

## 7. Sustainability Appraisal of the SAD

### 7.1 Development of SAD Policies

Table 30 below summarises how the Preferred Options for the SAD were developed into relevant SAD Policies. The table also identifies the main effects anticipated, which the SAD Policies might need to address, where feasible.

The SAD Policies fall into two broad categories:

- Policies identifying sites to be allocated for new development; and
- Policies identifying environmental assets and infrastructure to be safeguarded.

All sites designated for protection or allocated for development have been identified on the SAD Policies Map. The effects of both types of policies were evaluated through the SA.

**Table 30: Preferred Options – SAD Policies and Mitigation Requirements**

Preferred Options	Relevant SAD Policies	Predicted Effects – Requirements for Mitigation through the SAD
<b>General Approach</b> Option 2: Meet Core Strategy Growth Requirements	SAD Objectives All Relevant SAD Policies SAD Policies Map	No effects identified in Options Appraisal requiring mitigation through the SAD.
<b>General Housing Provision</b> Option 4: Surplus Employment Land, Non-Employment PDL and Surplus Open Space	RC1: Regeneration Corridors HC1: Land Allocated for New Housing Development HC2: Development of Other Land for Housing SAD Policies Map	The Option is consistent with the BCCS spatial strategy, and has positive aspects in terms of locating housing in areas where it is likely to be accessible to existing transport networks linking to jobs, shops and social infrastructure, and delivery of sufficient land to meet the BCCS housing requirements (including for affordable housing). The former industrial sites to be released for housing under this Option would also be broadly consistent with BCCS policy towards release of industrial land and surplus open space (DEL2 and ENV6).

Preferred Options	Relevant SAD Policies	Predicted Effects – Requirements for Mitigation through the SAD
<p><b>General Housing Provision</b> <b>(continued)</b></p>		<p>Potential environmental risks (where not already identified through the selection of sites to be allocated for housing by Policy HC1) will be addressed through existing national and local policy requirements (including BCCS Policies ENV5 and ENV8) to consider exposure to air pollution and apply the "sequential test" for flood risk to all potential housing sites. Sites will be evaluated using evidence already provided by local air quality monitoring, the BCCS Strategic Flood Risk Assessments and local flood risk assessments, which will identify sites at greatest risk and measures needed to reduce risks to acceptable levels.</p>
<p><b>Affordable and Special Needs Housing</b></p> <p>Option 3: New SAD Policy – Criteria-Based</p>	<p>HC3: Affordable Housing and Housing for People with Special Needs</p>	<p>This Option proposes that affordable and specialist housing would be located on sites that have already been assessed as suitable for general housing, so the effects will have been assessed as above. No additional potential adverse effects have been identified arising from this option alone. The option is intended to improve accessibility and the use of sustainable transport such as walking and public transport by residents, workers and visitors to specialist housing: such housing tends to be of a higher density than general housing.</p>
<p><b>Provision for Gypsies, Travellers and Travelling Showpeople</b></p> <p>Option 4: Identify sites specifically for Gypsies, Travellers or Travelling Show-people</p>	<p>HC4: Accommodation for Gypsies and Travellers and Travelling Show-people</p> <p>SAD Policies Map</p>	<p>Only one new large and two new smaller traveller sites are proposed, together with 5 new show-people sites. These also involve the use of previously developed land that was formerly occupied by housing or industry. The traveller sites will provide housing to meet the needs of a protected group under the Equalities Act 2010. No adverse effects have been identified in the Options Appraisal requiring mitigation.</p>
<p><b>Land for Industry</b></p> <p>Option 3: Existing Employment Land Supply, Additional Non-Employment PDL and Surplus Open Space</p>	<p>RC1: Regeneration Corridors</p> <p>IND1: Existing High Quality Industry</p> <p>IND2: Potential High Quality Industry</p> <p>IND3: Retained Local Quality Industry</p>	<p>No effects identified in Options Appraisal requiring mitigation directly through the SAD, but there will be some beneficial and adverse effects caused by new industrial development on vacant sites alongside housing. The beneficial effect is the impact on job creation, given that much of the land proposed for development is concentrated in areas of particularly high unemployment. But some residents could be adversely affected by noise and traffic. On balance we consider the advantages outweigh the disadvantages.</p>

Preferred Options	Relevant SAD Policies	Predicted Effects – Requirements for Mitigation through the SAD
<p><b>Land for Industry (continued)</b></p>	<p>IND4: Local Industry Consider for Release</p> <p>IND5: New Employment Opportunities</p> <p>SAD Policies Map</p>	<p>Existing development management can mitigate some of these by such measures as restricting hours of operation. Nevertheless, Walsall is an industrial town and most land proposed for industry has already been safeguarded or allocated through the UDP. Only in four cases (IN341 Land North of Hughes Road; IN333 Former Willenhall Sewage Works; and IN122 Former Moxley Tip, IN315) is new industry proposed close to existing housing. This amounts to about 3% of the total proposed industrial supply. In the case of Moxley Tip, there has already been a longstanding industrial consent.</p>
<p><b>Local Centres</b></p> <p>Option 2: Review to Reflect New Housing Proposals</p> <p>Option 4: Allocate Development Opportunities</p>	<p>SLC1: Local Centres</p> <p>SLC2: Local Centres Development Opportunities</p> <p>SAD Policies Map</p>	<p>No effects identified in Options Appraisal requiring mitigation through the SAD. Both the Preferred Options provide greater opportunities for enhancement of the built environment of Local Centres, and to improve the range of services they provide, so that people will have less far to travel to access basic services such as shops and health centres, and are more likely to be able to access them using active travel modes such as walking and cycling.</p>
<p><b>Out-of-Centre Developments</b></p> <p>Option 2: Allocate Declining Sites for Other Uses</p>	<p>IND5: New Employment Opportunities</p> <p>SAD Policies Map</p>	<p>No effects identified in Options Appraisal requiring mitigation. Option is likely to have significant positive effects overall, as it would involve re-allocating declining out-of-centre retail developments, for example, where there are a lot of vacancies, to other uses such as industry or housing. This would enable the sites to be more beneficially used, which would support objectives towards the promotion of sustainable communities and sustainable economic growth. There could also be benefits in terms of investment in the Town Centre and the District Centres if it means that the existing ‘town centre’ developments displaced from these sites were to relocate there, although this is not necessarily going to happen - uses displaced could also go to other out-of-centre sites to be retained, or to centres/ out-of-centre locations outside the borough, which would be even less accessible to Walsall residents.</p>

Preferred Options	Relevant SAD Policies	Predicted Effects – Requirements for Mitigation through the SAD
<p><b>Open Space</b></p> <p>Option 5: Increase Open Space Provision where Appropriate, Safeguard existing Open Space sites with the exception of low quality sites re-allocated for other uses</p>	<p>OS1: Open Space, Sport and Recreation</p> <p>SAD Policies Map</p>	<p>The Option could exacerbate existing quantitative deficiencies of open space provision in some areas. This would have to be mitigated through improving the quality of other open spaces in the borough in accordance with BCCS policy ENV6, UDP policy LC1 and the Urban Open Space SPD (2006). However, the re-allocation of low quality open space would provide opportunities to raise open space quality, improve the environment and aspirations of communities, and support the delivery of urban regeneration.</p>
<p><b>Community and Leisure Facilities</b></p> <p>Option 1: No Site Allocations</p>	<p>Updated UDP Policies Only:</p> <p>LC5: Greenways</p> <p>LC11: Land for Cemetery Extension, Bentley Lane</p> <p>SAD Policies Map</p>	<p>This is a ‘do nothing’ option, and although it is unlikely to have negative effects, the SAD is not proposing any new policies for community and leisure facilities and is proposing to update existing UDP policies for greenways and a proposed cemetery extension only. No further mitigation is required as effects on existing community and leisure facilities will be managed through application of other existing local plan policy.</p>
<p><b>University Campus</b></p> <p>Option 2: Replace ‘saved’ UDP Policy LC10</p>	<p>UW1: University of Wolverhampton Walsall Campus</p> <p>SAD Policies Map</p>	<p>No effects identified in Options Appraisal requiring mitigation through the SAD, except to ensure that the policy does not result in needless loss of open spaces within the University Campus.</p>
<p><b>Environmental Network</b></p> <p>Option 3: Enhancement Where Opportunities Arise and Targeted Investment</p>	<p>GB1: Green Belt Boundary</p> <p>GB2: Control of Development in the Green Belt and Countryside</p> <p>EN1: Natural Environment Protection, Management and Enhancement</p> <p>EN2: Ancient Woodland</p> <p>EN3: Flood Risk</p> <p>EN4: Canals</p> <p>EN5: Development in Conservation Areas</p> <p>EN6: Highgate Brewery (IN47)</p>	<p>No effects identified in Options Appraisal requiring mitigation through the SAD, except to ensure that all potential priorities for enhancement are identified within the policies, so that investment can be effectively targeted, if opportunities arise through future development proposals.</p>

Preferred Options	Relevant SAD Policies	Predicted Effects – Requirements for Mitigation through the SAD
<b>Environmental Network</b> (continued)	EN7: Great Barr Hall and Estate and St. Margaret's Hospital  SAD Policies Map	
<b>Green Belt Boundary</b>  Option 2: No Green Belt Review	GB1: Green Belt Boundary  SAD Policies Map	No change to Green Belt boundary is proposed, and the policy is mainly for clarification, therefore no mitigation is required.
<b>Green Belt Policy</b>  Option 2: New Green Belt Policy	GB2: Control of Development in the Green Belt and Countryside	No effects identified in Options Appraisal requiring mitigation through the SAD policy, which will update and expand the existing UDP policy and bring it into conformity with current national policy guidance and local objectives, therefore no mitigation is required.
<b>Natural Environment</b>  Option 4: Update Natural Environment Designations and refer to existing policy	EN1: Natural Environment Protection, Management and Enhancement  EN2: Ancient Woodland  SAD Policies Map	The only potential impacts identified in Options Appraisal requiring mitigation are potential constraints on mineral extraction. Otherwise effects are likely to be positive, so no mitigation required – policies will update and expand the existing UDP and BCCS policies and are likely to improve the effectiveness of the local plan in protecting the natural environment.
<b>Cannock Chase SAC – Mitigation of Effects</b>  Option 4: Adopt findings and conclusions of more recent HRA	N/A	No effects identified in Options Appraisal requiring mitigation through the SAD. The most recent HRA work by the Cannock Chase AONB Partnership suggests that there are unlikely to be any harmful effects on the integrity of the SAC from any increased visitor pressure likely to arise as a result of implementing the housing allocations identified in the SAD, therefore no mitigation is required.
<b>Flood Risk</b>  Option 2: Update Local Plan Flood Risk Policies	EN3: Flood Risk  SAD Policies Map	No effects identified in Options Appraisal requiring mitigation through the SAD policy, which is aimed at bringing the local plan policy into conformity with current national policy guidance on flood risk, therefore no further mitigation is required.
<b>Canals</b>  Option 2: Additional Policy on Canals	EN4: Canals  SAD Policies Map	No effects identified in Options Appraisal requiring mitigation through the SAD policy, which is aimed at providing up-to-date and locally specific guidance on development adjacent to canals, to supplement the existing guidance in BCCS Policy ENV4. The policy is therefore likely to improve the effectiveness of the local plan in conserving and enhancing the environment and amenity of the canalside environment in Walsall and no further mitigation is required.

Preferred Options	Relevant SAD Policies	Predicted Effects – Requirements for Mitigation through the SAD
<p><b>Historic Environment</b></p> <p>Option 2: Update Historic Environment Policies and Designations</p>	<p>EN5: Development in Conservation Areas</p> <p>EN6: Highgate Brewery (IN47)</p> <p>EN7: Great Barr Hall and Estate and St. Margaret's Hospital</p> <p>SAD Policies Map</p>	<p>No effects identified in Options Appraisal requiring mitigation through the SAD. Option is likely to have significant positive effects as by showing all of the main heritage assets in Walsall on the Policies Map and providing more up-to-date guidance for development affecting these assets, it is more likely that the design of new developments affecting such assets will have regard to all of the relevant issues, including features that are important for local distinctiveness, and will have positive effects on local character. It is also likely to encourage the re-use of existing buildings and building materials wherever possible, and the efficient use of land and buildings and encouraging well-designed developments that will benefit the health and well-being of local communities who value heritage assets and local character. Effects on other SA Objectives are likely to be neutral overall, given that there are existing policies in place to control other effects from new development.</p>
<p><b>Waste Recovery Targets</b></p> <p>Waste Options 1a and 1b Combined: General Recovery Targets and Recycling Targets</p>	<p>W1: Future Waste Management Requirements</p>	<p>No effects identified in Options Appraisal requiring mitigation through the SAD.</p>
<p><b>Existing Waste Infrastructure</b></p> <p>Waste Options 2a and 2b Combined: Safeguard All Existing Waste Sites but Prioritise Safeguarding of Strategic Waste Sites</p>	<p>W2: Existing Waste Management Sites</p> <p>SAD Policies Map</p>	<p>No effects identified in Options Appraisal requiring mitigation through the SAD, although policy may have to address any potential constraints to expansion at existing sites, where identified.</p>

Preferred Options	Relevant SAD Policies	Predicted Effects – Requirements for Mitigation through the SAD
<p><b>Suitable Waste Management Locations</b></p> <p>Waste Option 3b: SAD to Provide Additional Guidance</p>	<p>W3: New Waste Management Development – Waste Treatment and Transfer</p> <p>W4: New Waste Management Development – Waste Disposal</p> <p>SAD Policies Map</p>	<p>No effects identified in Options Appraisal requiring mitigation through the SAD, although policy may have to provide additional guidance for any specific sites identified as having potential for development with new waste treatment, transfer or disposal infrastructure.</p>
<p><b>Minerals Safeguarding Area (MSA)</b></p> <p>Minerals Option 1a: Single MSA</p>	<p>M1: Safeguarding of Mineral Resources</p> <p>SAD Policies Map</p>	<p>No effects identified in Options Appraisal requiring mitigation through the SAD.</p>
<p><b>Aggregates Recycling</b></p> <p>Minerals Option 3b: Site Allocations and/ or Additional Locational Guidance</p>	<p>M2: Safeguarding of Minerals Infrastructure</p> <p>M3: Secondary and Recycled Aggregates</p> <p>SAD Policies Map</p>	<p>No effects identified in Options Appraisal requiring mitigation through the SAD, although policy may have to address any potential constraints to expansion at existing sites, where identified.</p>
<p><b>Sand and Gravel Extraction</b></p> <p>Minerals Option 4a: BCCS Areas of Search Only</p>	<p>M4: Sand and Gravel Extraction – Birch Lane</p> <p>M5: Sand and Gravel Extraction – Branton Hill</p> <p>SAD Policies Map</p>	<p>Potential effects of restoration of existing Aldridge and Branton Hill Quarries and effects of further sand and gravel extraction proposals in BCCS Areas of Search at Birch Lane and Branton Hill (including proposals to take forward the current application to extend Branton Hill Quarry) - further guidance likely to be required to supplement existing guidance in BCCS Policy MIN2. Potential effects identified include effects on biodiversity (including Branton Hill SINC), amenity of nearby housing areas, and transport infrastructure including PROWs.</p>
<p><b>Brick Clay Extraction</b></p> <p>Minerals Option 5a: Stubbers Green Area of Search and Permitted Sites Only</p>	<p>M6: Brickworks</p> <p>M7: Brick Clay Extraction – Stubbers Green</p> <p>M8: Brick Clay Extraction – Other Areas</p> <p>SAD Policies Map</p>	<p>Potential effects of restoration of Sandown Quarry and changes to approved restoration programmes for Highfields South and Vigo/ Utopia, also potential effects of further mineral extraction in BCCS Area of Search at Stubbers Green (including proposed expansion of Atlas Quarry), and of implementing the ‘dormant’ permission at Highfields North – further guidance likely to be required to supplement existing guidance in BCCS Policy MIN3 which does not address effects of working at Highfields North. Potential effects identified include significant harmful effects on biodiversity (including</p>

Preferred Options	Relevant SAD Policies	Predicted Effects – Requirements for Mitigation through the SAD
<p><b>Brick Clay Extraction</b> <b>(continued)</b></p>		<p>Swan Pool and The Swag SSSI, Stubbers Green Bog SSS and Jockey Fields SSSI), landscape and agricultural land and potential harmful effects on amenity of nearby housing areas, air quality, hydrology, water quality and transport infrastructure including PROWs.</p>
<p><b>Fireclay Extraction</b> Minerals Option 6d: Do not Identify Yorks Bridge Area of Search - Rely on Existing Local Plan Policy</p>	<p>M9: Coal and Fireclay Extraction – Brownhills</p>	<p>Potential effects of restoration of Birch Coppice and implementation of ‘dormant’ permission at Brownhills Common (subject to current application for new working conditions) and further coal and clay extraction proposals in the ‘Yorks Bridge’ Area of Search identified in the BCCS - further guidance likely to be required to supplement existing guidance in BCCS Policies MIN3 and MIN5 and to replace ‘saved’ UDP Policy M7 on Birch Coppice. Potential effects identified include significant harmful effects on biodiversity (including Cannock Extension Canal SAC/ SSSI, Chasewater and Southern Staffordshire Coalfield Heaths SSSI, Brownhills Common and The Slough SINC), landscape and agricultural land and potential harmful effects on amenity, including open space, and transport infrastructure.</p>
<p><b>Fireclay Stockpiling</b> Minerals Option 7b: Rely on Existing Local Plan Policy on Stockpiling of Clays</p>	<p>M9: Coal and Fireclay Extraction – Brownhills SAD Policies Map</p>	<p>Potential significant harmful effects of further fireclay stockpiling in this area on the environment, amenity and transport infrastructure – further guidance likely to be required to supplement existing guidance in BCCS Policy MIN3.</p>
<p><b>Minerals Site Allocations</b> Minerals Option 8a: Allocate Sites for Mineral Extraction</p>	<p>M8: Brick Clay Extraction – Stubbers Green SAD Policies Map</p>	<p>Potential harmful effects of mineral extraction on biodiversity and hydrology arising from expansion of Atlas Quarry onto Recordon Land (only potential site allocation identified) – further guidance may be needed to supplement existing guidance in BCCS Policy MIN5, so that any new or revised planning applications will identify and evaluate all the potential effects, and where feasible will include provision for mitigation and compensation to reduce or offset unavoidable harmful effects.</p>



Preferred Options	Relevant SAD Policies	Predicted Effects – Requirements for Mitigation through the SAD
<b>Limiting the Impacts of Mineral Extraction</b>  Minerals Option 9c: Area/ Site- Specific Guidance	M4: Sand and Gravel Extraction – Birch Lane  M5: Sand and Gravel Extraction – Branton Hill  M7: Brick Clay Extraction – Stubbers Green  M8: Brick Clay Extraction – Other Areas  M9: Coal and Fireclay Extraction – Brownhills	Potential harmful effects arising from mineral extraction in locations identified as having potential – further guidance likely to be needed to supplement existing guidance in BCCS Policies MIN2 - MIN5, so that any new or revised planning applications will identify and evaluate all the potential effects, and where feasible will include provision for mitigation and compensation to reduce or offset unavoidable harmful effects.
<b>Transport</b>  Option 1: Safeguard Land	T2: Bus Services  T3: The Rail Network (UDP saved policy)  T4: The Highway Network (UDP saved policy)  T5: Highway Improvement (UDP saved policy)  SAD Policies Map	Potential adverse visual and noise effects if rail services are reintroduced as a result of the safeguarding of the Walsall - Brownhills line. It is likely however that a new rail scheme will mitigate some of these potential effects.
<b>Utilities Infrastructure</b>  Option 2: Do Not Allocate Sites for Renewable Energy	N/A	Current policy approach is sufficient. Any such development coming forward should be considered on a case by case basis through the development management process.

Source: SA Report Appendix H and Revised SAD Options Appraisal - Completed Matrix (January 2016)

## 7.2 Appraisal of SAD – Method of Appraisal

The appraisal of the SAD was carried out in two stages: firstly the appraisal of the Draft Plan (Preferred Options) in July 2015, and secondly the updating of the appraisal to reflect changes to the Plan prior to publication, in January 2016. The method of appraisal is summarised below.

## **Appraisal of Draft Plan (Preferred Options) – July 2015**

The first stage of the Appraisal of the SAD involving appraising the effects of each of the Draft SAD Policies (Preferred Options) published for public consultation in September 2015. The outcomes of this appraisal are set out in the ‘High Level Appraisal of SAD Preferred Options – Completed Matrix (June 2015)’ which is an updated version of the matrix published alongside the Draft SAD in September 2015.

## **Appraisal of SAD Policies – January 2016**

The appraisal of the Preferred Options carried out in 2015 was reviewed and updated in January 2016, to reflect significant changes to the SAD policies after the Preferred Options stage. **Appendix J** summarises the outcome of the appraisal of each of the SAD Policies. The detailed outcomes of the appraisal are recorded in the ‘High Level Appraisal of SAD Policies - Completed Matrix (January 2016).’

## **Appraisal of SAD Policies - Methodology**

At both stages, the appraisal of the SAD Policies was carried out by Council officers, and the methodology used was as described in Chapter 2 (see Section 2.6). However, before the appraisal could begin, Council officers had to decide how best to appraise each policy, for example, whether to appraise the effects of the whole policy only, or whether to appraise the effects of specific parts of the policy separately. The approach chosen depended on the scope and content of the policy, and the range of issues or number/ type of sites it covered.

For example, Policy LC5: Greenways involves relatively minor revisions to an existing ‘saved’ UDP policy, so the appraisal covered the effects of the policy as a whole only. However, Policy HC2: Development of Other Land for Housing is a new policy for housing development on sites not identified in the SAD, and covers a wider range of issues. As this policy provides specific guidance for “windfall” housing developments on previously-developed sites, housing design and density, and housing development on other sites identified in the SAD as having potential for housing development, the potential effects of each of these parts of the policy were appraised separately.

It was neither feasible nor appropriate to appraise every site identified on the SAD Policies Map individually, because in most cases no 'significant effects' are likely to arise that could not be addressed through the application of other BCCS, UDP and SAD policies, through the development management process, or through regulation. However, where there was potential for sites identified in the SAD to have 'significant effects,' the effects of safeguarding or allocating these sites were appraised separately. The following SAD policies included separate appraisals of specific sites or locations identified in the policy:

- Policy HC4: New sites for Gypsies, Travellers and Travelling Show-people;
- Policy IND5: New Employment Opportunities;
- Policy SLC1: New Local Centre – Blackwood Road;
- Policy LC11: Land for Cemetery Extension, Bentley Lane
- Policy UW1: Policy University of Wolverhampton Walsall Campus;
- Policy EN6: Highgate Brewery;
- Policy EN7: Great Barr Hall and Estate and the former St. Margaret's Hospital;
- Policy W2: Strategic Waste Sites to be safeguarded;
- Policies W3 and W4: Potential Waste Sites;
- Policy M2: Mineral Infrastructure Sites to be safeguarded;
- Policies M4, M5, M7, M8 and M9: Permitted Minerals Sites; and
- Policies M4, M5, M8 and M9: Minerals Areas of Search and other potential mineral extraction areas.

The final stage of the SA involved updating the appraisal of the Preferred Options to take into account changes to the SAD Policies prior to publication. In most cases only minor changes have been made to the policies to reflect updating of the evidence on constraints, and comments received during the consultation on the Draft Plans between September and November 2015. However, some of the minerals policies (M1 – M10) have been substantially revised, so these policies were re-appraised.

The appraisal of SAD Policies has taken into account the potential effects of environmental and physical assets and constraints, and information obtained from other sources such as land availability assessments and the outcomes of the Deliverability and Viability Assessments commissioned from consultants. When identifying the potential need for mitigation the assessors took into account the effects of existing local plan policies in the

BCCS and UDP, which would apply to any new planning applications. Such policies could therefore reasonably be expected to control many of the environmental, economic and social effects likely to arise as a result of the proposals identified in the SAD Policies.

## **7.3 Appraisal of Plan – Results**

### **Overview of Appraisal Results**

Table 31 below summarises the outcomes of the final appraisal of the SAD Policies completed in January 2016 prior to publication, the main effects identified in the appraisal, and how the potential harmful effects identified have been mitigated through the SAD in combination with existing local plan policies where feasible, or through other mechanisms where these are more appropriate or more likely to be effective. The paragraphs following summarise the types of effects identified in the appraisal, as required in Schedule 2 of the SEA Regulations, and explain how they have been addressed.

### **Short, Medium and Long-Term Effects**

The SA has considered the potential short, medium and long-term effects of the development proposed in the SAD on the SA Objectives. As is explained above (Chapter 4, Section 4.5), the SAD is a long-term plan and covers the same period as the BCCS. The policies will therefore be in effect until 2026 or until they are replaced by a new local plan. The developments proposed in the SAD will not be implemented all at the same time, but will be built progressively over the remainder of the plan period. The rate of progress on delivery of new developments identified in the SAD will be monitored through future AMRs.

The duration of the effects will also vary according to the type of development and the operations involved. For example, construction of new housing and industrial developments may be relatively short-term, depending on the size and scale of the development, but once construction has been completed, the ongoing effects of the development, for example, from the generation of traffic, pollutants and waste, contribution towards infrastructure and economic growth and job creation, or demand for infrastructure, are likely to be long-term.

Mineral extraction operations are usually long-term, particularly in the case of brick clay extraction. The proposed expansion of Atlas Quarry will extend the life of the site to at least

25 years, and the 'dormant' permission at Highfields North, if implemented, could be operated over a similar timescale. Such sites are not expected to be restored until all of the clay reserves have been removed, which would not happen until after the end of the plan period. However, new sand and gravel extraction sites would operate over a shorter timescale and would be expected to be progressively restored.

## **Permanent and Temporary Effects**

The SA has considered the potential permanent and temporary effects of the development proposed in the SAD on the SA Objectives. For example, the effects from demolition, construction and land remediation processes (where required) are expected to be temporary, whereas the operational effects of developments once they are built will be mostly permanent and irreversible. The main exceptions are mineral extraction and restoration of former mineral extraction sites, and remediation of derelict sites, where the effects of the operations will be temporary, although they could in some cases be long-term, for example in the case of brick clay extraction sites as noted above.

The effects of mineral extraction and other temporary operations are likely to be reversible, provided that sites are restored to high standards and for beneficial end uses afterwards. However, the reversibility of the effects will depend on the quality and condition of the site before development takes place, the nature of the development, and the extent to which it will affect environmental quality, amenity or infrastructure. For example, some temporary operations such as land remediation are likely to improve conditions, and encourage more beneficial land uses and environmental enhancement.

There are outstanding requirements for restoration of several existing and former quarries in Walsall, which the SAD Minerals policies have sought to address, to encourage restoration as soon as possible, while at the same time requiring this to be carried out to standards appropriate to each site.

## **Positive Effects**

The SA has considered the potential positive effects of the development proposed in the SAD on the SA Objectives, and such effects have been identified in the SA Matrices (see also Chapter 2, Section 2.6). Most of the SAD policies are likely to have positive effects on many of the SA Objectives, as they support the BCCS spatial strategy, and propose that most new

development will take place within the 'growth network' or in other locations that are accessible to existing transport networks, employment areas and social infrastructure, including open spaces. Examples of the positive effects identified include:

- The allocation of land for general housing on previously developed land that is not required for other land uses, and the other policies relating to housing (HC1 - HC3) will have positive effects on many of the objectives, and neutral effects on most of the others. The allocation of land for traveller sites that would otherwise be proposed for general housing will also have generally positive effects.
- The industrial land policies (IND1 - IND5) will have beneficial effects, as they protect the existing industrial land supply, which is crucial to the economic well-being of the Borough. They are predicated in the use of brownfield land. The supply is concentrated in areas close to the motorway network, the Black Country Route and the Black Country Spine Road, making it competitive for industry while close to the labour supply and the supply chain (for more details on this see the ELR). Also, because most of the new opportunities are concentrated in areas of multiple deprivation, the job opportunities will be beneficial as regards regeneration and tackling disadvantage, particularly in relation to SA Objectives 4, 6 and SA7.
- The SAD Local Centre policies (SLC1 and SLC2) are likely to have significant positive impacts on communities through ensuring they are sustainable and inclusive as facilities are in accessible locations (SA Objectives 4, 7 and 13). Concentrating investment in centres also provides opportunities for jobs in accessible locations and supports the sustainability of current business by encouraging further investment in the area making the centres attractive to customers (SA Objective 6). By establishing clear centre boundaries and allocating development opportunities there should be a positive impact on the built environment as the character of centres is maintained and vacant or underused site are more likely to be positively developed (SA Objective 9). Finally, as local centres are generally accessible by foot or public transport to the surrounding local communities they have a significant positive impact on the overall sustainability of the borough.
- The SAD policies on the Historic Environment (EN4 – EN7) are to be applied in combination with existing UDP Policies ENV25 – ENV30, and BCCS Policies ENV2 – ENV4. Overall, the policies are likely to have a positive impact upon the character of the borough's townscapes and landscapes through the protection and enhancement of the finite resource of heritage assets, which make an important contribution to environmental quality and the local distinctiveness of Walsall Borough. The benefits of enhancing the heritage assets throughout the borough and bringing them into

viable uses include positive social, economic and cultural impacts which will lead to enhanced desirability of areas, drawing in further investment and providing people with a more positive environment.

- The SAD policies on Waste are to be applied in combination with the existing BCCS Policies WM1 – WM5. Setting targets for delivery of new waste recycling, recovery and transfer infrastructure and identifying potentially suitable sites in the SAD (Policies W1, W3, W4) will support the delivery of the requirements identified in the BCCS, and the infrastructure local communities and businesses need to manage their waste more efficiently and cost-effectively, including recovery of energy from residual waste where appropriate (SA Objectives 4, 6, 10, 11).
- The SAD policies on Minerals are to be applied in combination with the existing BCCS Policies MIN1 – MIN5, and will replaced the ‘saved’ UDP Policy M7. Identifying specific requirements for restoration of existing and former quarries in the SAD, and for proposals for new conditions to be applied to ‘dormant’ sites (Policies M4, M5, M7, M8 and M9), will support the delivery of mineral extraction schemes and restoration programmes that will contribute appropriately towards the development of the environmental network, and deliver maximum benefits for biodiversity, outdoor recreation, landscape, walking and cycling, and water management (SA Objectives 2, 3, 4, 8, 9, 12, 13, 14).

## **Negative Effects**

The SA has considered the potential negative effects of the development proposed in the SAD on the SA Objectives, and such effects have been identified in the SA Matrices (see also Chapter 2, Section 2.6). Although some potential negative effects have been identified in relation to specific sites identified in the SAD, it is expected that these will be largely mitigated through application of existing local plan policies in the UDP and BCCS, and overall, the implementation of the SAD is expected to have relatively few negative effects on the SA Objectives.

No negative effects have been identified arising from the general housing policies HC1 to HC3. The policy that allocates new sites for gypsies and travellers (HC4) has been identified as having a negative effect on communities and population as, although the effect on travellers themselves will be overwhelmingly positive, traveller sites have been perceived as being difficult to integrate with existing communities. In part at least, this effect can be mitigated through good site design and management. In any case, the potential negative

effects of the traveller site allocations proposed in the SAD would be small, and certainly not “significant” in the scale of a sustainability appraisal, because only a limited number of new sites are proposed.

The Industrial land policies have minor adverse effects, notably where new industry is proposed next to housing. In this respect, SA Objectives 1, 2 and 12 could be affected. However, most of this new industry is likely to be high quality and unlikely to be a bad neighbour. Saved UDP policy JP8 regulates and mitigates such uses if they are proposed on any industrial land. Meanwhile, the sites identified as Consider for Release are generally where industry is causing an actual or potential nuisance to surrounding residents, notwithstanding its economic value. Therefore as they are replaced with housing this could improve overall amenity.

The only policies where significant negative effects have been identified are Minerals Policies M8 and M9. There is potential for these policies, in combination with existing planning permissions, to have significant negative effects on biodiversity, because they relate to proposals for mineral extraction that if implemented, would cause significant harm to designated nature conservation sites, the local landscape and agricultural land. Both policies have therefore been subjected to Detailed SA (see SA Matrices). The SAD has mitigated the effects identified in the appraisals as far as possible through the specific requirements identified in these policies (see Table 31 above for details).

## **Secondary, Cumulative and Synergistic Effects**

The SA has identified potential for further **cumulative** effects from development of new industry, waste management facilities and mineral extraction areas identified in the SAD, where there are already existing operations of a similar nature (Policies IND1 – IND5, W2 – W4, M4, M5, M7, M8 and M9). Further development of this type in the same areas could lead to a net increase in any existing harmful effects on amenity and transport infrastructure from generation of traffic, air pollution and noise (SA1, SA4, SA13).

In practice, it is difficult to address cumulative effects through the planning system as each development proposal that comes forward has to be treated ‘on its merits,’ although they are normally taken into account when evaluating planning applications. Any development that is EIA development is required to take into account cumulative effects. Where applicants are expected to evaluate these types of effects, they are also expected to take into account existing conditions and the cumulative effects of the development they are



proposing, in accordance with existing local and national policy guidance (for example, UDP Policies ENV10 and JP8 and BCCS Policies ENV8, WM2, WM4 and MIN5) and 'best practice.'

Examples of potential **secondary** effects of the SAD on SA Objectives include:

- Development on sites already affected by industrial and mining 'legacy' problems (Policies HC1, IND1 – IND5 and W3) may have secondary effects on adjacent land if there is a risk of contaminants migrating via underground voids or of further effects on ground stability (SA Objective 12);
- Development in areas vulnerable to flooding (Policies HC1, HC4, IND1 – IND5 and W3) could increase risks to adjacent land if they impede water flow, further secondary effects on biodiversity, soils and water are possible on sites affected by industrial and mining 'legacy,' as there is potential for contaminants to enter water bodies during heavy rainfall events (SA Objectives 2, 3, 12 and 14); and
- Open air waste management operations and mineral extraction operations (Policies W3, W4, M3 – M10) may generate a range of secondary effects, including effects from noise, dust and increased HGV traffic, having potential harmful effects on air quality, amenity and highway infrastructure (SA Objectives 2, 4 and 13).

Examples of the potential **synergistic effects** of the SAD on the SA Objectives include:

- Allocation of sites for new housing development on previously-developed land and surplus open space of lesser environmental quality (Policy HC1) has the potential to enhance the environment and bring new economic activity into the area, benefiting the local economy (SA Objectives 2, 6 and 9);
- Identifying a portfolio of existing and new employment sites and identifying opportunities for investment in Local Centres (Policies IND1 – IND5 and SLC2) could have further benefits on the local economy, i.e. if new jobs are created, increased consumer expenditure could help safeguard jobs in local centres (SA Objectives 4 and 6);
- Identifying an environmental network comprising multi-functional open spaces and other environmental assets (Policies OS1, GB1, EN1 – EN7) has the potential to enhance biodiversity, cultural heritage and landscape, benefit the amenity and well

being of local communities, and improve the general attractiveness of the borough as a place to live, work and invest in (SA Objectives 2, 3, 4, 5, 6, 9 and 14); and

- Development of new enclosed waste treatment facilities in areas where there are already complementary industrial activities (Policies IND1 – IND5, W2 and W3) may encourage the development of environmental technology “clusters” and supply of end products (including energy or residual heat) to nearby industrial consumers (SA Objectives 3, 6, 11 and 10).

## Inter-Relationships between Effects

The SA has considered the potential inter-relationships between the effects of the development identified in the SAD on the SA Objectives. Where effects on more than one SA Objective have been identified, which could be inter-related, this has been recorded in the SA Matrix. Examples of inter-related effects identified in the SA of the SAD Policies identified include:

- Inter-relationships between **traffic generation** and effects on **air quality, amenity and noise** (SA Objectives 1, 4, and 13), where development is likely to increase road traffic in a road corridor which runs through residential areas and is identified as a NO2 Area of Exceedance and/ or Noise Action Area;
- Inter-relationships between effects on **biodiversity, landscape, climate change resilience**, and effects on **soil quality** and **water quality** (SA Objectives 2, 3, 9, 12 and 14, where development that could increase risks from pollution is proposed near to inland waterways and in areas at risk from surface water or fluvial flooding; and
- Inter-relationships between effects on **biodiversity, ground conditions, townscape quality, soil quality** and **water quality** (SA Objectives 2, 9, 12 and 14), where development is proposed on sites affected by industrial and mining ‘legacy’ issues, near to inland waterways which are identified as wildlife corridors.

## Potential ‘Significant Effects’ – Proposals for Mitigation

Where potential harmful effects have been identified (including uncertain effects that could be harmful) which would not be addressed through application of existing national policy

guidance and local plan policy in the BCCS or UDP, they have been mitigated through the relevant SAD Policies, where feasible. Table 31 below identifies the action taken for each SAD Policy, to address the potential effects identified in the SA.

The **significant harmful effects of Policies M8 and M9** have been mitigated to the extent possible by identifying requirements for provision of supporting information with new or revised applications for mineral extraction. This will ensure that the effects of the development will be evaluated in more detail at the appropriate time, and that the measures proposed to prevent, manage and mitigate the effects on the environment, amenity and infrastructure will be assessed by the Council's Development Management Team, the Local Highway Authority and other infrastructure providers, and the relevant statutory consultation, to ensure that they are effective.

Similar requirements have been included in **Policies M4, M5 and M7** to control the harmful effects of further sand and gravel extraction in Aldridge and brick clay extraction at Stubbers Green, which will not necessarily be 'significant' and are not expected to be as harmful as implementing the 'dormant' permissions at Highfields North and Brownhills Common, or clay and coal extraction at Yorks Bridge. Otherwise, the effects of mineral extraction can be mitigated through the approved working programme and working conditions, and through environmental regulation, once development has been implemented. The conditions can establish the timescale for mineral extraction and restoration and the stages where updated working plans should be provided. Conditions can also require certain measures to be implemented to control the anticipated effects on the environment or amenity, and to require outstanding details of the development to be provided within a specified timescale.

The other policies identified as having some potential harmful effects are **Policies IND1 – IN5** and **W2 – W4**, which identify existing industrial areas and waste management sites to be safeguarded, and sites for new industrial development and possible new waste management development. The waste management policies have been amended to clarify that existing local plan policies on environmental protection will apply, that proposals must demonstrate they will not be harmful to health, the environment or amenity, and that the views of the relevant regulatory bodies and infrastructure providers will be an important 'material consideration' for determination of planning applications. Policies W2 and W3 also address the potential risks from fire identified by the Environment Agency.

Environmental permitting and waste permitting, which is outside the scope of the SAD, will also have an important role in controlling and managing the ongoing effects of mineral operations – as well as waste management operations and industrial operations - on the

environment, health and amenity, once they are implemented. The potential adverse effects of 'bad neighbour' industrial uses on the amenity of existing or planned housing developments will also continue to be regulated, and mitigated through the application of 'saved' UDP policy JP8, as noted above.

**Table 31: Appraisal of SAD Policies – Effects Identified and Proposed Mitigation**

SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
<b>2. Objectives, Regeneration Corridors and Issues</b>			
RC1: Regeneration Corridors	<b>0</b>	None as this policy has already been appraised as part of the BCCS.	No mitigation required.
<b>3. Homes for Our Communities</b>			
HC1: Land Allocated for New Housing Development	<b>+</b>	The Preferred Option is consistent with the BCCS spatial strategy, and locates housing mainly on previously developed land in areas where it is likely to be accessible to existing transport networks linking to jobs, shops and social infrastructure. The former employment sites to be released for housing would also be broadly consistent with BCCS policy towards release of industrial land and surplus open space (DEL2 and ENV6).	Potential environmental risks will be addressed through existing national and local policy requirements (including BCCS Policies ENV5 and ENV8). The potential for exposure to air pollution has been considered and the "sequential test" for flood risk has been applied.
HC2: Development of Other Land for Housing	<b>+</b>	The Preferred Option is consistent with the BCCS spatial strategy, and provides criteria to locate housing in areas where it is likely to be accessible to existing transport networks linking to jobs, shops and social infrastructure. These will mainly be previously developed land.	Potential environmental risks will be addressed through existing national and local policy requirements (including BCCS Policies ENV5 and ENV8) to consider exposure to air pollution and apply the sequential test for flood risk to all potential housing sites. Sites will be evaluated using evidence already provided by local air quality monitoring, the BCCS Strategic Flood Risk Assessments and local flood risk assessments, which will identify sites at greatest risk and measures needed to reduce risks to acceptable levels.

SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
HC3: Affordable Housing and Housing for People with Special Needs	+	Paragraph a) of this policy incorporates the existing affordable housing policy from the BCCS so has already been appraised as part of the BCCS. Paragraphs b) and c) seek to locate specialist housing in locations in or close to centres and other locations that have good public transport, on sites that would also be acceptable for general housing. The effects of using the sites for general housing will have been appraised under policies HC1 or HC2. The main additional effect of this policy will therefore be in respect of equalities: much specialist housing is occupied by the elderly or people with disabilities who are protected groups under the Equalities Act 2010.	As for SAD Policies HC1 and HC2. This policy by itself would have no adverse effects on environmental indicators
HC4: Accommodation for Gypsies and Travellers and Travelling Show-people	+	The policy proposes to allocate sites for this use that would also be acceptable for general housing were it not for this policy. The effects of using the sites for general housing will have been appraised under policies HC1 or HC2. The main additional effect of this policy will therefore be in respect of equalities: Gypsies and Travellers are protected groups under the Equalities Act 2010.	As for SAD Policies HC1 and HC2. This policy by itself would have no adverse effects on environmental indicators
<b>4. Providing for Industrial Jobs and Prosperity</b>			
IND1: Existing High Quality Industry	0	No effects identified, as this industry is already existing.	No mitigation required.
IND2: Potential High Quality Industry	+	Some current vacant sites will be developed, providing jobs in an area of high unemployment. There are unlikely to be significant adverse effects as proposed new development on current vacant land would not be 'bad neighbour' uses.	Unlikely to require mitigation, but if so, this can be dealt with through the development management process and 'saved' UDP Policy JP8.

SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
IND3: Retained Local Quality Industry	+	Some current vacant sites will be developed, providing jobs in an area of high unemployment. In some cases there could be 'bad neighbour' uses proposed close to existing housing or schools. Air quality could be adversely affected.	Bad neighbour uses are subject to 'saved' UDP Policy JP8 which imposes conditions on height, location, hours of operation and boundary treatment.
IND4: Local Quality Industry Consider for Release	+	Beneficial effects. The policy provides for the replacement of industrial industry by housing and other uses which are likely to improve amenity. This is within an industrial supply that aims to provide alternative employment development and therefore employment opportunities.	Some housing could be placed next to existing industry, but BCCS Policies DEL2 and IND4 include provisions to ensure that industry is not constrained. While new residents could be affected by industry, they will be aware of industry in the vicinity during the conveyancing process.
IND5: New Employment Opportunities	+	Beneficial effects, as these will provide for new jobs, thereby improving the employment base compared with the current situation. But four of these sites will involve development next to housing. However, this development is likely to be high quality rather than bad neighbour type uses.	Unlikely to have any adverse effects but if so, they can be mitigated through saved UDP policy JP8 (see above).
<b>5. Strengthening Our Local Centres</b>			
SLC1: Local Centres	++	The changes to the boundaries of the local centres have an overall positive impact. Ensuring the centre boundaries are realistic allows them to meet their function of serving local communities local needs by concentrating investment and services. The policy looks to ensure facilities such as local shops, doctors and community centres are in accessible locations for the communities they serve. This should mean that communities are not disadvantaged by facilities being in inaccessible locations.	No mitigation required.

SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
SLC2: Local Centres Development Opportunities	++	<p>This will have a positive impact overall as it makes it easier for investors to find sites in Walsall and encourages investment in local centres. It also helps defend against out-of-centre developments as the Council has sites which should be considered in the first instance. Development opportunities in local centres will be accessible having a positive impact on communities who can access facilities. This also has a positive impact on the townscape of centres as vacant sites or buildings are brought back into life.</p>	No mitigation required.
<b>6. Open Space, Leisure and Community Facilities</b>			
OS1: Open Space, Sport and Recreation	+	<p>This will have a positive effect overall as the policy will complement "saved" UDP Policies LC1 - LC6 and will help to deliver the requirements of BCCS Policy ENV3 to develop an environmental network in Walsall, and BCCS Policy ENV6 which requires the Council to identify the areas of Open Space that will be included in the network and safeguarded. In accordance with NPPF, all existing open space sites which are considered to be locally important are afforded the same protection. While the proposal to re-allocate some surplus/ lesser quality open space sites for other land uses could in some cases exacerbate existing quantitative deficiencies, this is only proposed where it is not feasible to make the improvements required to bring the site up to an appropriate standard. Furthermore, it is proposed to designate significantly more Open Space in the SAD than Policy LC1 of Walsall's UDP did previously.</p>	<p>On balance, the policy is likely to have positive effects, as it is proposed to allocate new areas of open space as well as to safeguard the majority of the pre-existing network. The policy also provides guidance on how the impact of proposals within or affecting open space provision will be determined, and signposts to the relevant national and local policies, including BCCS Policy ENV6 and "saved" UDP Policies LC1 - LC6. This will provide a basis from which to safeguard the functions associated with open space and ensure proposals likely to reduce the overall value of the network are either resisted, or if they cannot be, that appropriate mitigation is provided to compensate for any loss.</p>



SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
LC5: Greenways (this policy saved and updated from the UDP)	0	The only change to this policy is to update it, so that it no longer makes reference to another UDP policy that is no longer 'saved.' There are no other changes, so the overall effects on the SA objectives are neutral.	No mitigation required.
LC11: Land for Cemetery Extension, Bentley Lane (this policy saved and updated from the UDP)	0	The only change to this policy is to update it, so that it no longer makes reference to another UDP policy that is no longer 'saved.' There are no other changes, so the effects are neutral.	No mitigation required.
UW1: Wolverhampton University, Walsall Campus, Broadway, Walsall (UDP saved policy)	+	The objective of the policy is to balance the needs of the University with the need to safeguard the quality of the environment including the surrounding areas of open space and the amenity of residents living near to the campus. The retention of the existing UDP policy LC10 is not considered to be a reasonable alternative as the situation at the University has changed. The proposed new policy is likely to have positive effects on most of the SA objectives. The policy allows for the continued expansion of the University, whilst maintaining the environmental quality of the campus, including the areas of open space and landscaping and the ecosystem services it provides.	The policy aims to ensure that the maximum extent of open space and landscaping will be retained within the campus therefore no further mitigation is required.
<b>7. Environmental Networks</b>			
GB1: Green Belt Boundary	++	No changes proposed to the Green Belt boundary - the effects of this are largely positive, although the appraisal has taken into account that more viable locations for development are often in the Green Belt and maintaining the boundary would not help to deliver transport infrastructure or improve connectivity. However, the policy scores	No mitigation required.

SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
GB1: Green Belt Boundary (continued)	++	very positively against the SA environmental objectives, as the existing Green Belt boundary safeguards many of Walsall's nature designations, promotes a sustainable pattern of development reducing green house gas emissions and avoids development in areas of mineral resources or the best and most versatile agricultural land.	
GB2: Control of Development in the Green Belt and Countryside	++	The policy is intended to support the Green Belt boundary and its extent as proposed in SAD Policy GB1. Consequently the likely effects of the policy are very similar to those of Policy GB1. While effects on most SA Objectives are positive, Policies GB1 and GB2 combined impose limitations on the types of development that can be developed in the area defined as Green Belt on the Policies Map.	The policy sets out the circumstances in which development might not be considered inappropriate in the Green Belt in accordance with the NPPF, to clarify how the policies will be applied. No further mitigation required.
EN1: Natural Environment Protection, Management and Enhancement	+	The policy updates the designation of nature conservation sites. The overall effects are likely to be positive as it is likely to be complimentary towards most of the SA Objectives. It would safeguard areas useful for flood alleviation, has the potential to enhance the environment for local communities, provide an environment to improve health and well-being, safeguard landscape and townscape, areas of and setting of heritage assets, provides a framework for areas where renewable energy might be possible, safeguard soils and the water environment. However, the policy is likely to have some negative effects, as it provides constraints to economic growth, particularly in respect of potential constraints on mineral extraction.	Policy is consistent with national policy guidance and potential impacts on mineral extraction from protecting the natural environment are addressed in other SAD policies (in particular, Policies M4 – M9). No further mitigation required.

SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
EN2: Ancient Woodland	++	<p>The policy updates the designation of ancient woodland sites. The overall effects are likely to be positive as it is likely to be complimentary towards many of the SA objectives, for example, safeguarding woodlands is likely to contribute to carbon sequestration, biodiversity, mitigating the effects of climate change, providing a high quality amenity value for communities (health and well-being) and preserving an historically important landscape and aspect of Walsall's heritage.</p>	No mitigation required.
EN3: Flood Risk	++	<p>The policy is intended to operate in conjunction with UDP policy ENV40 and BCCS Policy ENV5, and incorporates the latest national guidance on flood risk including the application of the 'sequential test' when considering development in areas of potential risk from fluvial and surface water flooding. The effects of the policy are likely to be very positive overall. In particular, the policy is likely to have very positive effects on managing risks to existing residential areas and new housing developments as far as possible, including some of the most deprived communities in the borough who live in areas at risk. Avoiding development in areas at risk from flooding will also help to safeguard river and canal corridors, many of which are of importance for biodiversity and landscape character, and key infrastructure, including transport networks, and will also help to mitigate the effects of climate change which include flooding. SuDs might provide opportunities to improve townscape and landscape, provide opportunities for dealing with pollution at source, and improve water quality, as well as managing risks from flooding. The economic benefits of operating the policy are considered to be neutral overall. There are uncertainties about the impacts on conservation of heritage assets, some of which are in areas of potential risk.</p>	No mitigation required as harmful effects on heritage assets from flooding will be controlled through effective flood management and application of the SAD policy in combination with other existing local plan policies.

SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
EN4: Canals	++	<p>The overall effects of the policy are likely to be very positive. Increased canal side activities that are sensitive to the canal side environment should help to create more desirable places for development, attracting further investment and recreational opportunities, including maintaining and improving existing walking and cycling routes in canal corridors. There are also likely to be positive effects on the townscape and heritage assets that form part of the canalside environment as developments are expected to be of a high quality and to retain and conserve canalside buildings, features and structures of historic value, helping to address areas of dereliction, although the impact on landscape quality is less certain.</p> <p>The securing of contributions to maintain / improve the canalside infrastructure where justified is likely to help safeguard and improve the canal side environment and mitigate any potential harmful effects from development in canal corridors. The application of the policy is also likely to promote accessibility of canals to sustainable modes of transport making them more accessible to local communities, and to secure improvements to green infrastructure within the canal corridors, as well as improving biodiversity and contributing positively towards the amenity, health and well-being of local communities. The policy will also require developments to restore sections of the canal network to be supported with information demonstrating there will be no adverse effects to the water or wider environment.</p>	<p>Some effects on biodiversity and water quality are uncertain, as increased development and activity in canal corridors may have some impact, however, such impacts should in most cases be capable of being mitigated where effective maintenance arrangements are put into place as requirements of any planning permissions granted. The effects of contributions from developers are also uncertain, however they are considered necessary to support the infrastructure from which the unique opportunity is provided. The SAD policy in combination with existing local plan policies will provide an effective framework for negotiating appropriate solutions with developers, so no further mitigation is required.</p>

SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
EN5: Development in Conservation Areas	+	Overall effects of the policy are likely to be positive, although there are some uncertainties where the effects are site-specific and can only be determined through the development management process.	No mitigation required. Policy will be applied in combination with BCCS Policies ENV2 and ENV3 and UDP Saved Policy ENV29.
EN6: Highgate Brewery (IN47)	+	Overall effects of the policy are likely to be positive, although there are some uncertainties where the effects are site-specific and can only be determined through the development management process.	No mitigation required. Policy will be applied in combination with BCCS Policies ENV2 and ENV3.
EN7: Great Barr Hall and Estate and St. Margaret's Hospital	+	Overall effects of the policy are likely to be positive, although there are some uncertainties where the effects are site-specific and can only be determined through the development management process.	No mitigation required. Policy will be applied in combination with BCCS Policies ENV2 and ENV3.
<b>8. Sustainable Waste Management</b>			
W1: Future Waste Management Requirements	+	Overall effects of the policy are likely to be positive, as the delivery of new waste recycling, recovery and transfer infrastructure will help to support local businesses to manage their waste more efficiently and cost-effectively. It is also likely to support delivery of new waste recovery infrastructure that would help divert waste away from landfill, optimise the use of waste and drive waste as far as possible up the 'waste hierarchy,' and the delivery of new renewable energy infrastructure.	No mitigation required.
W2: Existing Waste Management Sites	+	Overall effects of the policy are likely to be positive. Potential negative or uncertain effects of possible expansion of the Strategic Waste Sites identified in the policy, including potential land use conflicts.	Effects to be mitigated by application of BCCS Policy WM2 and other relevant BCCS and UDP policies – SAD Policy W2 clarifies that these will apply, and that comments from the relevant environmental bodies and regulatory authorities will be an important 'material consideration.'

SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
W2: Existing Waste Management Sites (continued)			In response to representations from the Environment Agency, the policy also includes a requirement for risks from fire to be evaluated where proposals to upgrade existing waste facilities include large-scale open storage of waste, as this is not explicitly addressed in the BCCS policy or in the NPP for Waste. Environmental and physical constraints affecting each Potential Waste Site, which will be expected to be addressed in new or revised planning applications, have also been identified in the policy.
W3: New Waste Management Development – Waste Treatment and Transfer	+	Overall effects of the policy are likely to be positive. Potential negative or uncertain effects of new waste management developments on the Potential Waste Sites identified in the policy, including potential land use conflicts. Effects are uncertain in most cases, because no waste management developments are currently proposed on the sites identified, except for Fryers Road (WP2) and Branton Hill Recycling Relocation Site (WP6).	Effects to be mitigated by application of BCCS Policy WM4 and other relevant BCCS and UDP policies – SAD Policy W3 clarifies that these will apply, and also that comments received from the relevant environmental bodies and regulatory authorities will be an important ‘material consideration.’ In response to representations from the Environment Agency, the policy also includes a requirement for risks from fire to be evaluated where proposals to upgrade existing waste facilities include large-scale open storage of waste, as this is not explicitly addressed in the BCCS policy or in the NPP for Waste.

SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
W4: New Waste Management Development – Waste Disposal	+	Overall effects of the policy are likely to be positive. Potential negative or uncertain effects of development on the Potential Waste Sites identified in the policy. Effects are uncertain because for the Former Aldridge Quarry (WP1) and Sandown Quarry (WP3), it is possible that alternative methods of restoration may be chosen in preference to infilling of the void with waste.	Effects to be mitigated by application of BCCS Policy WM4 and other relevant BCCS and UDP policies – SAD Policy W4 clarifies that these will apply, and also that comments received from the relevant environmental bodies and regulatory authorities will be an important ‘material consideration.’ Environmental and physical constraints affecting Aldridge and Sandown Quarries, which will be expected to be addressed in future applications for restoration programmes for these sites, have been identified in SAD Minerals Policies M4 and M7.
<b>9. Sustainable Use of Minerals</b>			
M1: Safeguarding of Mineral Resources	+	Overall effects of the policy are likely to be positive.	No mitigation required.
M2: Safeguarding of Minerals Infrastructure	+	Overall effects of the policy are likely to be positive. Potential negative or uncertain effects of possible expansion of the Minerals Infrastructure Sites identified in the policy, including potential land use conflicts. Effects are uncertain because it is not known whether further proposals will come forward on these sites during the plan period.	Effects to be mitigated by application of BCCS Policy MIN5 and other relevant BCCS and UDP policies - SAD Policy M2 clarifies that these will apply. Environmental and physical constraints affecting each existing Minerals Infrastructure Site, which will be expected to be addressed if expansion or other changes are proposed, have also been identified in the policy.

SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
M3: Secondary and Recycled Aggregates	+	Overall effects of the policy are likely to be positive. Potential negative or uncertain effects of possible expansion of the existing Secondary and Recycled Aggregates sites identified in the footnote to the policy, including potential land use conflicts,	Effects to be mitigated by application of BCCS Policy MIN5 and other relevant BCCS and UDP policies – SAD Policy M2, which lists these sites, clarifies that these will apply. Environmental and physical constraints affecting each existing secondary and recycled aggregates production site, which will be expected to be addressed if expansion or other changes are proposed, have also been identified in Policy M2.
M4: Sand and Gravel Extraction – Birch Lane	+	The effects of the policies are likely to be limited, as there are valid planning permissions allowing mineral extraction at both Aldridge and Branton Hill Quarries. However, the overall effects are likely to be positive, as the policy encourages the beneficial restoration of both sites which are currently derelict and either not restored at all (Aldridge) or only partly restored (Branton Hill). The implementation of the policy would therefore have positive effects on SA9 and SA12. It would also have indirect benefits on SA8 because it requires measures to be implemented at Aldridge Quarry to stabilise the quarry slopes which are currently in an unstable and unsafe condition, and on SA6, as restoration of Aldridge Quarry could - depending on whether the current requirements for restoration are taken forward - provide a new inert landfill site for disposal of waste from the construction and demolition industry. Effects on other SA objectives are likely to be neutral as the existing policies should be able to control the effects of any further proposals relating to mineral extraction or restoration of the quarries.	Effects to be mitigated in part by application of BCCS Policy MIN2, which identifies a need to progress restoration of the existing Aldridge Quarry and address potential impacts on the highway network before further working is permitted within the Area of Search, and by application of other relevant local plan policy, including BCCS Policy MIN5 which identifies general requirements and criteria for evaluating proposals for mineral development. Further mitigation is proposed in SAD Policy M4 which identifies the specific requirements that applications for a new quarry restoration programme or for further mineral extraction in the Area of Search will be expected to address, to ensure that all of the potential harmful effects identified will be evaluated, managed and



SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
M4: Sand and Gravel Extraction – Birch Lane (continued)	?		where necessary, that harmful effects on the environment, amenity and transport infrastructure are prevented, reduced or as fully as possible offset through mitigation. The policy also requires applications to consider effects on amenity of communities and businesses in adjoining areas of Lichfield District in Staffordshire.
M5: Sand and Gravel Extraction – Branton Hill	?	Overall effects of policy are uncertain because they depend on factors outside the control of the SAD, such as whether the restoration of the un-restored areas of Branton Hill Quarry is progressed, whether the recycling area is relocated and the proposed new quarry access road (currently under construction) is completed and brought into use, and whether the current application for an extension to Branton Hill Quarry is able to be progressed, as this depends on the above. They also depend on the effectiveness of measures proposed to mitigate the potential harmful effects identified, in particular, effects on Branton Hill SLINC, effects on the local landscape, effects on water resources within the Groundwater SPZ, effects on Public Rights of Way (PROWs), and potential effects from increased traffic on neighbouring areas of Lichfield District in Staffordshire.	Effects to be mitigated in part by application of BCCS Policy MIN2, which identifies a need to progress restoration of the existing Branton Hill Quarry, avoid harmful impacts on groundwater resources, and address potential impacts on the highway network, including a requirement for a new quarry access road, before expansion of the quarry is permitted, and by application of other relevant local plan policy, including BCCS Policy MIN5 which identifies general requirements and criteria for evaluating proposals for mineral development. Further mitigation is proposed in SAD Policy M5 which identifies the specific requirements that will have to be met before the current application to extend Branton Hill Quarry can be progressed, to ensure that all of the potential harmful effects identified will be evaluated, managed and where necessary, that harmful effects on the environment, amenity and

SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
M5: Sand and Gravel Extraction – Branton Hill (continued)	?		transport infrastructure are prevented, reduced or as fully as possible offset through mitigation. The policy also requires applications to consider effects on amenity of communities and businesses in adjoining areas of Lichfield District in Staffordshire.
M6: Brickworks – Future Supply Requirements	?	Overall effects of policy are uncertain because they depend on factors largely outside the control of the SAD. It is unclear whether the permitted and unpermitted brick clay resources identified in the plan (Policies M7 and M8) would be able to supply Sandown Brickworks - the only brickworks in Walsall that cannot identify a 25-year supply of Etruria Marl - because the remaining resource areas identified are not in the control of the relevant brick manufacturer.	Effects to be mitigated by including a statement in the policy in support of the continued importation of clay to this factory, and in support of the creation of a new clay stocking area for imported clay, in line with BCCS Policy MIN3 and the current planning permissions for the brickworks which allow up to 95% imports. The support for a new clay stocking area is subject to this being part of a comprehensive restoration programme for the quarry. The policy also supports the supply of clay from sources in Walsall other than Sandown Quarry, provided that the effects on the environment, amenity and transport infrastructure would be acceptable.
M7: Brick Clay Extraction – Stubbers Green	?	Overall effects of policy are uncertain as they depend on some factors outside the control of the SAD such as whether proposals for the restoration of Sandown Quarry (MP7) will actually come forward within the plan period, and the effectiveness of the measures proposed to mitigate and compensate for the harmful effects of expanding Atlas Quarry (MP2) onto the Recordon Land (MXP3), which	Effects to be mitigated in part by application of BCCS Policy MIN3, which requires proposals for further brick clay extraction in the Area of Search to facilitate restoration of previously-worked areas, address impacts on designated nature conservation sites and address impacts from haulage of clay by

SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
<p>M7: Brick Clay Extraction – Stubbers Green  (continued)</p>	<p>?</p>	<p>is subject to a current planning application. These effects include the destruction of Stubbers Green SINC and possible indirect impacts on Swan Pool and The Swag SSSI, Stubbers Green Bog SSSI and Anchor Brook Valley SLINC, as a result of effects on hydrology.</p>	<p>road, and by application of other relevant local plan policy, including BCCS Policy MIN5 which identifies general requirements and criteria for evaluating proposals for mineral development. Further mitigation is proposed in SAD Policy M7, which identifies the specific requirements that a restoration programme for Sandown Quarry will be expected to address to maximise the benefits of the restoration of the site, taking into account the existing environmental and physical constraints and the requirements of the existing working conditions for the quarry. The policy also identifies the key issues that a new or revised application for expansion of Atlas Quarry will be expected to address, to ensure that all of the all of the potential harmful effects identified will be evaluated, managed and where necessary, that harmful effects on the environment, amenity and transport infrastructure are prevented, reduced or as fully as possible offset through mitigation. The requirements identified for Atlas Quarry and Recordon Land are based on the measures proposed in the current planning application, which has been approved in principle by the Council’s Planning Committee subject to completion of a S106 agreement.</p>

SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
M8: Brick Clay Extraction – Other Areas	--	<p>Overall significant negative effects. No further brick clay extraction is envisaged at Highfields South (MP6) which is currently undergoing restoration. Restoration of this site is likely to take longer than originally envisaged, although the ongoing effects of the infilling operations are likely to be controlled effectively through the existing planning conditions and through regulation of the landfill site. However, the benefits of the restoration of this site and Vigo/ Utopia (MP8), once completed, would be outweighed by the unavoidable significant negative effects on biodiversity, the local landscape and agricultural land that would arise if the ‘dormant’ permission at Highfields North (MP9) is implemented. The BCCS does not include any policy relating to Highfields North as the ‘dormant’ permission was believed to have been revoked at the time the plan was prepared. The site is within a relatively unspoiled area of open countryside, around 90% of it is designated as a SSSI (Jockey Fields), and parts of the site are also Grade 2 and Grade 3a agricultural land. The hydrology and hydrogeology of this area is also very complex, as it includes wetland areas that are fed by a network of small streams and ponds, and is identified as being at risk from surface water flooding by the Environment Agency. Impacts on hydrology from mineral extraction on this site could also have consequential effects on important wetland sites outside the area which are linked, such as Swan Pool and The Swag SSSI. The effects of a new brick clay extraction site at Highfields North or in the surrounding brick clay resource area would be very long-term but intermittent, because a brick clay extraction site would typically be in operation for more than 20 years, but would not</p>	<p>Effects to be mitigated in part by application of relevant local plan policy, including BCCS Policy MIN5 which identifies general requirements and criteria for evaluating proposals for mineral development. Effects to be further mitigated by including specific requirements in SAD Policy M8 that an application for working conditions for Highfields North will be expected to address, to reduce and manage the effects on biodiversity, hydrology, landscape and agricultural land. The policy also supports working outside the ‘dormant’ site in principle where this would mean harmful effects on the SSSI would be avoided, while recognising that this is likely to have similar effects on the landscape and hydrology, and possibly greater harmful effects on agricultural land, as more of the ‘best and most versatile agricultural land’ could be affected. The policy also requires restoration programmes for Highfields North to include habitats of equivalent value and quality to those currently present within the SSSI on at least 90% of the worked areas, as well as provision of replacement habitats off-site to offset the unavoidable destruction of habitats within the SSSI during the working phases. Proposals are therefore required to be supported by air quality, noise and</p>

SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
M8: Brick Clay Extraction – Other Areas  (continued)	--	be worked continuously – there are usually around three or four ‘campaigns’ of extraction per annum. All of the clay extracted would be exported off-site as there are no brickworks adjacent to this area, and the access to the site is via the A461, a NO2 Area of Exceedance and a Noise Priority Area.	transport assessments, and other relevant supporting information, demonstrating that effective mitigation measures will be implemented to prevent, reduce or as fully as possible offset the harmful effects of the development on the environment, amenity and transport infrastructure.
M9: Coal and Fireclay Extraction - Brownhills	--	Overall significant negative effects. There would be unavoidable harmful effects on biodiversity, amenity, landscape, vulnerability to flood risk, and transport infrastructure, including PROWs, if restoration of the former Birch Coppice site (MP3) is not completed and the ‘dormant’ permission at Brownhills Common (MP5) is implemented. There is a current planning application for working conditions to be applied to Brownhills Common and the former Birch Coppice site, which has been determined to be EIA development. The application has been in abeyance since 1999 pending the submission of an environmental statement. In addition to this, an indicative Area of Search for coal and fireclay extraction has been identified on the BCCS Minerals Key Diagram at ‘Yorks Bridge’ which is based on a coal prospecting area identified in 1990 by the former British Coal. The combined negative effects of coal and clay extraction at Brownhills Common and ‘Yorks Bridge’ on biodiversity, landscape amenity and the ‘best and most versatile’ agricultural land are likely to be significant. Brownhills Common is part of an important area of open space which is managed as a nature reserve, and forms part of an important area of lowland heathland habitat which extends beyond the borough boundary into the adjacent parts of Cannock Chase District in Staffordshire. The ‘dormant’ site is part of the Brownhills	Effects to be mitigated in part by application of BCCS Policy MIN4, which requires proposals for working conditions for Brownhills Common to address impacts on the SINC and to ensure that the site is restored to the highest standards once working has ceased, to provide habitats of equivalent value to those lost, and by application of other relevant local plan policy, including BCCS Policy MIN5 which identifies general requirements and criteria for evaluating proposals for mineral development. Further mitigation is proposed in SAD Policy M9 which identifies the supporting information that will be required with an environmental statement, in order to progress the current application for working conditions to be applied to Birch Coppice and Brownhills Common, to demonstrate how the harmful effects on biodiversity, amenity, and highway infrastructure, will be prevented, reduced or as fully as possible offset. Similar requirements apply to proposals for new coal and fireclay extraction at ‘Yorks Bridge’

SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
M9: Coal and Fireclay Extraction – Brownhills (continued)	--	Common and The Slough SINC, and is adjacent to the Chasewater and Southern Staffordshire Coalfield Heaths SSSI. The 'Yorks Bridge' area also includes part of the SINC and extends beyond the boundary into Staffordshire. The parts of the area in Cannock Chase District are near to the Cannock Extension Canal SAC/ SSSI. Although coal and fireclay would be worked using opencast methods, which is a relatively rapid method of mineral extraction, there would be significant impacts on the landscape and designated sites while working was underway. If clay was stockpiled within the extraction areas afterwards it would significantly prolong the harmful effects and delay restoration, because the stockpile would be operated as a 'virtual quarry' and could be in operation for more than 20 years. There are also concerns about the potential effects on highway infrastructure as the access to this area is relatively poor, and is likely to require improvement.	which will also be required to address any impacts on agricultural land and holdings. The policy also requires applications to consider effects on amenity of communities, businesses, areas of open space and highways in adjoining areas of Cannock Chase District in Staffordshire.
M10: Energy Minerals – Unconventional Hydrocarbons	0	Overall effects of the policy are likely to be neutral. There are no current proposals for oil and gas exploration in Walsall and no specific sites or areas are identified as having potential in the SAD. This is largely outside the control of the SAD as future proposals will depend on the outcome of feasibility studies and applications for Petroleum Development Exploration Licences (PEDLs). The main objective of the policy is to clarify the Council's approach towards this type of development and how it will apply existing national policy guidance and BCCS policy.	No mitigation required.

SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
<b>10. Transport and Infrastructure</b>			
T2: Bus Services	0	Effects likely to be neutral. Slight wording updates are proposed to take account of the latest bus related initiatives.	No mitigation required
T3: The Rail Network (UDP saved policy)	+	Overall effects are likely to be positive. This policy has been updated to delete reference to the proposed Metro link from Wolverhampton through Walsall to Wednesbury, which is not being pursued as it is no longer considered deliverable. It is intended to replace the metro proposals with a rapid transit proposal (which could be rail, tram-train or enhanced bus services) . This will use existing rail lines between Walsall, Wolverhampton and Wednesbury. The UDP did not allocate the land for the Metro line, but referred to it indicatively. This meant that there were potential uncertainties on property through which the line would pass. These uncertainties will now be eliminated.	No mitigation required.
T4 The Highway Network (UDP saved policy)	0	Effects likely to be neutral, as the only changes to the policy are wording changes for updating purposes.	No mitigation required.
T5 Highway Improvement (UDP saved policy)	0	Effects likely to be neutral. Slight wording updates are proposed to delete reference to Town Centre Ring Road as this project is now complete. The Issues and Options referred to the Darlaston Strategic Development Area (DSDA) Access Project, but this is now under construction.	No mitigation required.

Source: SA Report Appendix J and High Level Appraisal of SAD Policies - Completed Matrix (January 2016)

## 7.4 Equality Impact Assessment – Appraisal Results

### Potential Positive Effects on Equality and Diversity

The SA has identified the following potential **positive** effects on equality and diversity arising from the SAD Policies:

- **SAD Policies HC1 and HC2:** These policies seek to allocate and direct housing development for all sections of the community to locations that can be accessed easily by walking, cycling and public transport as well as by car. Many of these locations are in areas of the borough that currently experience multiple deprivation, include low incomes, high unemployment and poor health.
- **SAD Policy HC3:** The first part of this policy re-states policy HOU3 of the BCCS relating to the provision of affordable housing. The remainder of the policy seeks to encourage specialist housing, including that for the elderly or disabled, to be sited in locations with good access to services. This is intended to benefit both potential residents and care workers. A high proportion of the latter have low incomes and are women.
- **SAD Policy HC4:** This seeks to ensure sufficient land is allocated to meet the specialist housing needs of a group who are defined as protected under the Equalities Act 2010.
- **SAD Policies IND1 – IND5:** These policies are based on Option 3, which protects existing industrial land and identifies a portfolio of industrial opportunities, including some opportunities on land that is not currently in the industrial supply; while protecting Green Belt land from development. Most of these opportunities are concentrated in areas where there is the greatest need for employment opportunities, of the type provided by industry. It should also be noted that industrial development opportunities identified are intended to provide for previously unmet need, so as to improve the situation whereby investment was lost because there was nowhere to go in the Borough for industry, including inward investment. The benefits of this option will of course not be realised without a sustained effort to remediate and bring forward sites with abnormal costs.



- **SAD Policies SLC1 – SLC2:** One of the key positive outcomes of both the local centre policies is that they look to ensure facilities such as local shops, doctors and community centres are in accessible locations for the communities they serve. This should mean that communities are not disadvantaged by facilities being in inaccessible locations.
- **SAD Policies T2 – T5:** These policies are essentially updates of existing UDP policies. The safeguarding of the Walsall - Brownhills line is continued. If rail services were reintroduced this would greatly improve public transport accessibility for people without a car.

### Potential Negative Effects on Equality and Diversity

The SA has identified the following potential **negative** effects on equality and diversity arising from the SAD Policies:

- **SAD Policies IND1 – IND5:** There could be localised effects on air quality and noise on some residents in some areas, depending on the type of industrial development. However, there are existing local plan policies in place (in particular, 'saved' UDP Policy ENV10 and BCCS Policy ENV8), requiring new developments to address any harmful effects on amenity likely to arise from pollution.
- **SAD Policy W2:** Some Strategic Waste Sites identified in the SAD are near to residential areas affected by high levels of deprivation, and where this is the case, any further intensification of the operations could increase the existing effects on amenity, further disadvantaging the communities affected.
- **SAD Policies W3 and W4:** Some Potential Waste Sites identified in the SAD may be served by haulage routes which are close to residential areas, some of which (for example the A454 Black Country Route and M6 motorway corridor including Junctions 9 and 10) are affected by high levels of deprivation and high levels of noise and pollution - where this is the case, development could generate a further net increase in traffic movements, noise and air pollution, causing further harm and disadvantage to the amenity and wellbeing of the communities affected. However, there are existing local plan policies in place to control the effects of new or expanded waste management operations on the amenity of nearby residents (in particular, UDP Policy JP8 and BCCS Policies WM2 and WM4), and the SAD policies clarify that these will apply.

- **SAD Policies M3 – M9:** Expansion of mineral extraction could further disadvantage communities already affected by traffic, noise and pollution from existing waste, mineral and industrial operations in the north of the borough, as it will generate a net increase in traffic movements along major routes in this area (including the A452 Chester Road and A461 Walsall Road/ Lichfield Road) which pass through residential areas and are affected by high levels of noise and air pollution. Mineral extraction is also likely to generate direct effects on the amenity of people living nearby, access to Open Space and Public Rights of Way would also be restricted if the ‘dormant’ permissions at Brownhills Common (MP5) and Highfields North (MP9) are implemented. While it is largely outside the scope of the SAD to control the effects of mineral extraction where planning permission already exists, the SAD policies have identified the requirements that will need to be met in new or revised proposals, to control effects on amenity.
- **SAD Policies T2 – T5:** The alignment of a proposed light rapid transit route between Walsall and Wolverhampton (former ‘Midland Metro 5 Ws’ Route) was not allocated in the UDP but was referred to as a project. Wording covering this has now been withdrawn, and while this could result in a net reduction of accessibility for people who otherwise would have gained direct access to Wolverhampton City Centre by public transport compared with now, the metro line is already covered by public transport that connects with Walsall as a Strategic Centre.

## **Likely Effects of SAD on Equality and Diversity - Conclusions**

The overall effects of the SAD on equality and diversity, including potential for disproportionate effects on people with ‘protected characteristics’ and people already affected by disadvantage, are likely to be positive. Where negative effects have been identified, they have been addressed in the SAD policies where possible. However, some effects are unavoidable because it is outside the scope of the SAD to control them. Otherwise, potential harmful effects from new development can be mitigated through effective application of the SAD policies in combination with existing UDP and BCCS policies.

## 7.5 Health Impact Assessment – Appraisal Results

### Potential Positive Effects on Health and Wellbeing

The SA has identified the following potential **positive** effects on health and wellbeing arising from the SAD Policies:

- **SAD Policies HC1 - HC4:** The availability of decent housing is fundamental to health and wellbeing. The policies seek to provide new homes in locations that are accessible by walking and cycling and which have access to open space and services such as health facilities and food shops. They also take account of the need to avoid locating housing in areas that have poor air quality or are subject to excessive noise, flooding or other factors that might have an adverse effect on the health or wellbeing of future residents.
- **SAD Policies SLC1 – SLC2:** One of the key positive outcomes of both the local centre policies is that they look to ensure facilities such as local shops, doctors and community centres are in accessible locations for the communities they serve. This should mean that communities are not disadvantaged by facilities being in inaccessible locations.
- **SAD Policies EN5 – EN7:** Conserving and enhancing the historic environment will improve the character of the boroughs landscapes and townscapes which is likely to have a positive effect on the wellbeing of those who live in, work or visit these areas.

### Potential Negative Effects on Health and Wellbeing

The SA has identified the following potential **negative** effects on health and wellbeing arising from the SAD Policies:

- **SAD Policies IND1 – IND5:** There could be localised effects on air quality and noise on some residents in some areas, depending on the type of industrial development. However, there are existing local plan policies in place (in particular, 'saved' UDP Policy ENV10 and BCCS Policy ENV8), requiring new developments to address any harmful effects on health likely to arise from pollution. Many industrial operations

are also subject to regulation, which is aimed at ensuring that measures are in place to prevent any harmful effects on health and the environment.

- **SAD Policies W3 and W4:** Some Potential Waste Sites identified in the SAD may be served by haulage routes which are affected by high levels of noise and pollution – where this is the case, development could generate a further net increase traffic movements, noise and air pollution, which could be harmful to the health and wellbeing of people living near to these routes. However, there are existing local plan policies (in particular, UDP Policy JP8 and BCCS Policies WM2 and WM4) which require operators to evaluate the effects of the proposed operations on amenity. Many types of waste operation are also subject to regulation, which is aimed at ensuring that measures are in place to prevent any harmful effects on health and the environment. The Environment Agency has identified a further issue which is not already addressed in the local plan, which is the potential risk of fire where large quantities of flammable waste are stored in the open. This has become an increasingly important issue as there have been a number of high profile incidences of fires at waste facilities in the West Midlands. SAD Policies W2 – W4 clarify that all waste management development proposals must demonstrate they will not be harmful to human health and the environment, in line with the National Planning Policy for Waste (2014) and the Waste Regulations 2011 (as amended).<sup>1</sup> SAD Policies W2 and W3 also include a requirement for risks from fire to be evaluated, where large-scale open storage of waste is proposed at existing or new waste management sites.
- **SAD Policies M5, M8 and M9:** Expansion of Branton Hill Quarry (MP4) and implementation of the two ‘dormant’ mineral permissions at Highfields North (MP9) and Brownhills Common (MP5) would affect Public Rights of Way, implementation of the Brownhills Common permission would also severely restrict access to an area of Open Space which is within an area that has relatively high levels of child obesity. The SAD policies include specific requirements for new or amended proposals at these sites to address these issues.

## Likely Effects of SAD on Health and Wellbeing - Conclusions

The overall effects of the SAD on health and wellbeing are likely to be positive. However, there are uncertain effects in relation to the policies for Industry. On one hand, they could provide for increased well-being, if they result in further industrial development, as more

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<sup>1</sup> The Waste (England and Wales) Regulations 2011 (as amended) (SI 2011 No. 988:  
<http://www.legislation.gov.uk/ukdsi/2011/9780111506462/contents>

people would be in paid employment, but this is hard to measure. On the other hand, at some areas there could be a net adverse effect on air quality from increased traffic movements generated by industrial development.

The potential harmful effects identified are expected to be mitigated through existing local plan policies such as UDP Policies ENV10 and JP8, and BCCS Policies ENV8, WM2, WM4 and MIN5, which already require harmful effects on amenity to be addressed in planning applications for development likely to generate increased problems from traffic and pollution. Industrial, waste management and mineral extraction operations are also subject to environmental regulation outside of the planning system, unless the operations are low risk and are 'exempt.' The relevant regulatory authority – usually the Environment Agency or the Council – would be expected to evaluate any potential risks to health from the types of operations being carried out before a waste permit and/ or environmental permit is issued.

However, there is a limit to the extent to which the SAD can mitigate the effects of existing mineral permissions on Open Space and Public Rights of Way. SAD Policies M8 and M9 have gone as far as possible to mitigate the impacts of implementing the permissions at Highfields North and Brownhills Common, by requiring appropriate provision for diversion of the Public Rights of Way to maintain public access, and re-instatement of the Open Space at Brownhills Common through restoration as soon as possible. Policy M5 also includes a requirement to divert or re-instate Public Rights of Way affected by previous/ further sand and gravel extraction within the Branton Hill Area of Search.