waste through the waste hierarchy"* and *"ensuring that sufficient capacity is located within the Black Country to accommodate forecast waste arisings of all types during the Plan period and reducing the reliance on other authority areas"*. The policy seeks to promote the re-use and recycling of materials. Overall, the policy would be expected to help reduce the volume of waste generated in the Black Country and improve the management and disposal of waste. Therefore, a major positive impact would be expected (SA Objective 8).
- J.11.1.3 The policy also seeks to ensure *"new waste management facilities are located and designed to avoid unacceptable adverse impacts on the environment, human health and well-being, wildlife, heritage assets and amenity"*. These criteria would be likely to help avoid adverse impacts but does not set out details on how development proposals would result in positive impacts in relation to human health, biodiversity and cultural heritage. Therefore, negligible impacts would be likely against these objectives (SA Objectives 1, 3 and 12).

J.11.2 Policy W2 –Waste Sites

Policy W2 –Waste Sites

Protecting Waste Sites

- 1) The BCA will safeguard all existing strategic and other waste management facilities from inappropriate development, in order to maintain existing levels of waste management capacity and meet Strategic Objective 13, unless it can be demonstrated that:
 - a) there is no longer a need for the facility; and
 - b) capacity can be met elsewhere; or
 - c) appropriate compensatory provision is made in appropriate locations elsewhere in the Black Country; or
 - d) the site is required to facilitate the strategic objectives of the Black Country.
- 2) This policy will also apply to all new waste management sites which are implemented within the lifetime of the plan.

New development near existing waste facilities

- 3) Proposals for housing and other potentially sensitive uses will not be permitted near to or adjacent to an existing waste management site where there is potential for conflict between the uses,
 - a) unless a temporary permission for a waste use has expired, or the waste management use has otherwise ceased, and the site or infrastructure is considered unsuitable for a subsequent waste use;

Policy W2 –Waste Sites

- b) or redevelopment of the waste site or loss of waste infrastructure would form part of a strategy or scheme that has wider environmental, social and/or economic benefits which outweigh the retention of the site or infrastructure for the waste use and alternative provision is made for the displaced waste use;
 - c) or a suitable replacement site or infrastructure has otherwise been identified and permitted.
- 4) Waste site impact assessments will be expected to demonstrate that at least one of the above criteria applies. Applications should also identify any 'legacy' issues arising from existing or former waste uses, and how these will be addressed through the design of the development and the construction process

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W2	0	0	0	0	0	0	0	+	0	0	0	0	0	0

J.11.2.1 The aim of Policy W2 is to safeguard and retain capacity of the existing waste facilities in the Black Country. The policy also states that “*proposals for housing and other potentially sensitive uses will not be permitted near to or adjacent to an existing waste management site where there is potential for conflict between the uses*”. The policy would be likely to help ensure appropriate waste management continues in the Black Country and that capacity at these facilities does not decrease. Overall, a minor positive impact on waste would be expected (SA Objective 8).

J.11.3 Policy W3 – Preferred Areas for New Waste Facilities

Policy W3 – Preferred Areas for New Waste Facilities

- 1) The preferred locations for enclosed waste management facilities are the employment areas shown on the Waste Key Diagram and Local Authority Plan Maps.
- 2) All proposals for new waste management facilities should demonstrate how they will contribute to Spatial Objective 13 and the strategic objectives of Policy W1, such as the contribution they will make to landfill diversion, delivery of new waste management capacity and diversification of the range of facilities currently available.
- 3) All applications for waste development will be expected to comply with the requirements in Policy W4.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0

J.11.3.1 Policy W3 identifies allocations for new waste management infrastructure in the Black Country. The provision of waste management facilities would be likely to have a major positive impact on waste, by ensuring there are adequate facilities and capacity within the Black Country to effectively manage waste production (SA Objective 8).

J.11.3.2 At present, the scale and location of the proposed waste management facilities in unknown. Seeking to manage the Black Country's waste rather than exporting to surrounding areas could potentially result in some benefits, although these benefits are unknown at present. Overall, the likely impact in relation to environmental objectives is uncertain (SA Objectives 1, 2, 3, 4, 5, 6, 7 and 9).

J.11.3.3 The provision of waste management facilities would not be expected to impact housing, equality, health, economy or education (SA Objectives 10, 11, 12, 13 and 14).

J.11.4 Policy W4 – Locational Considerations for New Waste Facilities

Policy W4 – Locational Considerations for New Waste Facilities

Key Locational Considerations for All Waste Management Proposals

- 1) Proposals should demonstrate how they will contribute to Spatial Objective 13 and the strategic objectives of Policy W1, such as the contribution they will make towards landfill diversion, delivery of new waste management capacity and diversification of the range of facilities currently available.
- 2) Development for new build waste management facilities should be focused in local employment areas and will be required to meet the following criteria:
 - a) Evidence the need for the facility;
 - b) All waste processes and operations must be contained, processed and managed within buildings unless there are acceptable operational reasons why these processes cannot be contained in buildings;
 - c) Proposals must accord with all other policies in relation to the protection of the environment and public amenity, or demonstrate that other material considerations outweigh any policy conflicts;
 - d) Consideration will be given to the potential impacts of waste management proposals on;
 - i) Minimising adverse visual impacts;
 - ii) Potential detrimental effects on the environment and public health;

Policy W4 – Locational Considerations for New Waste Facilities

- iii) Generation of odours, litter, light, dusts, flies, rodents, birds and other infestation;
- iv) Noise, excessive traffic and vibration;
- v) Risk of serious fires through combustion of accumulated wastes;
- vi) Harm to water quality and resources and flood risk management;
- vii) Land instability;
- viii) Land use conflict; proposals should demonstrate compatibility with the uses already present within/adjacent to the area;
- ix) Where necessary mitigation measures should be identified to reduce any adverse effects to an acceptable level.
- x) Whether the proposal would provide opportunities for co-location of related uses and/or generate other benefits (for example; produce a range of waste types or streams, produce high quality aggregates or other useful raw materials, or supply heat and power or other forms of energy to adjacent uses).

Waste Applications – Supporting Information

- 3) Planning applications for waste development (Note 1) should include a supporting statement which clearly describes the key characteristics of the development. It should also explain how the development aligns with Spatial Objective X and the General Principles and Preferred Methods of managing waste in Policy W1. In particular, they should explain the contribution the development would make towards driving waste up the waste hierarchy, supporting the development of a more circular economy, meeting the Black Country's additional waste capacity requirements, and broadening the range of waste facilities currently available in the plan area.
- 4) The following information should also be included in the supporting statement and/ or on the planning application form:
 - a) The type of waste facility or facilities proposed;
 - b) The waste streams and types of waste to be managed;
 - c) The types of operation to be carried out on the site;
 - d) Whether waste would be sourced locally, regionally or nationally;
 - e) The maximum operational throughput in tonnes per annum;
 - f) For waste disposal, the total void space to be infilled in cubic metres;
 - g) The outputs from the operations, including waste residues;
 - h) The expected fate and destination of the outputs;
 - i) The number of associated vehicular movements;
 - j) The number of jobs created.

Notes:

- (1) This includes applications for new build waste developments, changes of use to waste developments, applications for new operational development and other material changes to existing waste sites, and 's73' applications to vary a condition attached to an existing waste permission. For definitions of 'waste development' and 'waste' see provided in the Policy Justification.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W4	0	0	0	0	0	0	0	+	0	0	0	0	0	0

J.11.4.1 Policy W4 sets out criteria to which new waste management facilities should be in accordance with. Waste management facilities will only be supported where there is an identified need for the facility. This would be likely to help fill any gaps in the Black Country and meet the locally identified waste management needs. A minor positive impact on waste would therefore be expected (SA Objective 8).

J.11.4.2 The policy states that consideration will be given to *"visual impacts"*, *"detrimental effects on the environment and public health"*, *"noise, excessive traffic and vibration"* and *"water quality and resources and flood risk management"* when allocating waste management facilities. These criteria would be expected to help prevent adverse impacts, and therefore, negligible impacts have been identified in relation to landscape, biodiversity, human health, transport, flood risk and pollution (SA Objectives 2, 3, 5, 7, 9 and 12).

J.11.4.3 Policy W4 states *"proposals must accord with all other policies in relation to the protection of the environment and public amenity"*. However, it is uncertain what policies this is referring to. It is recommended that this statement is expanded, and further detail provided.

J.11.5 Policy W5 – Resource Management and New Development

Policy W5 – Resource Management and New Development

Waste Management in new developments

- 1) All new developments should;
 - a) Address waste as a resource;
 - b) Minimise waste as far as possible;
 - c) Design sites with resource and waste management in mind;
 - d) Manage unavoidable waste in a sustainable and responsible manner; and
 - e) Maximise use of materials with low environmental impacts.
- 2) Where a proposal includes uses likely to generate significant amounts of waste, these should be managed either on-site or in as close a proximity, as possible to the source of the waste.
- 3) Resource and waste management requirements should be reflected in the design and layout of new development schemes. Wherever possible building, engineering and landscaping projects should use

Policy W5 – Resource Management and New Development

alternatives to primary aggregates such as secondary and recycled materials, renewable and locally sourced products and materials with low environmental impacts. Consideration should also be given to how waste will be managed within the development once it is in use.

- 4) Where redevelopment of existing buildings or structures and/or remediation of derelict land is proposed, construction, demolition and excavation wastes (CD&EW) should be managed on-site where feasible and as much material as possible should be recovered and re-used for engineering or building either on-site or elsewhere.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W5	0	0	0	0	0	+	0	++	0	0	0	0	0	0

- J.11.5.1 Policy W5 sets out criteria for the sustainable management of waste and resources associated with new developments, during both construction and occupation.
- J.11.5.2 The policy requires all new developments to “*minimise waste as far as possible*” and seeks to maximise the use of “*secondary and recycled materials, renewable and locally sourced products and materials with low environmental impacts*” wherever possible. This policy would be expected to promote sustainable and efficient waste management and use of materials across all new development in the Black Country and limit the generation of waste as much as is feasible. Furthermore, Policy W5 seeks to ensure that development design takes into account the need for waste management, when occupied. Overall, a major positive impact on waste would be expected (SA Objective 8).
- J.11.5.3 Additionally, through encouraging the efficient use of resources and reducing the need for extraction of primary aggregates, Policy W5 would be expected to result in a minor positive impact on natural resources (SA Objective 6).
- J.11.5.4 Policy W5 also seeks to ensure that environmental impacts as a result of resource management and new development are minimised. The policy encourages the use of materials with low environmental impacts and the management of waste either on-site or as close as possible to the source. These factors would be expected to minimise the potential for, and scale of, adverse impacts on the environment by reducing the distances travelled by waste management vehicles such as HGVs. Therefore, negligible impacts

have been identified for landscape, biodiversity, pollution and transport (SA Objectives 2, 3, 7 and 9).

J.11.6 Policy MIN1 – Minerals Production: Requirements

Policy MIN1 – Minerals Production: Requirements

- 1) To enable the Black Country to make an appropriate contribution towards identified local and regional requirements, the following production targets are identified for minerals over the plan period.

Construction Aggregates

Primary Land Won Sand and Gravel

- 2) Sufficient provision has been identified in this plan to enable the Black Country to supply at least 25% of the 7-year sand and gravel landbank for the West Midlands Metropolitan Area (WMMA)⁶⁰ over the plan period (see Policy MIN3). This equated to 6.2 million tonnes in total at the end of 2017, sufficient to provide for an average annual production rate of 120,000 tonnes per annum. The other resources in the Minerals Safeguarding Areas (MSAs) also have the potential to contribute towards future sand and gravel production.

Secondary and Recycled Aggregates

- 3) At the end of 2017, the Black Country was estimated to be producing around 720,800 tonnes of secondary and recycled aggregates per annum at permitted production sites⁸⁵. As a minimum, the Black Country will aim to maintain this level of production throughout the plan period. In support of this, permitted secondary and recycled aggregate sites expected to continue in production up to 2039 will be safeguarded (see Policy MIN2).

Efficient Use of Mineral Resources

- 4) All new developments will be encouraged to be resource-efficient, by making the maximum possible use of recycled mineral products in construction, to reduce reliance on quarried products and help maintain existing supplies for longer.

Industrial Minerals

Brick Clay (Etruria Marl)

- 5) Sufficient brick clay provision has been identified in this plan to meet the supply requirements of the operational brick manufacturing plants in the Black Country over the plan period, allowing for permitted imports from other areas. At the end of 2017 there were around 10 million tonnes of permitted reserves of Etruria Marl in Walsall. Subject to availability this would be sufficient to provide a 25-year supply to Aldridge, Atlas and Sandown brickworks in Walsall, based on the expected future annual consumption rates of these factories. This brick clay resource should therefore be safeguarded from inappropriate development (see also Policy MIN2).

Fireclay

⁶⁰ The West Midlands Metropolitan Area (WMMA) comprises the seven unitary authorities of Birmingham, Coventry, Dudley, Sandwell, Solihull, Walsall and Wolverhampton.

Policy MIN1 – Minerals Production: Requirements

- 6) Sufficient fireclay provision has been identified in this plan to meet the supply requirements of Swan Works in Walsall over the plan period. The existing stockpile and permitted reserves identified in Policy MIN3 and the other potential resources within the MSA have the capability to provide a 25- year supply of fireclay to this factory. They could also provide a long-term supply to brick manufacturing plants in Walsall, assuming that the fireclay present meets the requirements of the operators. This Fireclay resource should therefore be safeguarded (see also Policy MIN2).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
MIN1	0	0	0	0	0	+	0	0	0	0	0	0	+	0

J.11.6.1 Policy MIN1 sets out requirements for the production of construction aggregate and industrial minerals in the Black Country. The policy would be expected to help the Black Country *"make an appropriate contribution towards identified local and regional requirements"*. This policy would be expected to have a minor positive impact on natural resources within the Black Country (SA Objective 6).

J.11.6.2 This policy would also be expected to have a minor positive impact on the local economy, by supporting local construction and industrial businesses (SA Objective 13). Aggregate production can also have a role to play in the provision of materials for inland fluvial and coastal defence infrastructure, however, this policy is not considered to result in direct impacts on any other SA Objective.

J.11.7 Policy MIN2 – Minerals Safeguarding

Policy MIN2 – Minerals Safeguarding

Minerals Safeguarding Areas (MSAs)

- 1) Minerals safeguarding areas (MSAs) have been defined around the following mineral resources in Walsall Borough:
 - a) Sand and Gravel – Bedrock (Triassic, Sherwood Sandstone)
 - b) Brick Clay – Etruria Formation (principal brick clay resource within Carboniferous Upper Coal Measures)
 - c) Fireclay (potentially winnable resources underlying the principal coal seams within the Carboniferous – Upper Coal Measures)

Policy MIN2 – Minerals Safeguarding

- 2) The MSAs are identified on the Minerals Key Diagram and on the Policies Map for Walsall.
- 3) Planning applications for non-mineral development will only be supported in a MSA where the development will not compromise existing or future mineral working within the MSA and the following conditions are met:
 - a) The development will involve the extraction of some or all of the mineral resource prior to development, where is practicable to do so; or
 - b) It can be demonstrated that the site does not contain any mineral resources of economic value; or
 - c) It can be demonstrated that the 'prior extraction' of minerals is not feasible.
- 4) Applications for non-mineral development in a MSA should include supporting evidence demonstrating that one of the above criteria applies. Exceptions to this policy will apply to householder developments, conversions and changes of use of existing buildings, and other forms of development that do not involve any new building or excavation works likely to sterilise mineral resources.

Non-minerals developments outside the MSAs

- 5) Outside MSAs, mineral deposits that are identified as being, or may become of, economic importance will be safeguarded from unnecessary sterilisation.
- 6) Where development is proposed, encouragement will be given to the extraction of the mineral resource prior to or in conjunction with, development, where this would not have unacceptable impacts on neighbouring uses. Developments over five hectares should be accompanied by supporting information (as set out in the Justification) demonstrating that mineral resources will not be needlessly sterilised.

Existing Minerals Sites

- 7) The location of all permitted mineral extraction and mineral infrastructure sites are identified on the Minerals Key Diagram, and these sites are also listed in each of the BCA sections in Chapter 13. Applications for development within a 150m buffer zone of these sites will need to demonstrate they will not have any unacceptable impacts on these sites that would prevent them from continuing to operate.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
MIN2	0	0	0	0	0	+	0	0	0	0	0	0	0	0

- J.11.7.1 Policy MIN2 seeks to safeguard land as Mineral Safeguarding Areas (MSAs) containing potential mineral resource from other types of development that could compromise the availability of resources. Other development uses within MSAs will only be supported if the identified mineral resources are extracted prior to development or it is not feasible to extract the resource. This policy would be expected to protect mineral resources in the

Black Country and therefore have a minor positive impact on natural resources (SA Objective 6).

J.11.8 Policy MIN3 – Preferred Areas for New Minerals Development

Policy MIN3 – Preferred Areas for New Mineral Development

- 1) The preferred areas for new mineral development over the plan period are identified below and are shown on the Minerals Key Diagram and the Policies Map for Walsall. New mineral extraction proposals will be supported in these locations, provided that the development would comply with Policy MIN4, and would not conflict with other policy requirements or site allocations in this plan or in any other adopted development plan.

Aggregate Minerals

Sand and Gravel

- 2) Sand and gravel production is currently only permitted at the Branton Hill Quarry Extension site in Walsall (MX1). Further sand and gravel extraction will be supported in principle in the following Preferred Area:
 - a) MP1: Birch Lane, Aldridge, Walsall
- 3) Sand and gravel extraction will also be acceptable elsewhere within the MSA for sand and gravel (see Policy MIN2). When considering new sand and gravel extraction proposals, significant weight will be given to the contribution this would make towards the sand and gravel supply requirements identified in Policy MIN1

Borrow Pits

- 4) Short-term, time-limited excavation of fill material for specific engineering projects ('borrow pits') will be supported in principle. Such proposals should be supported by evidence that they are as near as possible to the project they will be supplying, and that secondary or recycled materials are either not available or are insufficient to meet the identified need for fill.

Industrial Minerals

Brick Clay

- 5) The extraction of brick clay (Etruria Marl) is currently permitted at the following sites in Walsall:
 - a) MX2: Atlas Quarry
 - b) MX3: Sandown Quarry
 - c) MX4: Highfields North
- 6) Atlas and Sandown Quarries are active clay pits which are supplying the adjacent brickworks, whereas Highfields North is a 'dormant' site.
- 7) Due to the limitations of the Etruria Formation resource areas in the Black Country, there is unlikely to be scope for further clay extraction outside of the permitted sites. However, if such proposals should come forward within the brick clay MSA during the plan period, significant weight will be given to the contribution that they would make towards providing or maintaining a 25-year supply of clay to a brick manufacturing plant.

Fireclay

Policy MIN3 – Preferred Areas for New Mineral Development

- 8) There is a stockpile of fireclay remaining from the former Birch Coppice site in Walsall (MS1). This is the main source of supply to the adjacent Swan Works, which manufactures pot clay blends. The same mineral permission for clay and coal working also applies to another site nearby, Land at Brownhills Common (MX5). Due to the constraints of the Brownhills Common site, mineral working is not expected to take place during the plan period.
- 9) Proposals for clay and coal extraction elsewhere within the fireclay MSA identified on the Key Diagram, and for the stocking of fireclay following extraction, will be supported in principle where it can be demonstrated that this is essential to maintain supplies of fireclay to brickworks over the long-term, and that there are no alternative sources of supply available. Significant weight will also be given to proposals that would allow for the revocation of the existing 'dormant' permission at Brownhills Common.
- 10) Proposals for clay and coal working in the vicinity of the Cannock Extension Canal must be accompanied by a Habitats Regulations Assessment (HRA) demonstrating that they would not harm the integrity of the SAC.

Building Stone

- 11) Building stone has not been worked in the Black Country for many years and is unlikely to be worked again during the plan period. However, short-term, time-limited extraction of Dudley (Wenlock) Limestone, Barr Limestone, Gornal Stone, Halesowen Sandstone and Sherwood Sandstone for the repair and conservation of heritage assets constructed of these materials will be supported in principle.

Energy Minerals

Coal

- 12) There is a general presumption against deep mining of coal, surface coal working (except where this is in relation to the working of fireclay) and colliery spoil disposal in the Black Country, unless the proposal would meet the tests of environmental acceptability set out in national policy guidance. Any such proposals will be expected to be fully justified in terms of the economic and energy benefits they will generate. Proposals for the working of coal will also be expected to extract maximum value from other mineral resources associated with coal deposits.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
MIN3	0	+/-	+/-	0	0	+	+/-	0	0	0	0	0	+	0

J.11.8.1 Policy MIN3 identifies areas for mineral extraction in the Black Country. Identified sites include: sand and gravel extraction at Branton Hill Quarry and Birch Lane, Aldridge; brick clay extraction at Atlas Quarry, Sandown Quarry and Highfields North; and fireclay extraction at Brownhills Common. The extraction of mineral resources at these sites would

be likely to have a minor positive impact to the provision of natural resources within the Black Country (SA Objective 6).

- J.11.8.2 The extraction of minerals within the Black Country would also be expected to support local construction and industrial businesses, and therefore, have a minor positive impact on the local economy (SA Objective 13).
- J.11.8.3 The policy also states that *"proposals for clay and coal working in the vicinity of the Cannock Extension Canal must be accompanied by a Habitats Regulations Assessment (HRA) demonstrating that they would not harm the integrity of the SAC"*. It is recommended that this policy text is expanded to provide further detail, in particular to provide specifics for proposals *"in the vicinity"* of the SAC. Policy MIN3 could therefore potentially help to prevent adverse impacts occurring at Cannock Extension Canal SAC.
- J.11.8.4 Nevertheless, the continual extraction of minerals or further extraction at the sites listed under Policy MIN3 would be expected to result in adverse impacts in relation to noise and air pollution, loss of biodiversity and geodiversity features, and potentially the local landscape. As the scale of the mineral extraction within the Preferred Areas are currently unknown, uncertain impacts would be likely in relation to landscape, biodiversity and pollution (SA Objectives 2, 3 and 7). Policy MIN4 'Managing the effects of Mineral Development' seeks to manage and minimise potential impacts for existing and new sites.

J.11.9 Policy MIN4 – Managing the Effects of Mineral Development

Policy MIN4 – Managing the Effects of Mineral Development

General Requirements for Minerals Developments

- 1) All mineral proposals at both new and existing sites should demonstrate how they will contribute towards Strategic Objective 'Meeting our resources and infrastructure needs', Strategic Priority 14 and the strategic objectives of Policy MIN1.
- 2) Proposals should minimise waste and provision should be made for the extraction, re-use or recycling of any other potentially useable materials.
- 3) Working plans and restoration proposals should include measures to maintain the stability of the working face, site and surrounding area.
- 4) When working ceases, all plant and equipment should be removed, and sites should be restored, as soon as possible.
- 5) The working, processing or recycling of minerals or extraction of coal bed methane must accord with all other policies in relation to the protection of the environment, public amenity and health, and surrounding land uses – or otherwise demonstrate that other material considerations outweigh any policy conflict;
- 6) Restoration programmes and after-uses for former mineral workings should reflect local character, include provision for after care, and where appropriate contribute towards environmental quality and infrastructure.

Policy MIN4 – Managing the Effects of Mineral Development

- 7) Long-distance transport or haulage of material should be avoided wherever possible, and the potential for transporting material by rail or inland waterways should be explored where feasible.
- 8) Proposals should address the impact of transporting minerals and mineral products on the highway network and should be accompanied by a Transport Assessment if generating a significant number of vehicle movements.

Additional Assessment Criteria for Minerals Developments

- 9) In addition to the general requirements set out above, proposals for mineral working or mineral-related infrastructure at both new and existing sites will be further assessed in terms of:
 - a) Minimising any adverse visual impacts;
 - b) Effects on natural, built and historic (including archaeological) environments and on public health;
 - c) Generation of noise, dust, vibration, infestation, lighting and excessive vehicle movements;
 - d) Compatibility with neighbouring uses – taking into account the nature of the operations, hours of working, the timing and duration of operations and any cumulative effects;
 - e) Harm to water quality and resources and flood risk management;
 - f) Ground conditions and land stability;
 - g) Land use conflict – proposals should demonstrate compatibility with the uses already present within the surrounding area;
 - h) Impacts on the highway, transport and drainage network;
 - i) Where necessary, mitigation measures should be identified to reduce any adverse effects to an acceptable level.
- 10) The above criteria will be used to identify and select sites for inclusion in other development plan documents (where appropriate) as well as for assessing planning applications.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
MIN4	0	0	0	0	0	+	0	+	0	0	0	0	0	0

J.11.9.1 Policy MIN4 sets out criteria by which development proposals for minerals working and infrastructure would be expected to comply. All development proposals will need to contribute to the extraction of minerals as set out in Policy MIN1. A minor positive impact on natural resources would therefore be expected (SA Objective 6).

- J.11.9.2 The policy seeks to *"minimise waste"*, and where possible, re-use materials. This would be likely to help reduce the volume of waste generated within the Black Country and as a result, a minor positive impact would be expected (SA Objective 8).
- J.11.9.3 Under this policy, mineral extraction sites would be required to be restored as soon as possible once work ceases. As part of restoration, consideration should be made to ensure restoration programmes *"reflect local character"* and *"contribute towards environmental quality and infrastructure"*. These factors would be likely to help prevent adverse impacts on landscape and biodiversity, and therefore, negligible impacts have been identified (SA Objectives 2 and 3).
- J.11.9.4 Policy MIN4 seeks to ensure *"long-distance transport or haulage of material should be avoided wherever possible"* and proposals should be accompanied by a Transport Assessment. This would be expected to have benefits to transport and local congestion, as well as reducing transport-related air pollution and carbon emissions. Nevertheless, the transportation of minerals would be expected to lead to a high number of HGVs on nearby roads. Overall, a negligible impact on climate change mitigation, pollution and transport would be likely (SA Objectives 4, 7 and 9).
- J.11.9.5 Development proposals for minerals extraction will be assessed for their effect on public health under this policy. This would be expected to help prevent development resulting in adverse impacts on human health, including inappropriate noise pollution and vibrations. Overall, a negligible impact on health would be likely (SA Objective 12).
- J.11.9.6 The policy also seeks to assess development proposals for their effects on *"historic (including archaeological) environments"* and would be likely to prevent adverse impacts on the historic environment. Therefore, a negligible impact on cultural heritage would be expected (SA Objective 1).
- J.11.9.7 Policy MIN4 will assess development proposals in terms of *"harm to water quality and resources and flood risk management"*. This would be likely to help ensure proposals under this policy do not exacerbate local flood risk, and therefore, a negligible impact would be expected (SA Objective 5).
- J.11.9.8 The policy states that *"the working, processing or recycling of minerals or extraction of coal bed methane must accord with all other policies in relation to the protection of the environment, public amenity and health, and surrounding land uses"*. However, it is uncertain which policies are being referred to here. It is recommended that further detail is included to provide clarity.

J.12 Recommendations

- J.12.1.1 Lepus has prepared a list of recommendations for the plan-makers to help shape the BCP policies (see Table J.14.1). These recommendations are not exhaustive. Further recommendations will be provided where appropriate throughout the plan making process.

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Table J.12.1: SA Recommendations for the Black Country Plan policies

SA Objective	SA sub-category	SA Recommendations	BCA Response
1: Cultural Heritage	Heritage assets	a. Where a development proposal could potentially result in substantial harm to the significance of a historic asset, clear justification should be provided, for example public benefits outweighing the harm to the asset.	
2: Landscape	Locally designated landscapes	a. Ensure development proposals aim to protect and enhance the special qualities of locally designated landscapes including the surrounding Country Parks.	
	Landscape character	a. Ensure development proposals are in-keeping with the local landscape character and the findings of the most recent Landscape Sensitivity Assessment ⁶¹ . b. Ensure development proposals are constructed in accordance with appropriate design guides and codes, including the 'Design: process and tools' ⁶² government guidance.	
	PRoW network and local properties	a. Development proposals which have the potential to significantly adversely affect views experienced by users of the PRoW network or local residents should incorporate appropriate mitigation.	
	Urbanisation and coalescence	a. Support development proposals which are in accordance with the findings of the Green Belt Study ⁶³ .	
3: Biodiversity, flora, fauna	International/ European	a. Policy ENV2 should take into account the findings of the Habitats Regulations Assessment when available. b. Where development proposals have the potential to adversely impact international or European designated sites, reference should be made to the 'Guidance to mitigate the impact of new residential development' ⁶⁴ and other relevant documents within the Evidence Base.	

⁶¹ Land Use Consultants (2019) Black Country Landscape Sensitivity Assessment. Available at: https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date Accessed: 15/09/20]

⁶² MHCLG (2019) Guidance. Design: process and tools. Available at: <https://www.gov.uk/guidance/design> [Date Accessed: 14/09/20]

⁶³ Land Use Consultants (2019) Black Country Green Belt Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced_redacted.pdf [Date Accessed: 15/09/20]

⁶⁴ Missing ref?

SA Objective	SA sub-category	SA Recommendations	BCA Response
and geodiversity	designated sites	c. Policies should support development which aims to protect, and where possible provide, supporting habitat to nearby Natura 2000 sites.	
	Green network	<ul style="list-style-type: none"> a. An 'Environmental Net Gain' policy would be more appropriate than a 'Biodiversity Net Gain' policy and would better reflect the 25-year Environment Plan⁶⁵. b. Protect and enhance the local green and blue infrastructure networks through a specific GI policy. It is recommended that a Green Infrastructure Plan or Strategy is prepared. c. Improve resilience and connectivity of biodiversity sites through landscape scale management. d. Provide reference to each authorities' Tree and Woodland Strategy or prepare one where a strategy is not yet in place. e. Ensure development proposals consider the potential to deliver wider benefits to natural capital and ecosystem services. f. Ensure development proposals set out ways to maintain and enhance links to the surrounding green network. g. It is recommended that Evidence Base documents in relation to biodiversity (including the 2010 Birmingham and the Black Country Biodiversity Action Plan) are updated in accordance with the latest guidance. 	
4: Climate change mitigation	Sustainable transport	<ul style="list-style-type: none"> a. Provide necessary infrastructure to encourage low carbon options. b. Aim to protect and enhance public space to encourage safe walking and cycling opportunities. c. Where appropriate, site-specific Transport Plans should be prepared. 	
	Energy efficiency	<ul style="list-style-type: none"> a. Development proposals should aim to be carbon neutral. b. All development proposals should aim to exceed the standards set out in the Building Regulations⁶⁶. c. Seek to achieve no biodegradable waste to landfill to reduce emissions, in line with 'Net Zero the UK's contribution to stopping global warming'⁶⁷. d. Consider retrofitting buildings to make them more energy efficient. e. It is recommended that a Climate Change Strategy is prepared. This could also help to identify the carbon capture and storage potential of the Plan area. f. Consider local partnerships to establish locally appropriate solutions to the climate crisis. 	

⁶⁵ HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [Date Accessed: 15/09/20]

⁶⁶ MHCLG (2016) Building Regulations: Approved Document. Available at: <https://www.gov.uk/government/collections/approved-documents> [Date Accessed: 14/09/20]

⁶⁷ Committee on Climate Change (2019) Net Zero The UK's contribution to stopping global warming. Available at: <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/> [Date Accessed: 14/09/20]

SA Objective	SA sub-category	SA Recommendations	BCA Response
	Natural environment	a. Protect and enhance the local green and blue infrastructure networks through a specific GI policy. It is recommended that a Green Infrastructure Plan or Strategy is prepared.	
5: Climate change adaptation	Fluvial flood zones	a. Using relevant data sources, ensure development proposals incorporate green infrastructure where appropriate.	
	Surface water flood zones	a. Ensure development proposals do not result in the exacerbation of surface water flood risk in surrounding areas. b. Development proposals should be built in accordance with the relevant Surface Water Management Plan ⁶⁸ . It is recommended that the Black County Surface Water Management Plan is updated.	
	Water quantity and quality	c. Ensure capacity of water treatment works d. Promote water efficiency in new developments	
6: Natural resources	Previously undeveloped land	a. The retention of trees and other vegetation should be encouraged to help retain the stability of the soil and prevent erosion. b. Effective management should be in place to help prevent pollution and unnecessary compaction of soils during construction. Consider the requirement for Construction Environmental Management Plans in Planning Conditions. c. Where sites contain bare soil following construction of development, it is recommended that vegetation, in particular native plant species, be used to cover the ground.	
	ALC Grade	a. Where appropriate, site-specific ALC studies should be carried out. b. Where possible, provide green infrastructure or open space to protect areas of BMV soil within a site boundary.	
	Contaminated land	a. Ensure development proposals on contaminated land are only permitted where it can be demonstrated that the contamination can be effectively managed or remediated so that it is appropriate for the proposed use.	
7: Pollution	Air pollution	a. Where appropriate, planning obligations should be used to secure contributions to tackle poor air quality or for air quality monitoring. b. Development should take into consideration recommendations within the relevant Air Quality Action Plan and the outputs of the Annual Status Reports.	
	Noise pollution	a. Ensure visual and auditory buffers are incorporated at the edge of development proposals located in close proximity to railway lines to help mitigate noise pollution.	

⁶⁸ Scott Wilson (2009) Black Country Water Cycle Study and Scoping Surface Water Management Plan. Available at: https://blackcountryplan.dudley.gov.uk/media/11668/water_cycle_study_scoping_surface_water_mgmt_plan.pdf [Date Accessed: 15/09/20]

SA Objective	SA sub-category	SA Recommendations	BCA Response
		<ul style="list-style-type: none"> b. Ensure development proposals which could potentially result in an increase in noise disturbance are adequately mitigated, for example, through efficient layout of development, restrict activities at certain times or the use of noise insulation. c. Development proposals should aim to protect areas identified as tranquil. An example method for identifying tranquillity include 'Mapping Tranquillity'⁶⁹. 	
	Water pollution	a. Development proposals should be built in accordance with recommendations within the Water Cycle Study ⁷⁰ and other relevant documents within the Evidence Base, including Water Resource Management Plans, Catchment Flood Management Plan and Basin Management Plans. It is recommended that the Water Cycle Study is updated.	
8: Waste	Waste generation	<ul style="list-style-type: none"> a. Development proposals should demonstrate measures to minimise waste generation during construction. b. Development proposals should integrate well-designated waste storage space to facilitate effective waste storage, recycling and composting. 	
9: Transport and accessibility	TBC	a. TBC	
	Accessibility	a. Ensure all development proposals and Travel Plans (where applicable) aim to reduce the reliance on the private car where-ever possible and aim to promote access to local facilities and services in a manner which minimises climate change emissions and promotes active travel.	
10: Housing	Provision of housing	a. Ensure all development proposals are built to a high-quality design in line with the 'Design: process and tools' ⁷¹ government guidance.	
11: Equality	Community cohesion	<ul style="list-style-type: none"> a. Ensure residential development proposals incorporate functional private or communal open space, including green space. b. Ensure development proposals provide adequate indoor space in line with, or beyond, the requirements set out in the technical housing standards⁷². 	

⁶⁹ CPRE (2005) Mapping Tranquillity. Available at: <https://www.cpre.org.uk/resources/mapping-tranquillity/> [Date Accessed: 14/09/20]

⁷⁰ Scott Wilson (2009) Black Country Water Cycle Study and Scoping Surface Water Management Plan. Available at: https://blackcountryplan.dudley.gov.uk/media/11668/water_cycle_study_scoping_surface_water_mgmt_plan.pdf [Date Accessed: 15/09/20]

⁷¹ MHCLG (2019) Guidance. Design: process and tools. Available at: <https://www.gov.uk/guidance/design> [Date Accessed: 14/09/20]

⁷² MHCLG (2015) Technical housing standards – nationally described space standards. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf [Date Accessed: 14/09/20]

SA Objective	SA sub-category	SA Recommendations	BCA Response
		<ul style="list-style-type: none"> c. Where appropriate, consider the option for community ownership of some facilities and services. d. Ensure development proposals promote social interaction, including the establishment of strong neighbourhood centres. e. It is recommended that an Equality Impact Assessment of the BCP is prepared. 	
	Crime	<ul style="list-style-type: none"> a. Ensure development proposals take into account privacy, access to sunlight, noise and disturbance, vibration, artificial lighting, odor, crime and safety. b. Ensure development proposals promote a safe and accessible neighbourhoods, helping to reduce crime and the fear of crime. c. Consider supporting the use of the 'Secured by Design'⁷³ scheme in relation to crime prevention. 	
12: Health	Access to health-related facilities	<ul style="list-style-type: none"> a. Development proposals should take into consideration the findings of the relevant Playing Pitch or Sports Strategies, along with other relevant documents within the Evidence Base. b. It is recommended that a Health Impact Assessment of the BCP is prepared. 	
	Air pollution	<ul style="list-style-type: none"> a. Where appropriate, planning obligations should be used to secure contributions to tackle poor air quality and for air quality monitoring. b. Development should take into consideration recommendations within the relevant Air Quality Action Plan and the outputs of the Annual Status Reports. 	
	Access to natural and outdoor spaces	<ul style="list-style-type: none"> a. Improve or enhance the PRoW and cycle network across the Plan area. It is recommended that the Rights of Way Improvement Plans for the four authorities are updated. b. Provide or improve safe pedestrian and cycle access to public greenspaces and open spaces. c. Development proposals should be in accordance with the relevant Open or Green Space Strategy. d. Ensure development proposals do not result in detrimental impacts to the safety of pedestrians and cyclists. 	
13: Economy	Access to employment opportunities	<ul style="list-style-type: none"> a. Ensure residential-led proposals are located in close proximity to bus stops or other sustainable transport options to reach employment opportunities. b. Improve access to employment opportunities, through provision of bus stops and bus services, and/ or improvements to the local pedestrian and cycle networks. 	
14: Education	Access to primary and secondary education	<ul style="list-style-type: none"> a. Increase the provision and capacity of primary and secondary schools across the Plan area in line with the identified need. 	

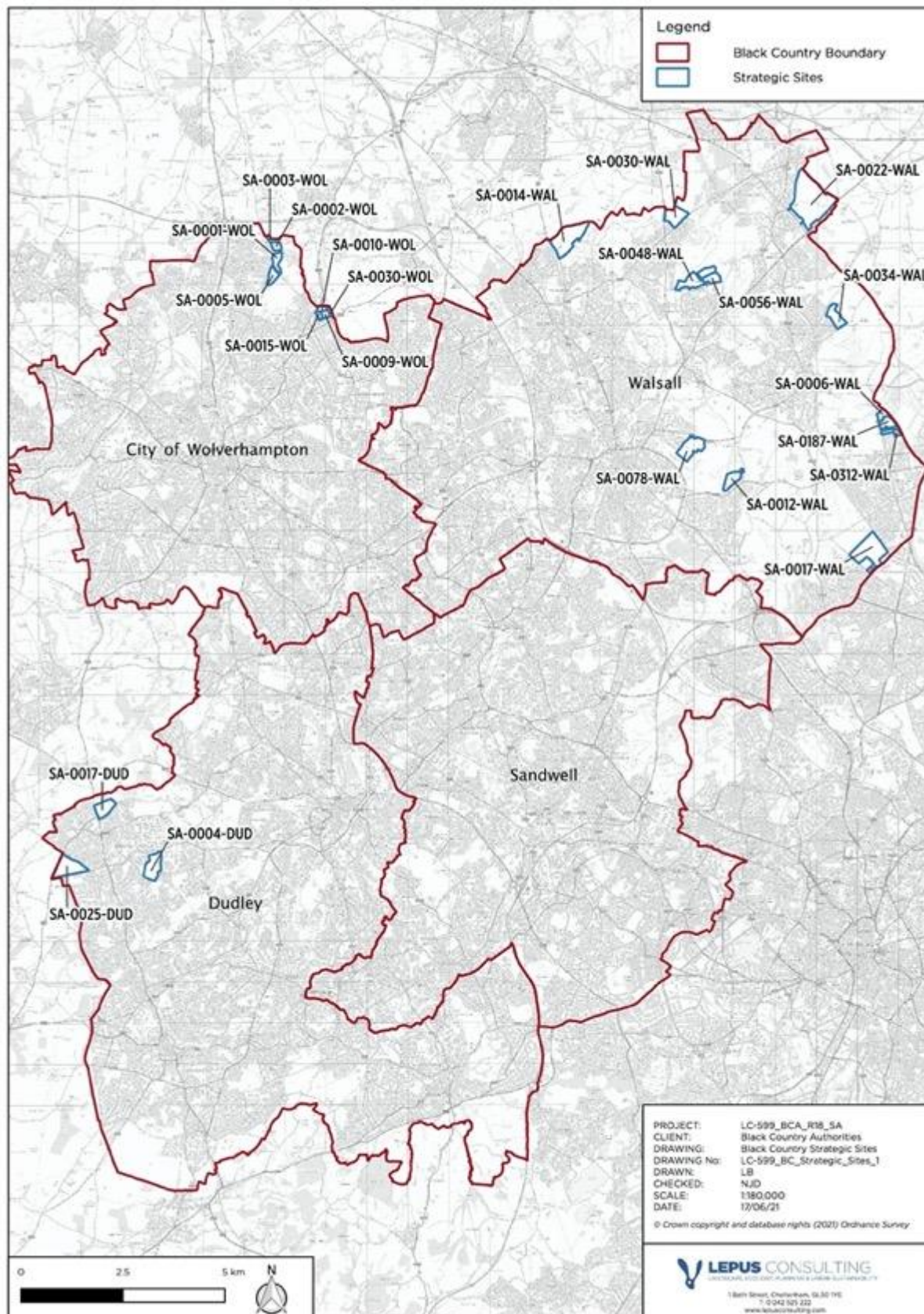
⁷³ Secured by Design. Available at: <https://www.securedbydesign.com/> [Date Accessed: 14/09/20]

J.13 Strategic Site Allocations

J.13.1 Introduction

- J.13.1.1 Part of the Black Country's spatial development strategy for the distribution of growth within is to focus strategic housing growth at a number of extensions to Neighbourhood Growth Areas.
- J.13.1.2 By focusing strategic growth within the Black Country towards strategic locations, the BCAs aim to ensure that future development is located within proximity to a range of services, facilities and employment opportunities.
- J.13.1.3 15 potential strategic locations for housing have been identified by the Draft BCP. Policies for these proposed strategic housing sites are provided within Draft BCP in Chapter 13 (Policy references WSA1-WSA9, DSA1-3, CSA1-2).
- J.13.1.4 The location of these 15 proposed strategic housing sites are presented in **Figure 13.1**.
- J.13.1.5 Tables 5.1-5.4 of the Main SA Report summarises the pre-mitigation scores (i.e. existing baseline constraints) for each of these strategic sites. Each of these strategic sites are assessed in detail in Appendices F to I and summarised / compared to all identified to reasonable site alternatives in Section 5 of the main SA report. The full supporting narrative in the appendices and methodology provided in Section 5 of the main SA report should be read in conjunction with this assessment..
- J.13.1.6 The BCA in selecting reasonable alternatives have considered the potential for mitigation in the site selection process and in the reasons for selecting and rejecting reasonable alternatives (see Section 5) of SA Main Report. The approach to 'post-mitigation scores' in the SA process set out below has only been applied to strategic housing sites accompanied by draft BCP policies. This is to ensure a consistent and transparent approach to the SA process in relation to information provided in the public domain in the form of BCP policies.
- J.13.1.7 'Post mitigation' scores will also be considered at the Regulation 19 stage of the SA process, taking into account the policies as specified in the pre submission version of the BCP.
- J.13.1.8 General Notes:
- J.13.1.9 The full implications of development proposed within the BCP on European sites are considered in greater detail in the accompanying Habitats Regulations Assessment (HRA). This includes consideration of hydrological considerations (water quantity and quality and hydrological linkages), air quality impacts, recreational pressures and functionally linked land.

- J.13.1.10 A number of candidate SINCs and SLINCs have been identified by the Local Sites Partnership within the BCA. It is understood that these will be subject to cabinet review prior to the Regulation 19 stage of the BCP. Once approved, candidate SLINCs will be incorporated into the SA assessment at that time. Where candidate SLINCs have been identified in relevant policies these have been referred to appropriately in the policy text by the BCA.
- J.13.1.11 The SA is mindful of the Government's intention to make biodiversity net gain a mandatory requirement for new development, once the Environment Bill receives Royal Assent and following publication of national guidance. Where possible, developers should be encouraged to carry out a biodiversity metric calculation early in the master planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements.



J.13.2 Policy DSA1 (Dudley Strategic Allocation) - Holbeache Lane /Wolverhampton Road, Kingswinford

Policy DSA1 (Dudley Strategic Allocation) - Holbeache Lane /Wolverhampton Road, Kingswinford



Policy DSA1 (Dudley Strategic Allocation) - Holbeache Lane /Wolverhampton Road, Kingswinford

- A52 The land south of Holbeache Lane / Wolverhampton Road Strategic Allocation falls within the Kingswinford Neighbourhood Growth Area and covers BCP Allocation DUH208. It is proposed that the site be removed from the Green Belt and be allocated to deliver approximately 330 homes at an average net density of 40 dph.
- A53 The estimated phasing of delivery is:
- 2030 - 2035 155 homes
 - 2035 – 2039 175 homes
- A54 There will be a requirement for the development of the site to be of the highest quality and to accommodate the correct infrastructure provision in the right places. The key planning requirements for the Holbeache Lane /Wolverhampton Road Strategic Allocation are set out below. Other standard policy requirements, as set out in the BCP and Dudley Local Plan documents and SPDs, will also apply. A Master Plan will be prepared to guide the development of the Strategic Allocation. This will provide further detail on the requirements set out in this policy and will provide a spatial framework for development.
- A55 The site is in one ownership and is situated in close proximity to strategic sites: Policy xx Ketley Quarry, Former Lower Gornal Sewage Works and Land at Swindon Road. The cumulative impact of the sites (and other housing / employment allocations) on local infrastructure provision will need to be considered, in terms of:
- school place impacts;
 - highways impacts;
 - delivery of green belt loss mitigation;
 - delivery of biodiversity net gain;
 - delivery of recreational open space improvement.
- A56 Once the BCP has been adopted, allocations should be developed in accordance with the criteria identified in respect of each site and all general policy requirements, including any necessary developer contributions.

School Place Requirements

- A57 A59 It is currently anticipated that both primary and secondary school place requirements arising from housing developments in the northwest of Dudley over the Plan period will be capable of being met through extensions to existing primary and secondary schools. Pedestrian and public transport improvements to increase accessibility to local primary and secondary schools may be required in accordance with Policy HOU2.

Highways Requirements

- A58 A60 It is essential that good pedestrian and cycle connections are made available to all nearby local amenities, including the local primary school and local centres. These connections should include pedestrian crossing improvements at the A449 to enable safe crossing of the highway.

Policy DSA1 (Dudley Strategic Allocation) - Holbeache Lane /Wolverhampton Road, Kingswinford

- A59 It is considered that a vehicular access point could be gained from the existing roundabout (A449 / A491) to the west of the site, subject to junction capacity analysis and wider transport modelling. A potential second access to Oak Lane via an improved Ham Lane could be provided. Highway and junction improvements would be required to Wall Heath and Kingswinford centres, as well as Stalling Lane and A449 / Himley Road. Details will be set out in the masterplan.

Green Belt Loss Mitigation Requirements

- A60 Measures to provide sufficient mitigation for the loss of green belt cannot be confirmed yet; rather this will be set out in the pre-submission document.
- A61 There will be a requirement for all green belt loss mitigation works and any necessary transfer of land ownership to be completed before the substantial completion of development.
- A62 The Green Belt boundary has been redrawn around the development site. In most cases there is an existing landscaped buffer or road that provides a defensible new green belt boundary. It is recommended that a buffer of landscaped open space is provided along the northern portion of the site, in order to ensure development is appropriately screened from the historically sensitive Holbeache Lane and Holbeache House. Developments should be designed to minimise potential harm to the integrity of remaining green belt areas and to landscape character, as identified in the Black Country Green Belt Study and Black Country Landscape Sensitivity Assessment.

Nature Conservation and Net Biodiversity Gain Requirements

- A63 All existing SINC, SLINC, tree preservation orders, hedgerows, woodland and significant trees both within and adjoining the development sites should be retained, protected and incorporated sympathetically into the design of development. Sufficient buffer areas should be provided at the edge of these habitat areas, particularly mature trees and hedgerows, to allow them to thrive following development (see ENV4).
- A64 It is anticipated that net biodiversity gain requirements for the developments will be met through delivery of the green belt loss mitigation requirements set out above, subject to the minimum 10% requirement identified in the Environment Bill / Act and the requirements of Policy ENV3.

Historic Environment Requirements

- A65 Located adjacent to this allocation, on its northern boundary, is the Grade II* listed Holbeache House and its curtilage (List Entry Number 1228293). The impact of any proposals on the setting and significance of this designated heritage asset will be a material planning consideration for development. Also in close proximity to this allocation, on its northern and north-eastern boundary, is the Oak Farm Wedge Area of High Historic Landscape Value (AHHLV 38), a non-designated heritage asset.
- A66 Applicants will therefore be required to support their proposals with a Statement of Heritage Significance (prepared in accordance with Historic England's latest guidance) illustrating that proposals have been formulated with a full appreciation of the requirements of Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and with the policies relating to designated and non-designated heritage assets laid out in the NPPF and local plan.
- A67 The design of the development should not impact on the existing character and appearance of Holbeache Lane, which provides a significant contribution to the setting and significance of

Policy DSA1 (Dudley Strategic Allocation) - Holbeache Lane /Wolverhampton Road, Kingswinford

Holbeache House and is also one of the positive features that contributes to the Oak Farm Wedge AHHLV.

Recreational Open Space Requirements

- A68 The incorporation of high-quality landscaping across the development should be a significant forethought of the design process. A well landscaped green buffer is required to the north of the site, which should also provide a neighbourhood area for play. In effect this should well separate development completely from the historically sensitive elements to the north.
- A69 Further to this, there should be some offsetting of development to the south of the site where existing dwelling houses are located, and well-used informal pedestrian routes exist. It is understood that a high-pressure gas pipeline runs across the middle of the site, which may require some offsetting of development if it were to be retained.

Sustainable Drainage Requirements

- A70 Naturalised sustainable drainage systems that are sufficient to retain greenfield runoff rates should be provided for the site, in accordance with Policy CC5. An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the master plan is prepared.

Local Wastewater Treatment Capacity

- A71 This site is served by Roundhill Wastewater Treatment Works and it is not anticipated that there are any issues with the site handling additional flow during the Plan period.

Design principles

- A72 The development of the site will form a new community and neighbourhood on Green Belt land; all proposals must have distinguishable merit in their design and form. Only high-quality design that is bespoke, unique and specific to the site will be acceptable, in line with the requirements of Policies CSP4 and ENV9 among others. The incorporation of high-quality landscaping across the development should be a significant part of the initial design process. A well-landscaped green buffer is required to the north of the site, which should also provide a neighbourhood area for play. In effect this should separate development completely from the historically sensitive elements to the north. All mature trees and hedgerows should be maintained as this will be vital to mitigate some of the visual impact of developing this Green Belt site.
- A73 Development should sit behind the existing tree-lined boundary along the A449 and should be outward looking making use of continuous perimeter roads to aid connectivity and permeability. The site as a whole should be highly permeable, avoiding the use of private drives and cul-de-sacs that limit on-foot and cycle connectivity. The layout of development should consider as a priority the amenity of existing residents to the south of the site, specifically those with dwellings that back onto it. Where possible the site layout should also seek to maintain and maximise key views across the development (predominantly south-east to north-west). Although there are no key commutable desire lines across the site, at current it is well-used for leisure by residents. This reinforces the need for a well-connected and permeable site layout as well as for an enhanced element of open space to make up for the loss of the site as whole.

Policy DSA1 (Dudley Strategic Allocation) - Holbeache Lane /Wolverhampton Road, Kingswinford

A74 Due to the sensitive historic location of the site and existing green belt setting, it is considered that apartments would not be acceptable here.

Nature Conservation and Net Biodiversity Gain Requirements

A75 The site is currently a large arable field surrounded by species-rich hedgerows – designated as SLINC, with rich ground flora. The site is adjacent to a woodland SLINC and has connectivity to the wider open countryside to the north of the site via arable fields and hedgerows. Mature hedgerows form the boundary of the arable area and the grassland areas of the site. These will need to be retained as part of the development as they support a wide variety of flora, support breeding birds and create a nesting and foraging habitat for many species. They include large stretches of intact, stock-proof hedge, and stretches of defunct, non-stock proof, hedge with gaps. The hedgerow adjacent to the Wolverhampton Road (A491) has several large, mature trees within it, including Norway maple and aspen. These will need to be retained as part of the development.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DSA1	0	-	+/-	+	0	-	-	-	+	++	0	+	+	+

J.13.2.1 The land south of Holbeache Lane / Wolverhampton Road Strategic Allocation falls within the Kingswinford Neighbourhood Growth Area and is proposed to be released from the Green Belt. Approximately 330 homes are proposed at an average net density of 40 dph. Overall, a major positive impact on Housing (SA Objective 10) and minor positive effect on the Economy (SA Objective 13) would be expected as a result of the proposed development at this strategic location.

J.13.2.2 One Grade II* Listed Building, Holbeache House and its curtilage, is situated near to the strategic location to the north. Also in close proximity to this allocation, on its northern and north-eastern boundary, is the Oak Farm Wedge Area of High Historic Landscape Value, a non- designated heritage asset. The measures outlined in this policy include a buffer of landscaped open space to the north of the proposed development and it is also noted that “*The design of the development should not impact on the existing character and appearance of Holbeache Lane, which provides a significant contribution to the setting and significance of Holbeache House and is also one of the positive features that contributes to the Oak Farm Wedge AHHLV.*” Assuming measures such as this are taken

into account, it is considered that there is potential to avoid significant adverse impacts on the historic environment, including the setting of heritage assets. Overall, the proposed development at this strategic location would be anticipated to have a negligible impact on heritage assets. Further reference could be made to a requirement to produce a Statement of Heritage Significance in accordance with other site allocation policies.

J.13.2.3 The site is located in an area of low landscape sensitivity based on the Landscape Sensitivity Assessment and an area of moderate sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents and users of PRoW. It is envisaged that a masterplan will be prepared to guide the development of the Strategic Location. Policy DSA 1 states that *"Measures to provide sufficient mitigation for the loss of green belt cannot be confirmed yet; rather this will be set out in the pre-submission document....In most cases there is an existing landscaped buffer or road that provides a defensible new green belt boundary. It is recommended that a buffer of landscaped open space is provided along the northern portion of the site, in order to ensure development is appropriately screened from the historically sensitive Holbeache Lane and Holbeache House. Developments should be designed to minimise potential harm to the integrity of remaining green belt areas and to landscape character, as identified in the Black Country Green Belt Study and Black Country Landscape Sensitivity Assessment."* In addition *"All mature trees and hedgerows should be maintained as this will be vital to mitigate some of the visual impact of developing this Green Belt site."* This policy therefore sets out envisaged measures to minimise harm to the statutory purposes of the Greenbelt, with a minor adverse impact identified in respect to Landscape (SA Objective 2) taking these measures into account. The policy includes provisions such as *"the incorporation of high-quality landscaping"*, retention of existing features, and landscaped buffer areas. This will include *"some offsetting of development to the south of the site where existing dwelling houses are located, and well-used informal pedestrian routes exist"*. The policy text recommends that layout of development should consider as a priority *"the amenity of existing residents to the south of the site, specifically those with dwellings that back onto it. Where possible the site layout should also seek to maintain and maximise key views across the development (predominantly south-east to north-west)"* and provide for *"a well-connected and permeable site layout as well as for an enhanced element of open space."* Overall, these measures are envisaged to help integrate the development into the existing local landscape context and help to minimise impacts on visual amenity.

J.13.2.4 Minor adverse effect in relation to biodiversity were identified in the pre-mitigation SA assessment due to potential development-related threats and pressures on the adjacent SLINC. The strategic location also contains various undesignated assets on-site which provide essential habitats for many species, including hedgerows, trees, and arable field boundaries. The policy identifies that *"The site is currently a large arable field surrounded by species-rich hedgerows – designated as SLINC, with rich ground flora. The site is adjacent to a woodland SLINC and has connectivity to the wider open countryside to the*

north of the site via arable fields and hedgerows. Mature hedgerows form the boundary of the arable area and the grassland areas of the site. These will need to be retained as part of the development as they support a wide variety of flora, support breeding birds and create a nesting and foraging habitat for many species. They include large stretches of intact, stock-proof hedge, and stretches of defunct, non-stock proof, hedge with gaps. The hedgerow adjacent to the Wolverhampton Road (A491) has several large, mature trees within it, including Norway maple and Aspen. These will need to be retained as part of the development." Further provisions within the policy text state that *"All existing SINC's, SLINC's, tree preservation orders, hedgerows, woodland and significant trees both within and adjoining the development sites should be retained, protected and incorporated sympathetically into the design of development. Sufficient buffer areas should be provided at the edge of these habitat areas, particularly mature trees and hedgerows, to allow them to thrive following development (see ENV4). It is anticipated that net biodiversity gain requirements for the developments will be met through delivery of the green belt loss mitigation requirements set out above, subject to the minimum 10% requirement identified in the Environment Bill / Act and the requirements of Policy ENV3."* The proposed development of approximately 330 dwellings at Holbeache Lane / Wolverhampton Road would be likely to result in a loss of biodiversity features, to some extent. It is also anticipated that the measures set out at the strategic location would potentially help to contribute towards maintaining habitat connectivity and enhancement. Where possible, it is recommended that all developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. Both potential positive and negative / uncertain effects are therefore identified in respect to biodiversity (SA Objective 3).

- J.13.2.5 The site is located within Flood Zone 1. A small part of the site coincides with areas of low and/or medium surface water flood risk. It is anticipated that Sustainable Drainage Systems (SuDS) *"sufficient to retain greenfield runoff rates will be provided for the site, in accordance with Policy CC5"*. The policy text notes that *"An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the master plan is prepared."* Integration with Sustainable Drainage Systems (SuDS) would be expected to minimise the extent of surface water flooding. Assuming that these measures are put in place this would lead to an overall negligible impact on Climate Change Adaptation (SA Objective 5). Options to minimise surface water flood risk and other sources of flooding should be assessed as part of the Flood Risk Assessment (FRA) that will be prepared for the site, including access options and potential allowances for climate change.

- J.13.2.6 The site is located within an AQMA, within 200m of a Main Road and within a Groundwater Source Protection Zone. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site-specific assessments. A minor adverse impact in respect to Pollution (SA Objective 7) is identified at this stage of the assessment.
- J.13.2.7 The site is identified as being located within predominantly Grade 2 land with a smaller component of urban land based on regional ALC Natural England mapping. The site is also located within an MSA. The site would lead to the loss of less than 20ha of undeveloped land and therefore a minor residual adverse impact is identified in relation to Natural Resources (SA Objective 6). Further mitigation may be required in regards to prior extraction of mineral resources owing to the site lying within a Mineral Safeguarding Area (Sand & Gravel and Wood).
- J.13.2.8 Minor positive impacts were identified in the SA assessment at the pre mitigation stage (See Appendix F) in relation to proximity to bus stops, pedestrian access, road access, pedestrian access to local services and public transport access to local services, with minor adverse impacts identified in relation to access to a railway station (>2km). A number of highways considerations are set out in this policy including seeking to ensure "*that good pedestrian and cycle connections are made available to all nearby local amenities, including the local primary school and local centres. These connections should include pedestrian crossing improvements at the A449 to enable safe crossing of the highway.*" The policy also reinforces the need for a well-connected and permeable site layout including "*making use of continuous perimeter roads to aid connectivity and permeability. The site as a whole should be highly permeable, avoiding the use of private drives and cul-de-sacs that limit on-foot and cycle connectivity.*" Opportunities to provide linkages to local railway stations could be explored where feasible. On balance, a minor positive impact is identified in relation to Transport and Accessibility (SA Objective 9) and climate change mitigation (SA objective 4).
- J.13.2.9 Recreational Open Space requirements are set out in the policy text in qualitative terms including a neighbourhood area for play and the envisaged transport measures are considered to facilitate active lifestyles via walking and cycling which would have a minor positive impact in terms of health objectives (SA objective 12).
- J.13.2.10 As noted in the policy text cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area including consideration of highways impacts; delivery of green belt loss mitigation; delivery of biodiversity net gain; delivery of recreational open space improvement. Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

J.13.3 Policy DSA 2 – Land at Swindon Road, Wall Heath, Kingswinford (The Triangle site)



Policy DSA 2 – Land at Swindon Road, Wall Heath, Kingswinford (The Triangle site)

- A76 Land at Swindon Road, Wall Heath, Kingswinford will be allocated for new residential growth and will form part of the Kingswinford Neighbourhood Growth Area; it includes BCP Allocation DUH211. It is proposed that the site be removed from the Green Belt and be allocated to deliver approximately 530 homes at an average net density of 40 dph.
- A77 The estimated phasing of delivery is:
- 2030 - 2035 280 homes
 - 2035- 2039 250 homes
- A78 There will be a requirement for the development of the site to be of the highest quality and accommodate the correct infrastructure provision in the right places. The key planning requirements for the Swindon Road, Wall Heath Strategic Allocation are set out below. Other standard policy requirements, as set out in the BCP and Dudley Local Plan documents and SPDs, will also apply. A master plan will be prepared to guide the development of the strategic allocation. This will provide further detail on the requirements set out in this Policy and will provide a spatial framework for development.
- A79 The site is in one ownership and is situated in close proximity to strategic sites: Policy xx Ketley Quarry, Former Lower Gornal Sewage Works and Holbeache Lane / Wolverhampton Road. The cumulative impact of these sites (and other housing /employment allocations) on local infrastructure provision will need to be considered, in terms of:
- school place impacts;
 - highways impacts;
 - delivery of green belt loss mitigation;
 - delivery of biodiversity net gain;
 - delivery of recreational open space improvement.
- A80 Once the BCP has been adopted, allocations should be developed in accordance with the criteria identified in respect of each site and all general policy requirements, including any necessary developer contributions.

School Place Requirements

- A81 It is currently anticipated that both primary and secondary school place requirements arising from housing developments in the north west of Dudley over the Plan period will be capable of being met through extensions to existing primary and secondary schools. Pedestrian and public transport improvements to increase accessibility to local primary and secondary schools may be required in accordance with Policy HOU2.
- A82 Should it be determined that some form of primary school provision is required as the BCP progresses towards adoption, this may need to be accommodated on the site and land will need to be allocated to accommodate a two-form entry primary school (appro 2.4ha).

Highways Requirements

- A83 Highway infrastructure is necessary in order for any development to function effectively and to minimise impacts on surrounding road junctions. It is considered that there should be three points of vehicular access, including from Swindon road to the north and Lodge Lane to the south. The number of access points required and their precise location should be subject to further detailed

Policy DSA 2 – Land at Swindon Road, Wall Heath, Kingswinford (The Triangle site)

transport assessment. Connections should be made through the site, so that pedestrians and vehicles can travel from Swindon Road, through to the A449 or Lodge Lane as they choose. Cycle infrastructure should form a key part of the site layout. Details will be set out in the master plan.

Green Belt Loss Mitigation Requirements

- A84 Measures to provide sufficient mitigation for the loss of green belt cannot be confirmed yet; rather this will be set out in the pre-submission document.
- A85 There will be a requirement for all Green Belt loss mitigation works and any necessary transfer of land ownership to be completed before substantial completion of development. Being a green belt site, the retention and provision of high quality landscaping should be a significant first stage in the design process. Aside from the aforementioned considerations regarding open space, mature trees along the periphery and within the site should be retained, as well as hedgerows within the site where possible.
- A86 The green belt boundary has been redrawn around the development site. In most cases there is an existing landscaped buffer or road that provides a defensible new green belt boundary. A significant level of well-landscaped open space should be retained, providing a landscaped open space buffer along the western side of the site where the impact on views is highest and there are clear constraints to development (notably the north-westernmost and south-westernmost fields, due to their topography and the potential impact of development on visual amenity in this location). Development will be concentrated in the easternmost portion of the site, where impacts on views and the surrounding area would be lowest. It is likely that higher densities could be accommodated here than in locations to the west. Developments should be designed to minimise potential harm to the integrity of remaining green belt areas and landscape character, as identified in the Black Country Green Belt Study and Black Country Landscape Sensitivity Assessment.

Nature Conservation and Net Biodiversity Gain Requirements

- A87 The site sits on the fringe of the urban area, with links to wider greenspace and open countryside. The site is surrounded by hedgerows that are of high ecological value due to the species that they support. Both the internal and boundary hedgerows contain mature trees, which should be retained as part of the site's features. These current hedgerow lines are growing along pre-existing / old boundaries. The site as a whole assists in the movement and migration of species as well as providing important feeding areas for local and migratory wildlife populations. There is potential for bat roosting sites in the mature hedgerow trees. Bat and bird boxes could be installed on some of the mature trees to provide nesting and roosting opportunities. A mixed semi-natural woodland occurs in the form of a small wooded copse, situated in the west of the site. Opportunities for enhancement and planting around this part of the site should be explored in line with Policy ENV4 - Trees, Woodland and Hedgerows. A management plan for the long-term maintenance of the woodland would also be required.
- A88 It is anticipated that net biodiversity gain requirements for the developments will be met through delivery of the green belt loss mitigation requirements set out above.
- A89 Policy ENV3 will apply to this site.

Historic Environment Requirements

Policy DSA 2 – Land at Swindon Road, Wall Heath, Kingswinford (The Triangle site)

- A90 Located adjacent to this strategic allocation, on its south-eastern edge is the Grade II listed Summerhill Hotel (List Entry Number 1228678). The impact of any development proposals on the setting and significance of this designated heritage asset will be a material planning consideration. Applicants will therefore be required to support their proposals with a Statement of Heritage Significance (prepared in accordance with Historic England's latest guidance) illustrating that proposals have been formulated with a full appreciation of the requirements of Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and with the policies relating to designated heritage assets laid out in the NPPF and local plan.
- A91 Within this allocation there is one site recorded on the Council's Historic Environment Record (HER), HER record 12113, which relates to a medieval book fitting. In view of this and in view of the fact that the allocation still retains the majority of its original field boundaries (as marked on the first edition OS) applicants will be required to support their proposals with a historic environment desk-based assessment, undertaken in accordance with guidance provided by the Chartered Institute for Archaeologists (CIfA).

Recreational Open Space Requirements

- A92 Subject to satisfactory delivery of mitigation for the loss of green belt, it is considered that the local area will have good access to existing recreational open space, allotment, play and sports facilities that have the capacity to meet the varied needs of new residents, in line with adopted open space standards. Therefore, no new on-site open space will be required, beyond that necessary to protect existing nature conservation value and provide sufficient natural, sustainable drainage systems. However, it will be necessary to provide quality walking and cycle routes within the developments that provide easy, quick and safe access to nearby open spaces and the countryside.

Sustainable Drainage Requirements

- A93 Naturalised sustainable drainage systems that are sufficient to retain greenfield runoff rates should be provided for the site, in accordance with Policy CC5. An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the master plan is prepared.

Local Wastewater Treatment Capacity

- A94 This site is served by Roundhill Wastewater Treatment Works and it is not anticipated that there are any issues with the site handling additional flow during the Plan period.

Design principles

- A95 Due to the tree-lined periphery of the site and its topography, it is considered that development would be best located at the edge of the site, fronting directly onto Swindon Road and Lodge Lane. The chosen layout must be highly permeable and well connected, prioritising pedestrian and cycle users, maximising the feeling of enclosure and responding to human scales. Proposals should avoid the use of private drives and cul-de-sacs, as these will hinder good on-foot / cycle connectivity. As such it is likely that proposals brought forward will differ to much of the existing morphology (cul-de-sac) in the surrounding area. As the site will create a new community / neighbourhood on green belt land, proposals must have distinguishable merit in their design and form. Only high-quality design that is bespoke, unique and specific to the site will be acceptable.

Policy DSA 2 – Land at Swindon Road, Wall Heath, Kingswinford (The Triangle site)	
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A96	Existing desire lines are well-used by local residents for leisure and walking to / from Summerhill School in the south. These should be retained and routes for school commuters diverted as little as possible.
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Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DSA 2	-	-	0	+	0	--	-	-	+	++	0	+	+	+

- J.13.3.1 Land at Swindon Road, Wall Heath, Kingswinford (The Triangle site) will be allocated for new residential growth and will form part of the Kingswinford Neighbourhood Growth Area and is proposed to be released from the Green Belt. Approximately 530 homes are proposed at an average net density of 40 dph. Overall, a major positive impact on Housing and minor positive effect on the Economy would be expected as a result of the proposed development at this strategic location.
- J.13.3.2 The site is located approximately 50m from the Grade II listed Summerhill Hotel, located to the southeast of the site. In addition, the policy notes that “*Applicants will be required to support their proposals with a Statement of Heritage Significance (prepared in accordance with Historic England’s latest guidance) illustrating that proposals have been formulated with a full appreciation of the requirements of Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and with the policies relating to designated heritage assets laid out in the NPPF and local plan. Within this allocation there is one site recorded on the Council’s Historic Environment Record (HER), HER record 12113, which relates to a medieval book fitting. In view of this and in view of the fact that the allocation still retains the majority of its original field boundaries (as marked on the first edition OS) applicants will be required to support their proposals with a historic environment desk-based assessment, undertaken in accordance with guidance provided by the Chartered Institute for Archaeologists (CIfA).*” Policy DSA 2 would be expected to ensure that heritage assets within Dudley are conserved in a manner appropriate to their significance, in line with national policy, and that the setting of historic assets are conserved. Where development proposals may present risks to the significance of an asset, Policy DSA 2 would require an accompanying statement to be prepared to describe the how the assessment has considered impacts on the significance of the asset and any mitigating actions that are proposed. With considerate planning, it is likely that there would be sufficient scope within this strategic location to direct development towards locations that would minimise effects on heritage resources. This policy would be expected to ensure that cultural heritage resources across the black country are suitably protected, however minor adverse impacts cannot be ruled out at this stage of the assessment process.

- J.13.3.3 The site is located in an area of moderate landscape sensitivity based on the Landscape Sensitivity Assessment and an area of moderate-high sensitivity in relation to greenbelt harm. No PRoW cross the site. A number of trees subject to Tree Preservation Orders (TPOs) lie at the boundaries of the site. Views towards the site from adjacent residential areas form an important consideration. Policy DSA 2 states that *"Measures to provide sufficient mitigation for the loss of green belt cannot be confirmed yet; rather this will be set out in the pre-submission document.... A significant level of well-landscaped open space should be retained, providing a landscaped open space buffer along the western side of the site where the impact on views is highest and there are clear constraints to development (notably the north-westernmost and south-westernmost fields, due to their topography and the potential impact of development on visual amenity in this location). Development will be concentrated in the easternmost portion of the site, where impacts on views and the surrounding area would be lowest. It is likely that higher densities could be accommodated here than in locations to the west. Developments should be designed to minimise potential harm to the integrity of remaining green belt areas and landscape character, as identified in the Black Country Green Belt Study and Black Country Landscape Sensitivity Assessment."* The policy text further recommends that *"Being a green belt site, the retention and provision of high quality landscaping should be a significant first stage in the design process. Aside from the aforementioned considerations regarding open space, mature trees along the periphery and within the site should be retained, as well as hedgerows within the site where possible."* On balance, and assuming these recommendations are taken into account, a residual minor adverse impact is identified in respect to Landscape (SA Objective 2).
- J.13.3.4 There are no designated ecological or geological sites located on, or immediately adjacent to, the site. However, the policy notes that *"The site is surrounded by hedgerows that are of high ecological value due to the species that they support. Both the internal and boundary hedgerows contain mature trees, which should be retained as part of the site's features. These current hedgerow lines are growing along pre-existing / old boundaries. The site as a whole assists in the movement and migration of species as well as providing important feeding areas for local and migratory wildlife populations. There is potential for bat roosting sites in the mature hedgerow trees. Bat and bird boxes could be installed on some of the mature trees to provide nesting and roosting opportunities. A mixed semi-natural woodland occurs in the form of a small wooded copse, situated in the west of the site. Opportunities for enhancement and planting around this part of the site should be explored in line with Policy ENV4 - Trees, Woodland and Hedgerows. A management plan for the long-term maintenance of the woodland would also be required."* Opportunities for delivering net gains in biodiversity should be sought in line with comments provided above in relation to Policy DSA1. The proposal is not anticipated to have an impact on statutory or non-statutory designated sites. Assuming an appropriate layout, GI and biodiversity mitigation and enhancement measures are put in place, it is likely that there

would be both positive and negative impacts with regard to on-site biodiversity. Taking each of these considerations into account, an overall negligible impact would be anticipated in respect biodiversity overall at this strategic location.

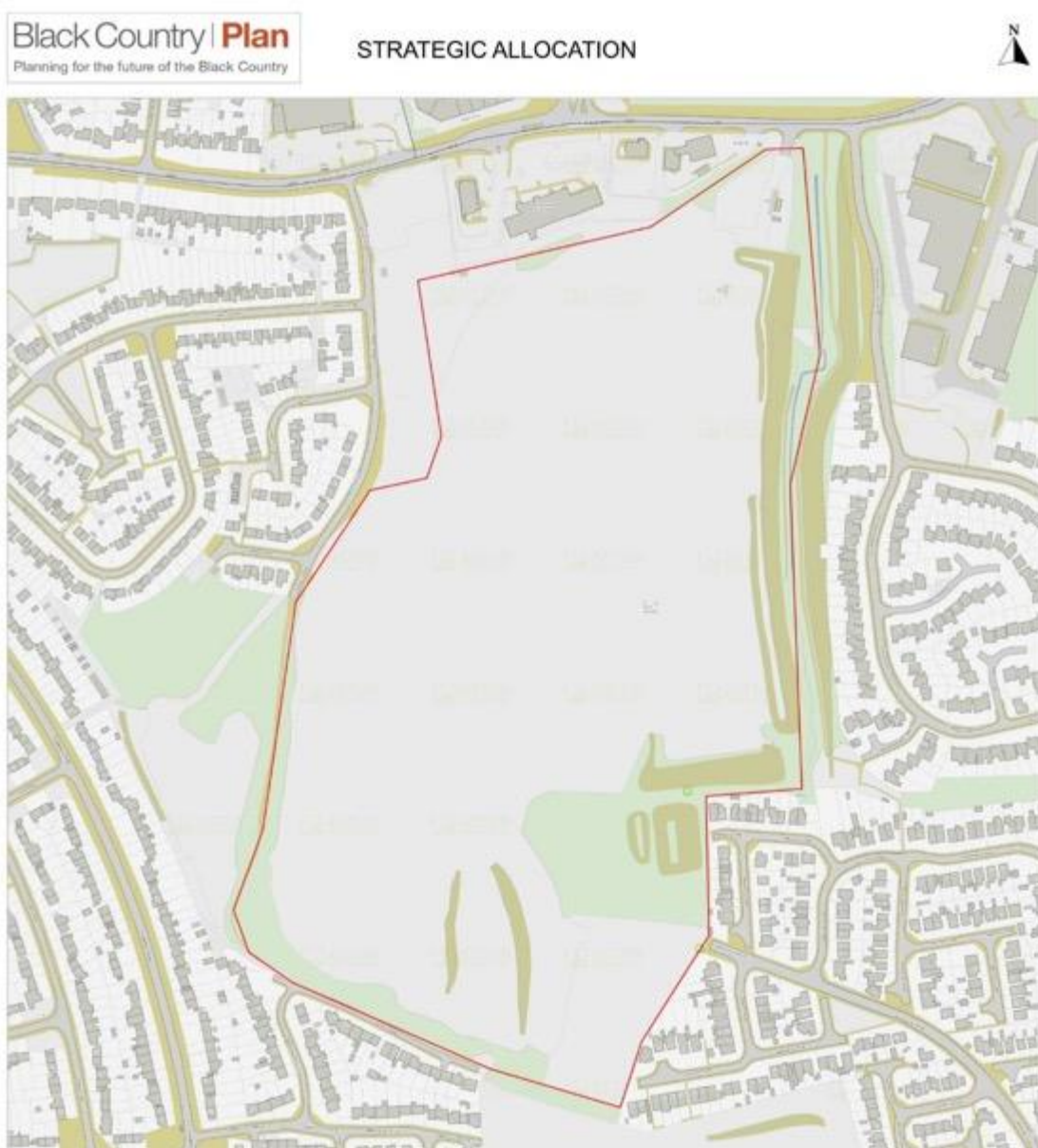
- J.13.3.5 The site is identified as being located within predominantly Grade 3 land and part Grade 2 based on regional ALC Natural England mapping. The site is not located within an MSA. The site would lead to the loss of more than 20 ha of undeveloped land which would lead to permanent impacts on the loss of natural resources associated with the change in use and therefore residual major adverse impacts are identified in relation to SA Objective 6.
- J.13.3.6 The site is located predominantly within Flood Zone 1, with a very small proportion located within Flood Zone 2. A small part of the site coincides with areas of low and/or medium surface water flood risk. Mitigation measures should be informed by the site-specific Flood Risk Assessments which is a standard requirement under the NPPF for any development located in Flood Zone 2, or for sites greater than 1 ha in Flood Zone 1. This should include consideration of site accesses and appropriate climate change allowances. It is anticipated that Sustainable Drainage Systems (SuDS) *"sufficient to retain greenfield runoff rates will be provided for the site, in accordance with Policy CC5"*. The policy text notes that *"An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the master plan is prepared."* Integration with Sustainable Drainage Systems (SuDS) would be expected to minimise the extent of surface water flooding. Assuming that these measures are put in place, this would lead to an overall negligible impact on climate change adaptation (SA Objective 5).
- J.13.3.7 The site is located within an AQMA, within 200m of a Main Road and within a Groundwater Source Protection Zone. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site assessments. A minor adverse impact in respect to Pollution (SA Objective 7) is identified at this stage of the assessment.
- J.13.3.8 Minor positive impacts were identified in the SA assessment in relation to proximity to bus stops, pedestrian access, road access, pedestrian access to local services and public transport access to local services, with minor adverse impacts identified in relation to access to a railway station (>2km). This policy notes that *"Highway infrastructure is necessary in order for any development to function effectively and to minimise impacts on surrounding road junctions. It is considered that there should be three points of vehicular access, including from Swindon road to the north and Lodge Lane to the south. The number of access points required and their precise location should be subject to further detailed transport assessment. Connections should be made through the site, so that pedestrians and vehicles can travel from Swindon Road, through to the A449 or Lodge Lane as they choose. Cycle infrastructure should form a key part of the site layout."* Details will be set out in the master plan. Assuming that these measures are implemented, a

minor positive impact is anticipated in relation to Transport and Accessibility (SA Objective 9). The proposed measures to *"provide quality walking and cycle routes within the developments that provide easy, quick and safe access to nearby open spaces and the countryside"* would also be anticipated to have a beneficial effect with respect to health and climate change mitigation objectives (SA Objectives 4 and 12).

- J.13.3.9 Minor positive for pedestrian access to secondary schools and public transport access to secondary schools were identified at the pre-mitigation stage of the SA assessment process (See Appendix F) with a minor adverse impact identified for pedestrian access to primary school (with a proportion of the site lying outside of a 15-minute walking distance from a local primary school). The policy text notes that *"Pedestrian and public transport improvements to increase accessibility to local primary and secondary schools may be required in accordance with Policy HOU2. Should it be determined that some form of primary school provision is required as the BCP progresses towards adoption, this may need to be accommodated on the site and land will need to be allocated to accommodate a two-form entry primary school (appro 2.4ha)."* Assuming that these measures are put in place, this would lead to an overall positive impact on Education (SA Objective 14).
- J.13.3.10 As noted in the policy text cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area including consideration of highways impacts; delivery of green belt loss mitigation; delivery of biodiversity net gain; delivery of recreational open space improvement. Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

J.13.4 Policy DSA3 - Land at Ketley Quarry, Kingswinford

Policy DSA3 - Land at Ketley Quarry, Kingswinford



- A97 Land at Ketley Quarry, Kingswinford will be allocated for new residential growth and will form part of the North West Regeneration Core Area covering BCP Allocations DUH203 and DUH221. The site's gross area is 20.81ha, of which 13.52ha of the site is developable for 600 dwellings based on 40 - 45dph.
- A98 The estimated phasing of delivery is:
- 2024 – 2029 50 homes
 - 2030 - 2035 250 homes
 - 2035- 2039 300 homes
- A99 There will be a requirement for the development of the site to be of the highest quality and to accommodate the necessary infrastructure provision in appropriate locations. The key planning requirements for the Ketley Quarry Strategic Allocation are set out below. Other standard policy

Policy DSA3 - Land at Ketley Quarry, Kingswinford

requirements, as set out in the BCP and Dudley Local Plan documents and SPDs, will also apply. A master plan will be prepared to guide the development of the strategic allocation. This will provide further detail on the requirements set out in this Policy and will provide a spatial framework for development.

- A100 The Quarry and adjacent sites are in separate ownership and are situated in close proximity to strategic sites identified Policy DSA1: South of Holbeache Lane / Wolverhampton Road and Policy DSA2: land at Swindon Road, Wall Heath. The cumulative impact of these sites (and other housing /employment allocations) on local infrastructure provision will need to be considered, in terms of:
- school place impacts;
 - highways impacts;
 - delivery of biodiversity net gain;
 - delivery of recreational open space improvements
- A101 Once the BCP has been adopted, allocations should be developed in accordance with the criteria identified in respect of each site and all other relevant general policy requirements, including any necessary developer contributions.

School Place Requirements

- A102 It is currently anticipated that both primary and secondary school place requirements arising from housing developments in the north west of Dudley over the Plan period will be capable of being met through extensions to existing primary and secondary schools. Pedestrian and public transport improvements to increase accessibility to local primary and secondary schools may be required in accordance with Policy HOU2.
- A103 Should it be determined that some form of primary school provision is required as the BCP progresses towards adoption, this may need to be accommodated on the site and land will need to be allocated to accommodate a two-form entry primary school (approximately 2.4ha).

Highways Requirements

- A104 Highway infrastructure is necessary for any development to function effectively and to minimise impacts on surrounding road junctions. It is considered that there should be vehicular access, of Dudley Road with a possible secondary access of Ketley Road, by Ketley Farm. The number of access points required, and their precise location should be subject to further detailed transport assessment. Pedestrian and cycle infrastructure should form a key part of the site layout providing connections to all nearby local amenities, including local primary schools and local centres. Details will be set out in the master plan.

Nature Conservation and Net Biodiversity Gain Requirements

- A105 There is a statutory designation relating to features of geological significance(SSSI) at the north of the site and two non-statutory geological designations (SINC) within its boundaries. The SSSI designation is a geological outcrop of the Etruria Formation, created during the Carboniferous Period (359-299 million years ago). The wider site is designated as a SLINC. The vast majority of the site is a disused quarry and is made up of bare ground and large mounds of quarry spoil. Parts of the quarry have become vegetated with early successional species and tall ruderal vegetation. The disused Tansy Green branch railway line runs to the east of the site, providing a further link to Fens Pools Nature Reserve to the south. Dawley Brook to the east of the site is designated as a SINC.

Policy DSA3 - Land at Ketley Quarry, Kingswinford

The site also contains three distinct areas of woodland, with the belt to the east and southwest of the site acting as a boundary feature.

A106 Bat and bird surveys, including for barn owls, will need to be carried out in the abandoned farmhouse and surrounding buildings. Other surveys such as reptile and badger surveys may also be required.

A107 Policy ENV3 will apply to this site.

Historic Environment Requirements

A108 This allocation is the site of the former Ketley Colliery (HER 7963) recorded as being mostly abandoned by the production of the first edition OS in 1884. It also contains the site of Ketley Quarry (also recorded on the first edition OS), which is one of the 'Geo-sites' located within the Black Country Geopark, (please also see Policy ENV6 and for more information, click on the following link: <https://blackcountrygeopark.dudley.gov.uk/sites-to-see/ketley-quarry/>).

A109 Located in the north-west corner of this allocation, adjacent to the road, is the site of a weighbridge and its associated Weights and Measures building (HER15424). The buildings first appeared on the Fourth Edition OS (1937-1948). Any proposed development should seek to incorporate these heritage assets into any future proposals for this part of the site along with suitable interpretation information.

A110 Located in the southern part of the allocation is the site of Stourbridge Extension Canal (HER 7385), built during the 1830's and opened in 1840. Proposals for the site should seek to include within it sympathetic ways of revealing the significance of this heritage asset.

Recreational Open Space Requirements

A111 It will be necessary to provide good-quality walking and cycle routes within the developments, which can provide easy, quick and safe access to nearby open spaces and the countryside.

Sustainable Drainage Requirements

A112 Naturalised sustainable drainage systems that are sufficient to retain greenfield runoff rates should be provided for the site, in accordance with Policy CC5. An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the master plan is prepared.

Local Wastewater Treatment Capacity

A113 This site is served by Roundhill Wastewater Treatment Works and it is not anticipated that there are any issues with the site handling additional flow during the Plan period.

Design principles

A114 New development will have a density of no more than 40-45dph and will also retain a network of public open space across the site. Any proposed development should create a permeable layout by connecting the surrounding vehicle roads and pedestrian routes with a network of public open space and tree-lined streets. Layouts should incorporate 'back to back garden' housing and avoid the rear or sides of gardens facing the streets and public realm. Existing trees and on-site biodiversity value (according to the outcome of robust surveys) must be safeguarded and incorporated into the proposed layouts. These assets should form part of the publicly-accessible open space and should not be located within any private plots, except in exceptional circumstance. Corner plots should be

Policy DSA3 - Land at Ketley Quarry, Kingswinford

designed to address both aspects e.g. consider and propose a dual building frontage to minimise blank / dead frontages. All public open space should be overlooked by housing.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DSA3	0	-	+/-	+	0	-	-	-	+	++	0	+	+	+

- J.13.4.1 The land at Ketley Quarry, Kingswinford will be allocated for new residential growth and will form part of the North West Regeneration Core Area and does not form part of the Green Belt. Approximately 600 homes are proposed at an average net density of 40-45 dph. Overall, a major positive impact on housing and minor positive impact on the economy would be expected as a result of the proposed development at this strategic location.
- J.13.4.2 No Scheduled Monuments, Listed Buildings, Registered Parks and Gardens or Conservation Areas are located in the immediate vicinity of the site, however as noted in the policy text *"This allocation is the site of the former Ketley Colliery (HER 7963) recorded as being mostly abandoned by the production of the first edition OS in 1884. It also contains the site of Ketley Quarry (also recorded on the first edition OS), which is one of the 'Geo-sites' located within the Black Country Geopark...Located in the north-west corner of this allocation, adjacent to the road, is the site of a weighbridge and its associated Weights and Measures building (HER15424). The buildings first appeared on the Fourth Edition OS (1937-1948). Any proposed development should seek to incorporate these heritage assets into any future proposals for this part of the site along with suitable interpretation information. Located in the southern part of the allocation is the site of Stourbridge Extension Canal (HER 7385), built during the 1830's and opened in 1840. Proposals for the site should seek to include within it sympathetic ways of revealing the significance of this heritage asset."* With considerate planning, it is likely that there would be sufficient scope within this strategic location to direct development towards locations that would minimise effects on heritage resources. Overall a negligible impact on cultural heritage is expected. The provisions to provide interpretative information may also have the potential to raise awareness of heritage assets in the locality.
- J.13.4.3 The site is located outside of the greenbelt and has not been assessed as part of the Landscape Sensitivity Assessment or Greenbelt Assessment as a brownfield site. A number of trees subject to Tree Preservation Orders (TPOs) are located along the eastern boundary of the site. Views of the site may potentially be available for local residents and

users of PRow (minor adverse impacts identified at the pre-mitigation stage). It is envisaged that a masterplan will be prepared to guide the development of the Strategic Location. It is envisaged that a masterplan will be prepared to guide the development of the Strategic Location. Policy DSA 1 states that *"New development will have a density of no more than 40-45dph and will also retain a network of public open space across the site. Any proposed development should create a permeable layout by connecting the surrounding vehicle roads and pedestrian routes with a network of public open space and tree-lined streets. Layouts should incorporate 'back to back garden' housing and avoid the rear or sides of gardens facing the streets and public realm. Existing trees and on-site biodiversity value (according to the outcome of robust surveys) must be safeguarded and incorporated into the proposed layouts. These assets should form part of the publicly-accessible open space and should not be located within any private plots, except in exceptional circumstance. Corner plots should be designed to address both aspects e.g. consider and propose a dual building frontage to minimise blank / dead frontages. All public open space should be overlooked by housing."* Subject to clarification on trees and woodland and assuming measures such as this are taken into account, it is considered that on balance there would be potential to minimise impacts on landscape and visual receptors at this strategic location. A residual minor adverse impact is identified in respect to Landscape (SA Objective 2) pending further details to be specified in the pre submission plan.

- J.13.4.4 Potential major adverse effect in relation to biodiversity were identified in the pre-mitigation SA assessment due to Ketley Claypit SSSI being located almost wholly within northeastern site area, which is designated for its geological interest. Ketley Quarry SINC, SLINC and geological site also lies within the site area along with deciduous woodland which is identified as a habitat of principal importance under the Natural Environment and Rural Communities Act 2006⁷⁶. Fens Pools SAC is located 1.3km east of site. The full implications of development proposed within the BCP on European sites will be considered in greater detail in the HRA (applies to all proposed strategic site allocations). The policy text notes that *"There is a statutory designation relating to features of geological significance (SSSI) at the north of the site and two non-statutory geological designations (SINC) within its boundaries. The SSSI designation is a geological outcrop of the Etruria Formation, created during the Carboniferous Period (359-299 million years ago). The wider site is designated as a SLINC. The vast majority of the site is a disused quarry and is made up of bare ground and large mounds of quarry spoil. Parts of the quarry have become vegetated with early successional species and tall ruderal vegetation. The disused Tansy Green branch railway line runs to the east of the site, providing a further link to Fens Pools Nature Reserve to the south. Dawley Brook to the east of the site is designated as a SINC. The site also contains three distinct areas of woodland, with the belt to the*

⁷⁶ Natural Environment and Rural Communities Act 2006. Available at:
<https://www.legislation.gov.uk/ukpga/2006/16/contents> [Date Accessed: 12/04/21]

east and southwest of the site acting as a boundary feature. Bat and bird surveys, including for barn owls, will need to be carried out in the abandoned farmhouse and surrounding buildings. Other surveys such as reptile and badger surveys may also be required. Where possible, it is recommended that all developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. The policy text also states that *"Existing trees and on-site biodiversity value (according to the outcome of robust surveys) must be safeguarded and incorporated into the proposed layouts."* At this stage it is considered that impacts on biodiversity are uncertain, based on the information available to date and that development within a proportion of the strategic location has the potential to result in adverse impacts on the geological features for which this SSSI has been designated as well as potentially direct and indirect impacts on biodiversity assets. Uncertain and potentially mixed effects are therefore identified in respect to biodiversity (SA Objective 3).

- J.13.4.5 It is noted that the site forms a former quarry. Sites which would include development of less than 20ha of undeveloped land has been assessed as having a potential minor negative on Natural Resources (SA Objective 6) in the pre mitigation SA assessment. It should be noted that the SA assessment adheres to a precautionary approach to the definition of previously developed land in the glossary of the NPPF⁷⁷.
- J.13.4.6 The site is located within Flood Zone 1. There are scattered areas of low, medium and high water flood risk throughout the site, focussed in the eastern area. It is anticipated that Sustainable Drainage Systems (SuDS) *"sufficient to retain greenfield runoff rates will be provided for the site, in accordance with Policy CC5. An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the master plan is prepared."* Integration with Sustainable Drainage Systems (SuDS) would be expected to minimise the extent of surface water flooding. Appropriate allowances should be put in place for climate change. Assuming that these measures are put in place, this would lead to an overall negligible impact on flooding and climate change adaptation (SA Objective 5).

⁷⁷ NPPF definition of Previously developed land "Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape."

- J.13.4.7 The site is located within an AQMA and within 200m of a Main Road. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site-specific assessments. A minor adverse impact in respect to Pollution (SA Objective 7) is identified at this stage of the assessment.
- J.13.4.8 Minor positive impacts in relation to proximity to bus stops, site pedestrian access, site road access and public transport access to local services were identified in the SA assessment at the pre mitigation stage (See Appendix F). Minor adverse impacts were identified in relation to access to a railway station (>2km) and pedestrian access to food and local services (nearest identified 910m west of site). The policy text states that *"It is considered that there should be vehicular access, Dudley Road with a possible secondary access of Ketley Road, by Ketley Farm. The number of access points required, and their precise location should be subject to further detailed transport assessment. Pedestrian and cycle infrastructure should form a key part of the site layout providing connections to all nearby local amenities, including local primary schools and local centres."* On balance, a positive impact is identified in relation to Transport and Accessibility (SA Objective 9), Health (SA Objective 12) and Climate Change Mitigation (SA Objective 4).
- J.13.4.9 Minor positive impacts were identified at the pre-mitigation stage of the SA assessment process for pedestrian access to primary school, pedestrian access to secondary school and public transport access to secondary school (See Appendix F).
- J.13.4.10 As noted in the policy text cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area including consideration of highways impacts; delivery of green belt loss mitigation; delivery of biodiversity net gain; delivery of recreational open space improvement. Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

J.13.5 Policy DSA4 – Corbett Meadow Local Green Space

Policy DSA4 - Corbett Meadow Local Green Space

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

STRATEGIC ALLOCATION



Key:

	Strategic Allocation
	Conservation Area
▲	Listed Buildings
●	Individual Tree Preservation Order (TPO)
	Grouped TPO
	Sites of Importance for Nature Conservation (SINC)
	Sites of Local Importance for Nature Conservation (SLINCs)
	Sites of Local Importance for Nature Conservation (SLINCs)
	Green Belt

Strategic Allocation:	DSA.6
Site Assessment Reference:	10516
Site Names:	Corbett Meadow
Local Authority:	Dudley
Ward:	Amblecote



A116 The area shown on the Proposals Map is allocated as Corbett Meadow Local Green Space. In line with national policy the site will be protected from inappropriate development, unless there are very special circumstances that outweigh the harm to the site.

A117 The views of the local community will also need to be taken into account when considering any development proposals on the site.

A118 Designation of land as Local Green Space is set out in the NPPF, allowing communities to identify and protect green areas of particular importance to them. It has been demonstrated that Corbett Meadow meets the criteria set out in Paragraph 100 of the NPPF (2019). The site of the meadow was purchased by local philanthropist John Corbett in 1892 to provide a hospital and the gardens and public grounds were to be used for the purposes of a public park. The site supports a variety of wildlife and is made up of flower-rich lowland meadow pasture, many wooded areas of veteran age and natural ponds.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DSA4	0	0	+	0	0	+	0	0	0	0	0	+	0	0

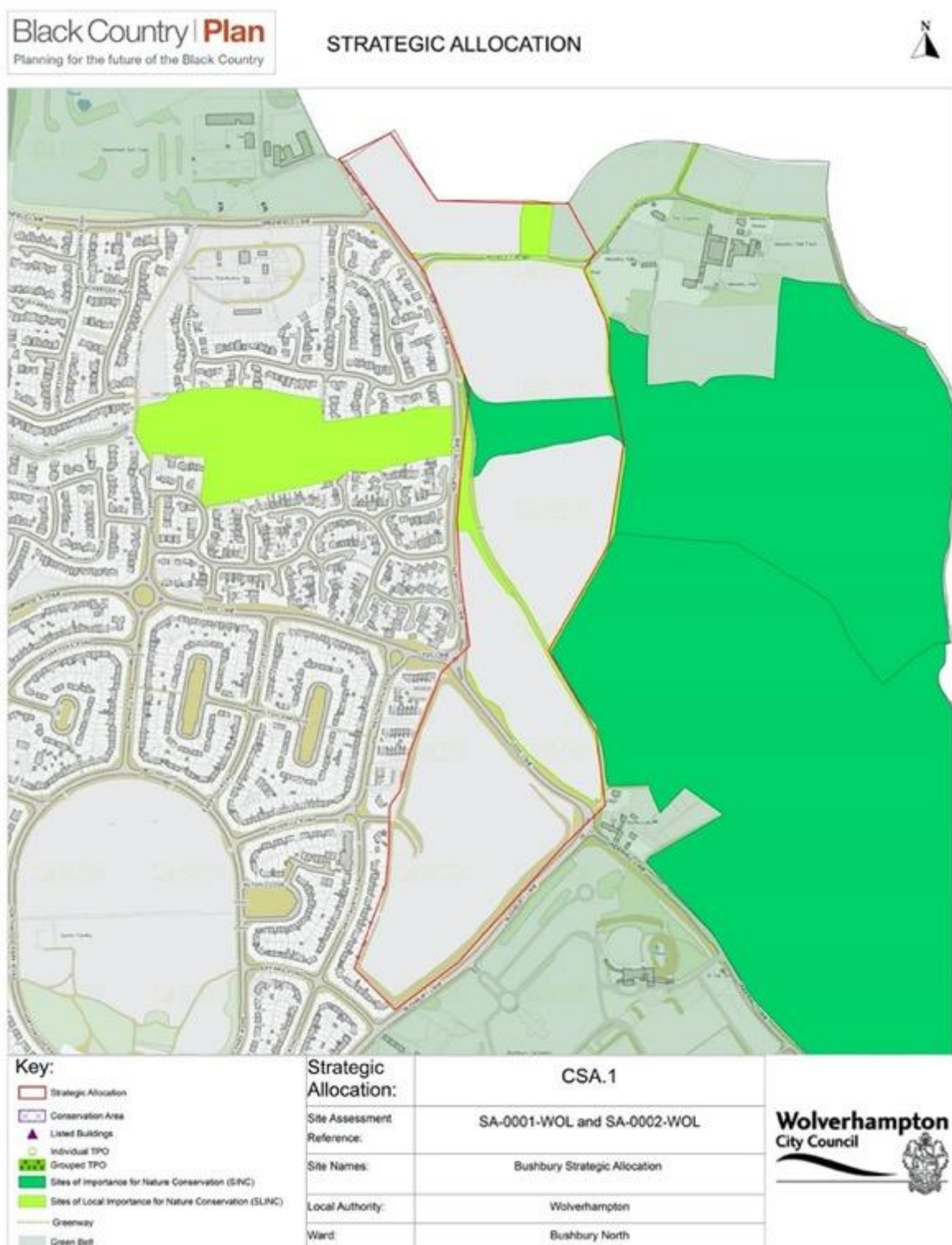
- J.13.5.1 Policy DSA 4 identifies Corbett Meadow as a Local Green Spaces (LGS) of importance to the local community which should be conserved for the use of present and future residents.
- J.13.5.2 LGSs can help to provide important wildlife habitats and corridors within built-up areas and form part of the local green infrastructure network. The policy text notes that the site *"supports a variety of wildlife and is made up of flower-rich lowland meadow pasture, many wooded areas of veteran age and natural ponds"* which are likely to be particularly valuable in terms of local biodiversity. Protecting green spaces through LGSs would be likely to result in a minor positive impact on biodiversity (SA Objective 3).
- J.13.5.3 Policy DSA.4 seeks to ensure that Corbett Meadow LGS is *"protected from inappropriate development"*. This would be anticipated to have a minor positive impact on natural resources (SA Objective 6). The NPPF recognises the benefits of open space in terms of its contribution to creating sustainable patterns of urban and rural development, its role in maintaining strong and vibrant communities and the associated promotion of health and well-being. Corbett Meadow LGS as a *"public park"* would be anticipated to help contribute to this and therefore a minor positive impact on health (SA Objective 12) could be expected.
- J.13.5.4 This policy could be strengthened in some areas. Consideration could be given to the following the following amendments: *"Development that would harm the identified qualities and demonstrated special characteristics of this LGS will not be supported unless*

there are exceptional circumstances which outweigh the harm to the LGS. In these cases alternative and appropriate green space should be provided" and "Development in the immediate vicinity of this Local Green Space should demonstrate how it respects, and where possible, enhances the character or setting of the Local Green Space." Specification could be provided of the types of criteria that may need to be met in order to demonstrate exceptional circumstances.

- J.13.5.5 Proposals for the enhancement and long term management of the LGS as part of the Green Infrastructure network could also be more explicitly set out within this policy or supporting text.

J.13.6 Policy CSA1 – Bushbury Strategic Allocation

Policy CSA1 – Bushbury Strategic Allocation



D30 The Bushbury Strategic Allocation falls within the Bushbury Neighbourhood Growth Area and covers BCP Housing Allocations WOH257, WOH258, WOH259 and WHO260.

Policy CSA1 – Bushbury Strategic Allocation

These sites have been removed from the green belt and allocated to deliver 532 homes in total, at an average net density of 40 dph, together with sufficient space to provide a two- form entry primary school.

The estimated phasing of delivery is:

- By 2029: 348 homes and primary school (if necessary)
- 2029-34: 184 homes

D31 The sites are currently in two separate ownerships; however, they require an integrated and comprehensive approach to development because they are adjacent to each other and have joint infrastructure needs, in terms of:

- school place impacts;
- highways impacts;
- delivery of mitigation for green belt loss ;
- delivery of biodiversity net gain;
- delivery of improvements to recreational open space

D32 The potential new primary school could also serve the needs of the Fallings Park Strategic Allocation (see Policy CSA2).

D33 The key planning requirements for the Bushbury Strategic Allocation are set out below. Other standard policy requirements, as set out in the BCP and Wolverhampton Local Plan documents and SPDs, will also apply. A masterplan will be prepared to guide comprehensive development of the Bushbury Strategic Allocation. This will provide further detail on the requirements set out in this Policy and will provide a spatial framework for developments.

School Place Requirements

D34 Current school place projections indicate that an additional single form entry primary school is required to serve the Bushbury Neighbourhood Growth Area and other planned housing developments in the north east of Wolverhampton. Therefore, 2.3ha of Site WOH260 has been set aside for a potential primary school. If this site is not ultimately required for provision of a primary school, it will be brought forward for additional housing. In this event, improvements to increase accessibility to nearby primary schools may be required in accordance with Policy HOU2.

D35 It is currently anticipated that secondary school place requirements arising from housing developments in the north east of Wolverhampton over the plan period will be capable of being met through extensions to existing secondary schools and / or provision of new secondary schools within Wolverhampton. Public transport improvements to increase accessibility to secondary schools may be required in accordance with Policy HOU2.

Highways Requirements

D36 To avoid adverse impacts on the wider road network, improvements to highway junctions along the Northcote Lane / Legs Lane / Bushbury Lane route will be required. Part of Moseley Road will also need to be upgraded to provide access to Sites WOH258 and WOH259, which will need to be brought forward together. Details will be set out in the masterplan.

Policy CSA1 – Bushbury Strategic Allocation

Green Belt Loss Mitigation Requirements

- D37 The following measures will together form sufficient mitigation for the loss of green belt at Sites WOH257, WOH258, WOH259 and WOH260:
- a) accessibility, biodiversity and environmental quality improvements to Northcote Farm Country Park, which falls within the green belt and is owned and managed by City of Wolverhampton Council;
 - b) accessibility, biodiversity and environmental quality improvements to 10.4ha of land designated as the Northcote Farm Country Park Extension Area, which is currently in the control of the owner of Sites WOH257, WOH258 and WOH259.
- D38 There will be a requirement for all green belt loss mitigation works and any necessary transfer of land ownership to be completed before substantial completion of development at sites WOH257, WOH258, WOH259 and WOH260.
- D39 The green belt boundary has been redrawn around the development sites to exclude them from it. In most cases there is an existing landscaped buffer or road that will provide a defensible new green belt boundary. However, the northern boundary of Site WOH259 abuts agricultural land in South Staffordshire. To provide a defensible new green belt boundary in this location, it is important to ensure that the design of development on the site incorporates a significant landscaped buffer along this northern boundary.
- D40 Developments should be designed to minimise potential harm to the integrity of remaining green belt areas and landscape character, as identified in the Black Country Green Belt Study and Black Country Landscape Sensitivity Assessment.

Nature Conservation and Net Biodiversity Gain Requirements

- D41 All existing SINCs, SLINCs, tree preservation orders, hedgerows, woodland and significant trees, both within and adjoining the development sites, should be retained, protected and incorporated sympathetically into the design of development (see Policy ENV4). Sufficient buffer zones should be provided at the edge of these habitat areas, particularly where there are mature trees and hedgerows, to allow them to thrive following development.
- D42 It is anticipated that biodiversity net gain requirements for the developments will be met through delivery of the green belt loss mitigation requirements set out above, and subject to the minimum 10% requirement identified in the Environment Bill / Act and the requirements of Policy ENV3.

Historic Environment Requirements

- D43 The design of developments should respect the existence of historic environment designations in areas to the north, east and south of the sites, specifically: Moseley Old Hall (National Trust); Northcote Farm Grade II Listed Building; Moseley Mill and Fishponds Area of High Historic Landscape Value; Moseley Court Bushbury Designed Landscape of High Historic Value; Moseley Historic Rural Settlement Area of High Historic Townscape Value and Bushbury Hill Conservation Area.

Recreational Open Space Requirements

- D44 Subject to satisfactory delivery of the green belt loss mitigation requirements set out above, it is judged that the local area will have good access to existing recreational open space, allotments and

Policy CSA1 – Bushbury Strategic Allocation

play and sports facilities that have the capacity to meet the varied needs of residents, in line with adopted open space standards. Therefore, no new on-site open space will be required, beyond that necessary to protect existing nature conservation value and to provide sufficient natural, sustainable drainage systems. However, it will be necessary to provide quality walking and cycle routes within the developments, which provide easy, quick and safe access to nearby open spaces and the countryside, and incorporate existing rights of way, including the existing footpath / cycleway track currently dividing the two parts of Site WOH257.

Sustainable Drainage Requirements

- D45 Naturalised sustainable drainage systems that are sufficient to retain greenfield runoff rates should be provided separately for each site, in accordance with Policy CC5. An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the masterplan is prepared.

Local Wastewater Treatment Capacity

- D46 The Black Country Water Cycle Study concludes that there is limited headroom / capacity at the Coven Heath wastewater treatment works serving the area. Severn Trent have identified this constraint and have indicated that they will be able to deliver the upgrades required to local wastewater treatment capacity in a timely manner to support the delivery of developments within Bushbury Neighbourhood Growth Area, and also other developments in the north of Wolverhampton and parts of South Staffordshire, over the Plan period.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSA1	-	-	+/-	+	0	-	-	-	+	++	0	+	+	++

- J.13.6.1 The Bushbury Strategic Allocation falls within the Bushbury Neighbourhood Growth Area and covers equivalent SA references SA0003WOL, SA0002WOL, SA0001WOL, SA0005WOL). The proposed Bushbury housing allocation is a composite of a number of smaller sites which have been assessed individually as part of the SA process at the 'pre mitigation stage' (See Appendix I). The site is proposed to be released from the Green Belt. Approximately 532 homes are proposed at an average net density of 40 dph, together with sufficient space to provide a two- form entry primary school. Overall, a major positive impact on housing and minor positive effect on the Economy would be expected as a result of the proposed development at this strategic location.

- J.13.6.2 The site is located in the vicinity of a number of Grade II* and Grade II listed buildings (with varying degrees of separation by buildings or woodland) and parts of the site are located outside of, but in proximity to, Bushy Conservation Area. Areas of high historic landscape value also occur in environs around the site. The policy text states that “*The design of developments should respect the existence of historic environment designations in areas to the north, east and south of the sites, specifically: Moseley Old Hall (National Trust); Northcote Farm Grade II Listed Building; Moseley Mill and Fishponds Area of High Historic Landscape Value; Moseley Court Bushbury Designed Landscape of High Historic Value; Moseley Historic Rural Settlement Area of High Historic Townscape Value and Bushbury Hill Conservation Area.*” This policy (and other policies within the BCP) would be expected to ensure that cultural heritage resources across the Black Country are suitably protected, however minor adverse impacts cannot be ruled out at this stage of the assessment process due to the level of information available at this time.
- J.13.6.3 The strategic site is located in an area of moderate landscape sensitivity based on the Landscape Sensitivity Assessment and area of very high sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents and users of PRoW on or near to the site. It is envisaged that a masterplan will be prepared to guide the development of the Strategic Location. The policy text notes that “*it important to ensure that the design of development on the site incorporates a significant landscaped buffer along [the] northern boundary*” and “*Developments should be designed to minimise potential harm to the integrity of remaining green belt areas and landscape character, as identified in the Black Country Green Belt Study and Black Country Landscape Sensitivity Assessment.*” A number of further measures are set out in the policy text to mitigate effects on the greenbelt including “*accessibility, biodiversity and environmental quality improvements to Northcote Farm Country Park, which falls within the green belt and is owned and managed by City of Wolverhampton Council; b. accessibility, biodiversity and environmental quality improvements to 10.4ha of land designated as the Northcote Farm Country Park Extension Area, which is currently in the control of the owner of Sites WOH257, WOH258 and WOH259. This area falls within the green belt and is a designated SINC, which is currently not accessible to the public. The area will be subject to sensitive improvements, opened up for public access.*” Together these measures are envisaged to help provide a degree of mitigation to the greenbelt and provide for a number of beneficial effects associated with the strategic site including access to areas which are not currently accessible to the public as well as biodiversity enhancements. A minor residual adverse impact is identified in respect to Landscape (SA Objective 2).
- J.13.6.4 Minor adverse effects in relation to biodiversity were identified in the pre-mitigation SA assessment due to the site lying within 15km on Cannock Chase SAC, the site lying within an IRZ of a SSSI where ‘any residential developments with a total net gain in residential units’ should be consulted on with Natural England and parts of the site lying adjacent to or within 100m of Moseley Hall & Northcote Farm SINC. The proposed development at

this location could potentially result in adverse impacts on these surrounding biodiversity assets, due to increased development-related threats and pressures. The full implications of development proposed within the BCP on European sites will be considered in greater detail in the HRA. The section under 'Green Belt Loss Mitigation Requirements' of this policy sets out a number of enhancements that are proposed in relation to adjacent biodiversity assets including SINC. Further provisions within the policy text state that "*All existing SINC, SLINC, tree preservation orders, hedgerows, woodland and significant trees, both within and adjoining the development sites, should be retained, protected and incorporated sympathetically into the design of development (see Policy ENV4). Sufficient buffer zones should be provided at the edge of these habitat areas, particularly where there are mature trees and hedgerows, to allow them to thrive following development. It is anticipated that net biodiversity gain requirements for the developments will be met through delivery of the green belt loss mitigation requirements set out above, subject to the minimum 10% requirement identified in the Environment Bill / Act and the requirements of Policy ENV3.*" The proposed development of approximately 532 homes at Bushbury as a greenfield site would be likely to result in a loss of biodiversity features, to some extent. It is also anticipated that the measures set out in this policy would help to contribute towards maintaining habitat connectivity and enhancement. Where possible, it is recommended that all developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. Both potential positive and negative / uncertain effects are therefore identified in respect to biodiversity (SA Objective 3).

- J.13.6.5 The site is identified as being located within predominantly Grade 3 land with a smaller component of Grade 2 land based on regional ALC Natural England mapping. The site is not located within an MSA. The site would lead to the loss of less than 20ha of undeveloped land which would lead to permanent impacts on the loss of natural resources associated with the change in use from the site's existing greenfield status and therefore a minor residual adverse impact is identified in relation to Natural Resources (SA Objective 6).
- J.13.6.6 The site is located within Flood Zone 1 and does not co-incide with areas identified at low, medium or high surface water flood risk. It is anticipated that Sustainable Drainage Systems (SuDS) "*sufficient to retain greenfield runoff rates will be provided for the site, in accordance with Policy CC5*". The policy text notes that "*An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the master plan is prepared.*" Integration with Sustainable Drainage Systems (SuDS) would be expected to minimise the extent of surface water flooding. Upgrades to local wastewater treatment capacity are

also envisaged as part of this development in association with Severn Trent Water, as specified in the policy text. Assuming that these measures are put in place this would lead to an overall negligible impact on flooding and climate change adaptation (SA Objective 5).

J.13.6.7 The site is located within an AQMA and within a Groundwater Source Protection Zone. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site-specific assessments.

J.13.6.8 Minor adverse impacts were identified at the pre-mitigation stage of the SA assessment process (See Appendix I) in terms of access to education facilities for component parts of the strategic allocation. Parts of the strategic allocation lie outside of a 15 minute walking distance from a local primary school, 25 minutes walking distance from a local secondary school and outside of a 25 minute journey by public transport to a secondary school. The policy text notes that *"Current school place projections indicate that an additional single form entry primary school is required to serve the Bushbury Neighbourhood Growth Area and other planned housing developments in the north east of Wolverhampton. Therefore, 2.3ha of Site C27 has been set aside for a potential primary school. If this site is not ultimately required for provision of a primary school, it will be brought forward for additional housing. In this event, improvements to increase accessibility to nearby primary schools may be required in accordance with Policy HOU2. It is currently anticipated that secondary school place requirements arising from housing developments in the north east of Wolverhampton over the plan period will be capable of being met through extensions to existing secondary schools and / or provision of new secondary schools within Wolverhampton. Public transport improvements to increase accessibility to secondary schools may be required in accordance with Policy HOU2."* Assuming that these measures are put in place this would lead to an overall major positive impact on education (SA Objective 14).

J.13.6.9 Minor positive impacts in relation to proximity to bus stops (<400m) were identified in the SA assessment at the pre mitigation stage (See Appendix I). Minor adverse impacts were identified in relation to access to a railway station (>2km) and parts of the site (Parcels SA-0002-WOL & SA-0003-WOL) being located outside of 15 minutes walking distance to food and local services as well pedestrian access to parts of the site. The policy text states that *"To avoid adverse impacts on the wider road network, improvements to highway junctions along the Northcote Lane / Legs Lane / Bushbury Lane route will be required. Part of Moseley Road will also need to be upgraded to provide access to Sites C24 and C25, which will need to be brought forward together. Details will be set out in the masterplan."* Further reference is made within the policy to *"providing quality walking and cycle routes within the developments, which provide easy, quick and safe access to nearby open spaces and the countryside, and incorporate existing rights of way, including the*

existing footpath / cycleway track currently dividing the two parts of Site C26." On balance, a positive impact is identified in relation to Transport and Accessibility (SA Objective 9), Health (SA Objective 12) and Climate Change Mitigation (SA Objective 4).

- J.13.6.10 As noted in the policy text cumulative impacts will need to be considered in relation to the site being within two separate ownerships and other strategic housing allocations in the surrounding area including consideration of school place impacts, highways impacts; delivery of green belt loss mitigation; delivery of biodiversity net gain; and delivery of recreational open space improvement. Cumulative impacts will be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

J.13.7 Policy CSA2 – Fallings Park Strategic Allocation



Policy CSA2 – Fallings Park Strategic Allocation

of high-quality recreational open space, including play facilities, on Site WOH262, to serve existing and new residents. The sites are suitable for an average density of 40 dph, with the exception of Site WOH271. Due to the linear shape of this site, the rural character of the local area and the need to create a defensible green belt boundary, a development of no more than 25 dph is appropriate.

D48 The estimated phasing of delivery is:

- By 2029: 200 homes and recreational open space
- 2029-34: 103 homes

D49 The sites are currently in four separate ownerships; however they require an integrated and comprehensive approach to development because they are adjacent to each other and have joint infrastructure needs, in terms of:

- school place impacts;
- highways impacts;
- delivery of green belt loss mitigation;
- delivery of biodiversity net gain;
- delivery of recreational open space

D50 The potential new primary school on the Bushbury Strategic Allocation could also serve the needs of the Fallings Park Strategic Allocation (see Policy CSA1 above).

D51 The key planning requirements for the Fallings Park Strategic Allocation are set out below. Other standard policy requirements, as set out in the BCP and Wolverhampton Local Plan documents and SPDs, will also apply. A masterplan will be prepared to guide the comprehensive development of the Fallings Park Strategic Allocation. This will offer further detail on the requirements set out in this Policy and will also provide a spatial framework for developments.

School Place Requirements

D52 Current school place projections indicate that an additional single form entry primary school is required to serve the Fallings Park Neighbourhood Growth Area and other housing developments over the Plan period in the north east of Wolverhampton. Therefore, 2.3ha of Site WOH260 has been set aside for a potential primary school.

D53 It is currently anticipated that secondary school place requirements arising from housing developments in the north east of Wolverhampton over the Plan period will be capable of being met through extensions to existing secondary schools and / or provision of new secondary schools within Wolverhampton.

Highways Requirements

D54 To avoid adverse impacts on the wider road network, major improvements will be required to Grassy Lane, Wood Hayes Road, the Grassy Lane \ Wood Hayes Road junction and the Wood Hayes Road \ Wood End Road signal-controlled junction. Development would also contribute towards increasing congestion on Cannock Road, which has been identified as a pinch point requiring medium term investment.

D55 Therefore, major improvements along the routes of Cannock Road and Wood Hayes Road are likely to be required. Details will be set out in the masterplan.

Policy CSA2 – Fallings Park Strategic Allocation

Green Belt Loss Mitigation Requirements

- D56 Mitigation for the loss of green belt at Sites WOH262, WOH263, WOH264 and WOH271 will be provided through accessibility, biodiversity and environmental quality improvements to the significant areas of recreational open space located in the nearby Bushbury Hill area, which fall within the green belt and are owned and managed by City of Wolverhampton Council. These cover: Tennyson Road Neighbourhood Park; Bushbury Hill Amenity Area; and Sandy Lane Allotments.
- D57 There will be a requirement for all green belt loss mitigation works and any necessary transfer of land ownership to be completed before substantial completion of development at sites WOH262, WOH263, WOH264 and WOH271.
- D58 The green belt boundary has been redrawn around the development sites to exclude them and to align with the administrative boundary between Wolverhampton and South Staffordshire. To the north and east this lies along a culvert / brook and hedgerows and through agricultural fields. To provide a defensible new green belt boundary in this location, it is important that the design of development incorporates significant landscaped buffers, which will also enhance the nature conservation value of existing habitats.
- D59 Developments should be designed to minimise potential harm to the integrity of remaining green belt areas and landscape character, as identified in the Black Country Green Belt Study and Black Country Landscape Sensitivity Assessment.

Nature Conservation and Net Biodiversity Gain Requirements

- D60 All existing hedgerows, woodland and significant trees both within and adjoining the development sites should be retained, protected and incorporated sympathetically into the design of development (see Policy ENV4). Sufficient buffer areas should be provided at the edge of these habitat areas, particularly where mature trees and hedgerows exist, to allow them to thrive following development.
- D61 It is anticipated that biodiversity net gain requirements for the developments will be met on-site or through the green belt mitigation measures set out above, and subject to the minimum 10% requirement identified in the Environment Bill / Act and the requirements of Policy ENV3.

Recreational Open Space Requirements

- D62 1ha of recreational open space, including play facilities, will be provided on Site WOH262 to deliver a park to serve residents. Following this provision, the local area will benefit from good access to recreational open space, allotments, play and sports facilities that together have the capacity to meet the varied needs of residents, in line with adopted open space standards. No additional new on-site open space is likely to be required, beyond that necessary to protect existing nature conservation value and provide sufficient natural, sustainable drainage systems. However, it will be necessary to provide quality walking and cycle routes within the developments that provide easy, quick and safe access to nearby open spaces and the countryside, and which also incorporate existing rights of way.

Sustainable Drainage Requirements

- D63 Naturalised sustainable drainage systems that are sufficient to retain greenfield runoff rates should be provided in accordance with Policy CC5. Allowances for the space necessary to accommodate these systems, and a culvert standoff zone, have been made when defining the indicative net developable area. These allowances may be adjusted when the masterplan is prepared.

Policy CSA2 – Fallings Park Strategic Allocation

Local Wastewater Treatment Capacity

D64 The Black Country Water Cycle Study concludes that there is limited headroom / capacity at the Coven Heath wastewater treatment works that serve this area. Severn Trent have identified this constraint and have indicated that they are able to deliver the upgrades required to local wastewater treatment capacity in a timely manner to support the delivery of developments within the Fallings Park Neighbourhood Growth Area, and also other developments in the north of Wolverhampton and parts of South Staffordshire, over the Plan period.

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

J.13.7.1 The Fallings Park Strategic Allocation falls within the Fallings Park Neighbourhood Growth Area and covers equivalent SA references SA0009WOL, SA0010 WOL, SA0015WOL, SA0030WOL. The proposed Fallings Park Strategic housing allocation is a composite of a number of smaller sites which have been assessed individually as part of the SA process at the 'pre mitigation stage' (See Appendix I). The land is proposed to be released from the Green Belt. Approximately 303 homes are proposed at an average net density of between 25-40 dph, responding to the characteristics of each of the site parcels. Overall, a major positive impact on housing would be expected as a result of the proposed development at this strategic location (taking all aggregate site parcels into account) alongside a minor positive impact on the economy.

J.13.7.2 No Scheduled Monuments, Listed Buildings or Registered Parks and Gardens are located in the immediate vicinity of the site and the site is not located in proximity to areas of high historic landscape value. Potential impacts on heritage resources, including the setting of heritage assets and the archaeological potential of the site would be addressed as part of the planning process and would be subject to other policies in the BCP. With considerate planning, it is likely that there would be sufficient scope within this strategic location to direct development towards locations that would minimise effects on heritage resources. Overall a negligible impact on cultural heritage is expected. The site is located in an area of low-moderate landscape sensitivity based on the Landscape Sensitivity Assessment and located within an area of low-moderate sensitivity in relation to greenbelt harm. No PRoW cross the site. Views towards the site from adjacent residential areas form an important consideration. It is envisaged that a masterplan will be prepared to guide the development of the Strategic Location. The proposed development and housing densities has been

designed to respond to the landscape characteristics on respective parts of the site. Policy CSA2 states that *"The sites are suitable for an average density of 40 dph, with the exception of Site C31. Due to the linear shape of this site, the rural character of the local area and the need to create a defensible green belt boundary, a development of no more than 25 dph is appropriate."* This policy also states that *"Mitigation for the loss of green belt at Sites WOH262, WOH263, WOH264 and WOH271 will be provided through accessibility, biodiversity and environmental quality improvements to the significant areas of recreational open space located in the nearby Bushbury Hill area, which fall within the green belt and are owned and managed by City of Wolverhampton Council. These cover: Tennyson Road Neighbourhood Park; Bushbury Hill Amenity Area; and Sandy Lane Allotments..... It is important that the design of development incorporates significant landscaped buffers, which will also enhance the nature conservation value of existing habitats."* Overall, these measures are envisaged to help integrate the development into the existing local landscape context. A residual minor adverse impact is identified in respect to Landscape (SA Objective 2).

- J.13.7.3 Minor adverse effect in relation to biodiversity were identified in the pre-mitigation SA assessment due to parts of the site lying within 15km on Cannock Chase SAC, the site lying within an IRZ of a SSSI where 'any residential developments with a total net gain in residential units' should be consulted on with Natural England. The proposed development at this location could potentially result in adverse impacts on these surrounding biodiversity assets, due to increased development-related threats and pressures. Both potential positive and negative / uncertain effects are therefore identified in respect to biodiversity (SA Objective 3). The full implications of development proposed within the BCP on European sites will be considered in greater detail in the HRA (applies to all proposed strategic site allocations).
- J.13.7.4 The site is located within Flood Zone 1. Small parts of the site co-incide with areas of low, medium and / or high surface water flood risk. Mitigation measures should be informed by the site-specific Flood Risk Assessment including consideration of site accesses and appropriate climate change allowances. It is anticipated that Sustainable Drainage Systems (SuDS) *"sufficient to retain greenfield runoff rates will be provided for the site, in accordance with Policy CC5. An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the master plan is prepared."* Integration with Sustainable Drainage Systems (SuDS) would be expected to minimise the extent of surface water flooding. Upgrades to local wastewater treatment capacity are also envisaged as part of this development in association with Severn Trent Water, as specified in the policy text. Assuming that these measures are put in place this would lead to an overall negligible impact on climate change adaptation (SA Objective 5).

- J.13.7.5 The site is located within an AQMA, within 200m of a Main Road and parts of the site are located within 10m of a watercourse. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site specific assessments.
- J.13.7.6 Minor positive impacts in relation to proximity to bus stops (<400m) were identified in the SA assessment at the pre mitigation stage (See Appendix I). Minor adverse impacts were identified in the SA assessment at the pre mitigation stage in relation to access to a railway station (>2km), road and pedestrian access to parts of the site. The policy text states that *"To avoid adverse impacts on the wider road network, major improvements will be required to Grassy Lane, Wood Hayes Road, the Grassy Lane | Wood Hayes Road junction and the Wood Hayes Road | Wood End Road signal-controlled junction. Development would also contribute towards increasing congestion on Cannock Road, which has been identified as a pinch point requiring medium term investment. The policy text also states that "it will be necessary to provide quality walking and cycle routes within the developments that provide easy, quick and safe access to nearby open spaces and the countryside, and which also incorporate existing rights of way."* The policy provides that 1ha of recreational open space, including play facilities, will be provided on Site WOH262 to deliver a park to serve new and existing residents. On balance, a minor positive impact is identified in relation to Transport and Accessibility (SA Objective 9) and Climate Change Mitigation (SA Objective 4).
- J.13.7.7 Minor positive impacts were identified at the pre-mitigation stage of the SA assessment process (See Appendix I) in terms of access to education facilities for the strategic allocation. The site lies 15 minute walking distance from a local primary school, 25 minutes walking distance from a local secondary school and within a 25 minute journey by public transport to a secondary school. The policy text notes that *"Current school place projections indicate that an additional single form entry primary school is required to serve the Fallings Park Neighbourhood Growth Area and other housing developments over the Plan period in the north east of Wolverhampton. Therefore, 2.3ha of Site WOH260 [relating to Bushbury Strategic Allocation] has been set aside for a potential primary school. It is currently anticipated that secondary school place requirements arising from housing developments in the north east of Wolverhampton over the Plan period will be capable of being met through extensions to existing secondary schools and / or provision of new secondary schools within Wolverhampton."* A minor positive impact is identified in relation to Education (SA Objective 14).
- J.13.7.8 As noted in the policy text cumulative impacts will need to be considered in relation to the site being within two separate ownerships and other strategic housing allocations in the surrounding area including consideration of school place impacts, highways impacts; delivery of green belt loss mitigation; delivery of biodiversity net gain; and delivery of recreational open space improvement. Cumulative impacts will be assessed at the

Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

DRAFT

J.13.8 Policy WSA1 (Walsall Strategic Allocation) – Home Farm, Sandhills, Walsall Wood

Policy WSA1 – Home Farm, Sandhills, Walsall Wood



Policy WSA1 – Home Farm, Sandhills, Walsall Wood

- C33 Home Farm is located on the northern boundary of Walsall with Lichfield. The northwest boundary is defined by the Wyrley and Essington Canal, with housing beyond and industrial uses to the far northwest corner. The northeast boundary follows the boundary to Lichfield District with more land in agricultural use beyond. The southwest boundary meets the rear garden boundaries to houses on Chester Road. The southeast boundary meets the Lichfield Road with houses on the opposite side.
- C34 The developable area is 54 hectares.
- C35 The estimated capacity of the site is 1890 houses.
- C36 Mixed tenure housing is suitable on the site, with higher densities of at least 45dph and affordable housing provision.

Design principles:

- Deliver appropriate local facilities to support the new residents and to enhance the sustainability of the existing area, including a new primary school and local health centre.
- Investigation and detailed proposals for remediation of contaminated land.
- A transport strategy that includes:
 - unconnected access to and from the site along Chester Road and Lichfield Road,
 - necessary capacity mitigation and improvements to the junction at Lichfield Road and Chester Road,
 - provides a new traffic light junction between Lindon Road and Chester Road and
 - provides opportunities for bus routes to serve the development.
 - Enhanced provision for pedestrians and cyclists, including enhanced connectivity with the district centre.
- Develop a site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.
- A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character or on protected animal species
- The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.

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

- J.13.8.1 The land at Home Farm is located on the northern boundary of Walsall with Lichfield and is proposed to be released from the Green Belt. Approximately 1890 houses are proposed with higher densities of at least 45dph and affordable housing provision. Overall, a major positive impact on housing and minor positive impact on the economy would be expected as a result of the proposed development at this strategic location.
- J.13.8.2 The proposed development is located approximately 230m from Wyrley and Essington Canal Footbridge at Ogley Junction and 280m from Sandhills Pumping Station Grade II listed buildings. The proposal also lies adjacent to an area of High Historic Townscape Value. Where there is potential for development to adversely affect a heritage asset, including the setting of that asset, an assessment should be undertaken to establish the extent of this potential effect as per guidelines provided by Historic England⁷⁸. There is likely to be some scope within the strategic location to direct development away from heritage assets and use sensitive layout and design to minimise the impacts of development. No reference is made to heritage resources in the policy text. Where impacts on designated and non-designated heritage assets remains uncertain at this stage, overall it is considered that the large scale of proposed development at this strategic location could potentially have a minor negative impact on heritage resources (SA Objective 1). Further reference could be made to a requirement to produce a Statement of Heritage Significance in accordance with other site allocation policies.
- J.13.8.3 The site is located in an area of moderate landscape sensitivity based on the Landscape Sensitivity Assessment and an area of high sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents. Due to the large scale of development proposed at approximately 1890 dwellings, it is considered likely that there would be an overall major residual negative impact on the local landscape (SA Objective 2). It is however anticipated that there would be opportunities at the Home Farm Strategic Location to limit the visual impact of development through design and incorporation of GI, alongside measures to retain and enhance existing landscape features and integrate the development into the local landscape context. This is set out in the policy text which states that the proposed development should include "*A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character or on protected animal species.*" It is anticipated that further details may be specified in the pre submission plan including an Indicative Concept Plan and Green Belt Loss Mitigation Requirements.

⁷⁸ Historic England (2017) The Setting of Heritage Assets - Historic Environment Good Practice Advice in Planning: 3.
Available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/> [Date Accessed: 20/04/21]

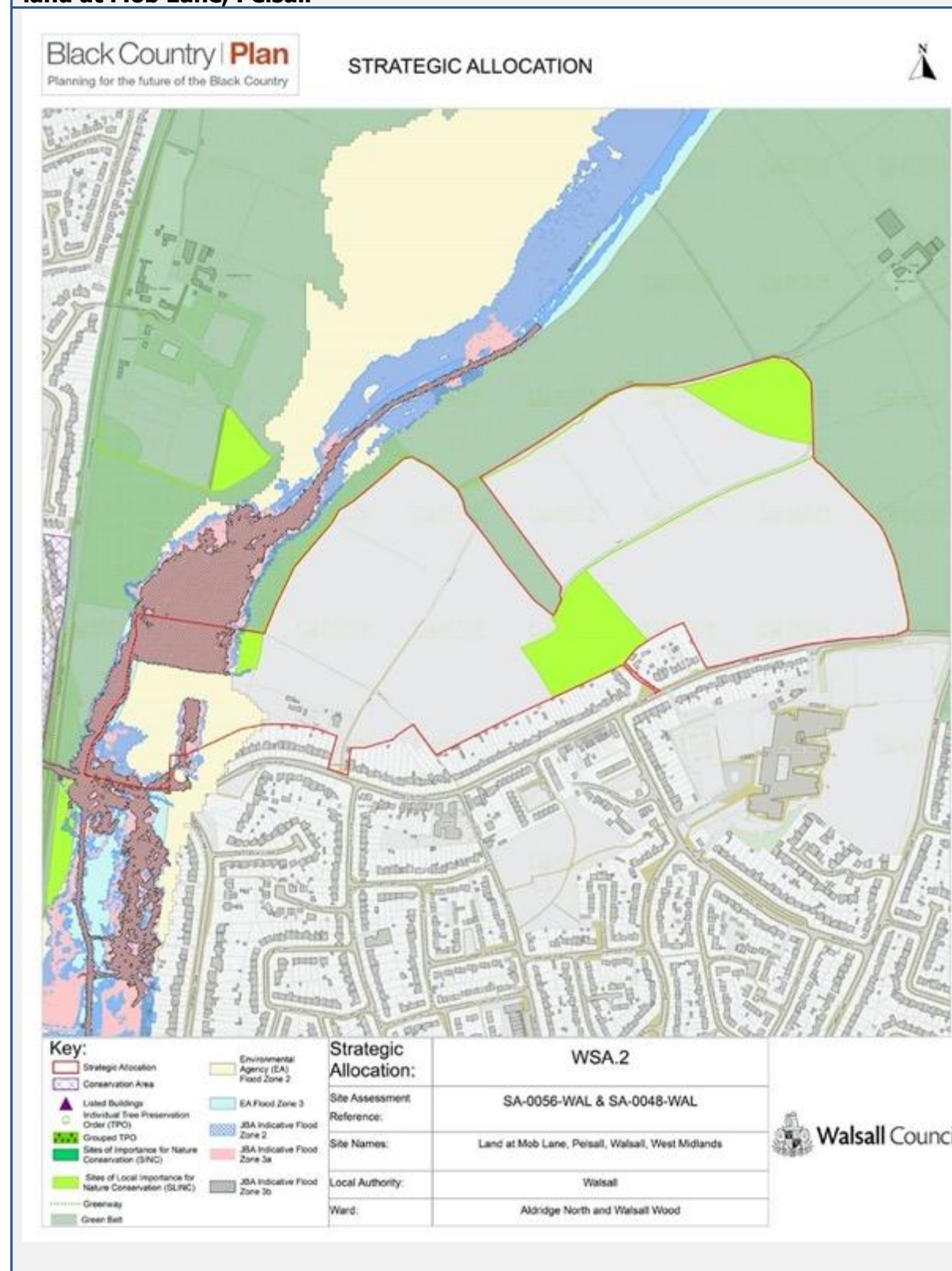
- J.13.8.4 Minor adverse effect in relation to biodiversity were identified in the pre-mitigation SA assessment due to parts of the site lying within 15km of Cannock Chase SAC, the site lying within an IRZ of a SSSI where 'any residential developments with a total net gain in residential units' should be consulted on with Natural England and the site lying approximately 200m from Shire Oak Park Local Nature Reserve. Parts of the site also coincide with Wyrley and Essington Canal SLINC, with a small proportion of the site contains deciduous woodland which is identified as a habitat of principal importance under the Natural Environment and Rural Communities Act 2006. The proposed development of approximately 1890 dwellings at Home Farm could potentially increase development-related threats and pressures to these biodiversity assets. Provision of a strategy for landscape and habitat creation at the strategic location could also potentially help to contribute towards maintaining habitat connectivity and enhancement. Opportunities should be sought for delivering net gains in biodiversity. Where possible, it is recommended that all developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. The SLINC should be retained and integrated into GI measures for the site. Taking into consideration the scale of development proposed it is anticipated that with appropriate habitat planning overall there would be mixed positive and negative impacts on biodiversity (SA Objective 3).
- J.13.8.5 The site is located within Flood Zone 1. A large proportion of the site coincides with areas of low and/or medium surface water flood risk, and a small proportion of the site coincides with areas of high surface water flood risk. Policy WSA1 states that proposals should *"Develop a site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits."* Assuming that these measures are put in place this would lead to an overall negligible impact on Climate Change Adaptation (SA Objective 5). Options to minimise surface water flood risk and other sources of flooding should be assessed as part of the Flood Risk Assessment (FRA) that will be prepared for the site, including access options and potential allowances for climate change.
- J.13.8.6 The site is located within an AQMA, within 200m of a Main Road, within a Groundwater Source Protection Zone and within 10m of a watercourse. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site specific assessments. The policy includes a requirement for *"Investigation and detailed proposals for remediation of contaminated land"* for this site which would help to minimise impacts on water pollution and provide remediation of contaminated land (compared to the existing

baseline situation). Assuming that these measures are put in place an overall negligible impact in relation to pollution is therefore anticipated (SA Objective 7).

- J.13.8.7 The site is identified as being located within predominantly Grade 3 land with a smaller component of 'urban' land based on regional ALC Natural England mapping. The site is also located within an MSA. The site would lead to the loss of more than 20ha of undeveloped land and therefore a major residual adverse impact is identified in relation to Natural Resources (SA Objective 6). Mitigation to minimise impacts on mineral resources is provided in the policy text which states that "*Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.*"
- J.13.8.8 It is anticipated that a new primary school and local health centre would be incorporated into the proposed development and provide all residents with good access to education and health services. Therefore, a major positive impact on education (SA Objective 14) and Health (SA Objective 12) would be expected, following development at this location.
- J.13.8.9 Development at this strategic location would also be expected to provide "*Opportunities for bus routes to serve the development*" and "*Enhanced provision for pedestrians and cyclists, including enhanced connectivity with the district centre.*" Assuming that these measures are put in place an overall minor positive impact on Transport and Accessibility (SA Objective 9) and Climate Change Mitigation (SA Objective 4) would be expected.
- J.13.8.10 Cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area. Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

J.13.9 Policy WSA2 – Land at Vicarage Road and Coronation Road, High Heath and land at Mob Lane, Pelsall

Policy WSA2 – Land at Vicarage Road and Coronation Road, High Heath and land at Mob Lane, Pelsall



Policy WSA2 – Land at Vicarage Road and Coronation Road, High Heath and land at Mob Lane, Pelsall

- C37 Land at Vicarage Road and Coronation Road and land at Mob Lane is located along the northern urban edge of High Heath. To the north are fields with Pelsall and Clayhanger urban areas beyond, to the east fields and a sewage works, to the south is proposed allocation WSA3, High Heath and an area of housing that is characterised by predominantly traditional semi-detached houses, and to the west is Pelsall and a former railway line.
- C38 The developable site area is 27.21ha.
- C39 The estimated capacity of the site is 713 houses.
- C40 Mixed tenure housing is suitable with higher densities of at least 35dph and affordable housing provision.

Design principles:

- Deliver appropriate local facilities to support the new residents and to enhance the sustainability of the existing area, including a new primary school and local health centre.
- Investigation of and detailed proposals for the remediation of contaminated land.
- A transport strategy that includes improvements to Mob Lane and Green Lane.
- A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and that is designed to deliver landscape, biodiversity and amenity benefits.
- A strategy for landscape and habitat creation that provides enhancement, retention and / or mitigation for established trees and hedges, to ensure there are no significant adverse impacts on visual amenity and character or on protected animal species.
- The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.

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

- J.13.9.1 The land at Vicarage Road is located along the northern urban edge of High Heath and is proposed to be released from the Green Belt. The proposed housing allocation is a composite of two sites (SA-0048-WAL and SA-0056-WAL) which have been assessed individually as part of the SA process at the 'pre mitigation stage' (See Appendix). The Approximately 713 houses are proposed with higher densities of at least 35 dph and affordable housing provision. Overall, a major positive impact on housing and minor

positive impact on the economy would be expected as a result of the proposed development at this strategic location.

- J.13.9.2 The proposed development is located approximately 60m west of Pelsall Common Conservation Area, separated by open space/some development and adjacent to Pelsall Burnt Mound Archaeological Priority Area. There is likely to be some scope within the strategic location to direct development away from heritage assets and use sensitive layout and design to minimise the impacts of development. No reference is made to heritage resources in the policy text. Where impacts on designated and non-designated heritage assets (including the potential for below ground archaeological remains) is uncertain at this stage, overall it is considered that the scale of the proposed development at this strategic location could potentially have a minor negative impact on heritage resources.
- J.13.9.3 The site is located in an area of moderate landscape sensitivity based on the Landscape Sensitivity Assessment and an area of high to very high sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents and users of the PRoW network which cross parts of the site. It is considered that well designed development could potentially provide opportunities to limit the impact of the development on the surrounding landscape and visual receptors. This could include landscaped buffers to maintain separation between the existing settlements, and retention or enhancement of key landscape features. However, the scale of development proposed at approximately 713 dwellings would be expected to result in major negative impact on the landscape (SA Objective 2). The policy text states that development should include *"A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character or on protected animal species."* It is anticipated that further details may be specified in the pre submission plan including an Indicative Concept Plan and Green Belt Loss Mitigation Requirements.
- J.13.9.4 Minor adverse effect in relation to biodiversity were identified in the pre-mitigation SA assessment due to parts of the site lying within 15km of Cannock Chase SAC, the site lying within an IRZ of a SSSI where 'any residential developments with a total net gain in residential units' should be consulted on with Natural England and the site lying approximately 150m east of Jockey Fields SSSI. Ford Brook SLINC is also located adjacent to the western area of the site and a small proportion of the site contains Coastal and Floodplain grazing marsh which is identified as a habitat of principal importance under the Natural Environment and Rural Communities Act 2006. It is understood that candidate SLINC also form part of the site. The proposed development of approximately 713 dwellings at Vicarage Road could potentially increase development-related threats and pressures to these biodiversity assets. Provision of a strategy for landscape and habitat creation at the strategic location could also potentially help to contribute towards maintaining habitat connectivity and enhancement. Opportunities should be sought for

delivering net gains in biodiversity. Where possible, it is recommended that all developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. Taking into consideration the scale of development proposed it is anticipated that with appropriate habitat planning overall there would be mixed positive and negative impacts on biodiversity (SA Objective 3).

- J.13.9.5 Parts of the site are located in Flood Zones 2 and 3a which coincides with western site area linking to Ford Brook. A proportion of the site is also located in 'Indicative Flood Zone 3b' in the southwestern area in the vicinity of Ford Brook. Policy WSA 2 states that proposals should "*Develop a site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.*" Assuming appropriate layout, GI and SUDS are put in place, it is likely that there would be both positive and negative impacts with regard to climate change adaptation (SA Objective 5). Taking this into consideration, an overall negligible impact would be anticipated at this strategic location. These considerations should be assessed as part of the Flood Risk Assessment (FRA) and Drainage Strategy that will be prepared for the site, including access options and potential allowances for climate change.
- J.13.9.6 The site is located within an AQMA and within 10m of a watercourse. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site-specific assessments. The policy includes a requirement for "*Investigation and detailed proposals for remediation of contaminated land*" for this site which would help to minimise impacts on water pollution and provide remediation of contaminated land (compared to the existing baseline situation). Assuming that these measures are put in place an overall positive impact in relation to pollution is therefore anticipated (SA Objective 7).
- J.13.9.7 The site is identified as being located within predominantly Grade 3 land based on regional ALC Natural England mapping. A large proportion of the site is also located within an MSA. The site would lead to the loss of more than 20ha of undeveloped land and therefore a major residual adverse impact is identified in relation to Natural Resources (SA Objective 6). Mitigation to minimise impacts on mineral resources is provided in the policy text which states that "*Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.*"
- J.13.9.8 It is anticipated that a new primary school and local health centre would be incorporated into the proposed development and provide all residents with good access to education

and health services. Therefore, a major positive impact on education (SA Objective 14) and Health (SA Objective 12) would be expected, following development at this location.

J.13.9.9 Uncertain impacts are recorded in relation to Transport and Accessibility (SA Objective 9) and Climate Change Mitigation (SA Objective 4) based on the level of information available at this time.

J.13.9.10 Cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

J.13.10 Policy WSA3 – Land north of Stonnall Road, Aldridge

Policy WSA3 – Land north of Stonnall Road, Aldridge



C41 Land north of Stonnall Road is located along the eastern urban edge of Aldridge. To the north are houses; to the east agricultural fields; to the south is proposed allocation SA-309-WAL and agriculture beyond; and to the west are houses. The predominant character of houses here are a mix of detached bungalows and houses, modern but traditionally styled.

Policy WSA3 – Land north of Stonnall Road, Aldridge

- C42 The estimated capacity of the site is 13.82ha.
- C43 The site is proposed to be allocated for 483 houses.
- C44 Mixed tenure housing is suitable, with higher densities of at least 35dph and affordable housing provision.

Design principles:

- Improvements to local facilities, to support residents and to enhance the sustainability of the existing area, in particular improved capacity at the primary school and local health centre.
- Investigation of and detailed proposals for remediation of contaminated land.
- A transport strategy that includes widening to Stonnall Road for the extent of the site allocation and improves pedestrian access.
- Develop a site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.
- Develop a strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character or on protected animal species.
- The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.

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

- J.13.10.1 The land north of Stonnall Road is located along the eastern urban edge of Aldridge and is proposed to be released from the Green Belt. Approximately 483 houses are proposed with higher densities of at least 35 dph and affordable housing provision. Overall, a major positive impact on housing and minor positive impact on the economy would be expected as a result of the proposed development at this strategic location.
- J.13.10.2 No Scheduled Monuments, Listed Buildings, Registered Parks and Gardens or Conservation Areas are located in the immediate vicinity of the site and the site is not located in proximity to areas of high historic landscape / townscape landscape value. Potential impacts on heritage resources, including the setting of heritage assets and the archaeological potential of the site would be addressed as part of the planning process and would be subject to other policies in the BCP. With considerate planning, it is likely that there would be sufficient scope within this strategic location to direct development towards locations that

would minimise effects on heritage resources. Overall a negligible impact on cultural heritage is expected (SA Objective 1).

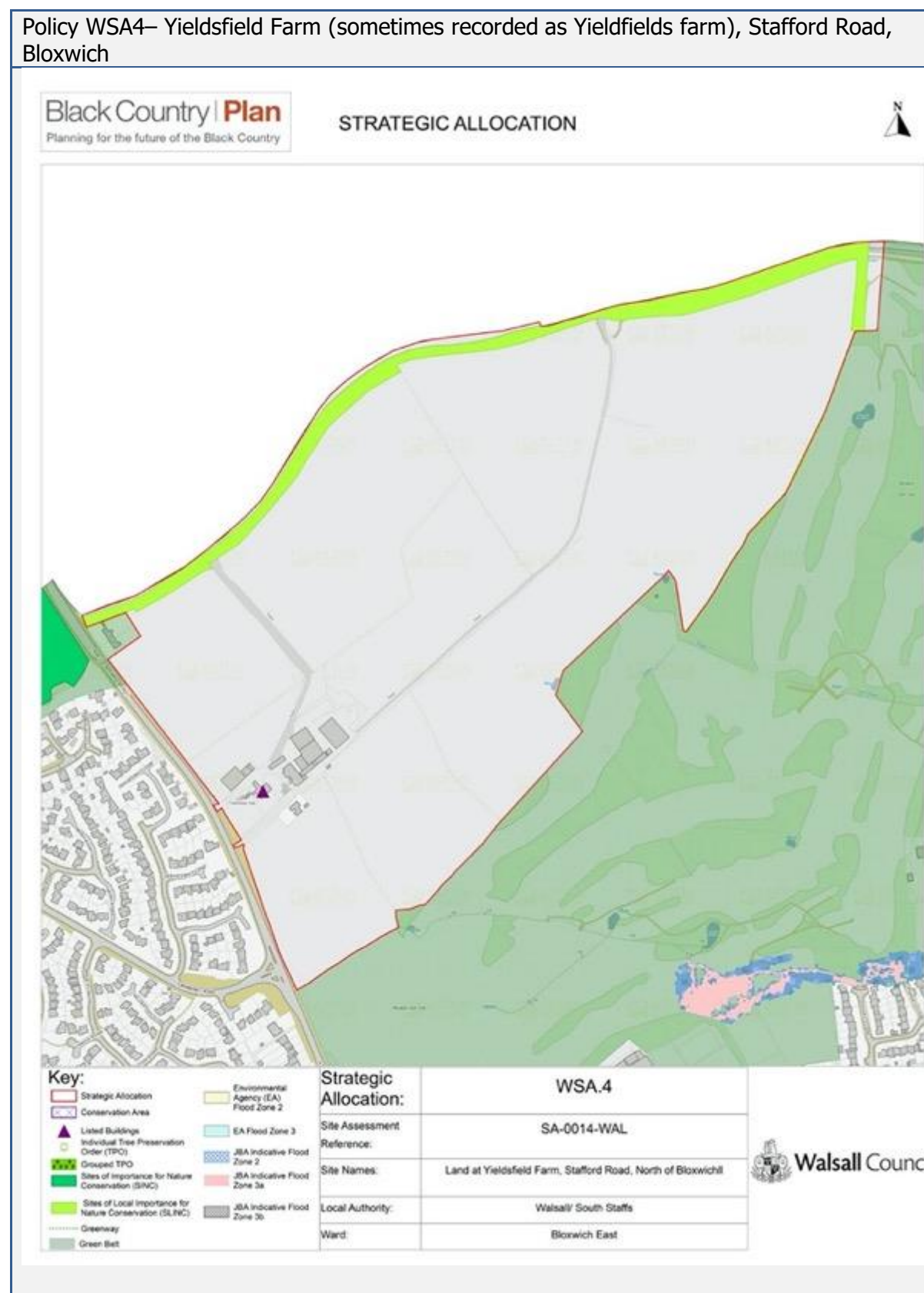
- J.13.10.3 The site is located in an area of moderate-high landscape sensitivity based on the Landscape Sensitivity Assessment and an area of high sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents. It is considered that well designed development could potentially provide opportunities to limit the impact of the development on the surrounding landscape and visual receptors. This could include landscaped buffers to maintain separation between the existing settlements, and retention or enhancement of key landscape features. However, the scale of development proposed at approximately 483 dwellings would be expected to result in major negative impact on the landscape (SA Objective 2). The policy text states that development should include *"A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character or on protected animal species."* It is anticipated that further details may be specified in the pre submission plan including an Indicative Concept Plan and Green Belt Loss Mitigation Requirements.
- J.13.10.4 Minor adverse effect in relation to biodiversity were identified in the pre-mitigation SA assessment due to parts of the site lying within 15km of Cannock Chase SAC, the site lying within an IRZ of a SSSI where 'any residential developments with a total net gain in residential units' should be consulted on with Natural England. Opportunities should be sought for delivering net gains in biodiversity. Where possible, it is recommended that all developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. Taking into consideration the scale of development proposed it is anticipated that with appropriate habitat planning overall there would be mixed positive and negative impacts on biodiversity (SA Objective 3).
- J.13.10.5 The site is located within Flood Zone 1. A small proportion of the site coincides with areas of low surface water flood risk. Policy WSA 3 states that proposals should *"Develop a site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits."* Assuming that these measures are put in place this would lead to an overall negligible impact on Climate Change Adaptation (SA Objective 5).
- J.13.10.6 The site is located within an AQMA and within a Groundwater Source Protection Zone. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site-specific assessments. The policy includes a requirement for *"Investigation and*

detailed proposals for remediation of contaminated land' for this site which would help to minimise impacts on water pollution and provide remediation of contaminated land (compared to the existing baseline situation). Assuming that these measures are put in place an overall negligible impact in relation to pollution is anticipated (SA Objective 7).

- J.13.10.7 The site is identified as being located within predominantly Grade 3 land with a smaller component of 'urban' land based on regional ALC Natural England mapping. The site is also located within an MSA. The site would lead to the loss of less than 20ha of undeveloped land and therefore a minor residual adverse impact is identified in relation to Natural Resources (SA Objective 6). Mitigation to minimise impacts on mineral resources is provided in the policy text which states that "*Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.*"
- J.13.10.8 The policy text states that the proposed development would include "*Improvements to local facilities, to support residents and to enhance the sustainability of the existing area, in particular improved capacity at the primary school and local health centre.*" Pending further details this would likely have a minor positive impact on Education (SA Objective 14) and Health (SA Objective 12), following development at this location.
- J.13.10.9 Uncertain impacts are recorded in relation to Transport and Accessibility (SA Objective 9) and Climate Change Mitigation (SA Objective 4) based on the level of information available at this time.
- J.13.10.10 Cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area. Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

J.13.11 Policy WSA4– Yieldsfield Farm (sometimes recorded as Yieldfields farm),
 Stafford Road, Bloxwich

Policy WSA4– Yieldsfield Farm (sometimes recorded as Yieldfields farm), Stafford Road,
 Bloxwich



Policy WSA4– Yieldsfield Farm (sometimes recorded as Yieldfields farm), Stafford Road, Bloxwich

- C45 Yieldsfield Farm is located along the northern urban edge of Bloxwich. To the north are fields with Newtown and Landywood beyond in South Staffordshire District. To the east lie fields and to the south is Bloxwich Golf Course. To the west is the Turnberry housing estate, composed of predominantly modern, traditionally styled detached houses. Within this site is Yieldsfield Hall, a Grade II listed building.
- C46 The developable site area is 32.3ha.
- C47 The estimated capacity of the site is 1304 houses.
- C48 Mixed tenure housing is suitable on the site with higher densities of at least 35dph and affordable housing provision.

Design principles:

- High quality, sensitive design and layout that conserves and enhances the setting and significance of Yieldsfield Hall, a Grade II listed building; this must be informed by a detailed heritage character assessment for the proposal.
- Delivery of appropriate local facilities to support residents and to enhance the sustainability of the existing area, including a new primary, school and local health centre.
- Contribution to improvements for secondary school provision in North Bloxwich.
- Investigation and detailed proposals for remediation of contaminated land.
- A transport strategy that includes new crossing points on the A34 and a new vehicular junction to serve the development.
- A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.
- A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character, in particular that might be experienced from the north and west, and to ensure there is no significant adverse impact on protected animal species.

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

J.13.11.1 Yieldsfield Farm is located along the northern urban edge of Bloxwich and is proposed to be released from the Green Belt. Approximately 1034 houses are proposed with higher densities of at least 35 dph and affordable housing provision. Overall, a major positive

impact on housing and minor positive impact on the economy would be expected as a result of the proposed development at this strategic location.

- J.13.11.2 Yieldfields Hall Farmhouse Grade II listed building coincides with the south western area of the Site. Bloxwich Golf Club Clubhouse Grade II listed building is also located approximately 190m south of site separated by open space. Policy WSA 4 would be expected to ensure that heritage assets within Walsall are conserved in a manner appropriate to their significance, in line with national policy, and that the setting of historic assets are conserved. Where development proposals may present risks to the significance of an asset, Policy WSA 4 would require an accompanying statement to be prepared to describe the how the assessment has considered impacts on the significance of the asset and any mitigating actions that are proposed. The policy text states that *"High quality, sensitive design and layout that conserves and enhances the setting and significance of Yieldsfield Hall, a Grade II listed building; this must be informed by a detailed heritage character assessment for the proposal."* This policy would be expected to ensure that cultural heritage resources across the Black Country are suitably protected, however minor adverse impacts cannot be ruled out at this stage of the assessment process (SA Objective 1).
- J.13.11.3 The site is located in an area of low-moderate landscape sensitivity based on the Landscape Sensitivity Assessment and an area of very high sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents. Due to the large scale of development proposed at approximately 1034 dwellings, it is considered likely that there would be an overall major residual negative impact on the local landscape (SA Objective 2). It is however anticipated that there would be opportunities at the Yieldsfield Farm Strategic Location to limit the visual impact of development through design and incorporation of GI, alongside measures to retain and enhance existing landscape features and integrate the development into the local landscape context. This is set out in the policy text which states that the proposed development should include *"A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character, in particular that might be experienced from the north and west, and to ensure there is no significant adverse impact on protected animal species."* It is anticipated that further details may be specified in the pre submission plan including an Indicative Concept Plan and Green Belt Loss Mitigation Requirements.
- J.13.11.4 Minor adverse effect in relation to biodiversity were identified in the pre-mitigation SA assessment due to parts of the site lying within 15km of Cannock Chase SAC, the site lying within an IRZ of a SSSI where 'any residential developments with a total net gain in residential units' should be consulted on with Natural England. The site is located across the road from Newtown Pool SINC and a strip of deciduous woodland is present to the north of the site which is identified as a habitat of principal importance under the Natural

Environment and Rural Communities Act 2006. It is understood that a candidate SLINC may also form part of the site. The proposed development of approximately 1034 dwellings at Yieldsfield Farm could potentially increase development-related threats and pressures to these biodiversity assets. Provision of a strategy for landscape and habitat creation at the strategic location could also potentially help to contribute towards maintaining habitat connectivity and enhancement. Opportunities should be sought for delivering net gains in biodiversity. Where possible, it is recommended that all developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. Taking into consideration the scale of development proposed it is anticipated that with appropriate habitat planning overall there would be mixed positive and negative impacts on biodiversity (SA Objective 3).

- J.13.11.5 The site is located within Flood Zone 1. There are scattered areas of low, medium and high surface water flood risk across the site. Policy WSA4 states that proposals should *"Develop a site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits."* Assuming that these measures are put in place this would lead to an overall negligible impact on Climate Change Adaptation (SA Objective 5). Options to minimise surface water flood risk and other sources of flooding should be assessed as part of the Flood Risk Assessment (FRA) that will be prepared for the site, including access options and potential allowances for climate change.
- J.13.11.6 The site is located within an AQMA and within 200m of a Main Road. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site specific assessments. The policy includes a requirement for *"Investigation and detailed proposals for remediation of contaminated land"* for this site which would help to minimise impacts on water pollution and provide remediation of contaminated land (compared to the existing baseline situation). Assuming that these measures are put in place an overall negligible impact in relation to pollution is anticipated (SA Objective 7).
- J.13.11.7 The site is identified as being located within predominantly Grade 3 land with a smaller component of Grade 4 land to the north of the site based on regional ALC Natural England mapping. The site would lead to the loss of more than 20ha of undeveloped land and therefore a major residual adverse impact is identified in relation to Natural Resources (SA Objective 6).
- J.13.11.8 It is anticipated that a new primary school and local health centre would be incorporated into the proposed development and provide all residents with good access to education and health services. The policy also states that proposals should include *"Contribution to*

improvements for secondary school provision in North Bloxwich." Assuming that these measures are put in place an overall major positive impact on education (SA Objective 14) and Health (SA Objective 12) would be expected, following development at this location.

- J.13.11.9 Uncertain impacts are recorded in relation to Transport and Accessibility (SA Objective 9) and Climate Change Mitigation (SA Objective 4) based on the level of information available at this time.
- J.13.11.10 Cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area. Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

J.13.12 Policy WSA5– Land at Yorks Bridge, Lichfield Road, Pelsall

Policy WSA5– Land at Yorks Bridge, Lichfield Road, Pelsall



Policy WSA5– Land at Yorks Bridge, Lichfield Road, Pelsall

- C50 The developable site area is 21.4ha.
- C51 The estimated capacity of the site is 774 houses.
- C52 Mixed tenure housing is suitable with higher densities of at least 35dph and affordable housing provision.

Design principles:

- Delivery of appropriate local facilities to support residents and to enhance the sustainability of the existing area, including a new primary school and local health centre.
- Investigation and detailed proposals for the remediation of contaminated land.
- A transport strategy that includes the widening of Lichfield Road to allow for a ghost turn into the site, and which includes necessary capacity mitigation and improvements to the junction at Lichfield Road, Wolverhampton Road, Lime Lane and Walsall Road.
- A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits whilst protecting existing SLINC designated areas.
- A strategy for landscape and habitat creation, which provides enhancement, retention and mitigation for protected and established trees and hedges, to ensure there is no significant adverse impact on ecology, biodiversity, visual amenity and character and protected animal species.

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

J.13.12.1 The land at Yorks Bridge is located on the northern urban edge of Pelsall and is proposed to be released from the Green Belt. Approximately 774 houses are proposed with higher densities of at least 35 dph and affordable housing provision. Overall, a major positive impact on housing and minor positive impact on the economy would be expected as a result of the proposed development at this strategic location.

J.13.12.2 The Grade II listed Wyrely and Essington Canal Footbridge at Pelsall Junction is located approximately 310m west of site. The proposal also lies adjacent to an area of High Historic Townscape Value. Where there is potential for development to adversely affect a heritage asset, including the setting of that asset, an assessment should be undertaken to

establish the extent of this potential effect as per guidelines provided by Historic England⁷⁹. There is likely to be some scope within the strategic location to direct development away from heritage assets and use sensitive layout and design to minimise the impacts of development. No reference is made to heritage resources in the policy text. Where impacts on designated and non-designated heritage assets remains uncertain at this stage, overall it is considered that the scale of proposed development at this strategic location could potentially have a minor negative impact on heritage resources (SA Objective 1).

- J.13.12.3 The site is located in an area of moderate-high landscape sensitivity based on the Landscape Sensitivity Assessment and an area of high sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents and users of the PRoW network in proximity to the site. A number of trees subject to Tree Preservation Orders (TPOs) are located within the boundaries of the site. It is considered that well designed development could potentially provide opportunities to limit the impact of the development on the surrounding landscape and visual receptors. This could include landscaped buffers to maintain separation between the existing settlements, and retention or enhancement of key landscape features. However, the scale of development proposed at approximately 774 dwellings would be expected to result in major negative impact on the landscape (SA Objective 2). The policy text states that development should include *"A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character or on protected animal species."* It is anticipated that further details may be specified in the pre submission plan including an Indicative Concept Plan and Green Belt Loss Mitigation Requirements.
- J.13.12.4 Cannock Chase SAC is located approximately 9.4km northwest of the site with the development lying within the 15km Zone of Influence for the SAC and Cannock Extension Canal SAC is located approximately 320m west of site. The full implications of development proposed within the BCP on European sites will be considered in greater detail in the HRA (applies to all proposed strategic site allocations). The site also lies within an IRZ of a SSSI where 'any residential developments with a total net gain in residential units' should be consulted on with Natural England and the site is located approximately 30m west of Pelsall North Common Local Nature Reserve. Parts of the site to the southwest also coincide with Wyrley and Essington Canal SLINC and a small proportion of the site contains deciduous woodland which is identified as a habitat of principal importance (formerly known as priority habitats) under the Natural Environment and Rural Communities Act 2006. The proposed development of approximately 774 dwellings at Yorks Bridge could potentially increase development-related threats and

⁷⁹ Historic England (2017) The Setting of Heritage Assets - Historic Environment Good Practice Advice in Planning: 3.
Available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/> [Date Accessed: 20/04/21]

pressures to these biodiversity assets. Provision of a strategy for landscape and habitat creation at the strategic location could also potentially help to contribute towards maintaining habitat connectivity and enhancement. Opportunities should be sought for delivering net gains in biodiversity. The SLINC should be retained and integrated into GI measures for the site. At this stage it is considered that impacts on biodiversity are uncertain, based on the information available to date and that development at the strategic location has the potential to result in direct and indirect impacts on biodiversity assets. Mixed / uncertain effects are therefore identified in respect to biodiversity (SA Objective 3).

- J.13.12.5 The site is located within Flood Zone 1. There are scattered areas of low, medium and high surface water flood risk to the south and north of the site. The site is located within Flood Zone 1. A small proportion of the site coincides with areas of low, medium and high surface water flood risk. Policy WSA 5 states that proposals should “*Develop a site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.*” Assuming that these measures are put in place this would lead to an overall negligible impact on Climate Change Adaptation (SA Objective 5). Options to minimise surface water flood risk and other sources of flooding should be assessed as part of the Flood Risk Assessment (FRA) that will be prepared for the site, including access options and potential allowances for climate change.
- J.13.12.6 The site is located within an AQMA, within 200m of a Main Road and within 10m of a watercourse. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site-specific assessments. The policy includes a requirement for “*Investigation and detailed proposals for remediation of contaminated land*” for this site which would help to minimise impacts on water pollution and provide remediation of contaminated land (compared to the existing baseline situation). Assuming that these measures are put in place an overall minor positive impact in relation to pollution is anticipated (SA Objective 7).
- J.13.12.7 The site is identified as being located within predominantly Grade 3 land with a smaller component of ‘urban’ land based on regional ALC Natural England mapping. The site is also located within an MSA (Fire Clay and Wood). The site would lead to the loss of more than 20ha of undeveloped land and therefore a major residual adverse impact is identified in relation to Natural Resources (SA Objective 6).
- J.13.12.8 It is anticipated that a new primary school and local health centre would be incorporated into the proposed development and provide all residents with good access to education and health services. Therefore, a major positive impact on education (SA Objective 14) and Health (SA Objective 12) would be expected, following development at this location.

- J.13.12.9 Uncertain impacts are recorded in relation to Transport and Accessibility (SA Objective 9) and Climate Change Mitigation (SA Objective 4) based on the level of information available at this time.
- J.13.12.10 Cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area. Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

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J.13.13 Policy WSA6– Land off Sutton Road, Longwood Lane, Walsall

Policy WSA6– Land off Sutton Road, Longwood Lane, Walsall



C53 Land off Sutton Road, Longwood Lane is located along the very northern part of Pheasey Park Farm. To the north are fields, to the east and south are houses and to the west is the canal with Arboretum Park beyond it. The character of the immediate area is defined by predominantly traditionally-styled detached houses. The site has recently been designated a SLINC.

Policy WSA6– Land off Sutton Road, Longwood Lane, Walsall

- C54 The developable site area is 11.9ha.
- C55 The estimated capacity of the site is 270 houses.
- C56 Mixed tenure housing is suitable in this location, with higher densities of at least 35dph and affordable housing provision.

Design principles:

- Improvements to local facilities, to support residents and to enhance the sustainability of the existing area, in particular improved capacity at the primary school and local health centre.
- Investigation of and detailed proposals for the remediation of contaminated land.
- A transport strategy that includes single access onto Sutton Road, and which ensures that the transport impacts of the development are appropriately managed and mitigated.
- Enhanced provision for pedestrians and cyclists, including enhanced connectivity with cycle route CR012.
- A site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and that are designed to deliver landscape, biodiversity and amenity benefits, which also takes full account of existing watercourses.
- A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for existing SLINC features and established trees, to ensure there is no significant adverse impact on ecology, biodiversity, visual amenity and character or on protected animal species.

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

J.13.13.1 The land off Sutton Road is located along the very northern part of Pheasey Park Farmland and is proposed to be released from the Green Belt. Approximately 270 houses are proposed with higher densities of at least 35 dph and affordable housing provision. Overall, a major positive impact on housing and minor positive impact on the economy would be expected as a result of the proposed development at this strategic location.

J.13.13.2 The south of site coincides with Wood End Moated Site Archaeological Priority Area and the majority of the site is located within an area of High Historic Landscape Value. No reference is made to heritage resources in the policy text. Where impacts on heritage assets (including the potential for below ground archaeological remains) is uncertain at this stage, overall it is considered that the scale of the proposed development at this strategic location could potentially have a minor negative impact on heritage resources.

- J.13.13.3 The site is located in an area of moderate-high landscape sensitivity based on the Landscape Sensitivity Assessment and an area of high sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents. At this stage of the assessment, it is considered that the development could have a potential major negative impact on the landscape (SA Objective 2). It is however considered that well designed development could potentially provide opportunities to limit the impact of the development on the surrounding landscape and visual receptors. This could include landscaped buffers to maintain separation between the existing settlements, and retention or enhancement of key landscape features. The policy text states that development should include "A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for existing SLINC features and established trees, to ensure there is no significant adverse impact on ecology, biodiversity, visual amenity and character or on protected animal species." It is anticipated that further details may be specified in the pre submission plan including an Indicative Concept Plan and Green Belt Loss Mitigation Requirements.
- J.13.13.4 Minor adverse effect in relation to biodiversity were identified in the pre-mitigation SA assessment due to Wood End Farm SLINC coinciding with the western part of the site and a small proportion of the site containing good quality semi improved grassland which is identified as a habitat of principal importance (formerly known as priority habitats) under the Natural Environment and Rural Communities Act 2006. It is understood that a candidate SLINC now also covers the entirety of the site. The proposed development of approximately 270 dwellings at Sutton Road could potentially increase development-related threats and pressures to these biodiversity assets. The policy text notes that provision for "*retention and mitigation for existing SLINC features*" should form part of any development proposals. Opportunities should be sought for delivering net gains in biodiversity. Taking into consideration the scale of development proposed it is anticipated that with appropriate habitat planning overall there would be mixed positive and negative impacts on biodiversity (SA Objective 3).
- J.13.13.5 The site is located within Flood Zone 1. Scattered areas of low, medium and high surface water flood risk occur in the north and south of the site. Policy WSA 6 states that proposals should develop "*A site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and that are designed to deliver landscape, biodiversity and amenity benefit.*" Assuming appropriate layout, GI and SUDS are put in place, an overall negligible impact would be anticipated at this strategic location with regard to climate change adaptation (SA Objective 5).
- J.13.13.6 The site is located within an AQMA and within 10m of a watercourse. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site specific assessments. The policy includes a requirement for "*Investigation and detailed proposals*

for remediation of contaminated land' for this site which would help to minimise impacts on water pollution and provide remediation of contaminated land (compared to the existing baseline situation). Assuming that these measures are put in place an overall positive impact in relation to pollution is therefore anticipated (SA Objective 7).

- J.13.13.7 The site is identified as being located within predominantly Grade 3 land based on regional ALC Natural England mapping with a small proportion of 'urban' land. The site would lead to the loss of less than 20ha of undeveloped land and therefore a minor residual adverse impact is identified in relation to Natural Resources (SA Objective 6).
- J.13.13.8 The policy text states that the proposed development should include "*Improvements to local facilities, to support residents and to enhance the sustainability of the existing area, in particular improved capacity at the primary school and local health centre.*" Pending further details this would likely have a minor positive impact on Education (SA Objective 14) and Health (SA Objective 12) following development at this location.
- J.13.13.9 Development at this strategic location would also be expected to provide "*Enhanced provision for pedestrians and cyclists, including enhanced connectivity with cycle route CR012.*" Assuming that these measures are put in place an overall minor positive impact on Transport and Accessibility (SA Objective 9) and Climate Change Mitigation (SA Objective 4) would be expected as well as positive impacts on health and wellbeing.
- J.13.13.10 Cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

J.13.14 Policy WSA7 – Calderfields West, Land at Aldridge Road, Walsall

Policy WSA7 – Calderfields West, Land at Aldridge Road, Walsall



C57 The site at Calderfields West, on land at Aldridge Lane, is located along the eastern urban edge of St. Matthews. To the north are fields, to the east is Calderfields Golf Club, to the south is the Arboretum and to the west are houses. The character of the area is a mix of traditional and modern

Policy WSA7 – Calderfields West, Land at Aldridge Road, Walsall

styled detached houses. Within the developable site area is Calderfields Farm, which provides seven existing barn conversion properties with gated access from Aldridge Road.

C58 The developable site area is 18.6ha.

C59 The estimated capacity of the site is 651 houses.

C60 Mixed tenure housing is suitable with higher densities of at least 35dph and affordable housing provision.

Design principles:

- Deliver appropriate local facilities to support the new residents and to enhance the sustainability of the existing area, including a new primary school and local health centre.
- Investigation and detailed proposals for the remediation of contaminated land.
- A transport strategy that ensure that the transport impacts of the development are appropriately managed and mitigated.
- Enhanced provision for pedestrians and cyclists, including enhanced connectivity with the town centre.
- A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.
- A strategy for landscape and habitat creation, in particular along the southern boundary to the Arboretum, providing new tree planting to ensure there is no significant adverse impact on the visual amenity and character of the Arboretum, nor on protected animal species.

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

J.13.14.1 The land at Calderfields West, is located along the eastern urban edge of St. Mathews and is proposed to be released from the Green Belt. Approximately 651 houses are proposed with higher densities of at least 35 dph and affordable housing provision. Overall, a major positive impact on housing and minor positive impact on the economy would be expected as a result of the proposed development at this strategic location.

J.13.14.2 A potential minor negative impact is identified in respect to cultural heritage resources (SA Objective 1) due to the proposed development being located in proximity to Walsall Arboretum Registered Park and Garden (RPG). There is also likely to be scope within the land available at the strategic location to incorporate a sensitive layout and design to minimise the impacts of development on the RPG. The policy text reinforces this by stating that proposals should include "*A strategy for landscape and habitat creation, in particular*

along the southern boundary to the Arboretum, providing new tree planting to ensure there is no significant adverse impact on the visual amenity and character of the Arboretum, nor on protected animal species." Mitigation requirements should be informed by the landscape and heritage assessments for the site and an arboricultural survey.

- J.13.14.3 The site is located in an area of moderate-high landscape sensitivity based on the Landscape Sensitivity Assessment and an area of high sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents and users of the PRoW network located near to the site. It is considered that well designed development could potentially provide opportunities to lessen the impact of the development on the surrounding landscape and visual receptors through design and incorporation of GI. However, due to the scale of development proposed, it is considered likely that there would be an overall major negative impact on the local landscape (SA Objective 2). It is anticipated that further details may be specified in the pre submission plan including an Indicative Concept Plan and Green Belt Loss Mitigation Requirements.
- J.13.14.4 A proportion pf the site is identified as containing habitats of principal importance (formerly known as priority habitats) under the Natural Environment and Rural Communities Act 2006 in the form of deciduous woodland and traditional orchards. The proposed development of approximately 651 dwellings at Calderfields West as a greenfield site would be likely to result in a loss of biodiversity features, to some extent. It is also anticipated that the measures set out at the strategic location could potentially help to contribute towards maintaining habitat connectivity and enhancement to address some of these impacts. Where possible, it is recommended that all developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. Both potential positive and negative are therefore identified in respect to biodiversity (SA Objective 3).
- J.13.14.5 The site is located within Flood Zone 1. A small proportion of the site also contains areas of low, medium and high surface water flood risk. Policy WSA 7 states that proposals should develop *"A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits."* Taking this into account, an overall negligible impact would be anticipated at this strategic location with regard to climate change adaptation (SA Objective 5).
- J.13.14.6 The site is located within an AQMA and within 200m of a main road. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site specific assessments. The policy includes a requirement for *"Investigation and detailed proposals*

for remediation of contaminated land' for this site which would help to minimise impacts on water pollution and provide remediation of contaminated land (compared to the existing baseline situation). Assuming that these measures are put in place an overall negligible impact in relation to pollution is anticipated (SA Objective 7).

- J.13.14.7 The site is identified as being located within predominantly Grade 3 land with a small proportion of 'urban' based on regional ALC Natural England mapping. The site would lead to the loss of less than 20ha of undeveloped land and therefore a minor residual adverse impact is identified in relation to Natural Resources (SA Objective 6).
- J.13.14.8 It is anticipated that a new primary school and local health centre would be incorporated into the proposed development and provide all residents with good access to education and health services. Therefore, a major positive impact on education (SA Objective 14) and Health (SA Objective 12) would be expected, following development at this location.
- J.13.14.9 Development at this strategic location would also be expected to provide "*Enhanced provision for pedestrians and cyclists, including enhanced connectivity with the town centre.*" Assuming that these measures are put in place an overall minor positive impact on Transport and Accessibility (SA Objective 9) and Climate Change Mitigation (SA Objective 4) would be expected.
- J.13.14.10 Cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

J.13.15 Policy WSA8 – Land between Queslett Road, Doe Bank Lane and Aldridge Road, Pheasey

Policy WSA8 – Land between Queslett Road, Doe Bank Lane and Aldridge Road, Pheasey



C61 Land between Queslett Road, Doe Bank Lane and Aldridge Road is made up of fields between the Pheasey Estate and Streedy. To the north are agricultural fields, to the east, south and west lies

Policy WSA8 – Land between Queslett Road, Doe Bank Lane and Aldridge Road, Pheasey

housing. The site surrounds Doe Bank Lane Farmhouse and farm buildings to the west, which are Grade II listed.

C62 The developable site area is 42.27ha.

C63 The estimated capacity of the site is 2024 houses.

C64 Mixed tenure housing is suitable with higher densities of at least 35dph and affordable housing provision.

Design principles:

- High quality, sensitive design and layout that conserves and enhances the setting and significance of Doe Bank Lane Farmhouse and farm buildings, which are Grade II listed buildings; this must be informed by a detailed heritage character assessment undertaken for the proposal.
- Deliver appropriate local facilities to support the new residents and to enhance the sustainability of the existing area, including a new primary school and local health centre.
- Investigation and detailed proposals for remediation of contaminated land.
- A transport strategy that ensures that the transport impacts of the development are appropriately managed and mitigated.
- A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and designed to deliver landscape, biodiversity and amenity benefits.
- A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character, nor on protected animal species.
- The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.

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

J.13.15.1 Land between Queslett Road, Doe Bank Lane and Aldridge Road is made up of fields between the Pheasey Estate and Streetly and is proposed to be released from the Green Belt. Approximately 2024 houses are proposed with higher densities of at least 35 dph and affordable housing provision. Overall, a major positive impact on housing and minor positive impact on the economy would be expected as a result of the proposed development at this strategic location.

- J.13.15.2 Grade II listed buildings at Doe Bank Farmhouse are located approximately 30m and 40m from the site boundary and the site is located wholly within Great Barr Conservation Area. Policy WSA 7 and other policies within the BCP would be expected to ensure that heritage assets within Walsall are conserved in a manner appropriate to their significance, including consideration of setting. When considering any planning application that affects a Conservation Area the local planning authority must pay special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area under the Planning (Listed Buildings and Conservation Areas) Act 1990. Where development proposals may present risks to the significance of an asset, Policy WSA 7 would require an accompanying statement to be prepared to describe the how the assessment has considered impacts on the significance of the asset and any mitigating actions that are proposed. The policy text states that the design principles should provide *"High quality, sensitive design and layout that conserves and enhances the setting and significance of Doe Bank Lane Farmhouse and farm buildings, which are Grade II listed buildings; this must be informed by a detailed heritage character assessment undertaken for the proposal."* This policy and other policies within the BCP would be expected to ensure that cultural heritage resources across the Black Country are suitably protected, however minor adverse impacts cannot be ruled out at this stage of the assessment process (SA Objective 1). The design of the proposed development should respond to recommendations contained in of the Conservation Area Appraisal and be designed to be in keeping with local character and distinctiveness.
- J.13.15.3 The site is located in an area of moderate-high landscape sensitivity based on the Landscape Sensitivity Assessment and an area of very high sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents. Due to the large scale of development proposed at approximately 2024 dwellings, it is considered likely that there would be an overall major residual negative impact on the local landscape (SA Objective 2). It is however anticipated that there would be opportunities at the Strategic Location to limit the visual impact of development through design and incorporation of GI, alongside measures to retain and enhance existing landscape features and integrate the development into the local landscape context. This is set out in the policy text which states that the proposed development should include *"A strategy for landscape and habitat creation that provides enhancement, retention and mitigation for established trees and hedges, to ensure there is no significant adverse impact on visual amenity and character, nor on protected animal species."* It is anticipated that further details may be specified in the pre submission plan including an Indicative Concept Plan and Green Belt Loss Mitigation Requirements.
- J.13.15.4 The sites is located within an IRZ of a SSSI where 'any residential development of 50 or more houses outside existing settlements/urban areas' should be consulted on with Natural England. The site is not located within or immediately adjacent to any designated biodiversity assets but is likely to contain various assets on-site which provide essential

habitats for many species, including hedgerows, trees, and field boundaries. Provision of a strategy for landscape and habitat creation at the strategic location could also potentially help to contribute towards maintaining habitat connectivity and enhancement. Opportunities should be sought for delivering net gains in biodiversity and strategic scale Green Infrastructure improvements, considering the size of development proposed. Where possible, it is recommended that all developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. Taking into consideration the scale of development proposed it is anticipated that with appropriate habitat planning overall there would be mixed positive and negative impacts on biodiversity (SA Objective 3).

- J.13.15.5 The site is located within Flood Zone 1. A small proportion of the site is subject to low surface water flood risk. Policy WSA 7 states that proposals should “*Develop a site-wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.*” Assuming that these measures are put in place this would lead to an overall negligible impact on Climate Change Adaptation (SA Objective 5).
- J.13.15.6 The site is located within an AQMA and within 200m of a Main Road. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site-specific assessments. The policy includes a requirement for “*Investigation and detailed proposals for remediation of contaminated land*” for this site which would help to minimise impacts on water pollution and provide remediation of contaminated land (compared to the existing baseline situation). Assuming that these measures are put in place an overall negligible impact in relation to pollution is anticipated (SA Objective 7).
- J.13.15.7 The site is identified as being located within predominantly Grade 3 land with a smaller component of urban land based on regional ALC Natural England mapping. The site is also located within an MSA. The site would lead to the loss of more than 20ha of undeveloped land and therefore a major residual adverse impact is identified in relation to Natural Resources (SA Objective 6). Mitigation to minimise impacts on mineral resources is provided in the policy text which states that “*Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.*”
- J.13.15.8 It is anticipated that a new primary school and local health centre would be incorporated into the proposed development and provide all residents with good access to education and health services. Assuming that these measures are put in place an overall major positive impact on education (SA Objective 14) and Health (SA Objective 12) would be expected, following development at this location.

- J.13.15.9 Uncertain impacts are recorded in relation to Transport and Accessibility (SA Objective 9) and Climate Change Mitigation (SA Objective 4) based on the level of information available at this time. It is recommended that further information should be provided on measures designed to promote active travel, reduce reliance on the private car and measures designed to mitigate impacts on climate change emissions prior to the pre submission stage of the BCP, given the scale of development proposed.
- J.13.15.10 Cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area. Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.

J.13.16 Policy WSA9– Land to the east of Chester Road, north of Pacific Nurseries, Hardwick

Policy WSA9– Land to the east of Chester Road, north of Pacific Nurseries, Hardwick



Key:		Strategic Allocation: WSA.9	
Strategic Allocation	Environmental Agency (EA) Flood Zone 2	Site Assessment Reference:	SA-0006-WAL, SA-0187-WAL & SA-0312-WAL
Conservation Area	EA Flood Zone 3	Site Names:	Land to the East of Chester Road, North of Pacific Nurseries, Hardwick, Walsall WS9 0PH
Listed Buildings	JBA Indicative Flood Zone 2	Local Authority:	Walsall
Individual Tree Preservation Order (ITPO)	JBA Indicative Flood Zone 3a	Ward:	Streetly
Grouped TPO	JBA Indicative Flood Zone 3b		
Sites of Importance for Nature Conservation (SINC)			
Sites of Local Importance for Nature Conservation (SLINC)			
Greenway			
Green Belt			



C65 Land to the east of Chester Road and north of Pacific Nurseries is part of a cluster of three sites, this one being the largest. To the north is proposed site allocation SA- 0006-WAL, currently used for

Policy WSA9– Land to the east of Chester Road, north of Pacific Nurseries, Hardwick

horsiculture; to the east is a railway line with a golf course beyond it; to the south lies Pacific Nurseries, part of which is subject to proposed site allocation SA-0312-WAL; and to the west are agricultural fields.

C66 The developable site area is 8.69ha.

C67 The estimated capacity of the site is 304 houses.

C68 Mixed tenure housing is suitable with higher densities of at least 35dph and affordable housing provision.

Design principles:

- Deliver appropriate local facilities to support the new residents and to enhance the sustainability of the existing area, including a new primary school and local health centre.
- Investigation and detailed proposals for remediation of contaminated land.
- A transport strategy that ensures the transport impacts of the development are appropriately managed and mitigated.
- Enhanced provision for pedestrians and cyclists, including enhanced connectivity with the local centre.
- A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and that is designed to deliver landscape, biodiversity and amenity benefits.
- A strategy for landscape and habitat creation which provides enhancement, retention and mitigation for established trees, to ensure there is no significant adverse impact on visual amenity and character nor on protected animal species.
- The site is in a MSA and requires prior extraction where practical and environmentally feasible. Where practical and environmentally feasible prior extraction for bedrock and superficial sand and gravel, shall take place.

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

J.13.16.1 The land east of Chester Road and north of Pacific Nurseries is proposed to be released from the Green Belt. Approximately 304 houses are proposed with higher densities of at least 35 dph and affordable housing provision. Overall, a major positive impact on housing and minor positive impact on the economy would be expected as a result of the proposed development at this strategic location.

J.13.16.2 No Scheduled Monuments, Listed Buildings, Registered Parks and Gardens or Conservation Areas are located in the immediate vicinity of the site and the site is not located in proximity

to areas of high historic landscape / townscape landscape value. Potential impacts on heritage resources, including the setting of heritage assets and the archaeological potential of the site would be addressed as part of the planning process and would be subject to other policies in the BCP. With considerate planning, it is likely that there would be sufficient scope within this strategic location to direct development towards locations that would minimise effects on heritage resources. Overall a negligible impact on cultural heritage is expected (SA Objective 1).

- J.13.16.3 The site is located in an area of moderate-high landscape sensitivity based on the Landscape Sensitivity Assessment and an area of moderate-high sensitivity in relation to greenbelt harm. Views of the site may potentially be available for local residents. At this stage of the assessment, it is considered that the development could have a potential major negative impact on the landscape (SA Objective 2). It is however considered that well designed development could potentially provide opportunities to limit the impact of the development on the surrounding landscape and visual receptors. This could include landscaped buffers to maintain separation between the existing residences, and retention or enhancement of key landscape features. The policy text states that development should include *"A strategy for landscape and habitat creation which provides enhancement, retention and mitigation for established trees, to ensure there is no significant adverse impact on visual amenity and character nor on protected animal species."* It is anticipated that further details may be specified in the pre submission plan including an Indicative Concept Plan and Green Belt Loss Mitigation Requirements.
- J.13.16.4 The site may support various assets on-site which provide essential habitats for many species, including hedgerows, trees, and field boundaries. Provision of a strategy for landscape and habitat creation at the strategic location could also potentially help to contribute towards maintaining habitat connectivity and enhancement. Opportunities should be sought for delivering net gains in biodiversity and strategic scale Green Infrastructure improvements, considering the size of development proposed. Where possible, it is recommended that all developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. Taking into consideration the scale of development proposed it is anticipated that with appropriate habitat planning overall there would be mixed positive and negative impacts on biodiversity (SA Objective 3).
- J.13.16.5 The site is located within Flood Zone 1. A small proportion of the site also contains areas of low, medium and high surface water flood risk. Policy WSA 9 states that proposals should develop *"A site-wide Sustainable Drainage Strategy, to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and*

amenity benefits.” Taking this into account, an overall negligible impact would be anticipated at this strategic location with regard to climate change adaptation (SA Objective 5).

- J.13.16.6 The site is located within an AQMA, within 200m of a main road and within a Groundwater Source Protection Zone. Measures to avoid or minimise impacts on air quality and water quality in construction and operation could be secured through reference to other policies in the BCP in the policy text and site-specific assessments. The policy includes a requirement for “Investigation and detailed proposals for remediation of contaminated land” for this site which would help to minimise impacts on water pollution and provide remediation of contaminated land (compared to the existing baseline situation). Assuming that these measures are put in place an overall negligible impact in relation to pollution is anticipated (SA Objective 7).
- J.13.16.7 The site is identified as being located within predominantly Grade 3 land based on regional ALC Natural England mapping. The site would lead to the loss of less than 20ha of undeveloped land and therefore a minor residual adverse impact is identified in relation to Natural Resources (SA Objective 6).
- J.13.16.8 It is anticipated that a new primary school and local health centre would be incorporated into the proposed development and provide all residents with good access to education and health services. Therefore, a major positive impact on education (SA Objective 14) and Health (SA Objective 12) would be expected, following development at this location.
- J.13.16.9 Uncertain impacts are recorded in relation to Transport and Accessibility (SA Objective 9) and Climate Change Mitigation (SA Objective 4) based on the level of information available at this time.
- J.13.16.10 Cumulative impacts will need to be considered in relation to other housing and employment allocations in the surrounding area Cumulative impacts will also be assessed at the Regulation 19 stage BCP, based on the level of available information at that time and in accordance with the proposed allocations at the Regulation 19 stage.