

5. Testing of SAD and AAP Objectives

5.1 Development of the SAD and AAP Objectives

At each stage in the preparation of the SAD and AAP the emerging SAD and AAP Objectives (see Chapter 1, Table 1) have been tested against the SA Objectives to identify areas of compatibility, and areas potential conflict or tension.

At the Issues & Options stage in 2013, the SAD and AAP Objectives identified at the time were tested against the SA Objectives developed at the SA Scoping stage. The results indicated that there was a high degree of compatibility between the proposed SAD and AAP Objectives and the SA Objectives. However, there were some areas of conflict. The most significant conflicts were between SAD Objectives that would allow mineral extraction, and SA Objectives that sought to conserve the natural and built environment.

Further testing was carried out in 2015 because of changes to the SA Objectives and SAD and AAP Objectives. The outcome of this was reviewed again in January 2016, following further revisions to SAD Objectives 9 and 10 and AAP Objective 8. The final results of the SAD and AAP Objectives testing are summarised in Sections 5.3 and 5.4 below.

5.2 Testing of SAD Objectives – Results

The results of testing the Objectives of the Publication version of the SAD are recorded in the Revised SAD Objectives Compatibility Matrix (Excel Spreadsheet), and in **Appendix F** of this report. The Appendix identifies the changes made to the Objectives when the Preferred Options were identified in July 2015 (changes in **blue text**), and before the final plan was published in January 2016 (changes in **purple text**).

There is a significant degree of compatibility between the SAD Objectives and the SA Objectives, and many of them are highly complementary to each other. For example, SAD Objective 4 to encourage investment of a suitable scale in Local Centres aligns closely with SA Objectives 3, 6, 7, 8 and 13, and SAD Objective 5 to provide a high quality environment through the definition of integrated environmental networks aligns closely with SA Objectives 2, 3, 4, 5, 8 and 9.

The only area of tension identified through the testing process is between SAD Objective 10, which relates to mineral resources and mineral production, and SA Objectives 2, 9 and 12, which relate to the protection of the natural environment and landscape and transport and accessibility. The reasons for the conflict are summarised in Table 26 below. There is no scope to reduce these tensions through further refinement of the SAD Objective without bringing it into conflict with national planning policy guidance on minerals.

Table 26: SAD Objectives – Summary of Conflicts with SA Objectives

SAD Objectives	Conflicting SA Objectives	Reasons for Conflict
<p>10. To identify and safeguard mineral resources of local and national importance and mineral production and distribution infrastructure, and identify suitable sites and areas for production of secondary and recycled aggregates and mineral extraction, where operations will not have unacceptable harmful effects on health, the environment, amenity, or infrastructure.</p>	<p>SA2 SA9 SA12</p>	<p>Further mineral working in Walsall means there will be less reliance on importing the raw materials needed to support economic growth from other areas, although this is likely to put more pressure on local transport networks, leading to potential conflict with Revised SA Objective 13. The mineral resources in Walsall that are most likely to be economic to work are underlying greenfield sites in the Green Belt, some of which are of importance for biodiversity and local landscape character, thereby bringing SAD Objective 10 into conflict with SA Objectives 2 and 9.</p>

Source: Sustainability Appraisal (SA) of Walsall SAD & AAP – Sustainability Appraisal Report (February 2016), Appendix F and Revised SAD Objectives Testing – Compatibility Matrix (January 2016)

No other areas of definite conflict have been identified between the SAD and SA Objectives, although the following areas of uncertainty have been identified:

- **SAD Objective 1** - concentrating development in the urban area could create tensions with SA Objectives 1, 2, 5 and 14, however, these are likely to be relatively minor compared with the overall benefits of an improved sustainable settlement pattern and concentrated development within the urban area, compared with the alternative sprawl-based development that would work against social, economic and environmental objectives, both locally and nationally;

- **SAD Objective 2** – vacant and derelict land that might be developed for new housing lies in areas where limit values for emission of nitrogen dioxide are being breached, or are in areas at risk of flooding, so effects on SA Objectives 1 and 14 are uncertain;
- **SAD Objective 3** – as some employment sites are near to canal corridors, in areas at potential risk from flooding or near to Areas of NO₂ Exceedance, the relationship to SA Objectives 1, 2, 3 and 14 is uncertain;
- **SAD Objective 6** – relationship with SA Objectives 3 and 6 is uncertain, because conserving historic buildings is not always economically viable, and some historic assets in Walsall are in areas at risk from flooding, there could also be a tension with SA Objective 10, although it is often possible to avoid, reduce or mitigate the effects of mineral extraction on archaeology and other heritage assets; and
- **SAD Objective 10** – relationship with SA Objectives 1, 3, 4, 5 and 14 is uncertain, as impacts of mineral extraction on air quality, climate change mitigation, local communities, cultural heritage and hydrology would be localised and temporary, and in many cases mitigation is likely to be feasible, while relationship to SA Objective 12 is likely to be negative in the short-term, it will probably be neutral in the long-term, provided that mineral extraction sites are well restored.

5.3 Testing of AAP Objectives – Results

The results of testing the Objectives of the Publication version of the AAP are recorded in the Revised AAP Objectives Compatibility Matrix (Excel Spreadsheet), and in **Appendix G** of this report. The Appendix identifies the changes made to the Objectives when the Preferred Options were identified in July 2015 (changes in **blue text**), and before the final plan was published in January 2016 (changes in **purple text**).

There is a significant degree of compatibility between the AAP Objectives and the SA Objectives, and many of them are highly complementary to each other. For example AAP Objective 9 is particularly compatible with SA Objectives 2, 3, 5 and 9, as delivery of an integrated, multi-functional environmental infrastructure network will help conserve and enhance sites of importance for biodiversity, geodiversity, cultural heritage, townscape and open spaces and make it easier to manage them. It is also compatible with SA Objectives 4, 7 and 8, because such a network would help to improve access to open spaces, the natural environment and cultural heritage for people living in and around the Town Centre, and will

help to improve their amenity and well-being and provide opportunities for active recreation. It would also provide opportunities to improve brownfield sites in line with SA Objective 12.

The only area of tension identified through the testing process is between AAP Objective 7 and Revised SA Objectives 1 and 3, if the objective has the effect of increasing the number of trips by road into and within the Town Centre. The reasons for the conflict are summarised in Table 27 below. There is no scope to reduce these tensions through further refinement new infrastructure provided - including low-emission buses. As the objective specifically includes an aspiration to enhance cycling and pedestrian links as well as other transport links, the objective is highly compatible with SA Objective 13, as well as being compatible with SA Objectives 4, 7 and 8. However, for communities living in or near to the Town Centre, these benefits could be offset by localised effects of increased noise and emissions from buses.

Table 27: AAP Objectives – Summary of Conflicts with SA Objectives

AAP Objectives	Conflicting SA Objectives	Reasons for Conflict
AAP OBJECTIVE 7: Improve accessibility to and within the centre for all sectors of the community, through the provision of integrated transport and enhanced cycling and pedestrian links.	1 and 3	The exceedance of statutory limit values for nitrogen dioxide (NO ₂) identified on the fringes of the Town Centre through air quality monitoring (see Figure 16) are largely caused by road transport, including buses which are the main form of public transport used in the borough. Road transport is also a significant cause of the carbon dioxide (CO ₂) emissions that contribute towards climate change.

Source: Sustainability Appraisal (SA) of Walsall SAD & AAP – Sustainability Appraisal Report (February 2016), Appendix G and Revised AAP Objectives Testing – Compatibility Matrix (January 2016)

No other areas of definite conflict have been identified between the AAP and SA Objectives, although the following areas of uncertainty have been identified:

- AAP Objective 1: As this option is not site-specific, there is uncertainty about compatibility with SA Objectives 1, 2, 5, 9 and 14. Large-scale developments could affect heritage assets, conservation areas and water management - but whether or not they would do so would depend on the location of the new developments. With regard to air quality, statutory limit values for nitrogen dioxide (NO₂) are being exceeded in some areas on the fringes of the Town Centre, and investment in these areas could create tensions with SA Objective 1. There is also uncertainty about the

relationship to SA Objective 10, although large-scale new developments have potential to include provision for in-house sustainable waste management.

- As this option is not site-specific, there is uncertainty about compatibility with SA Objectives 1, 2, 5, 9 and 14, for the same reasons indicated under AAP Objective 1.
- AAP Objective 3: As with AAP Objective 1, there is uncertainty about compatibility with SA Objectives 5, 9 and 14, as large-scale developments could affect heritage assets, conservation areas and water management. There is also uncertainty about the relationship to SA Objective 10, although encouraging more shops/ a wider range of shops is likely to increase the amount of "municipal" waste generated by businesses in the Town Centre.
- AAP Objective 4: As this option is not site-specific, there is uncertainty about compatibility with SA Objectives 1, 2, 5, 9 and 14, and relationship to SA Objective 3 is considered neutral, for the same reasons indicated under AAP Objective 1. There is also uncertainty about the relationship to SA Objective 10, although encouraging office development is likely to increase the amount of "municipal" waste generated by businesses in the Town Centre.
- AAP Objective 5: As this option is not site-specific, there is uncertainty about compatibility with SA Objectives 1, 2, 9 and 14, and relationship to SA Objective 3 is considered neutral, for the same reasons indicated under AAP Objective 1. There is also uncertainty about the relationship to SA Objective 10, although encouraging more leisure uses is likely to increase the amount of food waste generated by businesses in the Town Centre.
- AAP Objective 6: There is also uncertainty about the relationship to SA Objective 10, although encouraging educational development is likely to increase the amount of "municipal" waste generated by businesses in the Town Centre.
- AAP Objective 7: As this option is not site-specific, there is uncertainty about compatibility with SA Objectives 2, 5, 9 and 14, for the same reasons indicated under AAP Objective 1. There is also uncertainty about the relationship to SA Objective 10, although major improvements to transport infrastructure are likely to require significant amounts of raw materials for engineering.

- AAP Objective 8: There is some uncertainty about compatibility with SA Objective 13, as the aspiration to improve sustainable transport infrastructure could be harmful to the historic environment and townscape, depending on where the improvements take place and how impacts are managed. There is also uncertainty about compatibility with SA Objective 6, as aspirations to conserve and improve the built environment could increase the cost of development, which might in some cases make schemes unviable. On the other hand, an alternative objective which allowed badly-designed and unsustainable development is likely to create tensions with other SA objectives, and would also make the Town Centre less attractive for investors in the long-term.
- AAP Objective 9: There is some uncertainty about compatibility with SA Objective 13, as improvements to transport infrastructure could affect environmental assets, but on the other hand, an integrated environmental infrastructure network would also include greenways which would improve accessibility for cyclists and pedestrians. There is also uncertainty about compatibility with SA Objective 6, for the same reasons indicated under AAP Objective 8.
- AAP Objective 10: There is some uncertainty about compatibility with SA Objective 13 for the same reasons indicated under AAP Objective 9, and about compatibility with SA Objective 6, for the same reasons indicated under AAP Objective 8. Relationship to SA Objectives 3 and 14 are also uncertain, as the creation of more pedestrianised areas could increase the amount of surface water run-off and could impact on flood risk.

5.4 SAD and AAP Objectives Testing - Conclusions

The testing of the SAD and AAP Objectives against the SA Objectives shows that there is a high degree of compatibility between them. The degree of compatibility has improved since the Issues & Options stage, reflecting the changes that have been made to both the plan objectives and the SA Objectives. While some tensions remain, further refinement of the SAD and AAP Objectives is not possible without bringing them into conflict with existing national and local planning policy objectives.